KENTUCKY PYS 2022-2023 (MOD)

CONTENTS

Kentucky PYs 2022-2023 (Mod) 1
I. WIOA State Plan Type and Executive Summary 3
a. WIOA State Plan Type 3
b. Plan Introduction or Executive Summary 3
II. Strategic Elements 4
a. Economic, Workforce, and Workforce Development Activities Analysis 4
b. State Strategic Vision and Goals 36
c. State Strategy 39
III. Operational Planning Elements 43
a. State Strategy Implementation 43
b. State Operating Systems and Policies 51
IV. Coordination with State Plan Programs 84
V. Common Assurances (For All Core Programs) 86
VI. Program-Specific Requirements for Core Programs 88
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B 88
Program-Specific Requirements for Wagner-Peyser Program (Employment Services) 120
Program-specific Requirements for Adult Education and Family Literacy Act Programs 130
Program-Specific Requirements for Vocational Rehabilitation (Combined or General) 151
VII. Program-Specific Requirements for Combined State Plan Partner Programs 280
Performance Indicator Appendix 280
All WIOA Core Programs 280
Additional Indicators of Performance 280

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a unified plan

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

In accordance with the Workforce Innovation and Opportunity Act (WIOA), Kentucky has reviewed its 2020-2023 WIOA Unified State Plan and is submitting this two-year Modification to reflect changes in the labor market and economic conditions as well as other factors affecting implementation of the Unified State Plan.

This Modification communicates Kentucky's current vision of its state workforce system and continues its aim to foster better alignment of federal investments across job training and education programs. In preparing the Modification, Kentucky was mindful of the specific content areas identified in Training and Employment Guidance Letter (TEGL) No. 4-21 and has included updated language throughout regarding data-driven decisions, reemployment, equity in service delivery and educational programming, and enhancing supportive service offerings. In light of the significant disruptions and changes caused by the COVID-19 pandemic, Kentucky recognizes that strategic planning and cross-partner communication are, in fact, more important than ever.

Over the next two years, Kentucky is committed to providing more comprehensive and aligned approaches to addressing the workforce needs of the Commonwealth. Kentucky continues to focus its efforts on the following four goal areas, including objectives that describe how the Education and Workforce Development Cabinet will accomplish the goals.

GOAL 1: DELIVERY OF OPERATIONS:
Deliver workforce services in a flexible, seamless manner to engage customers and effectively connect job supply and demand.

Objective 1.1: Ensure all workforce partners work collaboratively to deliver services and agree upon shared workforce outcomes through a statewide Memorandum of Agreement.

Objective 1.2: Modernize and utilize technological platforms to connect agency information systems to improve transparency and to provide consistent case management, performance reporting, and data sharing.

Objective 1.3: Braid internal and external funding to ensure comprehensive support services are available to customers.

GOAL 2: EDUCATION & WORKFORCE ALIGNMENT:
Align education and workforce programs with labor market demands to connect job creators with qualified employees and prepare individuals for productive employment.

Objective 2.1: Align agency resources to support high-demand degree and credential attainment.

Objective 2.2: Develop partnerships and incentives to encourage lifelong learning and career development.

Objective 2.3: Increase post-secondary degree and credential attainment in high demand sectors.

GOAL 3: ENGAGEMENT & OUTREACH:
Leverage new and existing strategic partnerships and innovative communication to engage, support and grow the workforce.

Objective 3.1: Develop a communications plan that promotes education and career services available to job seekers.

Objective 3.2: Implement accessible, digital outreach strategies to promote resources to target populations

Objective 3.3: Develop outreach strategies that promote resources available to employers.

GOAL 4: RESOURCE ALIGNMENT:
Align internal and external resources to ensure efficient allocation across programs and initiatives.

Objective 4.1: Utilize shared data across the Cabinet for decision-making processes and efficiencies.

Objective 4.2: Ensure all funds are used to their greatest advantage.

Objective 4.3: Become a preferred employer within state government.

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

When the Great Recession ended in June 2009, the economy began to recovery. However, employment grew at a relatively slow rate and the recovery was initially dubbed the "Jobless Recovery." Over the next few years, the rate of job growth picked up and the United States would experience the longest economic expansion in the nation's history. During this time, many workers who had left the labor force returned as the prospects of finding work improved. The expansion ended abruptly in March 2020, as the nation took steps to contain the spread of COVID-19. State implemented restrictions and concerns among consumers contributed to large decreases in employment. As restrictions were eased and COVID-19 vaccines were distributed, the economy began to recover.

However, employment is still down and many workers who left the labor force have not yet returned.

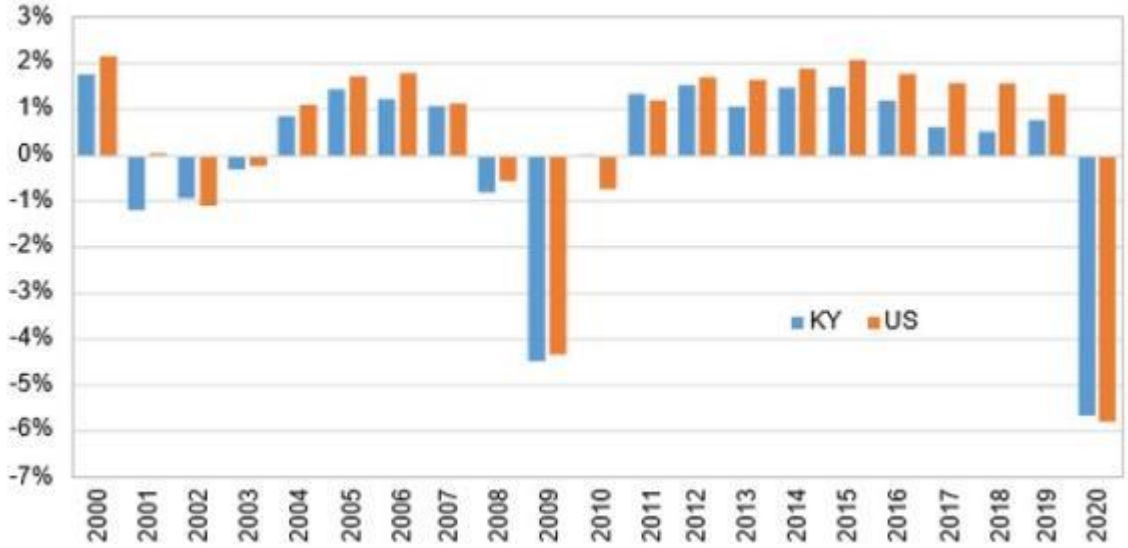
As Kentucky's economy continues to recover from the effects of COVID-19, LMI data will be examined and disseminated to the LWAs to inform decisions regarding WIOA programming. Specifically, two dashboards from KYSTATS which are updated multiple times per year with current LMI data will be shared as they are published: Kentucky Workforce Dashboard (KWD) and the Workforce Overview Report for Kentucky Regions (WORKR).

State Employment Trends

Employment in both Kentucky and the U.S. increased each year since the Great Recession ended. However, when restrictions to fight COVID-19 were adopted, employment declined.

Figure 1 shows the annual growth rates of employment in Kentucky and the U.S. This data comes from the U.S. Bureau of Labor Statistic (BLS) Current Employment Statistics (CES).

Figure 1
Annual Growth in Nonfarm Employment
Kentucky and U.S.



Source: KYSTATS, Labor Market Information Branch. Current Employment Statistics

Table 1 shows the distribution of employment across 11 major industries as of August 2021.

Table 1

Kentucky Employment by Industry
August 2021

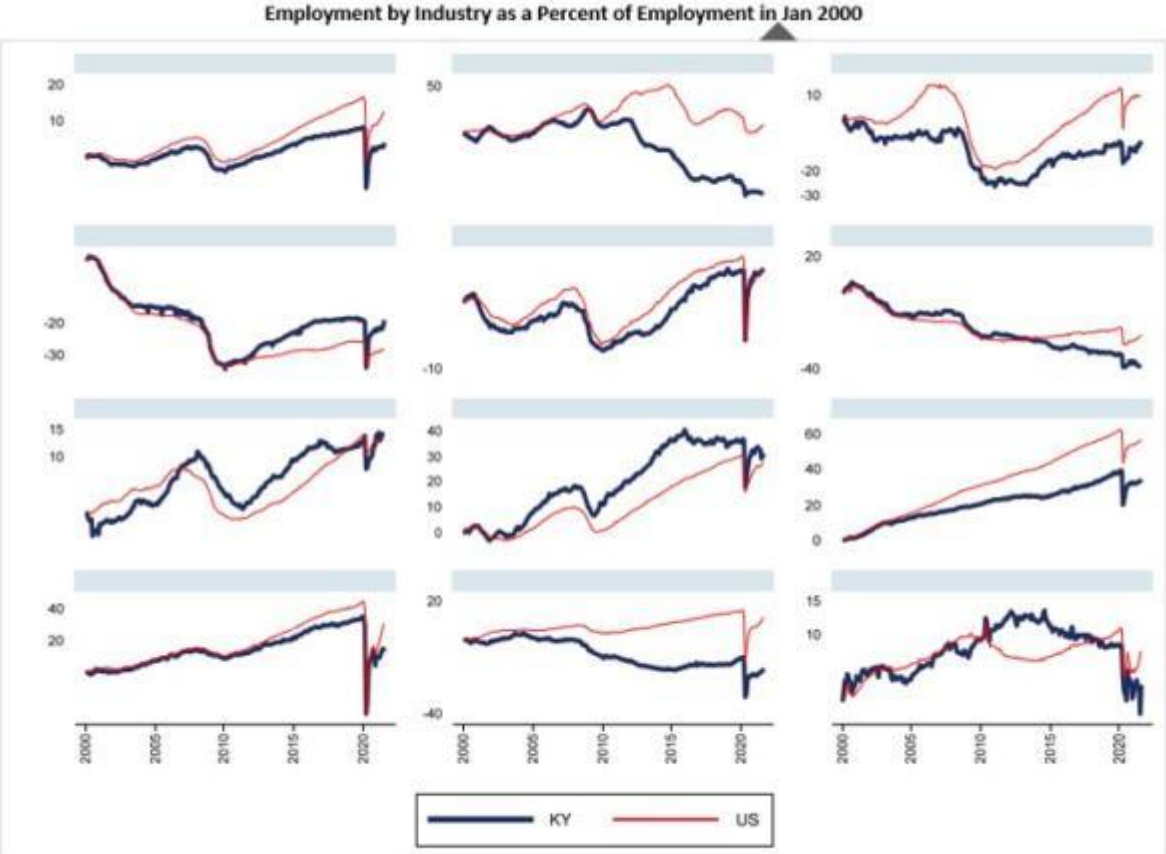
Industry	Employment (000s)	Percent of Total Employment
Mining & Logging	7.0	0.4
Construction	80.6	4.3
Manufacturing	250.9	13.3
Trade, Transportation, & Utilities	406.8	21.6
Information	19.6	1.0
Financial Activities	95.6	5.1
Professional & Business Services	209.0	11.1
Education & Health Services	280.8	14.9
Leisure & Hospitality	171.9	9.1
Other Services	64.1	3.4
Government	294.9	15.7
Total Nonfarm	**1,881.2**	**100.0**

Source: KYSTATS, Labor Market Information, Current Employment Statistics

Figure 2 shows how employment in Kentucky and the U.S. changed from 2000 to 2021 for these same industries. Employment levels are shown as a percent of employment in January 2000.

Prior to the Great Recession, Kentucky's manufacturing sector had been declining. However, when the Great Recession ended, employment in manufacturing increased. While growth slowed somewhat just before the pandemic, this sector did not show the type of decline it faced prior to the Great Recession. Professional and Business Services grew quickly in the years after the Great Recession but declined in recent years, even before the pandemic. Growth in Kentucky's Education and Health Services sector increased after 2015. This growth in this sector was driven primarily by gains in the health care sector. Employment in Kentucky's Information sector continued to decrease. However, this is a relatively small sector for Kentucky.

Figure 2
Employment by Industry as a Percent of Employment in Jan 2000



Source: KYSTATS, Labor Market Information Branch. Current Employment Statistics

Impact of the COVID-19 Pandemic

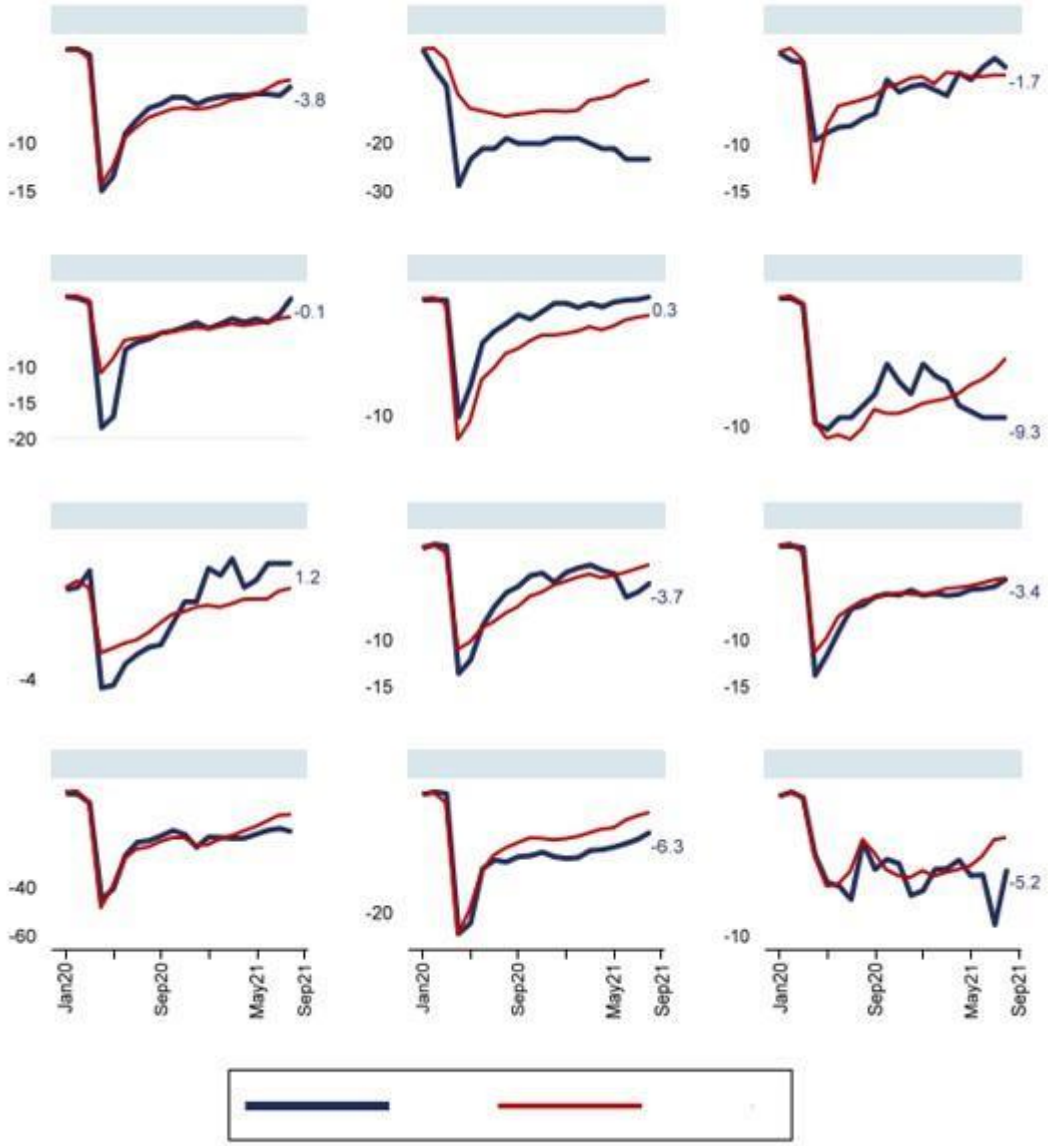
At the beginning of 2020, the nation was experiencing the largest economic expansion in its history. This changed suddenly in March 2020 as Kentucky and other states implemented restrictions to limit the spread of COVID-19. From April 2020 to March 2021, Kentucky's employment fell by nearly 295,000 workers. All major industrial sectors declined. However, losses were mostly concentrated among sectors where workers and customers were in close proximity, such as the Leisure and Hospitality sector. Employment began to recover in May 2020 as restrictions on business were eased. Figures 3 and 4 show how employment in each sector changed during the pandemic.

Figure 3 shows the employment each month as a percent of employment in January 2020. Figures are shown for each major industrial sector for Kentucky and the U.S. Kentucky initially recovered more quickly than the U.S. but has generally tracked closely with the national recovery. As of September 2020, Kentucky had recovered 75 percent of the jobs lost during the first two months of the pandemic. Even with these gains, Kentucky's employment levels were

still 3.8 percent lower than in the months before the pandemic. U.S. employment was still down 3.1 percent.

Some of Kentucky's sectors have recovered their pandemic losses. Employment in Kentucky's Financial Activities sector was 1.2 percent of pre-pandemic levels. Trade, Transportation, and Utilities was up 0.3 percent from January 2020. Other sectors such as Leisure and Hospitality have seen their recoveries slow. After recovering some losses, Kentucky's Information sector has declined. The information sector includes business in publishing, motion pictures, broadcasting and telecommunications.

Figure 3
Percent Change in Employment Since January 2020
Kentucky and U.S.



Source: KYSTATS, Labor Market Information Branch. Current Employment Statistics

As a result of the pandemic, Kentucky's workforce has had to overcome many challenges from both aspects of the employer and employee. Childcare providers, who were already decreasing in numbers, found it difficult to operate in the early stages of the COVID-19 pandemic due to the

closing of schools and businesses, which affected them financially and logistically. For those who remained open, employment levels declined significantly, which had a huge impact on student-to-teacher ratios. In many cases, mothers were forced to stay home because of the difficulty in finding available, affordable childcare options. With the sudden change across the state, there was a need to review the form of communication, policies, and wages around childcare (https://kypolicy.org/report-child-care-in-kentucky-is-crucial-and-needs-public-investment/)

The policy link also provides the following data: "In 2019, there were 12,185 Kentuckians who worked in the childcare sector, but following the COVID-19 pandemic and subsequent economic downturn, that number has fallen to 9,440- a one-year reduction in the workforce of 22.5%. Total childcare capacity has fallen for nearly a decade. Kentucky has 1,729 fewer childcare centers in July 2021 than in July 2021, a decline of 46%.

Employers were forced to think about being more flexible within their procedures and adopt more nonstandard work models, which can be a limited duration of time or permanent. The climate change in the workforce caused a demand for employers to rethink how they retain talent, conduct interviews, and implement innovative digital training platforms. A key component that had to be modernized was how to attract new employees who can be choosier about what job they accept; this means understanding the array of traditional fringe benefits, paired with workplace flexibilities that mattered to the new employee. With more questions than answers, this increased the need for employers to collaborate among workforce partners. As a result, most companies adopted a hybrid workplace where many employees rotate in and out of the offices for flexibility. This change effects company's culture, how works is completed, and how office space is utilized.

With the swift change to remote work, COVID-19 pushed broadband initiatives for lower-income families that didn't already have internet access. This initiative allowed more child(ren) to attend classes online and adults to work remote during the crisis. Families were encouraged by politicians to apply for the Emergency Broadband Benefit Program, which is a Federal Communications Commission program available because of the Consolidations and Appropriations Act that Congress approved in 2021. This program, which is now the Affordable Connectivity program, provides a temporary monthly discount to broadband bills for low-income households that qualify. These programs, and their sustainability are integral to closing the digital divide. (https://getemergencybroadband.org)

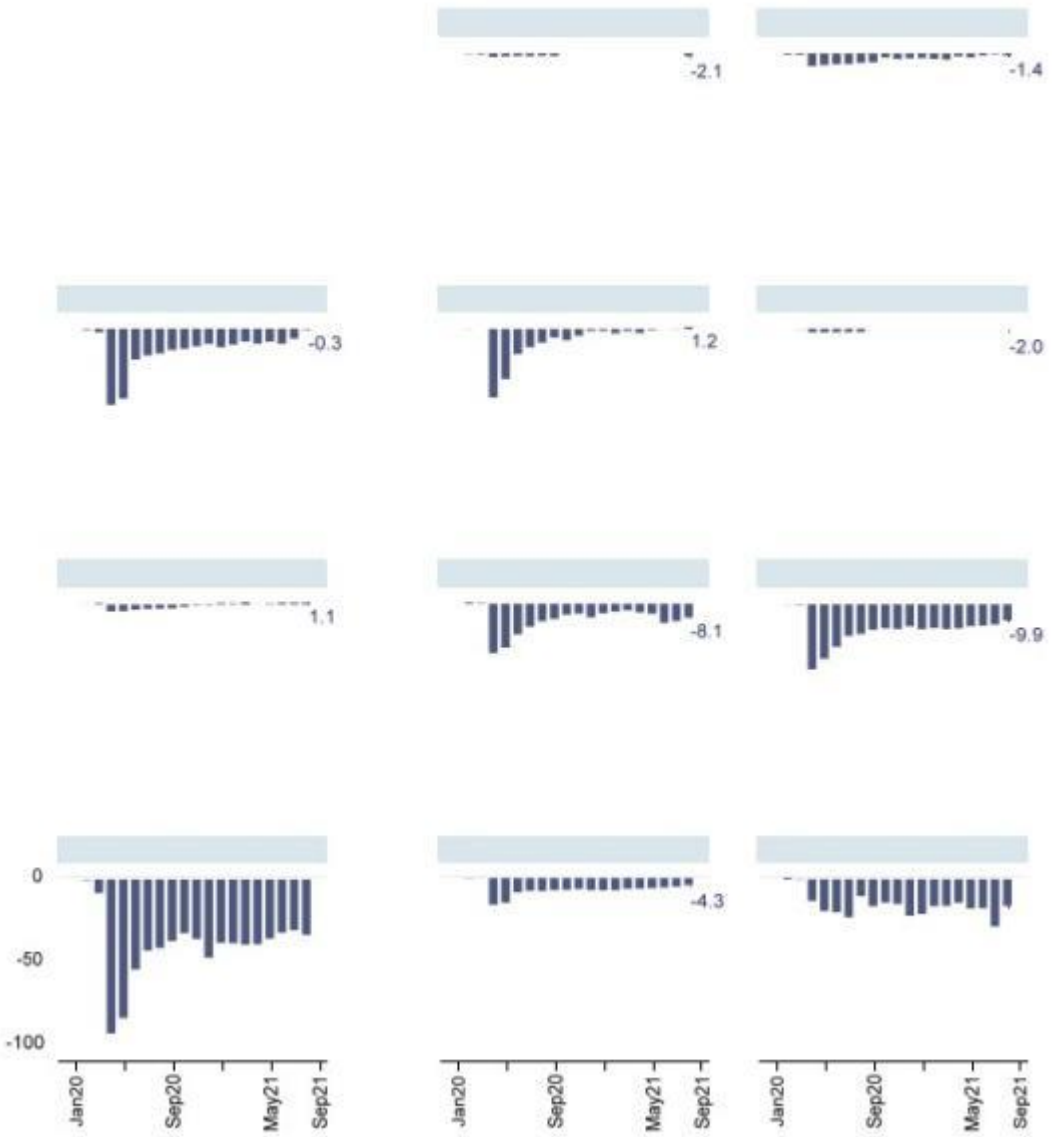
Once employees started leaving the workforce, either due to childcare or other reasons, it became difficult for Kentucky Career Centers to market job opportunities for those unemployed.

While there have been countless enhancements to the workforce, there are still issues of concern to work through:

- WIOA funding limits.
- Gaps in regional offices for the required review of resources.
- Incentives that the state and federal government can provide to employers.
- Decreasing the challenges for youth programs.
- Failure to meet people where they are—requiring pivot to digital career services.

Figure 4 shows the change in the number of jobs each month for each major sector compared to January 2020. The figures only show data for Kentucky. Between January 2020 to April 2020, the Commonwealth's Leisure and Hospitality employment fell by 92,700 jobs. As of September 2021, employment in this sector was still down 33,600 jobs from the beginning of 2020. While Kentucky's Information sector lost a large share of its jobs, the sector is relatively small, and therefore, accounts for a small share of the total jobs lost during the pandemic.

Figure 4
Change in Employment in Kentucky Since January 2020
(000s Jobs)



Source: KYSTATS, Labor Market Information Branch. Current Employment Statistics

Regional Employment Trends

Kentucky is divided into ten local workforce areas for administration of local workforce initiatives. These areas are shown in Figure 5.

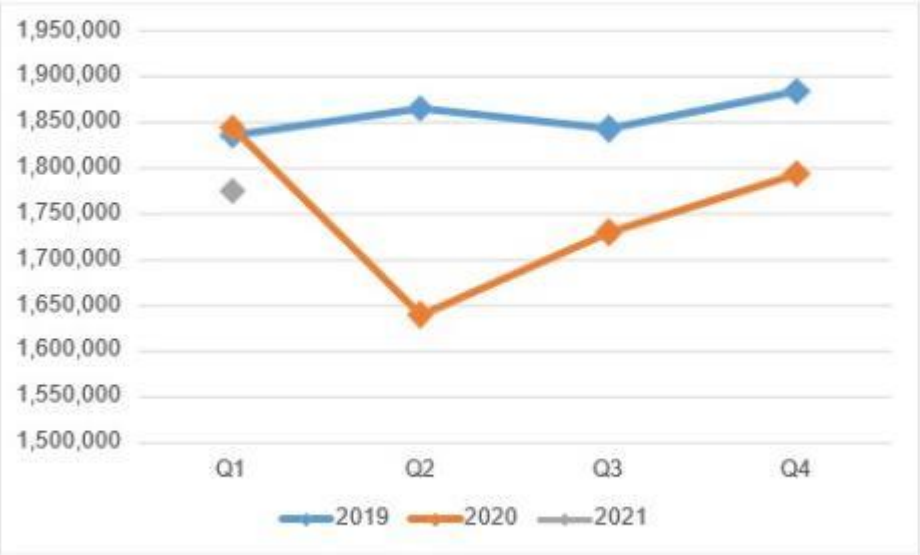
Figure 5 - Kentucky's Local Workforce Area

The following analysis of state and regional employment trends uses data from the BLS Quarterly Census of Employment and Wages (QCEW). Note that the QCEW data are similar to the CES data reported in Table 1 but do differ slightly. These differences come from how the employment data are collected, the time period covered, and how data are reported. The QCEW data allow for a more detailed analysis of Kentucky's regions including an analysis of detailed industries.

In 2020, the average annual employment in Kentucky dropped by 5.6 percent from 2019, to 1,752,505. There were nearly 105,000 fewer jobs in Kentucky during 2020 than in 2019. Note that because these are annual figures, they do not fully reflect the dramatic swings in employment that occurred from month to month during the pandemic.

Because work is seasonal, changes in employment were examined by quarter to the same quarter in the previous year. The number of jobs in the first quarter of 2020 was higher than in 2019, per Figure 6. However, there was a loss of nearly 205,000 jobs between the first and second quarter of 2020 as the pandemic hit. Job growth occurred in the third and fourth quarters of 2020 but the number of jobs in the first quarter of 2021 was nearly 69,000 less than the same period in 2020.

Figure 6
Employment by Quarter, 2019-2021



Source: KYSTATS, Labor Market Information Branch. Quarterly Census of Employment and Wages

The key to continuing the path of recovery is to determine which practices and programs are working and which are not. By increasing communication and collaboration between our workforce partners, we can identify the best practices and innovative programs being implemented and share them with the rest of the workforce system. One way we are doing this is by establishing a statewide MOU between all workforce partners. This MOU will ensure we are not duplicating services, create opportunities for a more robust referral system, and promote awareness of ongoing best practices. This work is on-going through the Kentucky Workforce Innovation Board's Collaborative, which intends to identify the state actors by function, rather than by agency structure so that all of our employer and local partners understand the role of each agency by the services they provide, understand which agency is responsible for program functions or oversight, and provide forward facing communications that allow easy identification of the program staff who can be reached for questions or program updates.

The digital divide and need for more on-line access to services are two sides of the same coin. The pandemic exacerbated the digital divide for many low-income Kentuckians, and the way forward for comprehensive workforce services needs to meet Kentuckians where they are, and that will not always be at a physical career center. The online platforms and digital toolkits are essential to the way forward. Modernization of the Workforce Ecosystems communications and messaging must include social media platforms outside the traditional use of LinkedIn and Facebook, and transition to newer platforms that have a broader, more diverse audience like YouTube and TikTok. This prong of the strategic plan will require the most significant update in this modification.

All partners have identified that the Kentucky Career Centers are the best kept secret in the Commonwealth, and all our partners need to work together on a comprehensive outreach strategy to ensure all communities and Kentuckians have access to workforce services and comprehensive wrap-around supports. Proven best practices for Kentuckians with high barriers re-entering the workforce remains the ability to provide wrap-around services to the whole family, and a fully integrated system that believes there is no wrong door into accessing the full

array of workforce services and supports. Kentucky's state and local workforce partners must do a better job of braiding funding, available services, and work that will enable this holistic approach to workforce.

The pandemic also highlighted the need for better strategies for rapid re-employment strategies. All the workforce partners in the Kentucky Career Centers have provided input to ensure that an updated strategy for co-enrollment will allow for smoother referral process and braiding of services to meet the workforce customers individual needs. Co-enrollment occurs once staff have determined a registration, assessment, individualized education plan, and provided staff assisted activity to those customers. Communication from the Office of Employment Insurance, directly to the Wagner-Peyser Employment Services teams and the WIOA Direct Service Providers is essential to ensure Kentuckians are connected to the programs and resources that will help them get back to work quickly.

The KWIB conducted stakeholder meetings with all 10 local areas, their education partners, their non-profit and contract partners, and interested industry partners over the last six months. The public hearing to receive public comment was February 24, 2022, during the public comment period. All KCC partners received the draft plan for further public comment, and comments have been incorporated into the modification language.

Table 2 shows employment as measured by the QCEW data at the state level for the first quarter of 2020 and 2021. The state level figures in Table 2 provide a benchmark for comparing similar figures for each LWA. Between the first quarters of 2020 and 2021, the greatest job losses occurred in Accommodation and Food Services, Government, and Manufacturing sectors. The Transportation and Warehousing sector added nearly 6,800 jobs over the same time period.

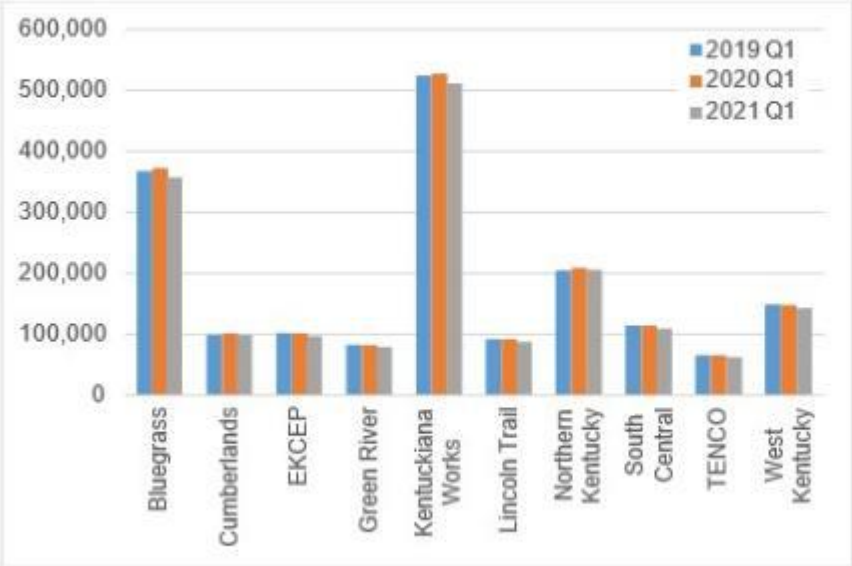
Table 2
Kentucky Employment by Industry

	Average Employment		Share	Change	
Sector	2020 Q1	2021 Q1	2021 Q1	Absolute	Percent
Accommodation & Food Svcs.	173,853	148,010	8.3%	-25,843	-14.9%
Admin. & Support & Waste Mgmt. & Remediation Svcs.	110,789	111,431	6.3%	642	0.6%
Agriculture, Forestry, Fishing & Hunting	8,006	7,963	0.4%	-43	-0.5%
Arts, Entertainment, & Recreation	19,116	15,734	0.9%	-3,382	-17.7%
Construction	75,501	73,433	4.1%	-2,068	-2.7%
Educational Svcs.	12,876	11,572	0.7%	-1,304	-10.1%
Finance & Insurance	70,693	71,488	4.0%	795	1.1%
Government	298,410	281,473	15.8%	-16,937	-5.7%
Health Care & Social Assistance	256,404	249,387	14.0%	-7,017	-2.7%
Information	20,025	18,848	1.1%	-1,177	-5.9%
Mgmt. of Companies & Enterprises	19,470	18,439	1.0%	-1,031	-5.3%
Manufacturing	246,391	237,775	13.4%	-8,616	-3.5%
Mining, Quarrying, & Oil & Gas Extraction	5,110	4,726	0.3%	-384	-7.5%
Other Svcs. (except Public Admin.)	43,498	40,336	2.3%	-3,162	-7.3%
Professional, Scientific, & Technical Svcs.	77,787	77,982	4.4%	195	0.3%
Real Estate & Rental & Leasing	20,095	18,793	1.1%	-1,302	-6.5%
Retail Trade	205,486	202,631	11.4%	-2,855	-1.4%
Transportation & Warehousing	105,321	112,109	6.3%	6,788	6.4%
Utilities	3,898	3,948	0.2%	50	1.3%
Wholesale Trade	71,912	69,736	3.9%	-2,176	-3.0%
All Industries	**1,844,844**	**1,775,929**	**100.0%**	**-68,915**	**-3.7%**

Source: KYSTATS, Labor Market Information Branch, Quarterly Census of Employment and Wages

Figure 7 shows the change in first quarter employment for the LWAs from 2019 through 2021. Between 2020 and 2021, half of the 69,000 jobs lost occurred in the largest LWAs – Bluegrass and Kentuckiana Works. In terms of percent change, the largest decreases occurred in TENCO (5.0 percent) and Lincoln Trail (4.7 percent).

Figure 7
Employment in the First Quarter by LWA, 2019, 2020 and 2021



Source: KYSTATS, Labor Market Information Branch, Quarterly Census of Employment and Wages

Below, Tables 3 and 4 show how first quarter employment has changed within each LWA from 2020 to 2021. Table 3 shows the share of employment by industry for each LWA for the first quarter of 2021. Table 4 shows the absolute change in employment from the first quarter of 2020 and shows which industries and LWAs are still struggling. Comparisons to the state are in Table 2 above.

Table 3
Share of First Quarter Employment by Industry and LWA, 2021 Q1

Industry	Bluegrass	Cumberlands	EKCEP	Green River	Kentuckiana Works	Lincoln Trail	Northern Kentucky	South Central	TENCO	West Kentucky
Accommodation and Food Services	8.8%	8.5%	8.4%	7.7%	7.2%	8.5%	8.9%	9.4%	10.1%	9.8%
Administrative and Support and Waste Management and Remediation Services	7.0%	7.4%	3.0%	5.2%	7.1%	4.2%	7.1%	4.5%	4.2%	4.3%
Agriculture, Forestry, Fishing and Hunting	1.2%	0.3%	0.0%	1.1%	0.1%	0.2%	0.0%	0.4%	0.0%	0.9%
Arts, Entertainment, and Recreation	1.1%	0.6%	0.2%	0.6%	1.1%	0.4%	1.2%	0.7%	0.6%	0.7%
Construction	4.5%	2.9%	2.5%	4.1%	4.2%	4.8%	3.6%	4.1%	4.6%	4.5%
Educational Services	0.8%	0.1%	0.0%	0.6%	1.1%	0.2%	0.6%	0.3%	0.1%	0.4%
Finance and Insurance	2.5%	2.6%	2.5%	4.6%	6.5%	2.9%	4.2%	2.4%	2.6%	2.6%
Government	21.2%	17.3%	25.1%	13.9%	10.3%	21.2%	12.0%	15.0%	18.6%	18.8%
Health Care and Social Assistance	12.0%	18.5%	23.8%	16.1%	14.0%	11.0%	11.1%	13.7%	19.8%	13.7%
Information	0.9%	1.1%	0.9%	0.5%	1.5%	1.2%	0.6%	0.7%	0.7%	0.8%
Management of Companies and Enterprises	0.8%	0.1%	0.1%	0.2%	1.4%	0.0%	2.4%	1.9%	0.2%	0.2%
Manufacturing	12.2%	14.6%	4.0%	21.6%	12.0%	22.3%	11.9%	21.8%	13.3%	13.9%
Mining, Quarrying, and Oil and Gas Extraction	0.1%	0.3%	3.1%	0.2%	0.1%	0.1%	0.0%	0.0%	0.1%	0.3%
Other Services (except Public Administration)	2.3%	1.6%	2.1%	2.4%	2.5%	2.1%	2.4%	2.0%	2.3%	2.2%
Professional, Scientific, and Technical Services	5.2%	2.2%	2.7%	2.2%	5.5%	2.8%	4.5%	2.6%	2.7%	3.7%
Real Estate and Rental and Leasing	1.1%	0.7%	0.7%	0.8%	1.3%	0.8%	1.1%	0.8%	0.7%	0.8%
Retail Trade	11.1%	14.3%	16.6%	11.4%	9.4%	12.3%	9.8%	13.2%	14.2%	13.6%
Transportation and Warehousing	3.6%	3.3%	1.9%	3.1%	9.7%	2.3%	13.2%	2.7%	2.6%	5.4%
Utilities	0.3%	0.3%	0.4%	0.2%	0.2%	0.2%	0.2%	0.0%	0.5%	0.1%
Wholesale Trade	3.5%	3.2%	1.8%	3.3%	4.7%	2.5%	5.1%	3.7%	2.2%	3.4%
All Industries	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Source: KYSTATS, Labor Market Information Branch, Quarterly Census of Employment and Wages

Table 4
Absolute Change in First Quarter Employment by Industry and LWA, 2020-2021

	Bluegrass	Cumberlands	EKCEP	Green River	Kentuckiana Works	Lincoln Trail	Northern Kentucky	South Central	TENCO	West Kentucky
Accommodation and Food Services	-6,730	-917	-719	-713	-10,481	-883	-2,662	-1,286	-771	-665
Administrative and Support and Waste Management and Remediation Services	-213	-13	207	-43	239	-210	1,120	-355	175	-93
Agriculture, Forestry, Fishing and Hunting	-224	18	-17	106	25	-26	3	-21	2	89
Arts, Entertainment, and Recreation	-865	-52	-41	-87	-1,771	-38	-639	-169	20	266
Construction	-725	-88	50	-357	10	250	-138	80	-227	-637
Educational Services	-696	-2	23	-4	-523	0	-47	-77	-6	25
Finance and Insurance	261	-129	-63	-55	594	25	195	-91	-83	-186
Government	-2,908	-1,341	-1,715	-948	-2,984	-2,356	-1,080	-1,041	-806	-1,768
Health Care and Social Assistance	-1,953	-793	-743	-505	-814	410	208	-760	-709	-1,076
Information	-294	15	-109	-110	-331	-47	-94	-91	-206	-307
Management of Companies and Enterprises	33	-12	79	-1	-223	-928	277	-133	3	-34
Manufacturing	-1,953	-276	-745	-109	-775	-606	-987	-1,517	-300	-1,340
Mining, Quarrying, and Oil and Gas Extraction	21	23	-457	-10	159	-7	17	-37	-28	-13
Other Services (except Public Administration)	-437	-10	-37	-192	-1,330	-129	-488	-71	-48	-304
Professional, Scientific, and Technical Services	33	-136	-131	-151	-382	355	108	-54	10	-22
Real Estate and Rental and Leasing	-149	5	-64	-58	-489	-236	-371	-87	-28	-32
Retail Trade	-675	455	-1	-74	-1,966	-92	-311	83	-254	-132
Transportation and Warehousing	1,156	90	-36	94	2,992	111	1,938	251	-20	489
Utilities	74	-3	0	-6	-25	4	5	2	-1	-2
Wholesale Trade	-463	-22	-186	-155	-597	-19	-840	35	-91	57
All Industries	**-16,731**	**-3,194**	**-4,703**	**-3,378**	**-18,702**	**-4,430**	**-3,788**	**-5,340**	**-3,368**	**-5,698**

Source: KYSTATS, Labor Market Information Branch, Quarterly Census of Employment and Wages

Emerging Sectors

If state and local agencies can accurately identify emerging sectors and the skills these sectors will need from their employees, these agencies might be able to allocate resources to help meet these needs as they develop. Unfortunately, identifying emerging sectors is challenging as many sectors as possible that appear to show some initial growth seem to lose momentum after a couple of years.

This analysis examines changes in employment across 3-digit NAICS codes in Kentucky to identify potentially emerging industries. This analysis used three criteria for to define emerging sectors. First, employment in a 3-digit sector must be less than two percent of Kentucky's total nonfarm employment. Second, employment in the sector must have grown faster over the past three year than the state's total employment. Finally, employment in the sector must have grown in two of the past three years. This was to remove sectors that experienced a one-time large increase.

Applying these criteria to employment from 2014 to 2017 suggested several sectors that might be emerging in Kentucky. These include several subsectors of manufacturing such as plastics and rubber products; electrical equipment, appliance, and components; and fabricated metal products. Additional sectors included data processing, hosting and related services, and securities, commodity contracts, and other financial investments and related activities.

To evaluate this methodology, the same criteria were applied to data from 2011 to 2014. Employment growth from 2014 to 2017 was then analyzed for the sectors that were identified as emerging during this time-period. The goal was to see whether employment continued to grow in these potentially emerging sectors. Of the 31 emerging sectors, 18, or 58 percent, continued to grow faster than the state over the next three years. Employment growth slowed for the remaining 13 sectors. Slight alterations to the criteria resulted in similar results.

These results suggest that identifying emerging sectors early is difficult to do reliably, making it difficult for state agencies to allocate resources to training that would be specific to these

industries. This also suggests that allocating resources to improving general skills that will be in demand across a boarder set of industries might be a more reliable strategy for preparing the workforce. Kentucky's workforce development ecosystem is invested in upskilling our workforce, by developing portable and transferrable skills as the foundational layer for developing life-long learners, ready to transition to the jobs and technology that emerging industries will bring to the forefront.

Employers' Employment Needs

Note that the occupational projections were completed with inputs that preceded the pandemic and therefore do not capture the impacts of COVID. The U.S. Bureau of Labor Statistics estimated that Kentucky's employment will increase by 86,311 jobs between 2019 and 2029. Table 5 shows job projections by major occupational groups. Table 6 shows some of the main skills that will be needed for these new jobs.

The top four occupational groups in terms of the number of additional jobs are Transportation and Material Moving; Healthcare Support; Healthcare Practitioners and Technical; and Food Preparation and Service-Related occupations.

These four occupational groups account for 54,710 new jobs. In terms of growth rates, the top four groups are Healthcare Support; Community and Social Service; Computer and Mathematical; and Healthcare Practitioners and Technical occupations.

Four occupational groups are projected to decline: Arts, Design, Entertainment, Sports, and Media; Office and Administrative Support; Construction and Extraction; and Sales and Related occupations.

Table 5
Employment Projections for 2029 by Major Occupational Group

	Employment (000s of Jobs)			
Major Occupation Group	**2019**	**Projected 2029**	**Change in Number**	**Percent Change**
Architecture and Engineering	29.3	31.2	1.9	6.5%
Arts, Design, Entertainment, Sports, and Media	22.3	22.3	0.0	-0.1%
Building and Grounds Cleaning and Maintenance	58.7	64.0	5.3	9.1%
Business and Financial Operations	78.7	83.2	4.5	5.7%
Community and Social Service	28.8	33.0	4.2	14.7%
Computer and Mathematical	33.9	38.4	4.6	13.5%
Construction and Extraction	84.3	82.0	-2.3	-2.7%
Education, Training, and Library	95.3	100.1	4.8	5.0%
Farming, Fishing, and Forestry	8.1	8.6	0.5	6.1%
Food Preparation and Serving Related	178.6	186.5	7.8	4.4%
Healthcare Practitioners and Technical	127.4	142.3	14.8	11.6%
Healthcare Support	74.0	89.6	15.7	21.2%
Installation, Maintenance, and Repair	91.8	96.8	4.9	5.4%
Legal	11.8	12.5	0.8	6.5%
Life, Physical, and Social Science	11.2	11.8	0.6	5.3%
Management	104.1	110.8	6.7	6.5%
Office and Administrative Support	263.3	257.5	-5.7	-2.2%
Personal Care and Service	53.1	57.1	4.0	7.5%
Production	200.3	201.6	1.3	0.7%
Protective Service	38.6	40.4	1.8	4.7%
Sales and Related	186.6	180.3	-6.3	-3.4%
Transportation and Material Moving	218.4	234.7	16.3	7.5%
Total, All Occupations	**1,998.5**	**2,084.8**	**86.3**	**4.3%**

Source: Kentucky Labor Market Information Branch, Occupational Projections

Of the 86,311 jobs projected to be created between 2019 and 2029, 77 percent will require active listening, 72 percent will require monitoring and 67 percent will require critical thinking as shown in Table 6. This assessment is based on the skills required by occupation for the projected new jobs created between 2019 and 2029.

Our partners at the Kentucky Chamber of Commerce Foundation Workforce Center are national leaders in the development and recruitment for business and industry partners engaging in the needs assessment known as the Talent Pipeline Management Program. The demand side projections of these employer collaboratives have been working to identify most commonly occurring skills and credentials, so that the regional workforce systems can partner to address training needs. Our partners in education and workforce can utilize the data collected here as well as the data published bi-annually through the Talent Pipeline Management program, to align the resources for training dollars to match the projected needs of employers. Regional training providers can target those soft skills identified as most commonly occurring, and pair with the identified credentials industry collaboratives identify, to ensure that our employers are in the driver's seat of workforce training and education for the jobs of tomorrow.

Table 6
Top Ten Skills for New Jobs Projected from 2019 to 2029

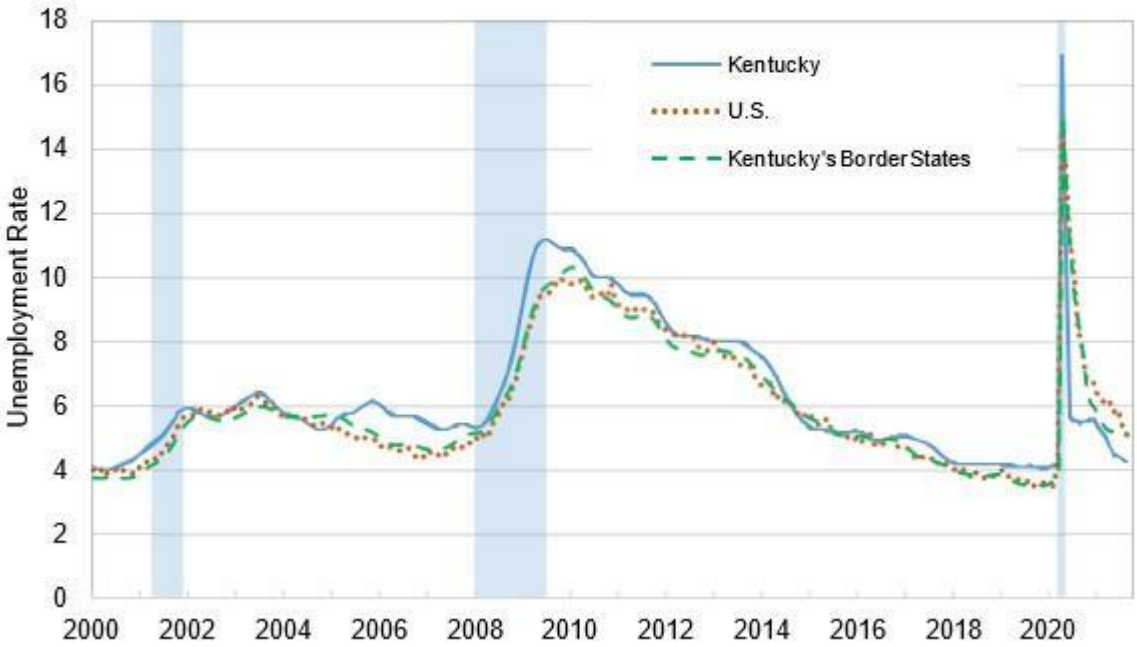
Skill	Percent of New Jobs that Will Require Skill
Active Listening	77%
Monitoring	72%
Critical Thinking	67%
Speaking	67%
Reading Comprehension	66%
Coordination	50%
Active Learning	47%
Complex Problem Solving	46%
Social Perceptiveness	44%
Judgment and Decision Making	39%

Sources: Kentucky Labor Market Information Branch, Occupational Projections and the Occupational Information Networks (O*NET) for skills

Following national trends, Kentucky's unemployment rate steadily declined after the Great Recession, spiked with the onset of the pandemic, and has since declined (Figure 8). In early 2020, the state saw its lowest level since the BLS began recording state unemployment rates in 1976. When the pandemic began, Kentucky's unemployment rate spiked to 16.9 percent. It has since declined and has recently returned to pre-pandemic levels (Figure 9).

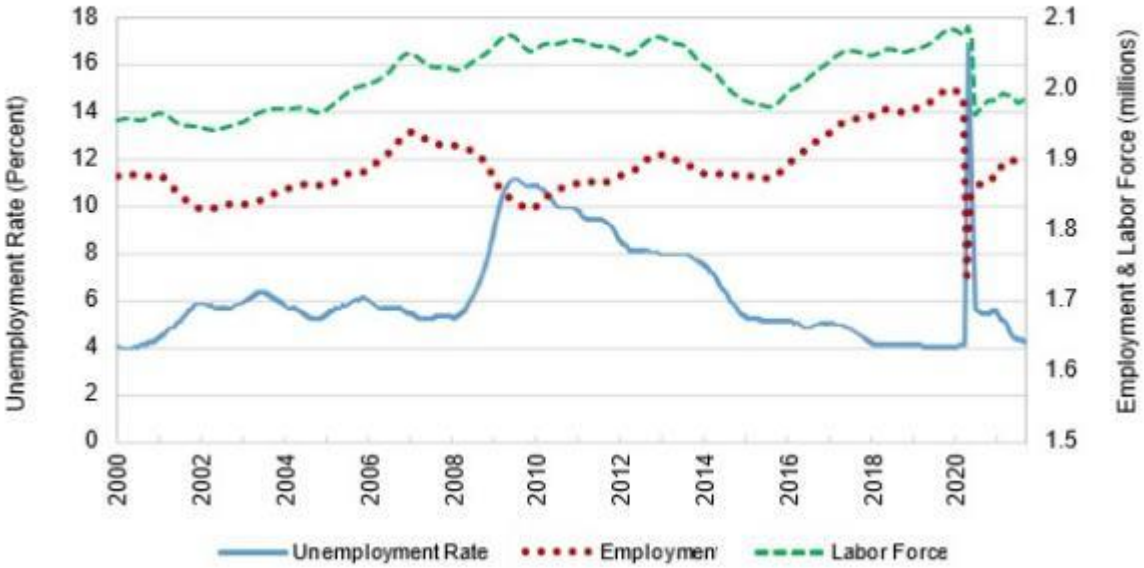
The lower unemployment rates in recent months can be explained by two main factors. First, as businesses reopened, many workers returned to their jobs. The second reason for Kentucky's recent low unemployment rate is a reduction in labor force participation. With the pandemic, many workers stopped looking for work and as a result were not counted as being unemployed. This is true even if they would like a job. Several factors have contributed to workers leaving the labor force including lack of childcare, health concerns, increased retirements, and enhanced unemployment benefits. Because the unemployment rate does not account for workers who left the labor force it does not fully describe Kentucky's economic situation.

Figure 8
Unemployment Rates



Source: KYSTATS, Labor Market Information Branch. Local Area Unemployment Statistics

Figure 9
Unemployment Rate, Employment, and Labor Force



Source: KYSTATS, Labor Market Information Branch. Local Area Unemployment Statistics

Labor Force Participation and Barriers to Work

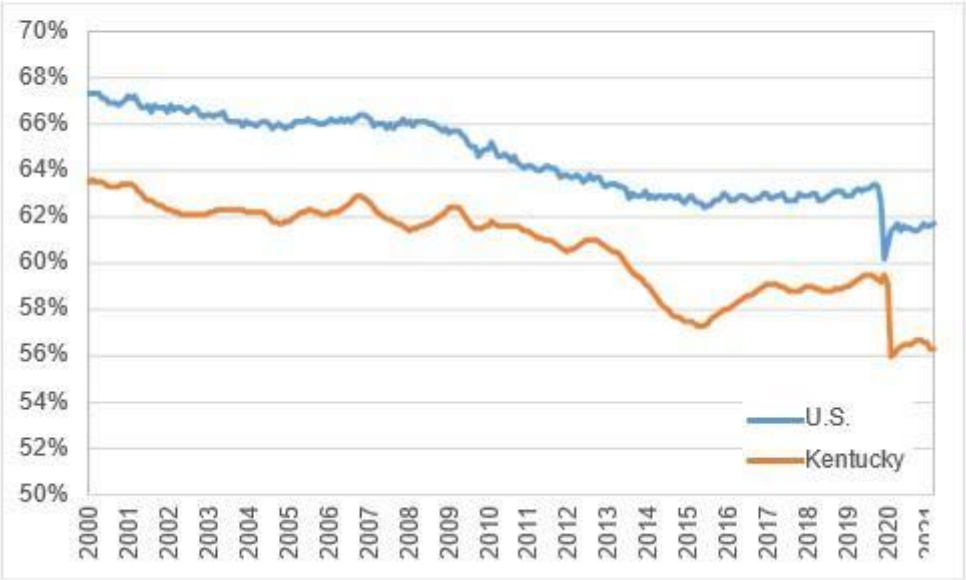
The labor force participation (LFP) rate measures the percentage of the civilian, non-institutionalized population age 16 and over who are either working or are unemployed and

searching for work. LFP in the U.S. and Kentucky has generally been declining, driven largely by the aging of the population.

Kentucky's LFP rate declined more quickly in 2013 through 2015 as workers who were unemployed for a long period stopped looking for work. From 2015 to 2020, improvements in the state's economy helped attract many of these workers back into the labor force. However, Kentucky's LFP rate was still typically about 4 percentage points lower than the U.S. rate. Several factors including educational attainment and health issues appear to contribute to this difference.

As noted, the pandemic reduced Kentucky's labor force participation rate. The nation also saw a significant reduction in LFP when the pandemic began. While the LFP rate for both Kentucky and the nation have improved, the gap between Kentucky and the nation has widened. This indicates Kentucky's workers have been less likely to return to the labor force.

Figure 10
Monthly Labor Force Participation Rates
(seasonally adjusted)



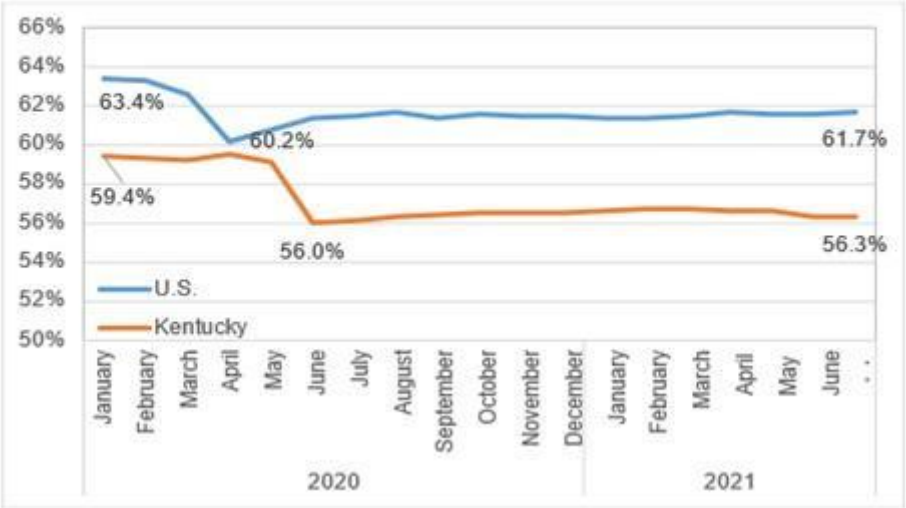
Source: KYSTATS, Labor Market Information Branch. Local Area Unemployment Statistics

Kentucky is facing a childcare crisis, with many facilities never having reopened after pandemic shut-down. For individuals who can even locate childcare, when the expanded subsidies from the federal assistance programs expire, most will find it cost prohibitive. The rate of opioid overdose deaths starkly increased during the pandemic, exacerbating the opioid crisis in east Kentucky.

While the Kentucky Chamber of Commerce recently reported in the "20 Years in the Making: Kentucky's Workforce Crisis" that while it is hard to quantify, the opioid epidemic may be responsible for a staggering 1.3 to 3.1 percentage point in Kentucky's workforce participation rate, representing up to a total loss of 55,200 workers.

All of Kentucky's workforce partners have been collaborating to better align resources to maximize efforts to connect the re-entry and recovery populations to workforce services to help build on-ramps back into the workforce.

Figure 11
Monthly Labor Force Participation Rates, 2020-2021
(seasonally adjusted)



Source: KYSTATS, Labor Market Information Branch. Local Area Unemployment Statistics

The workforce participation rate for the LWAs is an estimate calculated using the 5-year estimates from the American Community Survey. The methodology is similar to the LFP rate calculated by the BLS, but not identical and comparisons should be made with caution. Because the data used in these estimates were collected from 2015 through 2019, they do not reflect the impact of the pandemic. They do, however, show the historic regional differences in labor force participation across the Commonwealth. The workforce participation rate varies significantly across Kentucky's regions from 38.8 percent in the EKCEP to 69.5 percent in Northern Kentucky.

Table 7
Workforce Participation Rate by LWA

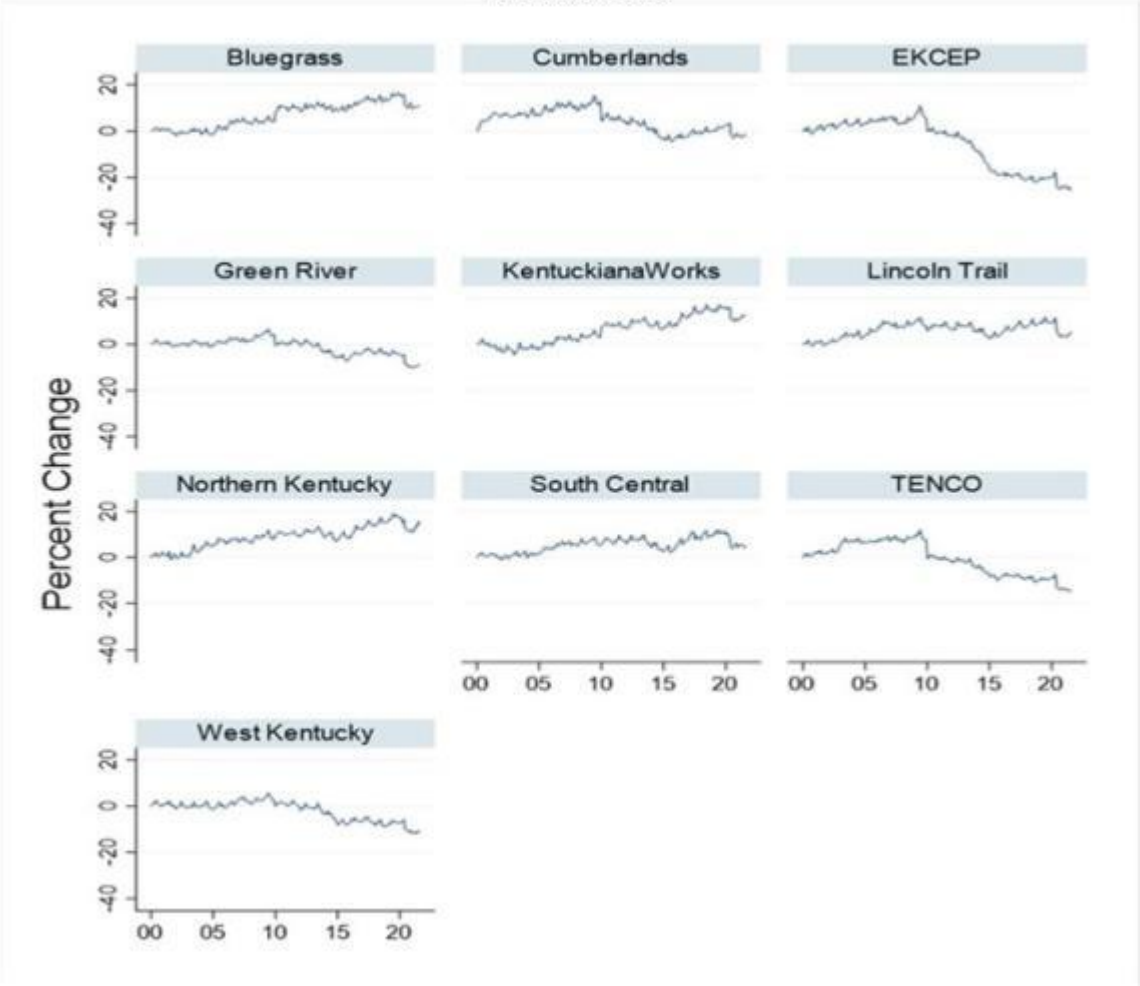
Local Workforce Area	LFPR
Bluegrass	64.1%
Cumberlands	51.5%
EKCEP	38.8%
Green River	59.5%
Kentuckiana Works	66.5%
Lincoln Trail	60.5%
Northern Kentucky	69.5%
South Central	59.5%
TENCO	50.5%
West Kentucky	54.5%
Kentucky	59.6%

Source: Analysis of U.S. Census Bureau,American Community Survey 5-year estimates, 2019

Figure 12 shows the number of people in the labor force as a percentage of the labor force in January 2000 across Kentucky's LWAs. Note that the figures are not LFP rates, which is the number of people in the labor force divided by the civilian noninstitutionalized population over the age of 16. Figure 12 shows the general trends in labor force for each LWA and reflects the impact of the pandemic. Urban areas including the Bluegrass, Kentuckiana Works, and Northern Kentucky LWAs have seen their labor forces grow over time. This partially reflects population growth but also reflects stronger economic opportunities in these areas. West Kentucky, TENCO, Green River, and EKCEP, however, have seen their labor force decline. These regional differences are driven by a combination of population trends, economic conditions, and the characteristics of the labor force within each region.

The pandemic hit all areas hard, but the recovery has been somewhat uneven. EKCEP and TENCO have seen their labor forces continue to decline even as COVID-19 restrictions were lifted. Northern Kentucky seems to be recovering its labor force more quickly than the rest of the state. The KWIB Collaborative is currently undertaking the research to publish the three-year workforce funding report for 2019-2021 to ensure that the unprecedented federal investments are aligned across the agencies and sectors, to maximize their impact and measure for success. Identifying successful strategies of our regional partners that have built resilience into our regional workforce systems, will allow communities to build back better and respond more quickly to market fluctuations after COVID-19 leaves center stage.

Figure 12
Percent Change in Labor Force Since January 2000 by LWA
Indexed to 2000



Source: KYSTATS, Labor Market Information Branch, Local Area Unemployment Statistics

The following section examines the prevalence of specific barriers to labor force participation in Kentucky. Many of the following estimates were based on data from the 2019 5-year American Community Survey and other data sources collected prior to the pandemic. Therefore, the estimates do not reflect changes related to the pandemic.

Educational Attainment. The population in areas with low LFP tend to have lower levels of education (Table 8). While 12 percent of the state population aged 25 to 64 has less than a high school education, the rate is 21 percent in EKCEP, 17 percent in Cumberlands, and 14 percent in TENCO. Individuals with lower levels of education are significantly less likely to work as shown in Table 9. Across the state, 40 percent of those with less than a high school education were employed. Sixty-three percent of those with a high school diploma or equivalent were employed. Employment rates among those with a college education were 77 percent.

Table 8
Educational Attainment of PopulationAged 25 to 64

Local Workforce Area	No High School	High School	Some College	Associates Degree	Bachelors or Higher	Total
Bluegrass	10%	27%	21%	9%	33%	100%
Cumberlands	17%	39%	21%	9%	14%	100%
EKCEP	21%	38%	19%	9%	14%	100%
Green River	11%	36%	24%	11%	19%	100%
Kentuckiana Works	9%	26%	23%	9%	33%	100%
Lincoln Trail	10%	36%	24%	12%	18%	100%
Northern Kentucky	9%	29%	22%	9%	31%	100%
South Central	13%	36%	19%	9%	22%	100%
TENCO	14%	38%	22%	10%	17%	100%
West Kentucky	12%	35%	23%	11%	19%	100%
Kentucky	**12%**	**32%**	**22%**	**9%**	**26%**	**100%**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Table 9
Percent Employed by Educational AttainmentAged 25 to 64

Local Workforce Area	No High School	High School	Some College	Associates Degree	Bachelors or Higher
Bluegrass	48%	67%	74%	79%	86%
Cumberlands	30%	58%	64%	75%	79%
EKCEP	21%	45%	54%	63%	76%
Green River	45%	66%	74%	77%	83%
Kentuckiana Works	49%	68%	75%	81%	87%
Lincoln Trail	43%	66%	73%	76%	87%
Northern Kentucky	48%	71%	77%	81%	89%
South Central	44%	64%	69%	75%	83%
TENCO	30%	54%	60%	76%	81%
West Kentucky	39%	61%	69%	77%	80%
Kentucky	**40 %**	**63 %**	**71 %**	**77 %**	**85 %**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 201

Disability and Health. Those with disabilities are also less likely to participate in the labor force. In Kentucky, approximately 15.9 percent of the population aged 16 to 64, or 453,470 individuals, reported having a disability that limits their activity (Table 10). Less than 29 percent of disabled individuals aged 25 to 64 were employed. This is considerably lower than the 64 percent employment rates among the general Kentucky population aged 25 to 64.

Of Kentucky residents aged 25 to 64, 407,297 (17.6%) reported having a disability. Of these, 267,187 (67.6%) were not in the labor force. By comparison, only 11.3% of US residents aged 25 to 64 reported having a disability. Labor force participation was also low among those with a disability nationally with 60.4% not in the labor force. These estimates suggest Kentucky has a larger share of its population reporting a disability and that disabilities are a more significant barrier to employment in Kentucky.

Table 10
Self-Reported Disability and Employment Status

	Prevalence of Disability (Aged 16 to 64)		Employment Status (Aged 25 to 64)		
Local Workforce Area	Number	Percent of Population with Disability	Employed	Unemployed	Not in Labor Force
Bluegrass	71,432	13.2%	33.6%	4.0%	62.4%
Cumberlands	39,258	19.6%	22.4%	1.9%	75.7%
EKCEP	63,280	27.2%	16.6%	3.8%	79.6%
Green River	22,542	16.9%	30.2%	3.6%	66.3%
Kentuckiana Works	81,375	12.5%	35.0%	4.1%	60.9%
Lincoln Trail	28,922	16.6%	31.7%	5.1%	63.2%
Northern Kentucky	35,598	12.0%	33.7%	4.0%	62.3%
South Central	32,393	16.7%	27.5%	3.6%	68.9%
TENCO	34,368	20.0%	23.6%	2.5%	73.9%
West Kentucky	44,302	17.5%	31.7%	2.7%	65.6%
Kentucky	**453,470**	**15.9%**	**28.8%**	**3.6%**	**67.6%**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Approximately eight percent, or 19,578, of Kentucky's residents aged 16 to 19 reported having a disability (Table 11). EKCEP has the highest disability rates among youth in Kentucky at 12.6 percent. The Kentuckiana Works LWA has the lowest at 6.6 percent.

Table 11
Youth Disability Rates, Aged 16 to 19

Local Workforce Area	Number	% Population with Disability
Bluegrass	3,681	7.7%
Cumberlands	1,248	7.8%
EKCEP	2,319	12.6%
Green River	1,171	11.4%
Kentuckiana Works	3,346	6.6%
Lincoln Trail	1,317	9.4%
Northern Kentucky	1,623	6.8%
South Central	1,833	9.6%
TENCO	1,414	10.1%
West Kentucky	1,626	7.8%
Kentucky	**19,578**	**8.3%**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Other health factors can also affect labor force participation. Recent research from the University of Kentucky estimated that diabetes reduces Kentucky employment by 15,700 workers (Clark et al. 2019).[1] Several studies have recently examined the impact that opioid abuse has on labor force participation. Krueger (2017) estimated that opioid abuse reduced the U.S. LFP rate by 0.6 percentage points for men and 0.77 percentage points for women.[2] Aliprantis and Schweitzer (2018) found a much larger effect that suggested a 10 percent increase in opioid prescribing was associated with a reduction in 0.5 percentage point reduction

in LFP among men and 0.14 percent reduction among women.[3] Based on this research, the University of Kentucky's Center for Business and Economic Research estimated that increases in opioid prescribing in Kentucky were associated with reduction in labor force participation rates of 1.3 to 3.1 percentage points for Kentucky residents aged 24 to 54 (Clark et al. 2019).[4] This amounts to approximately 23,100 to 55,200 fewer workers in the Commonwealth.

Older Workers. One in five Kentucky residents are over the age of 64 (Table 12). While the majority of Kentucky's older population live in urban areas, older residents account for a large share of the population in rural areas. Labor force participation is naturally low among the older population, but many continue to work, either out of preference or need. Approximately 15 percent of residents over the age of 65 are employed or looking for work in Kentucky.

Table 12
Population Aged 65 and Older and Employment Status

		Percent of Population	Employment Status (Age 65 & Older)		
Local Workforce Area	**Number**	**Older**	**Employed**	**Unemployed**	**Not In Labor Force**
Bluegrass	120,301	18.2%	17.7%	0.7%	81.6%
Cumberlands	57,387	22.3%	13.2%	0.3%	86.5%
EKCEP	64,408	21.7%	8.3%	0.3%	91.3%
Green River	37,124	21.8%	14.7%	0.1%	85.2%
Kentuckiana Works	155,671	19.4%	17.9%	0.5%	81.5%
Lincoln Trail	41,714	19.3%	13.2%	0.3%	86.5%
Northern Kentucky	64,898	18.0%	17.3%	0.6%	82.1%
South Central	47,088	19.6%	16.4%	0.4%	83.2%
TENCO	48,162	21.9%	10.6%	0.3%	89.1%
West Kentucky	73,873	22.6%	14.0%	0.5%	85.5%
Kentucky	**710,626**	**20.0%**	**15.1%**	**0.5%**	**84.4%**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

English Learners. Approximately 2.7 percent of Kentucky's residents age 16 to 64 have limited English proficiency (Table 13). Labor force participation among those with limited English proficiency is higher than the general population. However, there are significant difference in employment across regions. Nevertheless, limited proficiency with the English language can limit a workers ability to find certain types of employment and earn higher wages.

Table 13
Limited English Proficiency and Employment Status

	Prevalence of LimitedEnglish Proficiency (Aged 16 to 64)		Employment Status (Aged 25 to 64)		
Local Workforce Area	**Number**	**Percent of Population**	**Employed**	**Unemployed**	**Not in Labor Force**
Bluegrass	20,122	3.7%	72.6%	2.5%	25.0%
Cumberlands	2,296	1.1%	64.1%	1.4%	34.5%
EKCEP	937	0.4%	63.1%	0.0%	36.9%
Green River	2,537	1.9%	59.4%	4.1%	36.5%
Kentuckiana Works	30,204	4.7%	75.1%	2.8%	22.1%
Lincoln Trail	2,743	1.6%	68.1%	2.2%	29.7%
Northern Kentucky	6,358	2.1%	76.0%	0.8%	23.2%
South Central	7,456	3.8%	60.7%	1.0%	38.3%
TENCO	859	0.5%	58.7%	0.0%	41.3%
West Kentucky	3,835	1.5%	66.7%	4.7%	28.6%
Kentucky	77,347	2.7%	71.5%	2.4%	26.2%

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Homelessness. The U.S. Interagency Council on Homelessness reported that over 3,116 individuals in Kentucky are homeless on a typical day.[5] Of these, approximately 629 experienced chronic homelessness. The U.S. Department of Education estimates that nearly 24,000 Kentucky students experienced homelessness during the 2017-2018 school year.[6]

Native Americans. Kentucky has a relatively small Native American population. Data from the U.S. Census Bureau's American Community Survey suggests that less than one percent of Kentucky's residents were Native American. Approximately 54 percent of Kentucky's Native American population aged 25 to 64 were employed – lower than the employment rate for the general population.

Long-Term Unemployment. The slow recovery after the Great Recession caused many workers to be unemployed for prolonged periods. This can negatively affect workers' ability to find employment as skills can depreciate over time. Employers might also be concerned that long-term unemployment might signal concerns regarding a worker's productivity.

Table 14 shows when individuals who were unemployed last worked. The estimates only include those aged 25 to 64 and pre-date COVID-19. Twenty-eight percent of unemployed workers were unemployed for one to five years. Another 11.5 percent were unemployed for more than five years. This indicates that approximately 29,000 workers who were searching for employment have been unemployed for more than a year.

Table 14

Long-Term Unemployed and Employment Status (Aged 25 to 64)

	When Last Worked			
Local Workforce Area	**Past 12 Months**	**1-5 Years**	**Over 5 Years or Never Worked**	**Total**
Bluegrass	63.4%	27.6%	9.0%	100%
Cumberlands	49.9%	32.6%	17.5%	100%
EKCEP	43.1%	38.9%	18.0%	100%
Green River	74.9%	16.5%	8.6%	100%
Kentuckiana Works	65.2%	25.6%	9.1%	100%
Lincoln Trail	63.2%	21.9%	14.9%	100%
Northern Kentucky	60.6%	30.2%	9.2%	100%
South Central	66.5%	24.0%	9.5%	100%
TENCO	56.0%	32.3%	11.7%	100%
West Kentucky	58.9%	28.5%	12.6%	100%
Kentucky	**60.1%**	**28.3%**	**11.5%**	**100%**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Veterans. Among Kentucky residents aged 18 to 64, approximately 5.0 percent are veterans. Labor force participation among veterans is similar to the general population with 68 percent employed and

3.2 percent unemployed and looking for work. The Lincoln Trail LWA is home to a disproportionate share of veterans. Veteran's living in this area are more likely to work than in the state as a whole. Veterans make up a smaller share of the EKCEP population and are less likely to work.

Table 15

Veterans and Employment Status

Veterans (Aged 18 to 64)			Employment Status (Aged 25 to 64)		
Local Workforce Area	**Number**	**Percent of Population**	**Employed**	**Unemployed**	**Not in Labor Force**
Bluegrass	23,461	4.5%	70.5%	2.9%	26.5%
Cumberlands	7,582	4.0%	62.6%	1.3%	36.0%
EKCEP	6,268	2.8%	52.3%	4.0%	43.7%
Green River	5,902	4.6%	72.8%	2.1%	25.1%
Kentuckiana Works	30,896	5.0%	70.1%	4.0%	25.9%
Lincoln Trail	17,059	10.3%	69.3%	2.9%	27.8%
Northern Kentucky	16,233	5.7%	75.8%	3.1%	21.1%
South Central	7,854	4.2%	64.2%	4.1%	31.7%
TENCO	6,894	4.2%	61.2%	2.9%	35.8%
West Kentucky	13,705	5.6%	62.2%	3.5%	34.2%
Kentucky	**135,854**	**5.0%**	68.0%	3.2%	28.7%

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Poverty / Low-income. The 2021 poverty guidelines published by the U.S. Department of Health and Human Services classifies a family of four as living below the poverty level if its income is equal to or lower than $26,500. The Department updates the guidelines annually. In Kentucky, 18.7 percent of the population aged 16 to 64 lived at or below the poverty line (100 percent or lower). Another 18.0 percent have family incomes of 200 percent of the poverty. Table 15 shows poverty rates for those aged 16 to 64 within each LWA.

Not surprisingly, employment and labor force participation is less common among individuals in families with lower incomes (Table 17). Nearly 43 percent of Kentucky residents aged 25 to 64 who live at 200 percent of poverty or lower are employed. Over 80 percent of those with incomes over 200 percent of poverty were employed. These poverty statistics reflect the cumulative effects of various barriers to employment.

Table 16

Poverty Levels (Aged 16 to 64)

Local Workforce Area	Percent of Population with Family Income as a Percent of Federal Poverty Guidelines: 100 Percent or Lower	101 to 200 Percent	Over 200 Percent
Bluegrass	18.4	16.7	64.9
Cumberlands	25.0	23.5	51.5
EKCEP	30.2	24.3	45.5
Green River	18.0	17.9	64.1
Kentuckiana Works	13.9	14.9	71.2
Lincoln Trail	15.8	17.9	66.3
Northern Kentucky	12.0	14.3	73.7
South Central	20.9	19.8	59.3
TENCO	23.3	20.3	56.5
West Kentucky	20.2	20.0	59.8
Kentucky	**18.7**	**18.0**	**63.3**

Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Table 17

Labor Force Participation and Employment of Those Living at or Below 200 % of Poverty (Aged 25 to 64)

	Employment Status (Aged 25 to 64)		
Local Workforce Area	**Employed**	**Unemployed**	**Not in Labor Force**
Bluegrass	49.5	6.0	44.4
Cumberlands	35.7	5.2	59.2
EKCEP	27.3	6.2	66.5
Green River	45.3	4.6	50.1
Kentuckiana Works	49.5	7.5	43.0
Lincoln Trail	45.9	5.5	48.6
Northern Kentucky	47.6	6.1	46.3
South Central	44.5	4.7	50.9
TENCO	34.4	4.3	61.3
West Kentucky	42.4	4.9	52.7
Kentucky	**42.5**	**5.8**	**51.7**

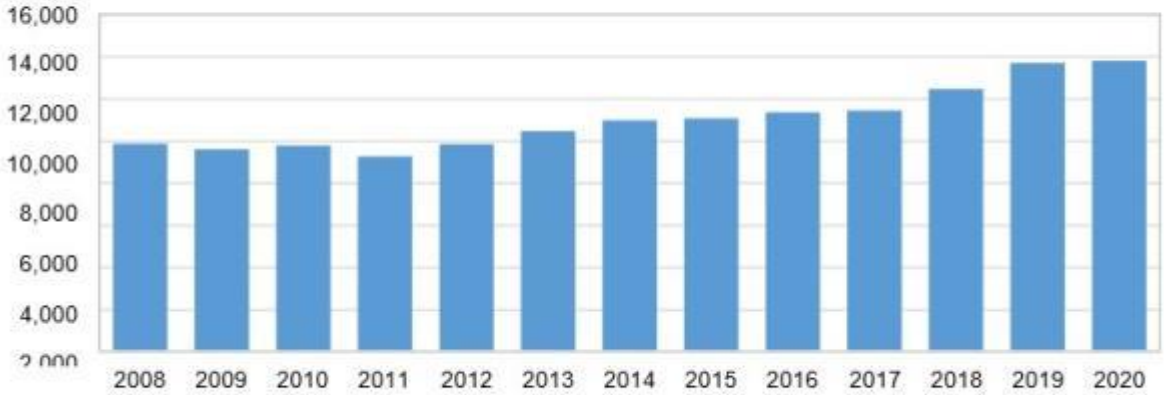
Source: Analysis of U.S. Census Bureau, American Community Survey 5-year estimates, 2019

Foster Care. The Kentucky Citizen Foster Care Review Board reported that 13,838 Kentucky children were in foster care in 2020. Twelve percent of foster children aged out of the system in 2020, which remained consistent with 2019. Foster children will likely face different challenges than the rest of the population as they attempt to gain a postsecondary education, develop skills, and enter the labor force.

Figure 13 - Children in Foster Care in Kentucky

Figure 13

Children in Foster Care in Kentucky



Source: Kentucky Citizen Foster Care Review Board Annual Reports 2008 through 2020.

Ex-offenders. According to the Kentucky Department of Corrections, in 2019 there were over 42,000 individuals who were on probation, parole, or some other form of supervision. Half of these individuals were on parole. Finding employment is one of the main challenges these individuals will face as they try to reenter society.

Table 18
Ex-Offenders, 2019

Local Workforce Area	Ex-Offenders
Bluegrass	6,225
Cumberlands	3,009
EKCEP	3,773
Green River	2,647
Kentuckiana Works	9,836
Lincoln Trail	2,614
Northern Kentucky	4,094
South Central	3,317
TENCO	1,972
West Kentucky	4,772
Unknown	10
Total	**42,269**

Source: Kentucky Department of Corrections.

Education, Skills and Skills Gaps

Education is one of the most important determinants of an individual's employment and earnings. Kentucky has generally lagged the nation in this area. Table 19 summarizes education levels in the U.S. and Kentucky for those aged 25 to 64. While approximately 33.4 percent of U.S. residents have at least a Bachelor's degree, this figure is only 25.5 percent for Kentucky's residents. A larger share of Kentucky's population have a high school education or less.

Table 19

Educational Attainment (Aged 25 to 64)

Education	U.S.	Kentucky
No High School	11.0%	11.7%
High School	25.8%	31.7%
Some College	20.6%	21.6%
Associate Degree	9.2%	9.4%
Bachelor's and Beyond	33.4%	25.5%
Total	**100.0%**	**100.0%**

Source: Analysis of U.S. Census Bureau, American CommunitySurvey 5-year estimates, 2019

This educational attainment gap between Kentucky and the nation will likely affect the types of jobs Kentucky can attract. Table 19 shows occupational projections for Kentucky by educational requirements. Kentucky is expected to add 86,311 jobs between 2019 and 2029. More than half of those jobs (56 percent) typically require some type of post-secondary education.

Table 20

Kentucky Occupational Projections by Educational Requirements for Growing Occupations

Education Requirements	Share
No formal educational credential	18%
High school diploma or equivalent	24%
Postsecondary nondegree award	12%
Some college, no degree	1%
Associate degree	4%
Bachelor's degree	31%
Master's degree	6%
Doctoral or professional degree	3%

Source: Kentucky Labor Market Information Branch, Occupational Projections, 2019 to 2029

States with populations that have less education will be less competitive attracting firms that require a highly skilled workforce. As jobs that require more education typically pay higher earnings, this skills gap will contribute to slower wage growth for the state.

[1] Clark, Michael W., Jenny Minier, Charles Courtemanche, Bethany Paris, Michael Childress. The Economic Impact of Diabetes in Kentucky. University of Kentucky, Center for Business and Economic Research, June 2019.

[2] Krueger, A. B. (2017). Where Have All the Workers Gone? An Inquiry into the Decline of the U.S. Labor Force Participation Rate. Brookings papers on economic activity, 2017(2), 1-87.

[3] Aliprantis, D., & Schweitzer, M. E. (2018). Opioids and the Labor Market. Federal Reserve Bank of Cleveland. Working Paper 18-07.

[4] Clark, Michael W., Jenny Minier, Charles Courtemanche, Bethany Paris, Michael Childress. The Effects of Opioids on Kentucky's Workforce. University of Kentucky, Center for Business and Economic Research, Sept 2019.

[5] United States. Department of Housing and Urban Development. The 2020 Annual Homeless Assessment Report to Congress. https://www.huduser.gov/portal/sites/default/files/pdf/2020-AHAR-Part-1.pdf

[6] National Center for Homeless Education. Federal Data Summary School Years 2015-16 Through 2017-18. January 2020. https://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

Kentucky offers a wide range of workforce education and training activities tailored to meet the needs of employers and job seekers in varied and unique communities across the state. The certified Kentucky Career Centers (KCC) are the storefront, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one-stop partner services reach into communities as well. An analysis of partner programs is provided below.

Employment Services

Career centers offer a full array of employment services to help adults and dislocated workers. Unemployment Insurance (UI) claims can be made via the Internet or through a dedicated call center. UI is currently reallocating staff resources to address identified problem areas (e.g., claim processing times and assistance line wait times) by placing local field staff in hubs around the state to assist people with filing UI claims. Staff assisted reemployment services are also provided to UI claimants through case management activities such as assessment, individual employment plans, provision of labor market information and reemployment workshops.

Employers and job seekers are encouraged to use the self-service functions offered in the Focus Career and Focus Talent online systems for labor exchange activities, however staff also assist with services for customers desiring or in need of facilitated or staff-assisted service. The Burning Glass suite, Focus Talent and Focus Career use artificial intelligence to provide accurate descriptions of job duties and job skills using industry recognized terms and also helps to ensure compliance with EEO and non-discrimination laws. Trained staff is available to provide individual service to customers upon request or in unique situations that require specialized assistance.

Staff-assisted services to employers include hosting, sponsoring and collaborating to provide job fairs, screening and referrals of qualified job applicants and job order writing, and assistance with EEO compliance. Offices are strategically located throughout the Commonwealth within a couple of hours or less from any location in the state, and customers have access to online services 24 hours a day, seven days a week.

If customers are ready for employment after receiving career services, staff members assist them with job search and placement, including resume building. If customers need individualized career or training services, they are referred to core and/or other partners to meet their identified needs. WIOA staff-assisted services focus on providing comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which includes assessment tools, interviewing and evaluation, development of an individual employment plan, individual and group counseling, career planning, internships and work experiences that are linked to careers, and English language acquisition and integrated education and training programs

Each of the 10 local areas must have at least one comprehensive KCC that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II — Adult Education (AEFLA program), WIOA Title III — Wagner-Peyser Act employment services and WIOA Title IV — Vocational Rehabilitation Program and other required partners. In addition to the core programs for individuals with multiple needs to access the services, the following partner programs are often available to provide access

through the one-stops: Career and Technical Education (CTE), Community Services Block Grant, Indian and Native American Programs, HUD Employment and Training Programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farm Worker Jobs Program, Senior Community Service Employment Program, Temporary Assistance for Needy Families (TANF), Trade Adjustment Assistance Programs, Unemployment Compensation Programs and Youth Build.

KentuckyAdult Education (KYAE, formerly Kentucky Skills U)

Kentucky Adult Education (KYAE) dedicates multiple resources to support instructors in providing instructional experiences that concurrently cover academic skills and essential skills. Within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills employers seek and that are critical to workplace success across all sectors and all levels of jobs.

To further support the acquisition of employability skills, KYAE also provides access to a Worldwide Interactive Network (WIN) suite of college and career readiness preparation tools, at no cost to local programs. This resource was purchased jointly through a partnership with the Kentucky Department for Workforce Investment and provides access to any state agency outside of the K-12 system.

Vocational Rehabilitation

The Office of Vocational Rehabilitation (OVR) provides support for education and training to eligible consumers in a number of ways. OVR can provide support for specific and appropriate job—related education and training if it is needed to prepare the consumer for a vocational goal that is aligned with the consumer's interests, strengths and abilities. The goal is identified through a vocational assessment and is agreed upon between the consumer and a VR counselor in the Individual Plan for Employment. The education and training can occur in a variety of settings including, but not limited to, community and technical colleges, baccalaureate institutions, short term training programs, intensive training programs offered by community rehabilitation programs (CRPs) and other providers, and individualized training through supported employment providers. OVR can also provide tuition assistance, assistance with books and other supplies, note keeping, sign language interpreting, tutoring, rehabilitation technology, and other appropriate supports determined on an individualized basis.

Through guidance, counseling and partnering with OAE, vocational rehabilitation counselors assist consumers in identifying their strengths and abilities, dealing with disability-related functional limitations, learning problem solving, and working through employment-related issues on their own. VR counselors train consumers to be self-advocates, making them aware of related laws such as the Americans with Disabilities Act (ADA), and their rights under those laws, particularly as they relate to workplace accommodations. OVR also assists consumers with disability-related work issues and assisted technology options in the workplace. OVR, principally through its job placement staff, also provides disability awareness training to employers.

Beyond training to develop specific job skills, OVR staff works with consumers on interviewing skills, resume writing, and job searches, often using mock interviewing as a tool to prepare them for job interviews and to know the types of questions that employers may ask. Consumers are also trained on what questions can and cannot be asked in an interview to someone with a disability and to someone with a criminal record by law. OVR prepares consumers for the barriers and struggles they may face when they start trying to find employment and help them to find employers that will work with them.

OVR can work with consumers on internships, apprenticeships, and on—the—job training arrangements as additional options on the career pathway to employment. These options allow individuals to train while being actual employees and assist with developing soft skills, such as

being on time for work, filling out a timesheet, using email, and dealing with co-workers and supervisor.

OVR also provides training directly at the residential training center it operates, the Carl D. Perkins Vocational Training Center (CDPVTC). Soft skills are taught as a part of the Work Adjustment Program (WAP) at the center. CDPVTC also offers the Academic and Life Skills Program of Higher Achievement (ALPHA) and the GED program. The ALPHA program provides instruction and support for students who want to complete vocational training or post—secondary education. Some students may also require a GED to gain employment or continue their education.

Finally, a number of short-term options are available at the center for consumers who may not want or be able to attend college. These short-term training options include: auto lube/detail, cosmetology, child care development, custodial/building maintenance, food service, grounds—keeping, industrial truck operation, and materials management. The center is intended for individuals who need intensive supports and ancillary services such as physical therapy, speech therapy, and occupational therapy, among others, all provided on-site.

Services related to education and training provided by OVR must be focused on individuals with disabilities achieving competitive integrated employment goals that match their interests, skills and abilities.

- Weaknesses:
    - KEE Suite is a web-based system that the Commonwealth uses for its WOIA data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities. To date, the Commonwealth continues to experience issues with KEE Suite and continues to work on various fixes. While not ready to abandon KEE Suite for another platform just yet, that decision must be made sooner rather than later.
    - Kentucky would like to see improvements in performance data, both in the quality of the data and in the results experienced by customers across the Commonwealth. As Kentucky works towards systematically improving and broadening the approach to data collection and analysis, the creation and implementation of a set of statewide performance metrics measurable at all career centers, in addition to the federal performance measures, is important and needed.
    - Focus Suites is viewed as a weakness because it is a dated system, that does not have mobile compatibility and increasingly difficult for users to navigate.
- Strengths:
    - The KYSTATS Longitudinal Data System continues to be a real strength for Kentucky, as well as a true commitment to cross-cabinet collaboration and to collaboration and service integration among WIOA partners.
    - Kentucky continues to make progress in aligning its workforce and educational programs with the needs of employers, through the work of the Kentucky Workforce Innovation Board (KWIB), the Kentucky Department of Education, the Kentucky Community and Technical College System (KCTCS), and the core WIOA partners.
    - Staff assistance with filing UI claims has been brought back into the career centers, allowing customers to get face-to-face help with the filing process. This approach is a strength because it will decrease mistakes with the filing process,

which in turn will decrease claim processing times and result in faster payment to qualified claimants.

- Kentucky established a Talent Pipeline Management system with KY Chamber to track real-time data related to industry demand and educational supply.
- Kentucky is the leader in its selected indicators that were adopted for reporting performance for Effectiveness in Serving Employers. Kentucky adopted the following two indicators: the penetration rate and the repeat customer rate.
- Kentucky has strong partnerships and a network of certified career centers that assist with delivering the workforce activities described above. Capacity limits and challenges include a budget environment with low likelihood of securing state funds for workforce efforts, and escalating technology, pension and staffing costs that are not supported through growth in either federal or state funds. Moreover, as discussed above, there currently technical difficulties limiting Kentucky's ability to implement system-wide case management and reporting solutions.

B. STATE STRATEGIC VISION AND GOALS

Vision and Goals: Kentucky envisions creating a workforce development system that aligns education with industry demands, prepares Kentuckians for future work, and drives economic development. Kentucky has identified four key areas that it must engage to create its ideal workforce development system:

1. Employers – Actively engage employers to drive Kentucky's workforce development system.
2. Education – Align and integrate P-12, adult education, and postsecondary education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future.
3. Workforce Participation – Increase Kentucky's workforce participation by creating opportunities, incenting workforce participation, and removing employment barriers for Kentuckians.
4. Organization and Resource Alignment – Focus resources on the most effective initiatives and improve the return on our workforce investment, utilizing data to constantly improve workforce development in Kentucky.

Furthermore, Kentucky has outlined four goals, including objectives to obtain these goals, to assist in achieving its mission:

GOAL 1: DELIVERY OF OPERATIONS. Deliver workforce services in a flexible, seamless manner to engage customers and effectively connect job supply and demand.

- Objective 1.1: Ensure all workforce partners work collaboratively to deliver services and agree upon shared workforce outcomes through a statewide Memorandum of Agreement (MOA).
- Objective 1.2: Modernize and utilize technological platforms to connect agency information systems to improve transparency and to provide consistent case management, performance reporting, and data sharing.
- Objective 1.3: Braid internal and external funding to ensure comprehensive support services are available to all customers.

GOAL 2: EDUCATION & WORKFORCE ALIGNMENT. Align education and workforce programs with labor market demands to connect job creators with qualified employees and prepare individuals for productive employment.

- Objective 2.1: Align agency resources to support high-demand degree and credential attainment.
- Objective 2.2: Develop partnerships and incentives to encourage lifelong learning and career development.
- Objective 2.3: Increase post-secondary degree and credential attainment in high demand sectors.

GOAL 3: ENGAGEMENT & OUTREACH. Leverage new and existing strategic partnerships and innovative communication to engage, support and grow the workforce.

- Objective 3.1: Develop a communications plan that promotes education and career services available to job seekers.
- Objective 3.2: Implement accessible, digital outreach strategies to promote resources to target populations.
- Objective 3.3: Develop outreach strategies that promote resources available to employers.

GOAL 4: RESOURCE ALIGNMENT. Align internal and external resources to ensure efficient allocation across programs and initiatives.

- Objective 4.1: Utilize shared data across the Cabinet for decision-making processes and efficiencies.
- Objective 4.2: Ensure all funds are used to their greatest advantage.
- Objective 4.3: Become a preferred employer within state government.

Performance Goals and Assessment: Kentucky will build a workforce investment assessment system that combines the results of independent review with the collection of common performance measures and then align those results with program improvements and innovations. Basic service delivery performance standards will be set to continuously improve. New comprehensive WIOA service delivery ideas and standards will be added over time to help ensure that common measure and customer satisfaction results go up over time. Kentucky will add to this basic approach and develop broader continuous improvement activities across the workforce system. Kentucky will evaluate statewide cross-program common data elements and gain information on the job seeker and employer programs, services and processes on an ongoing basis. This will allow the Kentucky Workforce Innovation Board, along with the core program and additional partners, to be committed to an aligned cohesive service delivery system with a shared understanding of policy and performance.

Additionally, KYSTATS is a distinct entity housed within the Kentucky Education and Workforce Development Cabinet tasked with the development, maintenance, and utilization of the Kentucky Longitudinal Data System (KLDS). KYSTATS is a wonderful resource and legislatively authorized to both collect and utilize data statewide from education and training programs encompassing early childhood through K-12, postsecondary, and workforce as well as develop state level metrics and evaluate and conduct research on education and workforce programs (KRS 151B.131 – 151B.134). All data integrated into the KLDS is linked across education and workforce sources through rigorous matching algorithms, which ultimately enables KYSTATS to report on education and employment outcomes across all sources of data. *See* Economic and Workforce Analysis *supra*.

The Office of Vocational Rehabilitation (OVR) maximizes all available resources in collaboration with all partners and agencies in assisting individuals with disabilities to achieve competitive integrated employment. This will ensure the provision of vocational rehabilitation services described in subparagraph (A) other than those specified in paragraph (5) (D), and in paragraph (1) through (4) and (14) of Section 103 (a) of the Rehabilitation Act Amendments of 1998, that are included in the individualized plan for employment of an eligible individual, including the provision of such vocational rehabilitation services during the duration of any dispute.

OVR is a key partner in the workforce system with established working relationships in all ten of Kentucky's workforce regions. OVR has five regional managers that serve on the local workforce development boards. They are active in the development and implementation process of the Memorandums of Understanding and infrastructure funding agreements and work closely with the OVR Executive Director. The regional managers as well as other OVR staff serve on local workforce committees and business services teams to assist with coordinating services to individuals with disabilities. This ensures that other workforce partners are well aware of OVR services for individuals with disabilities and staff are available to provide technical assistance as needed.

The Kentucky Workforce Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopting a plan to move Kentucky forward through workforce training and development. The OVR Executive Director is a member of the KWIB and participates on several of the board committees.

Reciprocal referral services with the Career Development Office and the Office of Vocational Rehabilitation: CDO and OVR have established reciprocal referral services which allow for more efficient services to individuals with disabilities. OVR plans activities to improve services in the state for individuals with multiple impairments, including individuals with dual sensory loss. The Central Office administrative functions for these workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners.

Kentucky is committed to gathering the collective data required under section 116 of WIOA for all the core partners. WIOA Section 116 (b) (2) (A) and its implementing regulations 34 CFR 361.155 (a) (1) establish the six primary indicators of performance. Core programs and partners, including OVR, have access to a business customer relationship management system based on a Salesforce platform. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). This allows for tracking of the Employer measures.

Kentucky assesses the overall effectiveness of the workforce investment system in relation to the strategic vision and goals of the KWIB and information from all the core programs. The ultimate goal is to increase the long—term employment outcomes for individuals seeking services, especially those with barriers to employment, to improve services to employers and demonstrate continuous improvement. Kentucky will also continue to assess the effectiveness and physical and programmatic accessibility of the career centers -- in accordance with Section 188 and the Americans with Disabilities Act of 1990 (42U.S.C. 12101 et seq.) -- and strives for continuous improvement of the career centers.

Kentucky has a certification process in place to ensure that KCC offices are ready to serve all qualified persons in the regional and local areas as expected. The certification process is fundamental to ensuring the alignment of programs, policies and activities in the workforce system. Workforce agencies and partners are engaged in these assessments and making any needed improvements to ensure that all related activities are being coordinated in a way that allows partners to review relevant information and take action to improve the system. OVR, the KWIB, and the KWIB Collaborative work closely with the Inclusive Worker Network, the

recently codified Employment First Council, and the Human Development Institute at the University of Kentucky to ensure that our workforce ecosystem for differently abled Kentuckians provides connections to inclusive hiring practices, education on workplace interventions, and providing supports for employees with a short-term illness or injury transitioning back to the workforce. Our cross-agency development continues to focus on employer engagement, to create more opportunities for all Kentuckians.

C. STATE STRATEGY

The Kentucky Workforce Innovation Board (KWIB) is a 38-member, employer-led advisory body that advises the Governor on workforce issues and guides the strategic direction of the Commonwealth's workforce system. The mission of the KWIB is "to be a leader and catalyst in creating a comprehensive, customer-driven workforce development system that meets the changing needs of job seekers, incumbent workers and employers." Through data analysis, policy recommendations, and dialogue at the local, state, and regional levels, KWIB members serve as stewards of workforce development throughout the Commonwealth. Starting in 2017, the KWIB responded to concerns over Kentucky's workforce participation rate, educational attainment statistics and public health indicators by revisiting its workforce strategy and developing recommendations to support a lifetime continuum of training, preparation, and investment for citizens. The objective of this effort was to create a common direction for workforce development, and align workforce assets across the Commonwealth to support Kentuckians in achieving and sustaining economic self-sufficiency throughout their working lives. Through an environmental scan of Kentucky's labor market data, over 600 entities and/or individuals consisting of citizens, providers, customers, employers and workforce development leaders across the Commonwealth the following vision and strategic goals were developed to guide Kentucky's workforce partners:

Employer Engagement: Actively engage employers to drive Kentucky's workforce development system. As consumers of the Kentucky's workforce and education system's human capital, employers must be deeply invested in the development of training and curriculum that shapes their future employees. The Commonwealth encourages employers (large and small) to assume leadership roles in workforce development programming at all points along the workforce lifecycle, from early childhood education through postsecondary study and upskilling of later-career individuals. The role of the employer may vary across workforce settings, ranging from providing on-site childcare for employees with pre-school-aged children, to educating teachers and parents about the opportunities available in advanced industries, to informing technical education curriculum with industry-specific requirements, to employing high school or postsecondary interns and apprentices, to actively recruiting qualified candidates facing barriers to employment. Across all of these activities, consistent industry input and guidance throughout the skills development continuum is essential to align the training of workers to the skills they will need to succeed in the workplace now, and into the future.

Education Completion and Attainment: Align and integrate P-12, postsecondary, and adult education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future. Employer engagement in the design and delivery of workforce development programs represents a catalyst for system change, one that is fundamental to the realization of a future in which the Commonwealth workforce system consistently delivers highly trained and flexible workers that create value for employers (as a direct result of their upfront contributions to program design). While a balance must continually be struck between filling immediate vacancies and skills gaps and preparing the workforce to adapt to the technological disruptions of the future, employers are most qualified to steer the direction of education and training so that workforce programs produce the qualified workers they seek, both now and in the future.

Investments in education and training are generational prospects that take significant time to come to fruition; that said, dynamic changes in technology and the labor market require that words like "upskilling" and "lifelong learning" become part of every Kentuckian's vocabulary. To put education into perspective, today's preschoolers are merely 12 years away from becoming our co-workers, and the jobs they seek may bear little resemblance to the workplace, as we know it. The Commonwealth must strive to instill a culture of lifelong learning among its residents, setting them up for success by encouraging continuous personal growth and achievement, integrating infrastructure for lifelong skills development, and eliminating gaps between education systems and the job market.

Workforce Participation: Increase Kentucky's workforce participation by creating opportunities, incentivizing workforce participation, and removing employment barriers for Kentuckians. For many Kentuckians, work is not only a source of income, but also a source of professional accomplishment, personal growth, and community. Workforce participation therefore represents a stabilizing factor in Kentuckians' lives, an environment that regulates daily life and provides a stepping-stone to wealth creation, achievement, and personal fulfilment. At some point, however, most Americans will encounter a potentially destabilizing situation, such as a layoff or termination, a debilitating injury or illness, a criminal conviction, or other life-impacting event that results in a period of unemployment. For many Kentuckians, what begins, as a temporary setback on the road of life can become a long-term roadblock – within the Commonwealth, with a significant portion of folks having exited the labor force altogether.

Many individuals derive self-worth and identity from their work; therefore, it is no surprise that protracted periods of unemployment are correlated with depression, substance abuse, and negative health outcomes. Kentucky has one of the lowest labor force participation rates and health rankings in the nation. Therefore, it is the Commonwealth's overarching priority to uncover and remediate the factors that cause workers to become discouraged and opt out of work.

Resource Alignment: Focus resources on the most effective initiatives and improve the return on our workforce investment, utilizing data to constantly improve workforce development in Kentucky. Workforce development is a matrixed function within government, touching numerous agencies and programs across multiple Cabinets, and intersecting with industry and the providers with whom service delivery is coordinated. While a high degree of engagement across sectors and administrative divisions is necessary to administer effective workforce programs, inconsistency in defining the workforce system, lack of resource alignment across its participants, and competing priorities amongst stakeholders result in ambiguous goal-setting, siloed activity, and decisions driven more by funding sources and reporting requirements than by impact on the populations served.

As an outcome of resource alignment, a Memorandum of Agreement (MOA) (Encompassing all Goals for the support of the local Kentucky Career Center system) will be established. Its purpose is to establish cooperative and mutually beneficial relationships among the required WIOA partners and other partners whose programmatic and financial participation have been determined to be vital to accomplishing the Governor's education, workforce and economic goals. This MOA also sets forth the relative responsibilities of the partners as they relate to the planning and implementation of the comprehensive and holistic workforce system in Kentucky at both the state and local levels. To ensure the maximum flexibility for all partners under this agreement, it is agreed that the partners may enter supplemental, agency-specific state or local agreements that further or complement this agreement. At a minimum, the partners to this MOA will agree to enforce the aspects of this agreement at the local level.

For the Commonwealth to enact its ambitious workforce agenda and affect substantive change, the system itself and the programs within it must be clearly and consistently defined, the resources invested to support it identified, and organizational structures aligned to promote

consistent approaches and prevent working at cross-aims. By giving workforce development administrative structure and naming its subsidiaries, the Commonwealth can move beyond workforce as a concept and accelerate its strategy to get Kentuckians back to work and earning competitive wages.

Collectively, all partnering programs are designed to meet the needs of job seekers, students and employers in relation to their individual needs as well as meeting the demands of the economic vitality of their respective region. An educated, adaptable, qualified labor market is the primary objective for workforce development in Kentucky; this sustained improvement of the Commonwealth's economy is accomplished through the alignment of business personnel needs and skills training. This collaborative strategy includes a partnership of local and state workforce development organizations dedicated to providing proactive workforce development and skill development resources to all customers. This strategy offers a streamlined approach to assisting customers with equipping them with the many resources available by leveraging all partner resources.

Adopting a portfolio approach to workforce investment that is informed and driven by industry and aligned to the workforce lifecycle will move Kentucky beyond the vague notion of a workforce development "system" – and towards a more dynamic, defined workforce marketplace, one where industry growth and hiring trends drive responsive policy interventions, and both employers and job seekers experience improved hiring, employment, and wage outcomes as a result of their engagement. In preparing its own strategic plan, KWIB engaged in extensive cross-sector dialogue between Kentucky's business, government, and education leaders, whose perspectives informed its content.

Beyond the logistics of how the KWIB's strategy is implemented, or how progress is measured, the most important aspect of the strategic plan is that the time to take action is NOW. Thus, the Governor created the Kentucky Education and Workforce Collaborative which has been charged with implementation of the plan as well as significant deliverables such as: 1) Benefit Cliff and Sustainability Analysis; 2) Resource Funding Report for education and workforce development; 3) State Memorandum of Agreement for all Collaborative members and 4) Reporting of Local Boards to the KWIB on a quarterly basis. You may find more information out about the Collaborative at http://web.sos.ky.gov/execjournalimages/2020-MISC-2020-0551-268390.pdf.

Kentucky's workforce challenges are not unique compared to those of its neighbors, or the nation as a whole; what differentiates the Commonwealth today is a recognition of the critical need to take immediate action, and the breadth of relationships that have been forged between leaders of the private and public sectors to act on the Commonwealth's commitment to its workforce.

With regard to the strategic plan as well as the work of the Kentucky Education and Workforce Collaborative, specific actions have been outlined to take place which result in partner entities working together to accomplish the success we want to realize. Below are the actions that have been and will be taken to align programs, integrate customer service models and work within the system of career centers (comprehensive, affiliate and access sites) to serve Kentuckians.

Resource Alignment

- 1st Quarter 2019: Began creation of a resource map of all federal and state funding, mapped by entity, by population and by source
- 2nd Quarter 2019: KY Works Collaborative was created which includes all members of the education, workforce and economic development system
- 3rd and 4th Quarter 2019: Analyzed data and metrics collected related to the 9 populations identified, and found gaps in funding assistance to support those populations in becoming self-sustainable

- 1st Quarter 2020: Studying the leveraging of resources by analyzing resource silos
- 2nd Quarter 2020: Initialize study of Kentucky Career Center Resources available by priority population which will assist in establishing gaps in the system for services
- 3rd Quarter 2020: Establish the MOA as related to programmatic and financial logistics of the system.

Workforce Participation:

- 1st Quarter 2018: Created and analyzed a matrix of barriers and opportunities related to nine established populations
- 2nd Quarter 2019: Created a strategic alliance with Human Development Institute to progress work forward with disability community
- 3rd Quarter 2019: Analyzed and initiated data work for KY benefit cliff analysis and self-sustainability studies
- 3rd Quarter 2019: Analyzed and tracked workforce participation rates along with other key trending data and metrics on Workforce Dashboard created by KY Center for Statistics
- 1st and 2nd Quarter 2020: Incorporating metrics associated with priority populations onto Dashboard

Employer Engagement:

- 1st Quarter 2018: Established a county level presentation to engage with local stakeholders about employer engagement and demand/supply balance (WorkReady Communities)
- 2nd Quarter 2018: Overhauled career technical education certification requirements to be locally and industry driven
- 3rd Quarter 2018: Overhauled Perkins leadership funding process to include employer participation
- 4th Quarter 2018: Launch of Talent Pipeline Management partnership with KY Chamber
- 2nd Quarter 2019: Began work-based learning team and championing efforts with industry recruitment
- 1st Quarter 2020: KYCOVI starts analysis of employer demanded credentials

Education Attainment and Completion:

- 1st Quarter 2018: Completed 10 industry led career pathways for education transition
- 4th Quarter 2018: Established Talent Pipeline Management system with KY Chamber to track real- time data related to industry demand/ educational supply
- 2nd Quarter 2019: Established metrics on the Dashboard, allowing tracking of credential completions and outcomes as related to supply, demand and overall health of the education and workforce system
- 3rd Quarter 2019: Established strawman for KY Credentials of Value Institute (KYCOVI) which includes all levels/partners of education to align transitional career pathways for students
- 1st and 2nd Quarter 2020: Begin Work-Based Learning Championing

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

KWIB serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of WIOA. The most crucial element for the Board's success is aligning the many facets of workforce development — business, labor, public education, higher education, economic development, youth activities and employment and training to cohesively create a system for Kentucky to progressively grow its economy.

Gov. Andy Beshear is currently being advised by the KWIB, which was created by Executive Order in July 2015, reissued by Governor Beshear in 2020. In turn, the KWIB is being advised by an executive committee and several standing committees. The executive committee provides overall direction to the KWIB. Standing committees are related to:

- performance and metrics,
- policy and operations,
- best practices review, and
- business and education partnerships.

Each committee meets between quarterly KWIB meetings to update the WorkReady Kentucky strategic plan so that it continues to align with this state plan. The new administration and the KWIB are working to manage and update the plan and planning process.

The KWIB will also be convening several stakeholder groups to address the following:

- talent supply/demand,
- performance of the overall workforce delivery system, and
- best approaches to address economic growth for Kentucky.

The information gained in those sessions will assist in updating the current KWIB strategic plan.

2. IMPLEMENTATION OF STATE STRATEGY

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

The Kentucky workforce system aligns programs strategically via its organizational structure (Titles I, III and IV in same Department, KWIB participation and Cabinet-level discussions and project development, as well as Kentucky Career Center system) in an attempt to effectively provide services to business customers and job seekers.

A critical component of this alignment effort is the partnership between the local workforce development boards and the state agencies (Office of Vocational Rehabilitation, Department of Workforce Investment, and Adult Education). Focusing on shared staff training, regional planning and new initiatives, as identified by the new administration, will allow this partnership to continue to expand and benefit employer and individual customers and the quality of the services they receive. On a local level in the ten workforce areas, there are established work teams and committees consisting of representation of all the core partners working to align the core programs through local efforts. Locally, the core partners along with optional partners

work together to establish resource sharing agreements for each area. Additionally, in the development of memorandums of understanding, work teams with representation from each partner come to agreements that further clarify roles, responsibilities and decision-making processes in the Career Center offices.

Alignment among program and partners is the result of a comprehensive approach to WIOA service delivery and implementation. Again, each of the 10 local areas must have at least one comprehensive KCC office that provides physical access to core WIOA services.

KCC has also established reciprocal referral services for individuals with disabilities. OVR has implemented its own information and referral system to ensure that individuals with disabilities will be provided vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for securing, retaining or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them.

Kentucky Adult Education (KYAE) provides information to local programs to assist individuals with barriers to employment to access the services for which they are eligible. For example, GED Plus is aimed at creating effective pathways to credentials for low skilled adults (testing at a sixth-12th academic grade level) so they can earn the credentials they need to get a family sustaining job. The initiative, a partnership between the Kentucky Community and Technical College System (KCTCS) and Skills U, seeks to reform how education is delivered to low-skilled adults by integrating basic skills education with technical training while providing wrap around services that include instructional and career supports for adult learners. Career and Technical Education is closely aligned with the project as well.

Kentucky will use funds to ensure that all youth program elements are made available to youth. The state supports the local workforce areas in designing youth programs tailored to the needs of in-school and out-of-school youth in local communities. Local areas encourage youth to use one-stop services as needed. Areas have designed special referral processes for youth who come into one-stops, and all partners will participate in training on all youth-related programs and services to ensure that cross-referral and comprehensive services are delivered to youth across the state.

Vocational Rehabilitation staff will provide high quality services and communication to transition students and youth, provide accurate and timely information related to work incentives and long-term supports for Social Security recipients, increase and improve job placement options and opportunities for persons served, strengthen and expand competitive integrated employment opportunities by implementing Section 511 of WIOA, improve programmatic and physical accessibility to workforce investment system partners and career center offices, communicate and cooperate with workforce partners on accountability measures discussed in Section 116 of WIOA and seek to meet the standards of WIOA, expand opportunities for increased services, such as supported employment, provide options for transportation and information related to medical services available to consumers, and provide a more timely and efficient process for accessing services.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Kentucky is a “One Workforce” focused state. Team Kentucky is our Governor’s message. Kentucky continually works to enhance the labor market, improve the state’s economy, and align the workforce services systems. The education system, employers, labor-management organizations, community-based organizations, and non-profits work together as one “Team Kentucky”. We continue to make progress in aligning its workforce and educational programs and pathways with the needs of employers, through the work of the KWIB, the Kentucky Department of Education, KCTCS, and the core WIOA partners. Further aiding alignment, the

registered apprenticeship program has transitioned from the Labor Cabinet to the Education and Workforce Development Cabinet intending to expand registered apprenticeships. In that vein, the one-stop partners continually provide employer education in Apprenticeship. As a one workforce ecosystem, we concentrate on meeting with employers to educate them about the apprenticeship registration process, and include presentations from Apprenticeship, local high schools, Kentucky Community and Technical College System, colleges, Business Services team members to show all aspects of registering and the benefits to do so. Finally, The Education and Workforce Development Cabinet have also expanded its partnership with the three branches of the Kentucky state government, executive, judicial and legislative to integrate Apprenticeship services statewide.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

The Customer Flow initiative focuses on both individual job seeker and employer customers, and this effort is a critical component to ensuring the KCC's ability to deliver on the following brand promise: As a team of experts, we are dedicated to providing Kentucky employers with a qualified, skilled workforce and the people of Kentucky with career, job training and educational opportunities. With the unique ability to connect employees and employers through the combined efforts of state and local partners, we will become a valuable, competitive and best-in-class asset in the growth of our regional and national economy. By guiding, empowering and inspiring our customers, we will continue our mission to create success stories across the Commonwealth.

Kentucky's statewide goal, through the Customer Flow project, is to improve customer flow through the centers and to enhance the value received by customers from their experience with the centers. Kentucky will continue its work in this area to facilitate customer flow enhancements and improve customer experiences/value through clear and direct policy guidance and performance expectations that address identified goals for this project.

Specifically, the Kentucky Career Centers continue to improve their efforts of coordination of services through cross training of program knowledge to all staff across all programs in order to ensure the customer can receive the basic information without having to see multiple staff. This cross training is aligned and coordinated through the One Stop Operator and are based on the needs of not only the individuals but staffing knowledge as well.

Kentucky continues to set knowledge and competency expectations related to WIOA so that all core career center staff, regardless of program or agency affiliation, can provide information regarding supportive services for individuals identified in section II (a) (1) (B). In addition, the career center partners have established reciprocal referral services which allow for more efficient services to be provided to individuals with barriers to employment.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

In partnership with local and state workforce organizations, the Department of Workforce Investment (D.W.I.) is dedicated to providing proactive business services and industry skills development. Through local Kentucky Career Center Business Service networks, this partnership has laid a foundation for coordinated business services that leverage the Office of Employer and Apprenticeship Services (OEAS) assets.

Kentucky Career Center Business Services offer a streamlined approach to assisting businesses with recruiting talent, training new and existing employees, and developing tomorrow's workforce. At its core, the Business Service strategy consists of five primary organizations that provide direct resources and services to businesses:

- Local Workforce Development Boards (LWDB)

• Kentucky Education and Workforce Development Cabinet (EWDC)

• Kentucky Cabinet for Economic Development (C.E.D.)

• The Kentucky Chamber's Workforce Center (Workforce Center)

• Kentucky Community and Technical College System (KCTCS)

These partnering agencies strive to provide unified, efficient, quality, and seamless workforce services and resources to new, existing, and expanding companies within the Commonwealth.

The Kentucky Career Center Business Service strategy has four primary components:

• Identify a single point of contact for business development within each WIOA region

• Streamline workforce resource delivery

• Unify and coordinate outreach and information

• Leverage multiagency data sharing systems

The Kentucky Career Center Business Service employers' strategic objectives are:

• Create a valued workforce development system for employers.

• Establish a clear channel for employer engagement in workforce development services.

• Increase the number of employers participating in work-based learning experiences and apprenticeships while also establishing employer champions.

• Engage employers in education efforts from P-12 through postsecondary study.

• Leverage employer data on workforce projections and training needs, using the talent pipeline management process of the Kentucky Chamber of Commerce and the local area business service network.

Successful employer engagement in the workforce system would include:

• An increase in employer engagement in education and workforce development, scaling to 3x current levels and mirroring that of neighboring states

• A projected (5x) increase in the number of registered apprenticeships and work-based learning opportunities sponsored by employers

• An established set of best practice industry exposure experiences aligning P-12 delivery with industry needs in local workforce regions

• At least 40% of Kentucky youth participate in work-based learning during their P-12 years to gain invaluable exposure to workplace skills early in life

• Streamlined business services team efforts by workforce region which focus on business retention and expansion via quality delivery of workforce services

• Establishment of 50 localized statewide talent pipeline management system consortia, which assist in the delivery of real-time data, allowing for better alignment of supply and demand in the workforce

The business service structure comprises three categories: resource alignment, employer engagement, and service delivery. Category one consists of one representative from each of the state-level core partners. These agencies collaborate to ensure state-administered employer resources are aligned to receive unified and coordinated information and services related to their workforce development plan points.

Category two includes the local Business Services team leads and OEAS workforce consultant staff dedicated to employer engagement as the primary function of their job. These organizations must work together to ensure that companies receive unified and coordinated information and services related to their workforce development needs. All partners also coordinate with their regional and local colleagues to ensure shared information among agencies.

Category three consists of the state team that includes core partners from the EWDC, C.E.D., KCTCS, and the Workforce Center. These organizations are responsible for delivering resources and services to employer customers.

Additional partners such as the Council on Postsecondary Education (C.P.E.) and Kentucky Department of Education (KDE) – Career & Technical Education (C.T.E.) serve in support roles at the local and state level to provide opportunities for employers to participate in curriculum development. The use of the W.I.N. career readiness system allows a consistent and holistic approach to career readiness with cognitive and essential soft skill development from secondary through postsecondary education.

The partnership brings together workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Kentucky has resources that allow flexible and customizable training specific to company needs, through such options as reimbursable grants and tax credits for classroom training, on-the-job training, tuition and certification training, entry-level and skills-upgrade training. Additional support comes through incentives targeting job seekers with barriers, such as Work Opportunity Tax Credit (WOTC), Federal Bonding, Kentucky Unemployment Tax Credit, and partner-specific workforce solutions.

The Kentucky Education and Workforce Development Cabinet (EWDC) moved the Division of Apprenticeship from the Kentucky Labor Cabinet to EWDC's Office of Employer and Apprenticeship Services within the Department for Workforce Investment. In cooperation with the U.S. Office of Apprenticeship and Training, this service oversees the Commonwealth's registered apprenticeship program. The goal of the transition is to increase the program's momentum by harnessing EWDC's existing statewide network to connect employers with potential employees and provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 600+ different programs currently representing 200+ unique occupations.

The Registered Apprenticeship model is a flexible, employer-driven approach that provides high-quality job training and produces skilled, competent employees for Kentucky employers. The division is responsible for registering apprenticeship programs that meet federal standards, issuing nationally recognized and portable credentials of completion to apprentices, and promoting the development of new programs through education, outreach, and technical assistance.

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform enables the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES).

An innovative, proactive approach to align business needs to core partner services is realized through data accessible in the Dun & Bradstreet (D&B) Market Insight System. This data serves to identify companies that are either in a growth pattern, a stable state, or on a potential downturn, signaling the necessity for early intervention for layoff aversion strategies. D&B applies two leading indicators of a business's financial growth outlook:

- Financial Stress Score provides predictive insights into the most likely businesses to fail within the next 12-18 months. Conversely, the Financial Stress Score enables strategic targeting of companies in strong financial condition and candidates for expansion learning incentives
- Material Change/Opportunity Segment follows real-time business activity and operating signals to determine what businesses are demonstrating in the moment growth characteristics or showing signs of contraction or declining business activity

OEAS gathers this real-time monthly data from D&B, filtered by LWDB, and distributed accordingly to provide targeted information for all the local partners to evaluate and initiate business engagement processes.

Further engagement consists of leveraging and expanding the partnership's efforts. Kentucky expects a great deal of new activity assessing and addressing employer needs via existing partnerships with business organizations like the Kentucky Chamber of Commerce, and most importantly, through new strategies and initiatives crafted by the new administration.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Engagement of Kentucky's education partners has been continuous and is accelerating under the pillars of the NGA Talent Pipeline Academy agenda, with both KCTCS and the CTE unit of KDE serving as core partners in that effort. The priority focus of all workforce partners is on building a work-based learning infrastructure that is employer defined and seamlessly delivered by an interlocking series of steps that begin early in the education pipeline and continue through careers and lifelong learning. In fact, fifteen of the 16 community colleges in Kentucky are fiscal agents for the AEFLA grant funds.

Kentucky Adult Education (KYAE) collaborated with KCTCS to create a new program called "GED®+Plus". The GED®+Plus program creates an accelerated option for providing education and training for adult learners through an integrated pathway model that allows students to learn academic and occupational skills at the same time. The GED®+Plus program targets working age adults who do not have a high school diploma or its equivalent. The program co-enrolls participants seeking a high school equivalency (HSE)/GED® diploma in a KYAE program and in one of the state's top five industry sectors, allowing participants to earn both a HSE/GED diploma and a short-term (i.e., one 16- week semester or less) certificate. GED®+Plus participants qualify for scholarships through the WRKS initiative to pay for their tuition in college classes. Skills U has 27 local providers who collaborate with the 16 KCTCS colleges to offer programs designed to meet labor market needs and increase credential attainment for adults. KYAE leadership meets quarterly with KCTCS to discuss marketing strategies, enrollment trends, and student success outcomes for GED®+Plus participants.

The Commonwealth initiated a WRKS that is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky's in-demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to $400 for "mandatory fees". HSE/GED® seeking students are eligible for this scholarship. Sixteen colleges and more than 70 campuses may extend GED+Plus offerings.

While the WRKS provides $400 per year for mandatory fees, students frequently find course required books, supplies, equipment, etc. costs prohibitive. Therefore, for the first semester of GED®+Plus, KYAE committed to contributing to the costs associated with these items. Additionally, Kentucky Community and Technical College System consigned $400 for the first 1,000 enrollees. Both partners are advocating for workforce partners to consider committing funding toward auxiliary course requirements as well as tuition. KYAE plans to offer

several defined time periods in which the GED® testing fees will be waived. These measures will assist in removing barriers to enable students to remain co-enrolled and accelerate earning a HSE/GED® diploma and occupational credential.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Kentucky will continue to strengthen data sharing across state agencies and workforce development partners, including all levels of education and proprietary providers to better understand education and employment outcomes and to support the spread of employer best practices.

From the perspective of training providers, staff members went to great lengths to ensure that representation from a host of industries and training providers were included in the Eligible Training Provider Listing (ETPL). Represented agencies include:

- Kentucky Department of Education, Office of Career and Technical Education
- Kentucky Council on Postsecondary Education
- Kentucky Commission on Proprietary Education
- Association of Independent Kentucky Colleges and Universities
- Kentucky Department of Labor, Division of Employment Standards (Apprenticeship Programs)
- Kentucky Adult Education (KYAE), formerly dba Kentucky SkillsU (KYSU)

Representatives from these agencies, as well as independent training providers, also make up the ETPL Steering Committee, which is a sub function of KWIB. This group assists with making sure the listing is comprehensive of services available to prospective participants, as well as accessible to all.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Given the skill development needs voiced by employers, enhancing community and technical college partnerships to increase training and development options for KCC customers remains a significant need. This is an area of focus with the goal of strengthening partnerships with community and technical colleges to expand "bridge" and post-secondary and training and education options for job seekers, and to expand market driven training programs for employers.

Kentucky is building on the initial success of the GED Plus credential initiative and taking additional steps to more fully engage KCTCS and the CTE programs of local districts and the KDE.

KDE also supports the development of career pathways through the Carl D. Perkins State Plan.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

In most areas of Kentucky, training investments have been quite explicitly linked to target industry sectors and high demand occupations. In many cases, these investments are individual training accounts (ITAs). An area of focus for the Career Centers is to expand their use of alternate training modalities, specifically employer-driven and work-based models, as well as registered apprenticeships, on-the-job training, and customized training.

Kentucky Department of Education (KDE)

KDE requires all secondary CTE programs to report on career pathway opportunities for students. The career pathway process encourages dual credit courses along with industry certifications and credentialing. KDE works closely with state-level CTE task force groups composed of KWIB representation and business and industry to review industry certification requirements for high school students. The certifications/credentials are then endorsed by the KWIB. This ensures the certificates and/or credentials will lead to employment and/or post-secondary credit. Kentucky also created the Tech Ready Careers for Kentucky (TRACK) pre-apprenticeship program. The apprenticeship areas include carpentry, electricity and manufacturing. The models vary based on the need of industry but lead to credentialing, apprenticeship credit, and/or post-secondary credit at an accredited institution while students are in high school.

Kentucky Adult Education (KYAE), formerly Kentucky Skills U (KYSU)

KYAE, an agency in the Department of Workforce Investment (DWI), is strategically positioned to create significant post-secondary education linkages. These linkages are important in recruiting students and helping them transition to post-secondary education, as well as to assist with planning and providing professional training and development for adult educators. The usual and customary services of KYAE, which services all 120 counties, include addressing academic deficiencies and equipping students for success in the next level of college and/or achievement via preparation for college, the National Career Readiness Certificate and the Kentucky Essential Skills Certificate.

GED Plus

KCTCS and KY Skills U have partnered to bring students an innovative GED® program where students can co-enroll in both Skills U and short-term KCTCS classes and earn their GED® plus a college certificate tuition-free in one of the five top state sectors -- Advanced Manufacturing, Allied Health, Business and Computer Science, Construction and Trades, and Logistics and Transportation.

Workforce Preparation

As a result of the extended pilot for Essential Skills, nearly one-third of the state's local adult education programs received coaching and training on integrating essential employability skills with academic instruction. KYAE dedicated multiple resources to support this training, including CTE's Perkins leadership grant funds. Consequently, within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills (often referred to as soft skills, e.g., collaboration, communication and critical thinking) employers seek.

KYAE plays an active role in several initiatives in the Commonwealth. KYSU programs prepare students to take the ACT WorkKeys assessment to earn the NCRC, a standardized credential that validates reading, mathematics and locating information skills for specific occupations. KYSU programs use WIN's online curriculum aligned with the WorkKeys assessment within an academic program of study and defrays the cost of the certificate for adult education students. KYAE includes the NCRC as a performance target and will continue to focus on it as a stackable credential throughout the students' educational journey. KYAE is supportive of the KCC system vision and collaborates with KCC offices across the Commonwealth (e.g., co—location, common intake and referral processes, etc.). The KSN is a unique partnership between the Cabinet for Economic Development, Education and Workforce Development Cabinet including KCC, the Labor Cabinet and KCTCS. The network is dedicated to assessing employer skills needs and designing and delivering effective workforce solutions. Local KYAE programs are available to provide services in cases where potential or current employees are eligible for adult education.

KYAE also partners with the Department of Corrections to serve both full-service jails' correctional offenders and state adult institution inmates. Adult educators provide educational

services to jails based on cooperative agreements with jailers. KCTCS faculty is commissioned to serve state adult correctional institution populations; however, adult educators support those educational experiences, offering evening classes for offenders.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

As one workforce and with implementing the current Kentucky Strategic Plan, a priority is developing a unified and collaborative approach to service delivery in the strategic partnership model. All the government agencies must work to meet the employment needs of business and industry by working together, taking a solutions-based approach. The Kentucky Center for Workforce Statistics (KYSTATS) collects and reports WIOA performance outcomes through the Kentucky Workforce Dashboard https://kystats.ky.gov/Reports/Reports. Furthermore, KYSTATS is exploring the existing co-contracting partnership between OEAS and C.E.D. to access the D&B data. The Commonwealth's goal is to create networking opportunities, bring awareness to the services each partnering agency delivers, and assemble the full array of services provided to customers efficiently and effectively.

A common pain point in economic development is the skills deficiency in the current workforce, which is being addressed through cross-agency training solutions targeting strategic sectors and supported through a combination of programs and incentives. This effort is coordinated with C.E.D. and KYSTATS, complementing our WIOA Title I Adult and Dislocated Worker - Wagner Peyser co-enrollment policy and service delivery approach, thus ensuring that services to career center customers are comprehensive. WIOA Title II Adult Education is provided through Kentucky Adult Education (KYAE)

Additionally, through the Office of Employer and Apprenticeship Services (OEAS), the workforce consultant team establishes an operational partnership with the Kentucky Cabinet for Economic Development (C.E.D.). Integrated into the C.E.D. business development and recruitment strategy, the workforce consultant team will provide project-specific analysis of labor market information, the workforce and education ecosystem, and an overview of workforce resources available to employers. Upon the project's decision to locate or expand, the workforce consultant will align workforce partners to deliver services and resources.

B. STATE OPERATING SYSTEMS AND POLICIES

Currently, the Commonwealth of Kentucky, Department for Workforce Investment is exploring options for a new case management system because the current system (KEE Suite) lacks desired comprehensiveness. With regards to Labor Exchange services, the system of use is Focus Suites. KEE Suite is utilized for Title I and Title III programs, KARES is utilized for the Title II program, and CMS is utilized for the Title IV program. The Commonwealth is reviewing systems which will allow for the seamless integration of all programs. In the meanwhile, DWI continues to merge data files in order to accomplish the coordinated implementation of the state strategies.

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

At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans:

- Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.

- This long range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system.

New data linkages will greatly enhance Kentucky's ability to make real time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements.

Currently, the Commonwealth of Kentucky, Department for Workforce Investment is exploring options for a new case management system because the current system (KEE Suite) lacks desired comprehensiveness. With regards to Labor Exchange services, the system of use is Focus Suites. KEE Suite is utilized for Title I and Title III programs, KARES is utilized for the Title II program, and CMS is utilized for the Title IV program.

The Commonwealth is reviewing systems which will allow for the seamless integration of all programs. In the meanwhile, DWI continues to merge data files in order to accomplish the coordinated implementation of the state strategies.

The KLDS is a collection of linked data from birth records through the workforce. Available data includes pre-K, K-12, postsecondary education, employment, wages, and much more. LMI produces labor force and unemployment metrics, employment and wages by industry and occupation, occupational projections, and more. When combining data from the KLDS and LMI, Kentuckians are able to get a well-rounded, informative view to coordinate the implementation of state strategies and initiatives.

Some examples of state strategies include:

- Understanding the employment and wages of postsecondary graduates
- Aligning in-demand occupations to Career and Technical Education career pathways
- Connecting adult education GED completers to WIOA measures for federal reporting
- Building a simulator that helps families understand the impact of work supports on their budget
- Creating the Career Explorer Tool that allows students and job seekers to assess their knowledge, skills, and abilities to then be aligned to matching careers
- Creating a dashboard that allows students to understand the cost of college while providing information about in-demand jobs
- Align supply of credentialed Kentuckians, current employment outcomes, and future demand of jobs in Kentucky
- Understand the youth and young adults of Kentucky and their outcomes based on area, race, gender, age, and available service providers
- Providing analyses for LWAs regarding the labor force, industry and occupational wages and employment, long-term projections, unemployment insurance claims, and demographics

- Developing a tool to summarize Kentucky's workforce ecosystem and provide metrics on labor market health, workforce funding distribution, and service outcomes for employers, customers, the Office of Unemployment Insurance and Adult Education

- Utilizing unemployment claims data to provide key indicators including weekly initial claims, percent of overall claims by county, claims by industry, and trends by select demographic indicators

- Creating a civilian labor force report to provide users with annual and monthly estimates across different geographies and timeframes

The coordinated case management system for the State of Kentucky allows for efficient co-enrollment across WIOA direct service providers for the Adult, Dislocated Worker, and Youth programs, and the majority of the programs in the Career Development Office: Wagner – Peyser, JVSG, Trade, and RESEA. The upgrades to the current case management system have made improvements that will increase the efficiency and validity of the data collection among the program partners and allow for easier referrals once eligibility has been determined. The coordination and warm hand-off from Kentucky Career Center programs through the shared case management system helps to break down the silos of the independent program staff and allows for a holistic approach to the workforce participant's needs. While the Office of Adult Education and Office of Vocational Rehabilitation do now share a case management system, there is a streamlined process for referrals from the other partners in the KCC to ensure that the needs of those communities are met.

For Kentucky's job banks, Focus Suite is an automatic job-match engine powered by Burning Glass Technologies containing a set of online tools for career seekers and employers. Career seekers can create a professional resume, search for jobs, apply for employment, and explore in-demand career paths and educational opportunities. Focus allows job candidates to assess their potential for short-term and long-term business needs. For employers, this labor exchange system assists employers with posting career openings, reviewing resumes, and sending invitations for interviews. A company can post job openings and search for qualified candidates today. This flexible database provides access to specific needs for employers: automated job seeker referrals based on company requirements, intelligent searching, quick job posting, and a user-friendly job posting writer. The system offers an intuitive design and features that employers request (i.e., puts the employer in control with a flexible job, talent, and account management and widens qualified candidates' selection). The system also offers a sizeable job-seeker pool, e.g., 24,000 active job seekers in the past 90 days.

The Focus Talent system allows employers remote access, 24/7, to manage their workforce account. For more information on each tool, please see the links below:

- Focus Talent at https://focustalent.ky.gov – for employers

- Focus Career at https://focuscareer.ky.gov – for career seekers

- Focus Explorer at https://focuscareer.ky.gov/careerexplorer/explorer/explore – career exploration module

In 2018, Kentucky implemented local performance metrics as a way measure "real time" performance. These measures restructured the way in which services were previously provided as they placed a heavier emphasis on employment services rather than unemployment services. Customers who enter the career centers are provided a Welcome, Orientation and Assessment. They meet with a career coach to assist with referrals and job placement services. Also, UI assistance has been brought back into the career centers, allowing customers to get face-to-face assistance with filing their UI claims. Customers may also use computers available at the career center to file their unemployment claims and receive assistance from a call center.

Currently, the Career Development Office (CDO) and the Office of Vocational Rehabilitation (OVR) are supported by case management systems that respond to requests for the following programs: • Wagner Peyser Labor Exchange (KEE Suite-Kentucky Engagement Enterprise Suite) • Unemployment Insurance — both benefits and tax/collections (Mainframe and Kentucky's Electronic Workplace for Employment Services — KEWES) • Veterans Program • Migrant and Seasonal Farm Workers Program • National Emergency Grants • High Growth Job Training • Foreign Labor Certification • Health Care Tax Credit System • Trade Adjustment Act • Work Opportunities Tax Credit • Workforce Innovation and Opportunity Act of 2014 (WIOA) • Student data • Customer records, services provided and costs of services for individuals with disabilities and blindness • Social Security Reimbursement tracking and processing • Social Security Ticket to Work assignment tracking and processing.

The agencies share many customers. However, agency case management systems have a number of constraints prohibiting data sharing among the sister agencies, as well as with employers, job seekers and training providers. The following information provides high-level overviews of each system:

KEE Suite is a Salesforce platform system a web-based system for its Workforce Innovation and Opportunity Act data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities.

Focus Suites is complemented by and integrated with Burning Glass Technologies' Focus Suite products: Focus Talent, Focus Career, Focus Assist and Focus Explorer. Focus Talent puts employee recruitment and account management in the hands of employers. Burning Glass Technologies' patented artificial intelligence powers the search and job-match engine using a combination of candidate workplace and transferrable skills and education. Focus Career helps the job seeker (Wagner Peyser, Title I, Title IV and UI customers) to build or enhance a resume, then analyze that resume to identify pertinent open job orders so the job seeker can set up automatic email alerts when a job match is made. Both Focus Talent and Focus Career are self-service systems. However, there is a staff assist module. Focus Assist helps CDO staff members support employers and job seekers through internal dashboards and menus should those users desire additional assistance. Finally, Focus Explorer, another self-service medium, is a career counseling tool for job seekers to discover in-demand jobs, skill requirements, certifications and education coursework.

Also important to note is that unemployment insurance claimants who are required to perform work searches are strongly encouraged to create a KEE Suite account and enter a resume in Focus Career or risk losing benefit eligibility.

Labor/Insight Labor/Insight is another Burning Glass Technologies application used by DWI staff. Labor/Insight enables real-time access to a comprehensive database that can track employer hiring by industry, occupation, education and skills, at a national, state or regional level. It can also quantify market demand for specific job qualifications. Labor/Insight is hosted by Burning Glass Technologies.

The Case Management System (CMS) supports consumer case management activities, authorizes related payment transactions, generates reports/report information and contains a Social Security Reimbursement subsystem for all Title IV consumers, for OVR. Consumer information, including confidential medical information, is collected to open a case within the respective agency. Agency services are based on the signed Individualized Plan for Employment between consumer and agency counselor. The system can attach scanned case documents, record staff provided services, staff activities, track comparable benefits, track consumer education and training advancements. There is a Social Security Reimbursement module within CMS that enables each respective agency to seek reimbursement for the cost of the services provided to agency consumers receiving Social Security Disability Insurance (SSDI) benefits or Supplemental Security Income (SSI) payments. There is a Maximus module that generates files

that are submitted to Social Security for the Ticket to Work program and tracks responses and ticket assignments. In July 2016, Kentucky ceased WIA data collection and reporting and began working to implement WIOA data collection and reporting requirements in addition to other USDOE and state reporting. CMS is a staff only application with a web front end. An interface exists between CMS and eMARS, the state's payment system, to enable processing of payments to, and refunds from, vendors. The system is Section 508 and Bobby compliant and staff use screen readers such as JAWS, ZoomText and WindowEyes, as well as speech recognition software such as Dragon Naturally Speaking.

The Kentucky Adult Education Reporting System (KAERS) is a nationally-recognized student management system designed and maintained through Kentucky Adult Education and the Commonwealth Office of Technology. It is used by all Title II adult education programs to record programmatic, student and fiscal agent information with a student portal for students to view their data and online curriculum. KAERS also has a reporting tool used to enhance program performance, a real- time student tracking function, and integrates external data sources. Data from KAERS is submitted, on a regular basis, to the Office of Career, Technical, and Adult Education (OCTAE) and KYSTATS.

The Department for Workforce Investment implemented a new case management system on October 1, 2018. KEE Suite was launched as an integrated Wagner Peyer, WIOA and Trade System with the vision of incorporating more partners in the future. Though there have been several problems with implementing KEE Suite, the need for an integrated case management system is clear.

At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans:

- Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.
- Conversion to a cross-agency, common case-management system will be executed as current legacy transactional systems are retired.

The system will be built using the same technology deployed for the common intake process. This long-range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data-linkages will greatly enhance Kentucky's ability to make real-time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements. KYSTATS collects accurate education and workforce data in the Kentucky Longitudinal Data System (KLDS) linking the data and generating timely reports about student performance through employment to guide decision makers in improving Kentucky's education system and training programs (KRS 151B.132(2)). KYSTATS currently collects data from key state agencies, such as OAE, OVR and post-secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132(4)). Additional transactional data collected will be added as data systems at state agencies are updated to reflect any changes required to measure the impact of education and workforce programs. Staffs at lead state agencies have access to their and other common data through KYSTATS' Web Intelligence Business Objects Platform (WEBI). Additionally, KYSTATS

has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133(5)).

From the Office of Employer and Apprenticeship Services perspective, while the various agencies share many customers, the agency case management systems have a number of constraints prohibiting data sharing among the sister agencies, as well as with employers, job seekers and training providers. The following information provides high-level overviews of each system:

Focus Suites

Focus Suites is complemented by and integrated with Burning Glass Technologies' Focus Suite products: Focus Talent, Focus Career, Focus Assist and Focus Explorer. Focus Talent puts employee recruitment and account management in the hands of employers. Burning Glass Technologies' patented artificial intelligence powers the search and job-match engine using a combination of candidate workplace and transferrable skills and education. Focus Career helps the job seeker (Wagner Peyser, Title I, Title IV and UI customers) to build or enhance a resume, then analyze that resume to identify pertinent open job orders so the job seeker can set up automatic email alerts when a job match is made. Both Focus Talent and Focus Career are self-service systems. However, there is a staff assist module. Focus Assist helps staff members support employers and job seekers through internal dashboards and menus should those users desire additional assistance. Finally, Focus Explorer, another self-service medium, is a career counseling tool for job seekers to discover in-demand jobs, skill requirements, certifications and education coursework. The Focus Suite shares information regarding job seekers, job search, job matching, job posting as well as receive/share external job postings from America's Job Exchange (AJE)/Job Central and spidered jobs from Burning Glass feeds.

Labor Insight

Labor/Insight is another Burning Glass Technologies application used by staff. Labor/Insight enables real-time access to a comprehensive database that can track employer hiring by industry, occupation, education and skills, at a national, state or regional level. It can also quantify market demand for specific job qualifications. Labor/Insight is hosted by Burning Glass Technologies.

WOTC

The Kentucky WOTC Online System is used by private sector businesses and companies who may act as the employer's agent. The KY WOTC Online System allows businesses and their consultants to enter tax credit applications (and submit the applications, for legal forms holders), track the status of submitted applications, print letters and certifications, and view any power of attorney that may exist.

KIBES

Kentucky Integrated Business Engagement System (KIBES) is a tool and resource to help manage business customer engagement as required by WIOA. Through the integrated tool on the Salesforce platform, partners engaged with business are able to track progress from the initial engagement to ongoing business services, thus allowing a clear picture of progress. Further, shared insight and resources can be accessed by partner staff allowing better communication and business services execution.

WIN Career Readiness System

The W.I.N. College Readiness Courseware includes five learning modules that provide learners with practice and application of concepts addressed by commonly accepted college placement exams: pre-algebra, algebra, geometry, reading and writing, and English. Learners begin by completing a pretest on college entry exam content to identify areas where further instruction is

needed. Following the pretest, learners complete the coursework modules at their own pace. There is a post-test at the end of every module to measure comprehension. These academic skills are considered foundational skills for many work environments.

The Kentucky Essential Skills Credential addresses skills including cooperating with others, resolving conflicts and negotiating, solving problems and making decisions, and taking responsibility for learning. Together these two credentials qualify an individual to be "work ready" for most employers' needs.

KY National Career Readiness System

The National Career Readiness Certificate (NCRC), part of A.C.T. WorkKeys is a product of A.C.T., Inc., demonstrating a person's work-readiness level. The KY NCRC system tracks all earned certificates by partnership members. The core assessments that make up the NCRC are Applied Math, Graphic Literacy, and Workplace Documents; these cognitive evaluations answer many questions about a jobseeker's work readiness. Small and large businesses have experienced dramatic drops in turnover after using NCRC as a screening tool for many of their jobs. The objective insight provided into the job candidates helps make better hires and spends less on training and retaining employees long term. There are currently over 163,000 NCRCs in Kentucky.

An Employer may either "require" or "prefer" an NCRC. The job must be profiled to "require" a NCRC or other WorkKeys assessments. For Employers who seek to "prefer" the NCRC as a condition of hire, it is recommended that the Employer cross-reference the desired WorkKeys assessments to the O'NET code of the position to be filled. Testing is paid for under Wagner-Peyser 10%, and all examinees are required to be enrolled in the State's WIOA reporting system.

Dun & Bradstreet

The Dun & Bradstreet solution for Kentucky includes two analytical scores: Financial Stress and Material Change / Opportunity Segment. Both scores are available in D&B's Market Insight where D&B data is updated on a monthly basis. The monthly Market Insight data is filtered according to LWDB and shared with local partners for dissemination and to provide a target list of potential businesses to engage with, especially those businesses are display characteristics of early signs of decay and those that are experiencing growth, as both instances require a workforce intervention to assist the business.

Federal Bonding

All Kentucky Career Centers and partner programs have access to a google docs design online form to request a Federal Bonding program fidelity bond to be issued to a business for hiring individuals from an untapped labor pool. This no cost, efficient, streamlined system allows for the business services network to better serve our customers better.

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

All one-stop partners, whether they are required partners or additional partners, must contribute to infrastructure costs of the one-stop centers based on proportionate use and relative benefits received. The required one-stop partners must provide access to their programs in the comprehensive centers and contribute to the infrastructure costs of those centers. These required partners also make other partner program's applicable career services

available at the comprehensive one-stop centers, and those partner programs may contribute to shared services and shared operating costs.

Under WIOA and its implementing regulations, consistent with the Uniform Guidance, funding provided by the one-stop partners to cover the operating costs, including infrastructure costs, of the one-stop delivery system must be based on the partner program's proportionate use of the system and relative benefit received (*See* **WIOA sec. 121(h)(1)(B)(i) and 121(h)(2)(C)(i), 20 CFR 678.700 through 678.760, 34 CFR 361.700 through 361.760, and 34 CFR 463.700 through 463.760**). Kentucky follows the below guidance regarding infrastructure funding of the one-stop centers:

Definitions

Term	Definition
Co-location	*Co-located Partners* – Kentucky Career Center (KCC) Partners who have a physical or virtual presence within the center(s), either full time, part time, or intermittent. *Non Co-located Partners* - KCC Partners with no physical presence in the center(s).
Contributions	*Cash Contributions* - Cash funds used to cover a partner's proportionate share of the KCC infrastructure costs. Can be paid either directly from the partner or through an interagency transfer on behalf of the partner (**20 CFR 678.720(c)(1)**). *Non-Cash Contributions* - Expenditures made by one partner on behalf of the KCC or contributions of goods or services contributed by a partner for the center's use. Contributions must be valued consistent with Uniform Guidance 2 CFR 200.306 (**20 CFR 678.720(c)(2-3)**). *Third Party In-Kind Contributions* - Contributions by a non-KCC Partner to support the KCC in general, not a specific partner; or contributions by a non-KCC Partner to a KCC Partner to support its proportionate share of the infrastructure costs. Unrestricted contributions that support the KCC in general would lower the total amount of infrastructure costs prior to proportionate division whereas restricted contributions can be used by the intended partner(s) to lower their share of the infrastructure costs (**20 678.720(c)(4)**).
Full-time Equivalent (FTE)	The ratio of the total number of hours worked (whether part-time, full-time or contracted) divided by an average full-time work week (e.g., 40 hours). Example: One employee who works 20 hours per week is expressed as .5 FTE.

Term	Definition
Infrastructure Costs	The non-personnel costs (e.g., rent, computers, phones, etc.) that are necessary for the general operation of the physical KCC, including: • Rental/lease costs of facilities • Costs of utilities and maintenance • Equipment (including assessment-related products and assistive technology for individuals with disabilities) • Technology to facilitate access to the center, including the center's planning and outreach activities
Local Funding Mechanism	The process used by the LWDB, CLEO(s), and KCC Partners to negotiate and agree to the amounts that each partner will contribute for KCC infrastructure funding, as well as the methods of calculating these amounts in order to include the infrastructure funding terms in the Memorandum of Understanding (MOU) as an Infrastructure Funding Agreement (IFA), and to sign the IFA and MOU in accordance with WIOA secs. 121(c)(2)(A)(ii) and 121(h)(l)(A)(i).
Memorandum of Understanding (MOU)	A document defining the agreement between the LWDBs, CLEOs and co-located partners relating to the operation of the workforce delivery system in the local area, including shared system and infrastructure costs.
KCC Partner	An entity that provides a program in a local area.
Proportionate Use	An amount that represents a required partner's portion of comprehensive KCC infrastructure costs based on its proportionate use of the KCC, relative to benefits received. This amount is determined through a reasonable cost allocation methodology that assigns costs to co-located partners in proportion to relative benefits received.
Relative Benefit	A measurement of a KCC Partner's share of infrastructure costs based on reasonable methods that are agreed to by all partners or determined in accordance with the State Funding Mechanism (SFM).
State Funding Mechanism (SFM)	The process used by the State to calculate the statewide funding caps and the amount available for local areas that have not reached consensus, and to determine the partners' contributions for infrastructure costs as outlined in **20 CFR**

Term	Definition
	678.730 through 678.738, 34 CFR 361.730 through 361.738, and 34 CFR 463.730 through 463.738.

This guidance is in compliance with **TEGL 17-16**, which provides additional discussion of the IFA and MOU process.

WIOA divides the operating budget of a KCC into two main elements – Infrastructure Costs and Additional Costs.

Infrastructure Costs

Infrastructure costs are non-personnel costs that are necessary for general operation of the KCC. Infrastructure costs include rent, utilities and maintenance, equipment (including assessment products and assistive technology), and technology to facilitate access to the KCC (including technology used for the center's planning and outreach activities). The costs of branding/common identifier materials may also be considered a part of infrastructure funding.

Non-personnel costs. Non-personnel costs are all costs that are not compensation for personal services. For example, technology-related services performed by vendors or contractors are non-personnel costs and may be identified as infrastructure costs if they are necessary for the general operation of the KCC. Such costs may include service contracts with vendors or contractors, equipment, and supplies.

Personnel costs. In contrast to non-personnel costs for the KCC system, personnel costs include salaries, wages, and fringe benefits of the employees of partner programs or their subrecipients, as described in 2 CFR 200.430 (Compensation – personal services) and 2 CFR 200.431 (Compensation – fringe benefits) of the Uniform Guidance. For example, allocable salary and fringe benefit costs of partner program staff who work on information technology systems (i.e., common performance and reporting outcomes) for use by the KCC as a whole are personnel costs – not infrastructure costs. Also, the cost of a shared welcome desk or greeter directing employers and customers to the services or staff that are available in that KCC is a personnel cost. These costs, therefore, cannot be included in infrastructure costs, but are included as "additional costs" in the KCC operating budget.

Additional Costs

The IFA contains the infrastructure costs budget, which is an integral component of the overall KCC operating budget. The other component of the KCC operating budget consists of additional costs, which **must** include career services and may include shared services and shared operating costs for a particular KCC.

While each of these components covers different cost categories, an operating budget would be incomplete if any of these cost categories were omitted, as all components are necessary to maintain a fully functioning and successful local KCC system. Therefore, the Department of Workforce Investment strongly recommends that the LWDBs, KCC Partners, and CLEOs negotiate the IFA, along with additional costs, when developing the operating budget for the local KCC system. The overall KCC operating budget must be included in the MOU.

Career Services. KCC Partners must ensure that at least some career services, described in **WIOA sec. 134(c)(2)**, are provided at the one-stop center. Additional requirements regarding career services may be found at **WIOA sec. 121(b)(1)(A)(i), (c)(2)(A)(ii), (e)(1)(A), and (i)(1), as well as 20 CFR 678.760, 34 CFR 361.760, and 34 CFR 463.760**.

Shared Operating Costs and Shared Services. KCC Partners also may share other costs that support the operations of the KCCs, as well as the costs of shared services. The costs of shared

services may include initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other KCC Partners, and business services (*see***WIOA sec. 121(i)(2), 20 CFR 678.760, 34 CFR 361.760, and 34 CFR 463.760**). As discussed in more detail in the section pertaining to personnel costs, such costs also may include personnel expenses associated with a shared welcome desk or greeter directing employers and customers to the services or staff that are available in that KCC.

A portion of the costs of LWDB staff performing functions that are not otherwise paid with WIOA Title I funds and support the general operations of KCCs may also be included as additional costs as long as these shared operating costs are proportionate and consistent with the Federal Cost Principles of the Uniform Guidance set forth in 2 CFR 200).

How are Infrastructure and Additional Costs Funded?

Each local area is expected to reach agreement on how infrastructure costs and additional costs will be shared among required partners. These guidelines and requirements support the local area's efforts in reaching an agreement for the allocation of these costs. It is critical that all steps of the process – establishing the budget, identifying cost allocation, identifying funding sources, and negotiation – be well-documented so that, in the event of an impasse, the Governor may resolve infrastructure funding swiftly and fairly. *See also* "Step 2" of the below State Funding Mechanism explanation, which details the sort of documentation that is needed.

A. Step 1 - Establish the Operating Budget

Although WIOA creates a special mechanism for funding infrastructure costs, the process for identifying, budgeting and allocating costs among KCC partners is ideally accomplished through the same process establishing the operating budget.

The KCC operating budget is the financial plan developed by the LWDB through negotiation with KCC Partners and with agreement of the CLEO(s). It may be considered the master budget that contains a set of individual budgets or components that consist of costs that are specifically identified in the statute:

- infrastructure costs, defined in **WIOA sec. 121(h)(4)**; and
- additional costs, which must include applicable career services and may include shared operating costs and shared services that are related to the operation of the KCC delivery system but do not constitute infrastructure costs. These additional costs are described in **WIOA sec. 121(i)**.

The operating budget will be included in a Memorandum of Understanding between the LWDB, the CLEO and the KCC Partners in each local area that outlines the sharing of costs and services and the overall program design for the Local Workforce Development Area. The MOU must contain, among other things, provisions describing how the costs of services provided by the KCC system and how the operating costs of such system will be funded, including the infrastructure costs for the KCC system (*See* **WIOA sec. 121(c)(2)(A) and 20 CFR 678.500(b), 34 CFR 361.500(b), and 34 CFR 463.500(b)**).

Once the LWDB establishes the operating budget and the infrastructure costs that are part of that budget, it will work with KCC Partners to develop the MOU and accompanying IFA. The IFA is a critical component of the MOU and must be included within the MOU.

The expected approach for funding infrastructure costs in the KCCs is through the development of a Local Funding Mechanism (LFM) where all co-located partners agree how infrastructure costs will be shared. In the event that a local area is unable to reach agreement, a State Funding Mechanism (SFM) will be put into effect as a last resort and remain in effect until such time that a local area can find consensus. The State Funding Mechanism process is described in a later section of this guidance.

B. Step 2 - Identify Cost Allocation Methods

Note: Cost allocation methods are pre-selected in the SharePoint/Access database.

After developing the operating budget, the local board must select allocation methodologies for the allocation of infrastructure costs and other shared costs. Any methodology selected must also be consistent with federal laws that authorize each partner's programs, comply with the Uniform Guidance cost principles to include allowable, allocable, reasonable and necessary costs, and be based on the proportionate use and benefit received by each partner's programs. Examples of cost pools and allocation bases are in Attachment I of TEGL 17-16.

The specific methodologies used to allocate costs are not prescribed in WIOA, its implementing regulations, the Uniform Guidance, or in this guidance. Each local KCC system is unique and presents a different set of circumstances within which costs are allocated. When developing the local MOU, LWDBs and partner agencies may choose from any number of methods, provided they are consistent with WIOA, its implementing regulations, and the Uniform Guidance, including the Federal Cost Principles.

Once the partners determine the infrastructure costs and budget(s) for additional costs, they must determine which methodologies are reasonable and acceptable and select the methodology (or methodologies) that will be applied. In other words, the partners are selecting the appropriate distribution base(s) under which they allocate infrastructure (and additional) costs.

Partner programs may agree to select different cost allocation methodologies and allocation or distribution bases for cost objectives within infrastructure costs and additional costs, such as applicable career services, shared operating costs, and shared services categories. Partners should focus on identifying methodologies that most effectively allocate costs based upon proportionate use and relative benefits received by the partners.

The negotiations of cost sharing and allocation among partners must be conducted in good faith and in an open and transparent environment. Full disclosure of costs and funding is essential to this process. Because of the need to provide maximum flexibility to accommodate various organization structures, costs, and budgets in local areas, there is no single method prescribed for allocating costs.

Two Examples of Cost Allocation Bases:

1. Proportionate share of partner's occupancy percentage of a KCC

The allocation based on proportionate share of partner's occupancy percentage of a KCC determines infrastructure costs based on percent of use of total KCC square footage per partner. For example, if a specific partner is utilizing 300 sq. ft. out of 1000 total square footage, said partner would be responsible for 30% (300/1000 = 30%) of the total KCC infrastructure costs. The ideal way to use square footage as the basis for allocation would be to identify the amount of dedicated space for each organization. For example, if a KCC is 10,000 square feet total, Organization A has 100 square ft. of dedicated space (used only for organization A) out of 2,000 of total dedicated square footage in the Center, the calculation would be that Organization A would pay 5% of the facilities costs (100/2000).

2. Proportionate share of FTE staffing

The allocation based on proportionate share of partner's total employees of KCC determines infrastructure costs based on percent of total KCC employee FTEs per partner. For example, if a specific partner employs 25 FTEs out of 250 total FTEs at the KCC, said partner would be responsible for 10% (25/250 = 10%) of the total KCC infrastructure costs.

FTE staffing is defined to include:

1. Required partner or contractor FTE staff onsite at the KCC.
2. Required partner or contractor FTE staff offsite but who are dedicated and available on demand to meet service access requirements via "directlinkage."

C. Step 3 – Identify Sources of Funding for Infrastructure Costs

After the KCCs operational budget and the cost sharing methodology are agreed upon, each partner must detail how they will provide their cash, non-cash (in-kind), and/or third party in-kind contributions.

As defined in TEGL 17-16, contributions for infrastructure and additional costs may be made from cash, non- cash, or third-party in-kind contributions. Non-cash and third-party in-kind contributions must be fairly evaluated in accordance with the Uniform Guidance at **2 CFR 200.306** and must be in the agreed upon KCC operating budget that must contain an infrastructure cost budget and an additional costs budget. All partner contributions, regardless of the source, must be reconciled and adjusted accordingly on a regular basis (e.g., monthly or quarterly) to ensure each partner program is contributing no more than its proportionate share based upon relative benefits received in accordance with the Uniform Guidance at 2 CFR part 200. To ensure that non-cash and third-party in-kind contributions are fairly evaluated, KCC Partners should agree on which sources or companies they use to assess or appraise the fair market value or fair rental value of non-cash and third-party in- kind contributions.

Cash contributions. Cash contributions are cash funds provided to the LWDB or its designee by KCC Partners, either directly or by an interagency transfer, or by a third party.

Non-cash contributions. Non-cash contributions are expenditures incurred by KCC Partners on behalf of the KCC and goods or services contributed by a partner program and used by the KCC. The value of non-cash contributions must be consistent with 2 CFR 200.306 and reconciled on a regular basis (e.g., monthly or quarterly) to ensure they are fairly evaluated and meet the partners' proportionate share.

Third-party in-kind contributions. Third-party in-kind contributions are contributions of space, equipment, technology, non-personnel services, or other like items by a non-partner (i.e., a third-party) to support the infrastructure costs associated with one-stop operations. The value of third-party in-kind contributions must also be consistent with the Uniform Guidance at 2 CFR 200.306 and reconciled on a regular basis (e.g., monthly or quarterly) to ensure they are fairly evaluated and, if contributed on behalf of a particular program partner, meet the partner's proportionate share.

Non-Core Partners should meet their infrastructure cost obligations in accordance with their program guidance and rules. Core Partner fund availability is detailed in the chart below, which briefly summarizes 20 CFR 678.720 and 678.740. A more detailed summary for all required partners may be found in Attachment III of TEGL 17-16.

Source	Available Funds to Pay Infrastructure Costs
WIOA Title I	Program funds, administrative funds, or both
WIOA Title II	Funds available for local administrative expenses or from non-federal resources that are cash, in-kind, or third party contributions
WIOA Title III	Any available funds
WIOA Title IV	Administrative funds

There are no specific caps on the amount or percentage of overall funding a specific KCC Partner program may contribute to the LFM, except that the amount may not exceed the amount

available for administrative costs under the authorizing statute. The amounts must be allowable and based on proportional use of the KCC and relative benefit received by the partner program, and must be consistent with 2 CFR 200, including the Federal cost principles.

In the LFM, the LWDB, CLEO, and at a minimum, all required KCC Partners must agree to *the amounts* and the *method of calculating the amounts* that each partner must contribute. Ultimately, those amounts must be included in the signed MOU.

D. Step 4 - Negotiation of Infrastructure Cost Sharing Agreements

In negotiations, the LWDB and CLEO must work to achieve consensus and informally mediate conflicts or disagreements. The LWDB and CLEO must provide technical assistance to new KCC Partners and local grant recipients so that they are informed and knowledgeable of the MOU and IFA.

IFAs are a mandatory component of the local MOU, described in **WIOA sec.121(c) and 20 CFR 678.500 and 678.755, 34 CFR 361.500 and 361.755, and 34 CFR 463.500 and 463.755**.

Similar to MOUs, the LWDB may negotiate an umbrella IFA or individual IFAs for one or more of its KCC centers. Consistent with **20 CFR 678.755, 34 CFR 361.755, and 34 CFR 463.755**, IFAs must include the following elements:

- The period of time in which the IFA is effective;
- Identification of the infrastructure costs budget, which is a component of the KCC operating budget;
- Identification of all KCC Partners, CLEO(s), and the LWDB participating in the IFA;
- A description of the periodic modification and review process to ensure equitable benefit among KCC Partners;
- Information on the steps the LWDB, CLEO(s), and KCC Partners used to reach consensus or the assurance that the local area followed the SFM process; and
- A description of the process to be used among partners to resolve issues related to infrastructure funding during the MOU duration period when consensus cannot be reached.

Note: At the conclusion of negotiations, the IFA must be included in the appropriate section of the MOU. Additionally, the agreed upon IFA and operating budgets must be entered in the SharePoint/Access application.

The one-stop operating budget may be considered the master budget that contains a set of individual budgets or components that consist of costs that are specifically identified in the statute -- infrastructure costs and additional costs. To determine the total operating cost of the KCC, the State is requesting the budget also include direct costs. These are nonshared costs that are partner specific (e.g., Individual Training Accounts-ITAs).

State Funding Mechanism

Local board negotiations related to services, methods of delivery, infrastructure and other shared costs must be concluded and a final report must be submitted on or before June 20, 2022. Failure to reach an agreement by the end of the remediation period will trigger the State Funding Mechanism (SFM).

The SFM is the process used by the State to calculate the statewide funding caps and the amount available for local areas that have not reached consensus, and to determine the partners'

contributions for infrastructure costs as outlined in 20 CFR 678.730 through 678.738, 34 CFR 361.730 through 361.738, and 34 CFR 463.730 through 463.738.

In accordance with 20 CFR 678.730, if the LWDB, chief elected official, and KCC partners in a local area do not reach consensus agreement on methods of sufficiently funding KCC infrastructure costs for a program year, the SFM is applicable to the local area for that program year. The LWDB must notify the Governor by the deadline established herein (i.e., June 20, 2022) of any failure to reach a consensus for funding infrastructure costs.

The SFM has eight discrete steps that must be followed by the Governor and LWDB in accordance with WIOA, TEGL 17-16, and 20 CFR 678.730 through 678.750, 34 CFR 361.730 through 361.750, and 34 CFR 463.730 through 463.750. These steps are addressed in detail below.

Step 1: *Notice of failure to reach consensus given to the Governor*. If the LWDB, local one-stop partners, and CLEO(s) cannot reach consensus on methods of sufficiently funding a one-stop center's infrastructure costs and the amounts to be contributed by each local partner program, the LWDB is required to notify the Governor, through his designee (i.e., the Commissioner of the Department of Workforce Investment).

Step 2: *Local negotiation materials provided to the Governor*. To assist the Governor in making these calculations and determinations, the LWDB must provide the appropriate and relevant materials and documents used in the negotiations under the LFM, preferably when notifying the Governor of the failure to reach consensus. At a minimum, the LWDB must give the Governor: (1) the local WIOA plan; (2) the cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share; (3) the proposed amounts or budget to fund infrastructure costs and the amount of partner funds included; (4) the type of funds (i.e., cash, non-cash, and third-party in-kind contributions) available; (5) any proposed or agreed upon one-stop center or system budget; and (6) any partially agreed upon, proposed, or draft IFAs. The LWDBs may also provide the Governor with any additional materials that they or the Governor find to be appropriate.

Step 3: *The Governor determines one-stop center infrastructure budget(s).* The Governor must determine the infrastructure budget(s) by either: (1) accepting a budget previously agreed upon by partner programs in the local negotiations, in accordance with 2 CFR 678.735(b)(1);or (2) creating a budget for the one-stop center using the State WDB formula (as described in 2 CFR 678.745) in accordance with 2 CFR 678.735(b)(3).

Step 4: *Governor establishes cost allocation methodology*. The Governor then must establish a cost allocation methodology to determine the one-stop partner programs' proportionate shares of infrastructure costs, in accordance with 2 CFR 678.736. That allocation methodology will be based on the proportion of the FTEs of each program that provides services in the respective Comprehensive or Affiliate Center, and will include both in person and virtual services provided from the program partners.

Step 5: *Partners' proportionate shares are determined*. Using the selected methodology and taking into consideration the factors concerning individual partner programs listed in 2 CFR 678.737(b)(2), the Governor must determine each partner's proportionate share of the infrastructure costs.

Step 6: *Governor calculates statewide caps*. Once the Governor has created a cost allocation methodology, the Governor then must calculate the statewide caps to determine the maximum amounts that required partner programs could be required to contribute toward infrastructure funding in that local area. There are no statewide caps for additional partners because the SFM does not apply to them.

Step 7: *Governor assesses the aggregate total of infrastructure contributions as it relates to the statewide cap*. Once the Governor has determined the applicable program cap for each program, as well as the proportionate share of the infrastructure costs that the Governor has determined under Step 5 would be required of each local required one-stop partner in a non-consensus area without regard to the cap, the Governor must ensure that the funds required to be contributed by each partner program in the non-consensus local area(s), in aggregate, do not exceed the applicable program cap.

If the aggregate total contributions are below the applicable program cap, then the Governor must direct the one-stop partners to contribute what was determined to be their proportionate shares. If the aggregate total contributions exceed the cap, then the Governor may either:

A. Inquire as to whether those local partner programs that have pushed the aggregate total contributions above the applicable program cap (i.e., those whose contributions would have otherwise exceeded the Statewide cap on contributions) are willing to contribute beyond the applicable program cap in accordance with their proportionate share; or

B. Allow the LWDB, one-stop partners, and CEO(s) to re-enter negotiations to reassess each one-stop partner's proportionate share, make adjustments, and identify alternate sources of funding to make up the difference between the capped amount and the proportionate share of infrastructure funding of the one-stop partner or reduce infrastructure costs to reflect the amount of funds available without exceeding the applicable program cap level.

Step 8: *Governor adjusts proportionate shares*. The Governor must make adjustments to specific local partners' proportionate shares in accordance with the amounts available under the applicable program cap for the associated program, if the LWDB, CEO(s), and the required one-stop partners fail to reach agreement on how to address the situation in which the proportionate share exceeds the cap using the approaches described in Step 7. The aggregate total contribution of a program's local one-stop partners under the SFM may not exceed the applicable program cap.

Statewide Caps on Proportionate Share (to be used only if the Governor needs to determine local share):

Limiting Percentages for Programmatic Statewide Caps on Infrastructure Funding Under the State Funding Mechanism:

Program Type	Limiting Percentage
WIOA title I programs (youth, adult, or dislocated worker)	3%
Wagner-Peyser Act ES	3%
AEFLA	1.5%
Perkins IV	1.5% of funds made available for postsecondary level programs and activities and funds used to administer postsecondary level programs and activities in the prior year
VR	
PY 2017	0.75% of Fiscal Year 2016 Federal VR funding
PY 2018	1% of Fiscal Year 2017 Federal VR funding
PY 2019	1.25% of Fiscal Year 2018 Federal VR funding
PY 2020 and subsequent years	1.5% of Fiscal Year 2019 (or applicable

Appeals Process for Infrastructure Costs Determined by the Governor

The appeals process relating to the Governor's determinations of infrastructure costs is below. This process will ensure efficient resolution of an appeal so that the funds are distributed in a timely manner, consistent with the requirements of 20 CFR 683.630:

1. The Governor, with assistance of the Kentucky Workforce Innovation Board, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the SFM.
2. Any required partner may appeal the Governor's determination on the basis of a claim that:
    a. The Governor's determination is inconsistent with the proportionate share requirements of 20 CFR 678.735(a) or;
    b. The Governor's determination is inconsistent with the cost contribution caps described in 20 CFR 678.735(c) and 678.738.
3. An appeal must be made within 21 days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the 21st day from the date of the notice of determination.

Timelines for Negotiating Infrastructure Cost Sharing Agreements

The following section details the structured process and typical timeline by which KCC Partners can negotiate the infrastructure cost sharing agreement. One timeline is provided for the current Program Year (2022) and a second timeline is provided for all future program years:

Process	Description	PY 2022 Timeline	Regular Timeline
Information Sharing	1. Identify KCC operating costs, including infrastructure costs and additional costs.	October 2021- May 2022	April
Budget Development and Review	2. Develop the KCC operating budget that includes an infrastructure costs budget and additional costs budget. 3. Develop the cost allocation methodology, including the identification of cost pools and allocation bases. 4. Determine estimated partner contributions.	October 2021- May 2022	April – May
Budget Approval	5. Prepare and agree to the IFA(s).	June 20, 2022	May; Notify Gov on last business day before May 10

Process	Description	PY 2022 Timeline	Regular Timeline
	6. Notify Governor if failure to reach consensus 7. Allocate actual costs by each partner's proportionate use and relative benefit received.		
Follow Up	8. Conduct a periodic reconciliation (quarterly). 9. Modify infrastructure costs budget and/or cost allocation methodology, as appropriate. 10. Evaluate the existing process and prepare for the following program year. 11. Provide annual reconciliation to DWI at close of Fiscal Year.		June
SFM Application	Failure to reach agreement on KCC infrastructure costs will result in application of a state funding mechanism per 20 CFR 678.730.	June 21, 2022	June

Again, LWDBs boards must provide a final agreed upon budget and signed MOUs including all cost sharing agreements by June 20, 2022 and by July 30, 2022 for all subsequent program years.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

The Governor serves as the grant recipient for the Commonwealth. The Governor appoints all members of the KWIB who -- in conjunction with the Governor -- provide leadership across the workforce system. The Department of Workforce Investment thru the Kentucky Education and Workforce Development Cabinet, on behalf of the Governor, administers and oversees the WIOA programs and holds primary responsibility and accountability for oversight of Kentucky's workforce development system. The Governor has designated ten (10) Workforce Development Areas and the Chief Elected Officials within those areas to act as grant recipients. Leadership from the State and Local Boards are strengthened by requiring WIOA core partners to have representation on all workforce boards. The partnership is further supported by an executive order, which has mandated and non-mandated partners as a team under the auspices of the Kentucky Education and Workforce Collaborative. Furthermore, a statewide Memorandum of

Agreement that will tie all stake holding partners together for delivery of a comprehensive workforce and education system is currently in development.

The organization chart for Education and Workforce Development Cabinet can be found at https://personnel.ky.gov/DHRAOrgCharts/OC-51.pdf.

The organization chart for the Department of Workforce Investment can be found at https://personnel.ky.gov/DHRAOrgCharts/OC-51531.pdf.

A map of the local workforce areas can be found at https://kwib.ky.gov/Local-Boards/Documents/Local_WI_Areas_Map.pdf.

The Education & Labor Cabinet is still in the process of aligning the new Cabinet structure, with the merger to become effective on July 1, 2022. At this time, there are still discussions and modifications are being made to address concerns as they arise, and the final organization chart has not been finalized. Kentucky will provide an update to the 2022 State Plan Modification once the organizational chart has been finalized by Cabinet leadership and the Personnel Cabinet.

B. STATE BOARD

A comprehensive new member orientation occurs for all new members inclusive of their role on the board and the purpose and scope of work required of the board. An overview of the work of the previous board was highlighted.

Additionally, the executive director of the board met individually with each KWIB member to discuss specific interests, priorities and thoughts about progressing Kentucky's workforce system forward.

The board chair established an executive committee. Members were invited to participate in regional training orientations set up throughout the state which would assist in establishing relationships between the state and local board members.

A strategic planning session of the board is scheduled for early spring. At this session an in-depth review of the workforce issues facing the Commonwealth will occur, including a discussion of the Kentucky Plan to deal with the Opioid Crisis. Additionally, the Board will work to develop strategies to implement the vision set forth by the new gubernatorial leadership.

I. MEMBERSHIP ROSTER

The Kentucky Workforce Innovation Board (KWIB) serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of the federal Workforce Innovation and Opportunity Act of 2014. The most crucial element for the Board's success is aligning the many facets of workforce development -- business, labor, public education, higher education, economic development, youth activities and employment and training --- to cohesively create a system for Kentucky to progressively grow its economy.

The Current Configuration for the KWIB is provided in the table below, with identification of the business and industry, workforce and organized labor representatives, core program leadership, legislative, chief elected officials, and government ex-Officio membership. There are 16 identified appointed representatives from business and industry, which make up the majority of the 31 voting members of the body. There are seven workforce and labor

representatives appointed, making up 22% percent of the 31 voting members of the KWIB. Both the Executive Directors of OVR and Adult Education are appointed members, and the Cabinet's Deputy Secretary Mary Pat Regan is the administration representative ultimately responsible for the oversight of the WIOA and Wagner- Peyser Core Programs.

	Voting Member	Kevin Smith - Immediate past CHAIR	Jim Beam Brands/Beam Suntory
WF	Voting Member	Amy Luttrell - Chair WFP	Goodwill
B&I	Voting Member	Heidi Margulis	Humana
B&I	Voting Member	Kim Menke - **CHAIR KWIB** Chair Res Align / Funding	Toyota
B&I	Voting Member	Lori Ulrich – **VICE CHAIR/** Chair Work Ready Comm	Fleming-Mason Energy
WF-Labor	Voting Member	Scott Pierce	Education, Security, Strategic Planning Labor
B&I	Voting Member	Beth Davisson - Chair Ed/Emp Engagement	Chamber of Commerce
B&I	Voting Member	Jimmy Stanton	Southern Star Energy
CORE	Voting Member	Cora McNabb	OVR (DOL mandated)
WF	Voting Member	Dianne Owen	Four Rivers Foundation
Education Partner	Non-Voting	Dr. Aaron Thompson	Council on Post-Secondary Education
Education Partner	Non-Voting	Dr. Jason Glass	Dept. of Education
Governor	Voting Member	Governor Andy Beshear	Commonwealth of KY
Education Partner	Non-Voting	Pres (Dr. Paul Czarapata)	KCTCS
CORE	Voting Member	Dr. John Gregory	Office of Adult Education
B&I	Voting Member	Jonathan Webb	AppHarvest
Local CEO	Voting Member	Judge Exec. Michael Hale	Barren County Judge Exec
Education Partner	Non-Voting	OPEN SEAT	
B&I	Voting Member	Karen Trial	Hitachi
B&I	Voting Member	Keith Sparks	EnerFab
B&I	Voting Member	Kim Humphrey	River View Coal
Ex-Officio	Non-Voting	Lt. Governor /Sec. Coleman	Education & Workforce Development Cab.
B&I	Voting Member	Lynn Parrish	BitSource

	Voting Member	Kevin Smith - Immediate past CHAIR	Jim Beam Brands/Beam Suntory
CORE	Voting Member	Mary Pat Regan	Education & Workforce Development Cab.
Local CEO	Voting Member	Mayor Robert Blythe	City of Richmond
B&I	Voting Member	Michael Buckentin	Logan Aluminum
Legislative	Voting Member	Representative Bobby McCool	Representative, 97th District, Leg. Research Comm.
B&I	Voting Member	Kevin Butt	Toyota Motor & Manufacturing of Kentucky
B&I	Voting Member	Ryan Holmes	EHI Consultants
WF	Voting Member	Sadiqa Reynolds	Louisville Urban League - CEO
Ex-officio	Non-Voting	Secretary Jamie Link	Education & Labor Cabinet
Ex-Officio	Non-Voting	Secretary Larry Hayes	Economic Development Cabinet
Ex-Officio	Non-Voting	Secretary J. Michael Brown	Executive Cabinet
Legislative	Voting Member	Senator Jimmy Higdon	Senator, 14th District Leg. Research Comm.
WF	Voting Member	Sharon Price	Community Action
B&I	Voting Member	Suhas Kulkarni	Indus, Inc.
Education Partner	Non-Voting	Superintendent Bo Matthews	Barren County Schools
WF - Labor	Voting Member	Terry Sexton	Labor Rep
WF - Labor	Voting Member	Todd Dunn	Labor Rep
B&I	Voting Member	Tony Georges	UPS

II. BOARD ACTIVITIES

A comprehensive new member orientation occurred for all new members inclusive of their role on the board and the purpose and scope of work required of the board. An overview of the work of the previous board was highlighted. The current members serving a consecutive term are being paired with a newer member, or less connected member to ensure that all business and industry members understand their value to the KWIB, and in the larger committee structure. The KWIB is working to connect their members to initiatives with our other partners in

education and workforce and are always looking for additional ways that our industry partners can provide feedback from an employers' perspective.

Additionally, the executive director of the board met individually with each KWIB member to discuss specific interests, priorities and thoughts about progressing Kentucky's workforce system forward. The board chair established an executive committee. Members were invited to participate in regional training orientations set up throughout the state which would assist in establishing relationships between the state and local board members. A strategic planning session of the board is scheduled for early spring. At this session an in-depth review of the workforce issues facing the Commonwealth will occur, including a discussion of the Kentucky Plan to deal with the Opioid Crisis. Additionally, the Board will work to develop strategies to implement the vision set forth by the new gubernatorial leadership.

The KWIB continues to ensure that their members are actively engaged in all of the statutory duties they maintain as the state workforce board. Our executive committee, with support from the staff, is engaged in putting procedures in place for items that the board must approve, One-Stop Certifications and MOU/IFAs as examples. The KWIB's primary goal is to increase the transparency of the work done by the KWIB and the Collaborative, and to ensure that we are connecting our education partners to our industry partners, our state board members to the local boards. KWIB is working hard to break down the traditional silos of workforce and education partners to truly foster and support a comprehensive approach to workforce development activities that nurtures innovation, encourages data driven responses, and is nimble enough to address emerging trends as they arrive.

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

A. ASSESSMENT OF CORE PROGRAMS

KYSTATS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability. An approach Kentucky is actively exploring would house all data required for these reports in the Kentucky Longitudinal Data System (KLDS). The priority is to identify and deploy a third—party, non—agency entity to receive, clean and report from multiple data sources in the short term and ultimately assist in the development of common reports when the common system is implemented.

Kentucky assesses the overall effectiveness of the workforce investment system in relation to its strategic vision and goals, seeking integration of activities and information from all the core programs. The ultimate goal is to increase the long—term employment outcomes for individuals seeking services, especially those with barriers to employment, to improve services to employers and demonstrate continuous improvement. Kentucky will assess the effectiveness, physical and programmatic accessibility in accordance with Section 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), and continuous improvement of the career center.

Kentucky has a certification process in place to ensure that KCC offices are ready to serve all qualified persons in the regional and local areas as expected. The certification policy is fundamental to aligning programs, policies and activities in the workforce system. Workforce agencies and partners are engaged in this assessment and continuous high—quality improvements to ensure that all related activities are being coordinated in a way that allows partners to review relevant information and take action to improve the system.

KYSTATS works with all relevant state agencies to integrate data storage activities which, hitherto, were being carried out separately. This ensures that data about all persons seeking services from any of the core programs are captured and matched so as to avoid duplication of service delivery. Not only does this help track the workforce services provided, it also enables

evaluation of those services — for example, the employment status of eligible training program completions several years out.

Storing all WIOA—related data in a common data warehouse will enhance data retrieval and analysis, which will help KCC to efficiently assess the quality of our workforce service providers. Kentucky will review data to track provider success in meeting the targets in the following areas:

• learning gains;

• entry into employment in required quarters;

• obtaining a secondary credential and enrollment into post—secondary or training;

• obtaining a secondary credential and gaining employment; and

• gaining a post—secondary credential.

Having all core programs' data integrated will enable service providers to conduct regular audits to determine which program service providers are challenged in meeting targets and in need of technical assistance beyond the standard leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

KYSTATS and state agencies will continue to work with KWIB to ensure required reports for the performance accountability are completed to the best of the state's ability.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

To ensure success, Kentucky requires partnerships between career center offices and representatives of the core and local providers such as adult education centers, career and technical education centers, community colleges and local economic development.

The activities of all career center programs and activities will be assessed through the following mechanisms:

- state and local level fiscal and programmatic monitoring;
- surveys of stakeholders;
- data validation; and analysis of data

The Kentucky Career Centers are certified every three years. In order to obtain such certification, the Local Workforce Development Boards must complete a comprehensive review of the programs and centers. Each board selects a review committee to complete this task. In addition, ongoing reviews and monitoring take place throughout the year to ensure program compliance is being met.

C. PREVIOUS ASSESSMENT RESULTS

KWIB, in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations, have engaged in an aggressive effort to implement the strategic initiatives outlined in the WorkReady Strategic Plan, which was approved by the preceding Governor in 2018. On October 8, 2021 following a review of progress to date, Governor Beshear approved the plan to continue to move forward. The plan serves as a blueprint for transforming Kentucky's workforce services and is focused on adapting to the changing needs of employers to create a demand-driven, business-led, solutions-based publicly funded talent development system for the Commonwealth. Through the work of these

initiatives, assessments will be occurring on several levels for the core programs in several areas.

In order to address problem areas identified by prior assessments as well as provide continuous oversight and assessment of current programs, the Governor created a working group called the Kentucky Education and Workforce Collaborative. This group will be responsible for implementing the strategic plan and assessing the workforce system as related to its defined metrics and deliverables. Already, the workforce dashboard, created in 2019, assists with the continuous assessment of programs and deliverables, which then shapes the Commonwealth's strategies going forward. The dashboard can be viewed at https://kystats.ky.gov/Reports/Reports.

Additionally, the Commonwealth has established multiple committees to work on and achieve milestones as related to our four major identified objectives: Employer Engagement, Education Completion and Attainment, Workforce Participation and Resource Alignment. These committees have access to analysis tools that are continuously being built out to provide more relevant and focused information, which in turn is used to shape strategies and initiatives. In 2022, we are working to finalize resource alignment map of all federal and state funds allocated to special populations; market the newly completely benefit cliff analysis calculator; a self-sustainability calculator; a GIS map of all credentials from secondary and post-secondary education entities; and a modified strategic plan which addresses the COVID-related events and economic changes that are happening in the Commonwealth.

Our strategy and approach ensures we are using all WIOA programs and collaborating resources to effectively address the gaps in services identified through previous assessments as well as to achieve greater access and effectiveness of the programs. The assessments and metrics, which we continuously review, helps to guide us along the way.

D. EVALUATION

KYSTATS and state agencies will partner on a comprehensive approach to evaluation and research. KYSTATS has the capacity and expertise to convene the various partners to ensure coordination and effectiveness. Performance accountability measures the following indicators from respective core programs:

- job seekers receiving services in required quarters;
- job seekers receiving referrals to partner services in required quarters;
- customers placed in employment in required quarters;
- employer contacts made in required quarter;
- median earnings of customers placed in employment;
- credential attainment;
- measurable skill gains; and
- effectiveness in serving employers.

Evaluation will be conducted based on the indicators listed above. Previously, Kentucky used surveys to measure effectiveness in serving employers in the state.

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)

WIOA Title I youth funds are allocated to the LWDAs using the formulas and methodologies prescribed in Section 128(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

- Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in all areas of substantial unemployment in the State;
- Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and
- Relative number of disadvantaged youth in each LWDA compared to the total number of disadvantaged youth in the State. Note: Kentucky has one LWDA that is a designated rural concentrated employment program. The state applies the 90 percent hold—harmless provision contained in WIOA, Section 128(b)(2)(A)(ii).

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

WIOA Title 1 adult funds are allocated to the LWDAs using the formulas and methodologies prescribed in Section 133(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

- Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in areas of substantial unemployment in the State;
- Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and
- Relative number of disadvantaged adults in each LWDA compared to the total number of disadvantaged adults in the State. The state applies the 90 percent hold harmless provision contained in WIOA, Section 133(b)(2)(A)(ii).

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

Dislocated Worker Funds - WIOA Title 1 dislocated worker funds are allocated to the LWDAs in accordance with WIOA section 133(b)(2) and TEGL 29-14, Change 1. The method used to allocate the dislocated worker funds to the LWDAs divides the total dislocated worker funds received by the state into two pools. One pool equals 50 percent of the total received and allocated to the local areas as follows: • 30 percent based on unemployment insurance data, • 40 percent based on unemployment concentrations, • 2 percent based on plant mass layoffs, • 13.5 percent based on declining industries, • .5 percent based on farmer-rancher economic hardship data, and • 14 percent based on long-term unemployment. The other pool equals 10 percent of the total received and allocated to the local areas as follows: • 60 percent based on unemployment concentrations; and • 40 percent based on declining industries. The state is updating its policy that reiterates the language for the distribution of dislocated worker funds that each region is guaranteed to receive an allocation percentage for a year that is no less than 90% of the average allocation percentage of the local area for the prior two years as contained in WIOA, Section 133(b)(2)(B)(iii). The policy should be updated no later than Sept. 30, 2016.

The governor may elect to adjust the percentage of the pool amounts or the allocation percentages used to distribute the pools.

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

During grant year 2020-21, Kentucky Adult Education (KYAE) will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). This is a regional approach to funding distribution, meaning applicants are required to select what counties they want to provide services for and apply for a "service area." Funding will be distributed based on population needs (i.e., those without a high school diploma/ equivalent) and performance, which is based on a funding model that includes federal (i.e., Measurable Skill Gains) and state performance goals (i.e., high school equivalency diplomas).

All KYAE RFAs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements.

Eligible applicants must meet or exceed a demonstrated effectiveness criterion/threshold set by the state. If the eligible applicant meets or exceeds the demonstrated effectiveness eligibility criterion, the applicant may advance to a subsequent review process and its application scored by a review panel. If the applicant does not meet or exceed the eligibility criterion, its application will not be reviewed for funding consideration. The state will adhere to the regulations in 34 CFR 463.24 which identify how to determine an applicant is an organization of demonstrated effectiveness.

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

All KYAE Requests for Awards (RFAs) for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

C. VOCATIONAL REHABILITATION PROGRAM

The Rehabilitation Act defines the amount of funds each state receives to provide vocational rehabilitation services in Sec. 8 (a). The funding is based on the ratio of the per capita income of each state to the per capita income of the United States for the three most recent consecutive years for which data is available. The funding allotment has a minimum of 33.3 percent and a maximum of 75 percent and is promulgated by the secretary of the U.S. Department of Education from Oct. 1—Dec. 31 of each even numbered year and is in effect beginning the following federal fiscal year.

Effective October 1, 2018, Kentucky has one Combined Agency the Office of Vocational Rehabilitation.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Kentucky has the following goals for data alignment and integration:

- development and implementation of a common intake process,
- integration with underlying transactional systems currently in place,
- implementation of a common case management system to ultimately replace the current program—specific transactional systems, and
- reporting from a common data repository.

At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following goals:

• Develop or create a reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.

• Convert to a cross—agency common case management system will be executed as current legacy transactional systems are retired. The common case management system will be built using the same technology deployed for the common intake process.

This long—range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data linkages will greatly enhance Kentucky's ability to make real—time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement.

More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan as it ensures standardization and integrity of mandated state and federal reporting requirements.

KYSTATS collects accurate education and workforce data in the KLDS in order to link the data and generate timely reports about student performance through employment to be used to guide decision makers in improving Kentucky's education system and training programs. (KRS 151B.132(2)). KYSTATS currently collects data from key State agencies, such as KYSU and OVR and, post—secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132(4)).

Additional transactional data collected will be added as data systems at State agencies are updated to reflect any changes required to measure the impact of education and workforce programs. The staff at lead state agencies has access to their and other common data through KYSTATS' Web Intelligence Business Objects Platform (WEBI). Additionally, KYSTATS has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133(5)).

Kentucky is currently testing a common intake and service delivery approach based on a sales force platform. The initial test will focus on one particular grant and several local career centers. Building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with KYAE will be added as priorities are determine and funding becomes available.

Beginning in August 2021, KEE Suite underwent an overhaul to correct issues which were not addressed in the original deployment in October 2018. Since that time, there have been six Sprints/design changes which have corrected the issues. The following depicts the Sprints schedule:

Milestones Achieved –

- Sprint 1 changes deployed on 10/15/2021.
- Sprint 2 changes deployed on 11/12/2021.
- Sprint 3/4 changes deployed on 1/12/2022.
- Sprint 5 changes to deployed on 3/4/2022.
- Sprint 6 changes to be deployed on 5/6/2022.

These Sprints have allowed the functionality of the system to become more stable as well as reporting to become more accurate in terms of data entry and data output.

The Commonwealth of Kentucky is currently in the process of replacing its Labor Exchange System and plans to deploy the new system in late summer/early fall.

The Kentucky Education and Workforce Development Cabinet works closely with the governor and will continue to do so as plans for the above goals are finalized and implemented to ensure that Board expertise and leadership knowledge are incorporated.

KYSTATS will work with the state board to ensure data and metrics are presented in a timely, accurate fashion. This information will be used to inform the governor about the successes and risks of implementation.

KYSTATS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability. An approach

Kentucky is actively exploring would house all data required for these reports in the KLDS. The priority is to identify and deploy a third—party, non—agency entity to receive, clean and report from multiple data sources in the short term and ultimately to assist in the development of common reports when the common system is implemented.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

KYSTATS, along with state agencies and the state board, will have access to pre training and post—training program information for all individuals receiving services. These measures include entry and exit data, post—secondary data and employment data.

KYSTATS recently began working with DWI to gather data and report on ETA 9171. Data on individual participants is collected from all Eligible Training Providers (ETP) that report to DWI. The DWI supplements this information with Participant Individual Record Layout (PIRL) data. KYSTATS, through the state longitudinal data system (KLDS) is able to match this information with postsecondary data from the Council on Postsecondary Education (CPE) and wage data from the Labor Market Information branch (LMI), part of KYSTATS.

For each core program, the data on entering, continuing and completing postsecondary education or entering or remaining in employment will be evaluated. Employment rates in the second and fourth quarters after program exit will be determined for each program to determine their success in entering or remaining in employment. Rates can also be summarized at the state and regional levels. By examining wage and employment data, KYSTATS can determine if employment is maintained throughout the four quarters. Kentucky has joined the SWIS system to help with out-of-state employments outcomes. For those continuing their education, data from CPE will show if the participant completed further credentials, including certificates, licenses or degrees.

The benefit of using the KLDS is that as individuals attain additional marketable skills, changes in their employment and wages can also be evaluated over time. In addition, Kentucky can determine the extent to which persons receiving training and education services are obtaining employment in industries and sectors related to their programs of study. Furthermore, KYSTATS has the capability with the KLDS to develop additional outcome measures, such as wage progression, to help determine the effectiveness of strategies such as career pathways.

In addition to using the federal performance measures prescribed in WIOA to evaluate the core programs, Kentucky will work with the regions to discuss development of additional indicators as needed to meet local needs. The goal of any such measure would be to provide information to allow the workforce development boards to make more informed decisions about programming and the use of funds to meet local demand. Kentucky will develop additional performance measures to the degree they provide meaningful and actionable information and data can feasibly be collected.

Finally, KYSTATS can work with local partners and relevant stakeholders to conduct program evaluation and research that examines program impacts on wages and employment, using rigorous statistical methodology to compare the labor market outcomes of individuals who participate and complete relevant programs with similar individuals who do not participate and complete these programs.

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

UI wage record data is already included in the Kentucky Longitudinal Data System and will be used as a key outcome indicator for all training programs, consistent with federal and Kentucky state laws.

Kentucky will continue to use UI wage record data, consistent with federal and Kentucky state law, to validate employment information for the Quarterly Census of Employment and Wages (QCEW) program. QCEW uses this information to meet its federal program deliverables and also provides labor market information on the number of establishments, employment and wages by industry (North American Industry Classification System) within the state.

D. PRIVACY SAFEGUARDS

Only authorized staff may access UI wage records and UI claimant data. Requests for access follow a stringent process that is examined first by the Department of Workforce Investment, Office of Unemployment Insurance. Upon agency approval, requests are sent to Security Administration within the Commonwealth Office of Technology for approval. Once access has been approved, all users are assigned a unique user name and password. Users access authentication is performed through Active Directory domain controller and multi-level security policies through Resource Access Control Facility procedures. In addition, multiple levels, internal and external, of firewall protection prohibit unauthorized access. Finally, annual audits are performed by the Office of the Auditor of Public Accounts, Commonwealth of Kentucky that focus on application security measures and data protection.

7. PRIORITY OF SERVICE FOR VETERANS

"Priority of Service" means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. This "priority" allows a veteran or an eligible spouse to either receive access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of or before the non-covered person.

It is the responsibility of the public workforce system to provide priority of service for all veterans and eligible spouses who receive services under any qualified job training program, including career assistance provided under workforce services.

For a service such as classroom training or other training services, priority of service applies to the selection procedure as follows.

- First, if there is a waiting list for the formation of a training class or other training services, then priority of service requires a veteran or other eligible to go the top of that list.
- Second, priority of service applies up to the point at which an individual is both approved for funding and accepted or enrolled in a training class. Priority of service is not intended to allow a veteran or eligible spouse to "bump" the non-covered person from that training class.

It is important to distinguish between the identification of a veteran for priority of services and the verification a veteran's status or the verification of an eligible spouse. If an individual self-identifies as a veteran or eligible spouse, at the American Job Center (i.e., Kentucky Career Center), that individual should be provided with immediate priority in the delivery of employment services. When a veteran or eligible spouse undergoes eligibility determination for enrollment (e.g., in WIOA Adult Program), it is appropriate to initiate verification of veteran status. The only employment services that require prior verification of eligibility for priority of service are those that require a commitment such as classroom training.

American Job Centers (AJCs) (i.e., the Kentucky Career Center) must ensure that veterans and eligible spouses are identified at the "point of entry" (e.g., reception area, resource area, Web-sites, Self Service and informational bulletin boards etc.). When identifying veterans and eligible

spouses, the AJC's and other grantees and sub-grantees must ensure that veterans and eligible spouses are made aware of:

- Their entitlement to priority of services;
- The full array of employment, training and placement services available; and
- Applicable eligibility requirements for programs and services.

Procedure to Ensure Priority of Service at Kentucky Career Centers

1. Identify veterans and eligible spouses when they visit service delivery points.

2. Display signs that clearly describe the priority of services and the registration process. This information must also be conveyed when veterans and eligible spouses access services electronically or by telephone.

3. It is neither necessary nor appropriate to require verification of the status of a veteran or eligible spouses at the point of entry.

4. If a person self identifies as a veteran or eligible spouse immediate priority of service is required.

5. Monitoring the priority of services will be done at the point of entry and during training or employment services.

Definitions of Eligibility for Priority of Service for Veterans and Eligible Spouses:

- **Eligible Veteran**, as specified in 38 U.S.C. 101(2), means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable.
- **Eligible Spouse**, as defined at section 2(a) of the JVA (38 U.S.C. 4215 [a[), means the spouse of any of the following:
    - Any veteran who died of a service-connected disability;
    - Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
        - Missing in action;
        - Captured in line of duty by a hostile force; or
        - Forcibly detained or interned in line of duty by a foreign government or power.
- Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- Any veteran who died while a disability was in existence.

Disabled Veterans' Outreach Program (DVOP) Referral Process:

The Intake Staff at the Kentucky Career Centers are the first points of contact and will identify eligible veterans or eligible spouses with significant barriers to employment. Persons who self-identify at the point of entry and who have not already been determined to be eligible for DVOP services will be asked to fill out the Veteran Information Form to determine eligibility. The Veteran Information Form asks for an answer of "yes" or "no" to all significant barriers and

additional designated populations in accordance with VPL 03-14, including changes 1&2, and VPL 03-19. When filling out the Veteran Information Form:

1. Answering "yes" to any of the questions in the section Barriers to Employment would indicate that the veteran or eligible spouse is eligible for DVOP services.
2. In the section 2020 Poverty Guidelines, the Poverty Guidelines chart is updated yearly in accordance with US DOL. This information can be located at https://aspe.hhs.gov/poverty-guidelines. A veteran or eligible spouse who is within the guidelines indicates that they are eligible for DVOP services.

The Intake Staff determines if the individual meets the criteria and eligibility requirements for DVOP services. Those that are eligible for DVOP services are referred to the DVOP. In the event that a DVOP specialist is not available, the veteran or spouse will be referred to the appropriate Wagner-Peyser or WIOA staff in addition to scheduling or referring to an available DVOP specialist by appointment.

Significant Barriers to Employment as outlined by VPL 03-14, including changes 1&2, and additional designated populations as outlined in VPL 03-19 include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those:
    - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
    - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b», as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36));
- A veteran lacking a high school diploma or equivalent certificate; or
- Veterans aged 18-24;
- Vietnam-era Veterans;
- Eligible Transitioning Service Members, Spouses, and Caregivers
    - Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as Individualized Career Services)
    - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTF) or warrior transition units (WTU); and
    - The spouses or other family caregivers of such wounded, ill, or injured members.

Again, eligible veterans and eligible spouses who are determined to have a significant barrier to employment are referred to a DVOP specialist. Additionally, any eligible veterans or eligible spouses who are part of a designated additional population will be referred to the DVOP. These referrals will be made following an initial identification of a SBE through the registration process. Customers registering electronically using Kentucky's Focus Career module will be asked a series of questions to determine if they are priority of service eligible. If they are identified as eligible, they are presented with a screen defining priority of service and directed to their local career center for further information on services and programs.

Monitoring:

The State Veterans' Program Coordinator analyzes the Performance Report for Jobs for Veterans' State Grants data generated by the Workforce Integrated Performance System (WIPS) quarterly, to include Sections:

1. Summary Information,
2. Participant Summary and Service Information,
3. Employment Barrier,
4. Core Indicators of Performance, and
5. Veterans' Priority of Service.

The generated data from the reports include covered entrants from point of entry, services provided and distinguishes from veterans and eligible spouses. The Quarterly Manager's Reports on Services to Veterans, along with onsite office validations and desk audits, are used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the Kentucky Education & Workforce Development Cabinet.

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

Accessibility is addressed on several levels and venues in the KCC. Given that OVR staffs are housed in many of the career center offices and are a central part of the workforce programs, there is a heightened sense of assuring this topic is addressed. Accessibility is a part of the required certification process under Title II.

Career Centers are accessible so that all customers can fully use services and resources. KCC offices:

- are fully ADA compliant;
- are feasible (As new center locations are selected, KCC offices are located in areas that are convenient for their customers, close to major highways, on public transportation routes, centrally—located, close to heavily—trafficked areas such as malls and shopping centers, etc.);
- provide assistive technology to assist customers with disabilities (visual, hearing or physical) so they can access computers and other KCC resources/services;
- evaluate assistive technology annually to ensure that it is up—to—date and fully functioning.
- provide free parking and inclusive parking spaces that are adequate for the average level of customer traffic, especially for individuals with disabilities; and

- make services accessible to customers who have language and literacy barriers (non—English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers).

For assistive technology, the objective is to design a computer workstation/kiosk that can be used by individuals with the widest possible range of abilities and/or circumstances. Kentucky follows the guidelines set forth by the Job Accommodation Network, One—Stop Disability Resource Manual. All Kentucky Career Center offices are expected to ensure universal access to programs and activities for all eligible individuals. Kentucky has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age.

DWI will comply with the provisions of the Americans with Disabilities Act (ADA) and applicable federal regulations prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the U.S. Department of Labor Final Rule on Federal Executive Order 11246.

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

Services have to be accessible to customers who have language and literacy barriers (e.g. non-English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers). Kentucky will provide English learners access to services that assist them in achieving competence in writing, speaking and understanding English.

KCC core programs and partners will work together to increase opportunities in the educational and workforce system for individuals who are English language learners. Adult Education will play a key role as a partner for learners in the Kentucky workforce system. Career center staff will need to be knowledgeable of resources for the English language learner to acquire fundamental literacy skills. These available resources will allow job seekers to improve their skills and be ready for post—secondary education or training, job advancement and economic self—sufficiency.

All Kentucky Career Centers take necessary steps to ensure that each individual center is in full compliance with federal regulations. Services are available to all customers in their native language when possible. All Kentucky Career Center staff are trained in using interpretation services (Language Lane Telephone Services), as well as the proper staff to have materials translated for customers.

Staff members at each career center serves as an equal opportunity officer. Staff members receive annual training on the delivery of services to ESL individuals, including proper use of phone interpretation services and obtaining translated materials. This process is overseen by the state's equal opportunity officer and outlined within the Methods of Administration plan filed with the Department of Labor, Civil Rights Center. Additionally, DWI has a Limited English Proficiency Policy that addresses procedures for both translation and interpretation for staff and is accessible to all partners as requested.

IV. COORDINATION WITH STATE PLAN PROGRAMS

A statewide Memorandum of Agreement between Kentucky Workforce System Partner Programs for the Integrated Workforce System is nearing completion and execution. The purpose of this Memorandum of Agreement (MOA) between state-level workforce system partner programs is to establish cooperative and mutually beneficial relationships and successfully accomplish the following:

1. Streamlining statewide identification and sharing of common core services by function rather than by agency;

2. Effective blending of funds by function rather than agency to the extent not inconsistent with federal law;
3. Participation in a common and coordinated system of referral;
4. Participation in a common case management system; and
5. Achievement of established performance goals grouped by function rather than by agency, as defined by the Kentucky Workforce Innovation Board and the Education and Workforce Development Cabinet.

The MOA will define roles and responsibilities for the local staff and contractors, including providing the following workforce services in the KCC system:

1. Assisting individuals in obtaining employment that leads to self-sufficiency;
2. Providing employers with access to qualified and appropriately skilled employees who have been assessed, trained and possess appropriate credentials and certifications;
3. Delivering effective programs offered through a seamless and integrated workforce development delivery that eliminates duplication of services;
4. Reducing administrative costs and accommodating the needs of employers;
5. Holding participant organizations accountable for costs, appropriate use of state and federal funding, performance, and metrics; and
6. Reacting to the current demand for skilled workers by specific industries and identified sectors of unfilled jobs.

The MOA will also identify the roles and resources that workforce system partner programs will contribute to integrate service delivery and support operations of the KCC system in all areas of the state. It also is intended to reflect state programs' commitments and activities to work in collaboration to implement the following priorities of the state's workforce strategic plan:

1. Employers - Actively engage employers to drive Kentucky's workforce development system.
2. Education - Align and integrate P-12, adult education and postsecondary education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future.
3. Workforce Participation - Increase Kentucky's workforce participation by creating opportunities, incenting workforce participation, and removing employment barriers for Kentuckians.
4. Organization and Resource Alignment - Focus resources on the most effective initiatives and improve the return on our workforce investment, utilizing data to constantly improve workforce development in Kentucky.

The long list of partner entities, state agencies, and programs that will be parties to this MOA includes:

Education and Workforce Development Cabinet

Department of Workforce Investment

Kentucky Center for Statistics

Kentucky Department of Education

Kentucky Cabinet for Economic Development

Kentucky Community & Technical College System

Kentucky Labor Cabinet

Cabinet for Health and Family Services

Department for Community Based Services

Department for Aging and Independent Living

Division of Disability Determination Services

Kentucky Justice and Public Safety Cabinet

Kentucky Workforce Innovation Board

Kentucky Council on Post-Secondary Education Conference of Presidents

Kentucky Commission on Military Affairs

Kentucky Chamber of Commerce

Kentucky Housing Corporation

Job Corps

Kentucky Association of Counties

Kentucky League of Cities

Kentucky Association of Area Development Districts

National Federation of Independent Businesses

Kentucky Human Development Institute

These parties will commit to providing integrated delivery of comprehensive workforce services in Kentucky to the job seeker and business customer in a welcoming, inclusive environment.

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

The State Plan must include	Include
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 compliance with the uniform	Yes

The State Plan must include	Include
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

Kentucky identifies five regions and 10 local workforce areas delivering services as related to WIOA. The five (5) workforce regions have been identified as:

- Central Region consisting of the Northern Kentucky, Lincoln Trail and Bluegrass local workforce development areas.
- East Region consisting of the Eastern Kentucky Concentrated Employment Program (EKCEP) and Ten County Area (TENCO) local workforce development areas.
- South Central Region consisting of the South Central and Cumberlands local workforce development areas.
- West Region consisting of the Green River and West Kentucky workforce development areas.

- Bi-State, consisting of Southern Indiana Works Workforce Board and Kentuckiana Works Workforce Area.

The 10 local workforce areas are:

- Bluegrass Local Workforce Area composed of Anderson, Bourbon, Boyle, Clark, Estill, Fayette, Franklin, Garrard, Harrison, Jessamine, Lincoln, Madison, Mercer, Nicholas, Powell, Scott and Woodford counties.
- Cumberlands Local Workforce Area composed of Adair, Casey, Clinton, Cumberland, Green, McCreary, Pulaski, Russell, Taylor, Rockcastle, Laurel, Whitley and Wayne counties.
- Eastern Kentucky Concentrated Employment Program Local Workforce Area composed of Bell, Breathitt, Carter, Clay, Elliot, Floyd, Harlan, Jackson, Johnson, Knott, Knox, Lawrence, Lee, Leslie, Letcher, Magoffin, Martin, Menifee, Morgan, Owsley, Perry, Pike and Wolfe counties.
- Kentuckiana Works Workforce Area — Greater Louisville Local Workforce Area composed of Jefferson, Bullitt, Henry, Oldham, Spencer, Shelby and Trimble counties.
- Green River Local Workforce Area composed of Daviess, Hancock, Henderson, McLean, Ohio, Union and Webster counties.
- Lincoln Trail Local Workforce Area composed of Breckinridge, Grayson, Hardin, Larue, Marion, Meade, Nelson and Washington counties.
- Northern Kentucky Local Workforce Area composed of Boone, Campbell, Carroll, Gallatin, Grant, Kenton, Owen and Pendleton counties.
- South Central Local Workforce Area composed of Barren, Hart, Metcalfe, Monroe, Allen, Butler, Edmon— son, Logan, Simpson and Warren counties.
- TENCO Local Workforce Area composed of Bath, Boyd, Bracken, Fleming, Greenup, Lewis, Mason, Montgomery, Robertson and Rowan counties.
- Western Kentucky Local Workforce Area composed of Ballard, Caldwell, Calloway, Carlisle, Christian, Crittenden, Fulton, Graves, Hickman, Hopkins, Livingston, Lyon, Marshall, McCracken, Muhlenberg, Todd and Trigg counties.

With the support of the Education and Workforce Development Cabinet (EWDC), Kentuckiana Works is working to operationalize the Bi-State Plan with Southern Indiana Works Workforce Board to advance the regional workforce. This as an example of how partnerships can advance a region's workforce. This Plan is the first of its kind to merge interstate regions into one designated workforce hub. This significant collaboration exists between local areas Indiana Region 10 and Kentuckiana Works in order to develop the regional plan around the Louisville metropolitan area, which includes urban and rural sprawl in southern Indiana. The Bi-State Regional Plan creates an innovative picture of the region's economy and workforce environment through rural-urban, Indiana-Kentucky strategies to attain regional goals and objections.

As the Bi-State Plan made significant changes to the Central Region, the Education and Workforce Development Cabinet want to ensure that the current configuration of local workforce development areas met the needs of the remaining areas. There was not time to perform a comprehensive analysis for this modification, but the intention is to review the data of commuting patterns, current joint ventures, and other shared resources when meeting with the affected parties to discuss what, if any, other changes need to be made to planning regions

for local and regional plan purposes. These conversations will occur throughout the remainder of this planning period to ensure that all partners have sufficient information to review for any additional recommended changes for the 2024-2028 WIOA State Plan period.

WIOA Title 1, Chapter 2, Section 106 outlines the requirements and process for the determination of regions and local areas including identification, types of regions, initial designation, subsequent designation, process, considerations, designation on recommendation by the state board and appeals. By July 1, 2015, the governor, in consultation with the Kentucky Workforce Investment Board or its successor (state board), developed a policy and procedure for the designation of all local areas, as well as a policy for the designation of new local areas. The policy included:

- consultation with the state board.
- consultation with the chief elected officials and affected local boards; and
- consideration of comments received through a public comment process. The public comment period offered adequate time for public comment prior to the designation of the local workforce development area and provided an opportunity for representatives of interested business, education and labor organizations to have input into the development of the formation of the local area.

The public comment period offered adequate time for public comment prior to the designation of the local workforce development area and provided an opportunity for representatives of interested business, education and labor organizations to have input into the development of the formation of the local area.

Specifically, Kentucky took a precise and comprehensive approach to area designation as follows:

- A request was made to the governor for a local area designation.
- KWIB established a steering committee.
- The steering committee developed draft recommendations for consideration based upon data, fiscal integrity and performance of current local areas.
- The Department of Workforce Investment completed local input and public comment sessions and period on recommendations.
- The steering committee considered feedback, federal guidance, reviewed data, performance and fiscal integrity once again and finalized recommendations
- KWIB reviewed the public input received and the final recommendations from the steering committee.
- KWIB made a recommendation to the governor on region and local area designations.
- The governor issued an executive order on regions and local area designation.

In 2015, Education & Workforce Development Cabinet issued 15-004. The policy includes the following directions on the Development of Local and Regional Planning Areas:

"In accordance with WIOA, Section 106(b)(4) and TEGL 27-14, change 1, section 2.A., at any time the CLEO and LWDB from any unit of general local government or combination of units may submit a request for designation as a workforce development area. The State Board must determine if the request for a new local area meets the considerations required in WIOA section 106(b)(4) and TEGL 27-14, section 5.B. and recommend to the Governor approval or denial of

the request. The Governor may approve or deny the request, after reviewing the State Board's recommendation and the considerations, and notify in writing the CLEO and LWDB.

As authorized by TEGL 27-14, change 1, section 2.B., a Concentrated Employment Program (CEP) grant recipient that requested designation as a local area in accordance with Workforce Investment Act (WIA) section 116(a)(2)(B) and which was designated a local area for the two-year period preceding the date of enactment of WIOA may request designation as a local area under WIOA in accordance with the procedures in 5.C. of TEGL No. 27-14. Any such requests for initial designation are subject to the requirements in WIOA section 106(b)(2) that the CEP local area performed successfully and sustained fiscal integrity.

The process for identification of regions and designation of local areas is as follows:

1. For a designation of a local area, request made to Governor.
2. Establish Steering Committee;
3. Steering Committee develops draft recommendations for consideration;
4. DWI completes local input and public comment process on recommendations and any other alternatives;
5. Steering Committee considers feedback, federal guidance and finalizes recommendations;
6. KWIB reviews the input received and the final recommendations from the Steering Committee;
7. KWIB makes recommendation to the Governor on region and local area designations;
8. Governor issues Executive Order on regions and local area designation/redesignation; and
9. Appeals process is initiated for initial and subsequent designation requests.

The appeal process is outlined as follows:

1) A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area under WIOA Section 106(b)(2) or (3) by the Governor may submit an appeal to the State Board. 29 U.S.C.A. § 3121(b)(5).

2) The appeal shall be filed no later than thirty days after receipt of the denial of designation of an area as a local area by the Governor.

3) The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

4) A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the State Board may request a review by the United States Department of Labor Secretary.

5) The request for review shall be filed no later than thirty days after receipt of written notification of the denial from the State Board. The request for review shall be submitted by certified mail, return receipt requested, to the Secretary, United States Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the request for review shall be simultaneously provided to the State Board in care of the Executive Director, Kentucky Workforce Investment Board, Education and Workforce Development Cabinet, 500 Mero Street,

3rd Floor, Frankfort, KY 40601 and the Executive Director, Office of Employment and Training, 275 East Main, Frankfort, Kentucky 40621.

6) On review, the United States Department of Labor Secretary shall consider whether:

a. The unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State plan, or

b. The unit or grant recipient meets the requirements for designation as a local area under 29 U.S.C.A. § 3121(a)(2) or (a)(3), as appropriate.

7) The request for review shall be conducted in accordance with procedures established by the United States Department of Labor Secretary.

8) The United States Department of Labor has confirmed that there is no appeal available regarding determinations under WIOA Section 106(b)(4)."

A formal request to modify the planning regions was made in May 2021 by KentuckianaWorks leadership team to the Education and Workforce Development Cabinet's General Counsel, DWI Commissioner, and Deputy Secretary. The following events occurred in which input was received for the proposed modification:

Timeline – Bi-State Regional Plan Discussion

- **June 2021—**Local & Regional Plans Completed; discussion with USDOL and Governor's Office about the request by KentuckianaWorks to complete Bi-State Regional Planning only and no intrastate Regional Planning with the Central Region in Kentucky. The requested changes will be proposed to the KWIB, and incorporated into the 2022 Modification Draft; USDOL Representatives from Region 3 indicated no need for a separate waiver to be filed on the 2020 WIOA State Plan, currently approved.
- **September 2021** - Meetings began with LWDAs to discuss changes seen since COVID.
- **October 15, 2021** - WIB Director's meetings where State plan modification process was discussed
- **November 10, 2021** – KWIB Board Meeting where information about removing Kentuckiana Works from the Central Region will be a part of the State Plan Modification
- **November 19, 2021** - WIB Director's meetings where State Plan Modification process was discussed
- **December 17, 2021** - WIB Director's meetings where State Plan Modification updates were provided
- **January 21, 2022** - WIB Director's meetings where State Plan Modification updates were provided, which included the Recommendation of KentuckianaWorks as stand alone region.
- **January 26, 2022** – Executive Committee meeting where updates provided on State Plan Modification. Timeline has been pulled up to March 15, 2022, from early April as due date. Discussion around assigning KentuckianaWorks to its own region. Want to have data and discussion before further splitting up regions. 2022 Modification was approved to remove KentuckianaWorks from the Central Region. More thought / data will be reviewed before the next Unified State Plan due 2024. Per Executive Committee members, data and performance standards need to be part of reviews. Executive Committee approved the changes, confirmed with the Governor's Office that the Bi-State Region was the only regional planning document required from KentuckianaWorks.

- **February 18, 2022** - WIB Director's meetings where State Plan Modification updates were provided
- **February 21, 2022 – March 10, 2022** – State Plan Modification open for public comment; received six (6) emails of feedback.
- **February 24, 2022** – Public Hearing for open comment for State Plan Modification; 1 person not associated with state joined.
- **March 10, 2022** – Cindy Read of KentuckianaWorks sent an email with comments about the section on removing KentuckianaWorks from the Central Region.
- **March 15, 2022** – State Plan Modification submitted through WIOA portal with change to Regions.
- **March 17,** 2022 – KWIB quarterly board meeting where State Plan Modification updates were provided.
- **March 18, 2022** - WIB Director's meetings where State Plan Modification updates were provided

The appeal process is outlined as follows.

(1) A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area by the Governor may submit an appeal to the State Board. 29 U.S.C. § 3121(b)(6)

(2) The appeal shall be filed no later than thirty (30) days after receipt of the denial of designation of an area as a local area by the Governor.

(3) The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

(4) A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the State Board may request a review by the United States Department of Labor Secretary.

(5) The appeal shall be filed no later than thirty (30) days after receipt of written notification of the denial from the State Board. The appeal shall be submitted by certified mail, return receipt requested, to the Secretary, United States Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the appeal shall be simultaneously provided to the State Board in care of the Executive Director, Kentucky Workforce Innovation Board, 500 Mero Street, Frankfort, Kentucky and the Department of Workforce Investment, 500 Mero Street, 4th Floor, Frankfort, Kentucky 40601

(6) On appeal, the United States Department of Labor Secretary shall consider whether:

(i) the unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State Plan, or

(ii) the unit or grant recipient meets the requirements for designation as a local area under 29 U.S.C. § 3121, as appropriate.

(7) The appeal shall be conducted in accordance with procedures established by the United States Department of Labor Secretary.

(8) The United States Department of Labor has confirmed that there is no appeal available regarding determinations under WIOA Section 106(b)(4).

(1) The Governor, through assistance of the Kentucky Workforce Innovation Board, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.

(2) Any required partner may appeal the Governor's determination on the basis of a claim that:

(a) The Governor's determination is inconsistent with the proportionate share requirements of 20 CFR 678.735(a) or;

(b) The Governor's determination is inconsistent with the cost contribution caps described in 20 CFR 678.735(c) and 678.738.

(3) The process will ensure resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of 20 CFR 683.630.

(4) An appeal must be made within sixty (60) days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the 60th day from the date of receipt of the notice of denial or revocation. The appeal must be submitted to the State Board in writing.

(5) The appeal must be signed/submitted by the chief executive officer of the one-stop partner submitting the appeal.

(6) The appeal must specify the circumstances and details of the appeal.

(7) The appeal may be made only on the ground that the Governor's determination is inconsistent with proportionate share requirements in NPRM §678.735(a), the cost contribution limitations in §678.735(b), or the cost contribution caps in §678.735(c).

(8) The State Board will consider and rule on the appeal in writing within sixty (60) days of receipt.

2. STATEWIDE ACTIVITIES

Most active Kentucky policies, guidance documents, and procedures may now be found on the KWIB's "WIOA Planning & Policy" page. This webpage also contains a link to a "Table of Kentucky Workforce Policies, Guidance and Procedures." DWI is currently working on updating many of these policies through the work of the Policy Committee, supported by the Office of Legal & Legislative Services.

For Governor's Set Aside Funding, Kentucky supports system transformation and innovation by reviewing real-time data and results of current and recent projects to identify those with positive outcomes and could benefit from additional resources. Kentucky also prioritizes technology infrastructure to ensure that individual and employer services are supported by modern, integrated contact and customer management platforms and staff and customer training. Leadership will identify new areas of interest and priorities that will be addressed using set aside funding.

DWI allocates funding to the local areas for Rapid Response services. Workers who are dislocated due to plant closures and layoffs receive Rapid Response services. Early intervention plays an essential role in successful re-employment and can help workers and communities adjust to the effects of layoffs and plant closings. For many workers who have been dislocated, Rapid Response encompasses strategies and activities necessary to plan for and respond to as quickly as possible following either an announcement of a closure or layoff, mass job dislocation resulting from a disaster, natural or otherwise; and delivery of services to enable dislocated workers to transition to new employment as quickly as possible.

The state Rapid Response unit within the Office of Employer and Apprenticeship Services (OEAS) ensures that Rapid Response is provided by the LWDB, which serves as the primary contact for all Rapid Response activities. Each LWDB area has a Rapid Response team responsible for coordinating employment transitioning supportive services.

OEAS receives impending layoffs via WARN Act notices, media releases, the Governor's office, and referral for services from supporting partners, i.e., C.E.D., Labor Market Information programs, local boards, and chief elected officials. OEAS informs local Rapid Response team coordinators of the impending layoff, and they contact the company to develop an appropriate plan for the employer, communities, and workers. The LWDB coordinator is responsible for reporting activities through KIBES, a comprehensive, integrated management and reporting system that allows partners to share activities.

Whenever possible, all contact occurs before a layoff date and is onsite on company time. The team is trained to react quickly and offer a customizable service that fits the needs of the employees and the company. The team discusses resources and services available to help the employer manage the layoff and identify the specific needs of the affected employees. OEAS provides the local Rapid Response team a D&B customized list of employers with a like NAICS code and growth potential in proximity to the affected business. This information is to be used as a resource for targeted hiring efforts and to assist in re-hiring the affected workforce.

Using information gained from the employer assessment and onsite meeting, the Rapid Response team develops a plan to deliver necessary services to the workers. An appropriate specialized service plan for Rapid Response is then generated. Employee Rapid Response services may include technical workshops, job fairs, and/or other enhanced services at the request of the company or local officials.

Rapid Response activities include services from the following agencies:

- State and local economic development
- State and local Unemployment Insurance Benefit Programs
- Labor Market Information programs of OEAS, C.D.O., Kentucky Adult Education, C.P.E., O.V.R.
- State and local health and family services programs
- Local health departments
- Trade Adjustment Assistance Program (if qualified)
- The USDOL Employee Benefit Security Administration
- LWIOA one-stop system Dislocated Worker Program services

Rapid Response services are designed to be seamless with other local one-stop services. Employees and employers receive one-stop service information during their respective service sessions. Also, during the initial onsite meeting, the local coordinator assesses whether the employer meets the criteria of a trade impacted employer by the standards established by the Trade Adjustment Assistance Act as amended. The local coordinator assists the employer with completing and submitting a trade petition to the Office of Trade Adjustment Assistance.

Furthermore, statewide layoff aversion strategies are implemented to address at-risk companies and workers. Kentucky's dedicated Business Services Teams have established relationships, resources, and networks with employers for customizing the best service plans, including layoff aversion, to meet the business' needs. Kentucky's State Rapid Response functions as a service of the Business Services Teams within OEAS and partner agencies. All

business services team partners refer to Rapid Response as a last resort after all other layoff aversion strategies have been exhausted.

Business Services Teams engage in several partnerships to expand the range and quality of the services available to companies and affected workers and to develop an effective layoff aversion early layoff-warning network through partnerships with C.E.D., the Labor Market Information, local boards, and chief elected officials to meet the needs of the employer and employee. This positive, proactive business-friendly service is promoted when layoff aversion services provide labor pool data to C.E.D.

Moreover, targeting businesses that display early signs of decay to avoid layoffs is also possible through Dun & Bradstreet Market Insight. By pairing Financial Stress and Material Change/Opportunity Segment Scores, local Rapid Response teams can understand the current trajectory and the future outlook of businesses in their region. For example, does a company show Low Financial Stress and Growth Material Change? Or, is an employer in a Medium Financial Stress and Contraction Material Change category? This insight can help the team build a thoughtful business engagement strategy and anticipate what resources an employer may need, such as training, equipment, and/or funding. As an early warning mechanism, OEAS distributes monthly reports detailing businesses who are an opportunity or layoff aversion.

Rapid response encompasses strategies and activities necessary to (1) quickly respond following a closure or layoff announcement or to a mass job dislocation resulting from a disaster, natural or otherwise; and (2) enable dislocated workers to transition to new employment as quickly as possible. In cases of natural disasters, the provisions of Rapid Response emergency assistance are adapted to the particular disaster; the Kentucky Career Center (K.C.C.) Rapid Response Unit collaboratively assists at the direction of the Kentucky Emergency Management (K.E.M.) at http://kyem.ky.gov/ and Federal Emergency Management Association (FEMA) at www.fema.gov/. If reasonable, necessary, and allowable, the rapid response may provide guidance and/or financial assistance to establish local community transition teams to assist the impacted community in organizing support for the dislocated workers and in meeting the basic needs of their families, including heat, shelter, food, clothing and other necessities and services that are beyond the resources and abilities of K.C.C. Beyond an immediate and initial response by rapid response, if deemed necessary, K.C.C. Rapid Response Unit will coordinate with K.E.M. and FEMA to organize and manage the delivery of services for the project, including the local workforce development area local Rapid Response teams. The service would include coordination and submission of an application for a National Dislocated Worker Grant if needed.

These guidelines will be followed with the agency responsible for the action resulting from a disaster: 1. Identify the local WIOA area(s) affected and the specific counties — K.C.C. state Rapid Response Unit; 2. Contact appropriate WIOA area designees for the workforce development board and fiscal agent — K.C.C. state Rapid Response Unit; 3. Reach out to K.E.M. and FEMA — K.C.C. state Rapid Response Unit; 4. Ensure strong communication and collaboration between the K.C.C. Rapid Response efforts and the work of KEM/ FEMA- K.C.C. state Rapid Response Unit; 5. Discuss the extent of the disaster and current dislocated worker fund availability — Kentucky Career Center state Rapid Response Unit; 6. Discuss projected participant service levels and re-employment needs to address the disaster results — K.C.C. state Rapid Response Unit; 7. Provide a copy of the rapid response additional assistance funding request forms to the local WIOA area(s) for additional needed funds — K.C.C. state Rapid Response Unit; 8. Process and review the Rapid Response additional assistance application and process accordingly for a recommendation to fund — K.C.C. state Rapid Response Unit; 9. Inform local WIOA area designee that award has been approved by K.C.C. Rapid Response Unit; and 10. Consider applying for a national dislocated worker grant — K.C.C. state Rapid Response Unit. The policies and protocols developed through this collaboration will be used in the event of any other significant natural disaster.

In Kentucky, the Rapid Response program operates in essentially the same manner regardless of whether a TAA petition or certification is involved.

The state extends Rapid Response services to all worker groups (or on an individual basis, if applicable) covered by a T.A.A. petition just as it provides Rapid Response services to any working group that has been or will be permanently laid off.

In most cases, the state and its local Rapid Response team are already aware of a given dislocation event, and Rapid Response activities are underway before a T.A.A. petition is filed. If a T.A.A. petition is the first notice of a dislocation event, the state will notify the local Rapid Response team, contacting the employer and associated union(s) to plan worker transition services.

The minimum level of services extended must conform to established requirements described in the Statewide Activities section. When Rapid Response is extended to potentially T.A.A. eligible worker groups, basic T.A.A. program information must be shared, including the program enrollment process should certification occur. If the state does not have access to the working group before the layoff, the state will use U.I. claimant information to identify potentially affected workers. In this situation, the local Rapid Response team will be required to extend outreach to the laid-off workers using contact information obtained from U.I.

At a minimum, the outreach materials must include information about the WIOA Dislocated Worker Program and basic information explaining the T.A.A. program.

A local area may request Rapid Response funding in the form of Dislocation Grants and Additional Assistance Grants to serve potentially T.A.A.—eligible worker groups; in the same manner, it requests funds for all other worker groups. The only difference is that Additional Assistance funding can't fund training once a T.A.A. certification covers a worker group. If a T.A.A. petition is certified, the State's T.A.A. program is responsible for identifying individuals potentially eligible under the certification through worker lists supplied by the employer and/or U.I. claimant information.

The T.A.A. program then uses a standard mailer to contact the potentially eligible individuals, inviting them to attend a Trade Orientation Session to learn about program benefits and register. At Trade Orientation Sessions, T.A.A. program staff review program benefits, the process for accessing the benefits, and critical deadlines. Orientation participants are also provided written materials and referred to a handbook covering the T.A.A. program benefits, specific to the participant's T.A.A. amendment year.

A representative from the WIOA, Dislocated Worker program, is present during orientation sessions to cover basic information about that program, enrollment, and an explanation of the advantages of dual enrollment.

Kentucky is committed to exploring ways to make T.A.A. program information more user-friendly and improve coordination between the T.A.A. and WIOA programs. Rapid Response teams are familiar with benefits and services offered under the trade program and attend all local or statewide trade training.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

As the Education and Workforce Development Cabinet works to place more emphasis on work-based learning, we continue to work with employers who can include both a training and educational component to the job. We continue to revamp all programs, WIOA Title I and Trade,

to include more on-the-job training, work experience, and registered apprenticeship opportunities.

The Kentucky Career Center system is the one-stop hub for all workforce initiatives. The Kentucky Career Centers serve the workforce system in Kentucky with two primary customer populations: the job seekers and the businesses of the Commonwealth. Jobseeker services involve job readiness assistance, such as resume building, interview skills, training opportunities, soft skills development, and ultimately connection to an equitable career path. The Office of Employer and Apprenticeship Services (OEAS) of the Kentucky Career Center (KCC) system along with partners provide workforce services to businesses, workforce professionals, training providers, and educators. The office connects businesses to the workforce system to spark innovative hiring, developing, and retaining a workforce. OEAS is self-described as human googles for workforce development. The KCC system serves as a dynamic extension to H.R. departments and assists with recruitment, training, upskilling, retention, layoff aversion strategies, and accessing incentives to improve diversity hiring.

Workforce recruitment is one of the biggest requests OEAS gets. OEAS thru the Kentucky Career Center is the bridge between talented Kentuckians and their next career. Pivoting to meet change, OEAS connects a diverse pool of job seekers to local employers engaged in hiring. As part of federal requirements, OEAS works to provide a diversified talent pool by promoting individuals with disabilities, veterans, and re-entry and recovery job seekers who are more than eager to apply their talent for business openings. OEAS workforce development consultant's employer engagement staff assist with job order-taking, job matching, and referrals based on the business need. Job development is done by contacting employers on behalf of specific job seekers. OEAS actively seeks out job openings from employers on behalf of the applicant when doing job development. Workforce development consultants work on employer relations by contacting employers to inform them of the services available from OEAS, providing labor market information for business decision-making, and following up on the results of and satisfaction with services provided.

The OEAS workforce development consultants also serve as state Rapid Response service coordinators in our state Rapid Response unit. Rapid Response from OEAS helps employers and employees in business transition mode. Layoff aversion strategies are key in connecting the dislocated workers with employers hiring. The Kentucky Career Center and OEAS Rapid Response Teams provide statewide, early intervention re-employment services at no cost to companies and their employees affected by layoffs and closings. Mandated and funded by WIOA, our quality, on-site outplacement services provide an effective and smooth transition to new employment for all the affected employees. While an employer may not change the business conditions that make layoffs necessary, calling the Rapid Response Team can reduce the cost of layoffs for the employer and employees. In working with Rapid Response, an employer can expect a quick response to transition planning needs and confidentiality concerning business needs. The business will receive information about alternatives that could lessen the impact of a layoff and pre-layoff services designed to help workers shorten their transition time. The service includes Information on Kentucky Career Centers and Unemployment Insurance. Rapid Response assists in maintaining worker morale and productivity during the transition and in preparing affected workers to find new employment. Lastly, the staff has Information about the Worker Adjustment and Retraining Act (WARN) and plant closing laws.

Work based learning innovation is also key to adjusting to the time, and training and upskilling Kentucky's workforce is an essential service OEAS provides. OEAS and our respective local workforce partners can help create a robust training program that builds on essential skills needed for success, such as communication, teamwork and collaboration, critical thinking, and workplace professionalism, through our assessments and credentialing services. These necessary skills can help a new hire succeed during the critical onboarding period, and at the same time, learning these skills can help incumbent workers grow into leadership and

supervisory roles to continue to advance Kentucky's innovation forward. OEAS provides training and upskilling services thru the Worldwide Interactive Network (WIN) and the NCRC (National Career Readiness Certificate).

The WIN Essential Soft Skills module is a no-cost online and face-to-face training system that helps employers train and assess attitudinal, behavioral, and applied competencies, precisely the "soft/essential skills" most critical to thriving in today's workplace. This free professional development system increases a user's skills in up to eight training modules for successful employment. Having a training and assessment tool for those skills is invaluable to many employers.

The NCRC program provides the Kentucky National Career Readiness Certificate (KY NCRC). This is a credential from the ACT WorkKeys® assessments. The certificate substantiates to employers that an individual possesses the basic workplace skills required for 21st Century jobs. Even if an individual has a high school diploma (or GED) or a postsecondary degree, the KY NCRC further verifies that the worker can handle every day and vital tasks in today's workplaces. The KY NCRC confirms to employers anywhere in the United States that an individual has essential core employability skills in reading comprehension (Workplace Documents), common math sense (Applied Math), and understanding data and applicable graphics (Graphic Literacy). The NCRC is used when the employer has an ACT WorkKeys Profile for a specific position requiring assessments that make up the NCRC: Applied Math, Graphic Literacy, and Workplace Documents. The NCRC is currently over $33 per person. The Kentucky Career Center system staff administer these assessments and check the results against criteria established in advance by the business, ensuring "quantified" and "qualified" individuals move forward. In FY20, Kentuckians took over 15,000 ACT WorkKeys assessments. The vast majority of these were for hiring or training requirements. Those assessments that led to obtaining the NCRC gave the person a stackable and portable work-ready credential.

Further, having businesses engaged with the worked based learning development of their workforce is critical for retention and filling those hard-to-fill jobs, and a solution could be to grow your talent through work-based training initiatives such as the Kentucky Registered Apprenticeship program. The Registered Apprenticeship program combines on-the-job training from doing the job with knowledge of the occupation. Through this joint approach, the apprentice becomes a subject matter expert and can fill the most in-demand and hard-to-fill positions on the market today. Moreover, today's Registered Apprenticeships go beyond traditional constructions and skilled trades to encompass careers such as aerospace engineer, physical therapy aide, office manager, and even a whiskey specialist (this is Kentucky after all). There are over 1,500 occupations recognized for apprenticeship programs, and OEAS can help create this nationally recognized program as an upskilling initiative. As apprenticeships are often coupled with community college courses, this innovative program offers an alternative path to postsecondary education to continue Kentucky's growth and competitiveness.

The United States Department of Labor (USDOL) recognizes OEAS as the State Approving Agency (SAA) managing the state's Department of Labor Registered Apprenticeship Program (RAP). OEAS is the authorized registration agency of RAPs and apprentices for federal purposes as found in 29 CFR-29.13 – Recognition of State Apprenticeship Agencies. OEAS oversees the day-to-day management of Kentucky's RAPs in compliance with federal regulations in 29 CFR Part 29 and 29 CFR Part 30 as well as Kentucky Revised Statutes Chapter 343 ("Apprenticeship") and state administrative regulation 787 KAR 3:010 ("Registration of apprenticeship programs"). OEAS is the grant holder for the state registered apprenticeship grants, manages the grants, provides program oversight, complies with all data management and reporting requirements, and coordinates compliance through the program's network. RAPs are an innovative work-based earn and learn model that meets national standards for registration with the USDOL Office of Apprenticeship and OEAS. The USDOL RAP in Kentucky fulfills a strategic data-driven solution for our employers' workforce development needs. RAPs

are a part of achieving the vision of Kentucky being a national leader in workforce development. Kentucky's RAP is a model program in successfully preparing individuals to enter or advance in the workforce. Even in a global pandemic, these programs have provided career pathways for those just entering the workforce and a means to broaden opportunities for those looking to expand their careers.

With registered apprenticeship training, there is a written contract between the apprentice and the sponsor (employer), approved by and registered with Kentucky and the USDOL Office of Apprenticeship, that specifies the length of training and school hours and outlines the skills and competencies to be learned and the wages the apprentice will receive. Kentucky's RAP allows employers to design their training program tailored to the company's needs if it meets the minimum criteria set forth by the USDOL Office of Apprenticeship. OEAS and USDOL Office of Apprenticeship closely monitor apprenticeship programs to ensure they meet the quality training and instruction mandated by 29 CFR Parts 29 and 30.

As of May 12, 2022, there are currently 352 active RAPs employing 4,414 apprentices in I.T., Advanced Manufacturing, Healthcare, Skilled Trades, and Professional Services. There has been an increase in the Electrician, Electrical Linemen, Certified Nursing Assistants, Pipefitters, and Sheet metal workers occupations. Kentucky has expanded its program with new programs in agriculture, childcare development, equine, distilled spirits, infrastructure (Heavy Highway and Sewer/Water), aviation, and primary metals industries.

Being competitive in the business sphere is important; workforce incentives are available to businesses by connecting with OEAS. Every business, no matter their industry, should be utilizing the Work Opportunity Tax Credit. This federal tax incentive provides businesses from $1,200 – $9,600 in tax savings per new hire when they hire from target populations, such as qualified veterans, long-term unemployed, or individuals receiving public assistance. Second, the no-cost Federal Bonding program is designed to lower risk when hiring justice-involved individuals with significant employment barriers. These two programs are easy to administer from the H.R. perspective, and OEAS helps implement them in the onboarding process.

Examples of regional efforts include:

Bluegrass Region

<u>On-the-Job Training (OJT)</u>

Individual Service Strategy (ISS) - for youth that qualify could be enrolled in paid and unpaid work experiences on-site. On-the-job-training opportunities are available for various aspects of the field.

<u>Internships</u>

Kentucky Employs Youth (KEY) - a project developed in-school and allows students to be interviewed and selected if matched. Then the student is placed with that business for a paid work-experience for 320 hours to learn about various positions.

<u>Work Experience</u>

Work Experience Program or Work-Based Learning places jobseekers with an employer for up to 480 hours at no cost to the employer as it is covered by WIOA.

<u>Registered Apprenticeships</u>

Work Ethic Seal Program - for students to focus on three primary sections to develop skills set by all partners to build a strong and dedicated workforce. An interview is guaranteed for the graduate who received the certificate, but a position isn't guaranteed.

<u>Incumbent Worker Training</u>

Incumbent Workers will work with a Talent Development Specialist (TDS) to avert a layoff through upskilling.

Employer Engagement Opportunities

Business Services Team (BST) engage with employers to implement customized solutions based on a workforce needs assessment.

Other initiatives

Small Business Summitt - an annual event that provides valuable information to small business to improve their business.

EKCEP Region (Eastern KY Concentrated Employment Program)

Employer Engagement Opportunities

AEROready Certification from Common Sense Economic Development - This certification informs industrial site selectors that the area has met the criteria — including availability of local training in technical skills and an available skilled workforce — necessary to support aerospace industries.

Other initiatives

Talent Pipeline Management (TPM) initiative - Business Service Director serves on the TPM and oversees local Business Service Teams which allows us to coordinate efforts and work toward a similar goal. The TPM works directly with local businesses to identify current and projected workforce needs to ensure training funds are utilized to fill in the workforce skill gap.

Green River Region

Customized Training

WEST KY MARITIME INDUSTRY TRAINING PROGRAMS - West Kentucky training providers and non-profits have created training opportunities for individuals interested in pursuing careers in the growing maritime industry.

Other initiatives

Eligible Training Provider List (ETPL) - for approved training programs and vendors; providing at completion, the participant will receive an industry recognized credential or certificate and the program falls within the state and local identified high growth/high demand sectors.

Kentuckiana Works Region

On-the-Job Training (OJT)

Kentucky Manufacturing Career Center - obtain the hiring needs of manufacturing sector.

Internships

SummerWorks - an award-winning summer jobs program in Louisville. Internship Academy program available for youth who have a job-shadowing experience for work-based learning.

Work Experience

Internship Academy Program - available for youth who have a job-shadowing experience for work-based learning opportunities.

Employer Engagement Opportunities

Tech Louisville - Helps individuals from economically disadvantaged communities gain the skills to start careers as computer user support specialists.

Other initiatives

Career Edge, Virtual Workshops, and Online Training Options will continue post-covid

Lincoln Trail Region

Internships

The Direct Hire Path offers a career immediately and opportunities to participate in apprenticeship programs.

Customized Training

The Coding Academy - allow students to enter the job market within months through short term certifications in Java and Security+ and CompTIA A+. The Greater Fort Knox Coding Academy - will focus on filling a critical shortage of IT workforce with coding skills with the Army and its contractors.

Incumbent Worker Training

Individual training accounts (ITAs) - will be utilized for occupational skills training services. The ITA will be developed by and between the customer, direct services provider staff (WIOA Career Managers), and the eligible training provider. The agreement identifies the roles and responsibilities of each party.

Employer Engagement Opportunities

Expungement Pilot Program - employers are able to assist employees with the expungement process and associated costs to remove qualifying Class D felony convictions from their records which can be a barrier to successful employment. As the need for skilled, available workers continues to grow, this creates new paths for residents to enter the workforce.

Other initiatives

- Workforce Crisis Task Force - held its annual Workforce Summit in June 2020. A link to the slide deck for the virtual summit is included here for reference on some key projects. The link includes video presentations on pilot projects that were established to assist individuals overcoming barriers.
- Addiction Recovery Center - housed at the former St. Catharine College Campus about how the board can work with their residents in developing plans to enter or reenter the workforce.
- The third subcommittee of the Workforce Crisis Task Force is Unlocking Local Potential. This group's charge is to retain the region's young talent by connect them to meaningful work experiences

Northern KY Region

On-the-Job Training (OJT)

Lift Up project - creates a one-stop delivery system for job training and transition to employment for individuals in treatment for Substance Use Disorders (SUD) in the NKY area.

Customized Training

Greater Knox Coding Academy - allowed students to enter the job market within months through short term certifications.

Employer Engagement Opportunities

Individual Service Strategy (ISS) - for youth to determine the overall needs and strengths of the client, as well as short and long-term goals.

South Central Region

Internships

High School Workforce Engagement Programs

Work Experience

Work Experience Program (WEX) and KY hirED Scholarship Program

Registered Apprenticeships

Sky Fame Program

Customized Training

Etiquette and Soft Skills Workshops

Employer Engagement Opportunities

Insider Jobs Webcast

Other initiatives

Job Corps Partnership - to provide essential skills curriculum, work-based learning, resume assistance.

TENCO (Ten Counties) Region

Employer Engagement Opportunities

Talent Pipeline Management (TPM) initiative - The Business Service Director serves on the TPM and oversees local Business Service Teams which allows us to coordinate efforts and work toward a similar goal.

West Kentucky Region

Customized Training

WEST KY MARITIME INDUSTRY TRAINING PROGRAMS - West Kentucky training providers and non-profits have created training opportunities for individuals interested in pursuing careers in the growing maritime industry.

Employer Engagement Opportunities

Talent Pipeline Management (TPM) initiative - The Business Service Director serves on the TPM and oversees local Business Service Teams which allows us to coordinate efforts and work toward a similar goal.

Other initiatives

- INLAND LOGISTICS AND MARINE INSTITUTE (WKCTC) - West Kentucky Community and Technical College's Inland Logistics and Marine Institute in Paducah provides training and education for the logistics and marine industries. As well as providing a location near industry for workforce training, the Institute also houses WKCTC's Logistics & Operations Management and Marine Technology programs.
- Eligible Training Provider List (ETPL) - for approved training programs and vendors; providing at completion, the participant will receive an industry recognized credential or certificate and the program falls within the state and local identified high growth/high demand sectors.

2. REGISTERED APPRENTICESHIP

The United States Department of Labor (USDOL) recognizes the Office of Employer and Apprenticeship Services (OEAS) of the Department for Workforce Investment (D.W.I.) within the Kentucky Cabinet for Education and Workforce Development (KEWDC) as the State Approving Agency (S.A.A.). The S.A.A. manages the state's Department of Labor Registered Apprenticeship Program (R.A.P.) and is the grant holder for the Apprenticeship State Expansion Grants (A.S.E.), coordinating compliance through Kentucky workforce eco-system. OEAS has developed a structure that ensures that all RAPS in the state have high-quality apprenticeship features described in 29 C.F.R. Part 29 (Subpart A) and 29 C.F.R. Part 30. We use grant funds to support structures, resources, and activities that strengthen compliance with 29 C.F.R. Part 29 (Subpart A) and 29 C.F.R. Part 30 by all KY RAPS.

Further, KY leverages efforts funded through other USDOL-funded investments to maximize the use of resources and minimize the duplication of efforts and services. OEAS is the authorized registration agency of R.A.P.s and apprentices for federal purposes as found in Federal Regulation 29-CFR-29.13 – Recognition of State Apprenticeship Agencies. OEAS oversees the day-to-day management of Kentucky's R.A.P.s in compliance with federal regulations 29-CFR Part-29 – Labor Standards for The Registration of Apprenticeship Programs, and 29-CFR Part-30 - Equal Employment Opportunity Apprenticeship, as well as Kentucky Revised Statute 343 and 803 KAR 1:010, registration of apprenticeship programs. As the state apprenticeship agency that is the grant holder for the state registered apprenticeship grants, we manage the grants, provide program oversight, comply with all data management and reporting requirements, and coordinate compliance through the state workforce system.

R.A.P.s are an innovative work-based earn and learn model that meets national standards for registration with the USDOL Office of Apprenticeship and OEAS. The USDOL RAP in Kentucky fulfills a strategic data-driven solution for our employers' workforce development needs. R.A.P.'s are a part of achieving the vision of Kentucky being a national leader in workforce development. A RAP combines on-the-job training, learning from doing the job, and the theoretical knowledge of the occupation. Through this joint approach, the apprentice becomes a subject matter expert and can fill the most in-demand and hard-to-fill positions on the market today. Kentucky's R.A.P. program successfully prepares individuals to enter or advance in the workforce. A RAP is designed to produce highly skilled workers who are fully competent in all aspects of an occupation, including knowledge, skill, and proficiency on the job. Even in a global pandemic, these programs have provided career pathways for those just entering the workforce and a means to broaden opportunities for those looking to expand their careers.

With registered apprenticeship training, there is a written contract between the apprentice and the sponsor (employer), approved by and registered with Kentucky and the USDOL Office of Apprenticeship, that specifies the length of training school hours and outlines the skills and competencies to be learned and the wages the apprentice will receive. Kentucky's R.A.P. allows employers to design their training program tailored to its needs as long as it meets the minimum criteria set forth by the USDOL Office of Apprenticeship. OEAS and USDOL Office of Apprenticeship closely monitor apprenticeship programs to ensure they meet the quality training and instruction mandated by 29 C.F.R., parts 29 and 30.

The OEAS Apprenticeship Training Representatives (A.T.R.'s) provide technical assistance to the current 600+ existing programs and 4000+ apprentices in assuring that the program sponsors meet the quality standards in training and instruction as mandated by 29 C.F.R., parts 29 and 30. OEAS is also working with the Kentucky Career Center ecosystem, private and public employers, and partners across the Commonwealth, including registered apprenticeship intermediaries, to establish new and non-traditional RAPS. Kentucky is incorporating Registered Apprenticeship into its workforce service design and delivery strategy by holding monthly meetings regarding the youth apprenticeship and skilled trades apprenticeship and quarterly cross-training meetings with all apprenticeship partners.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

In August 2015, Kentucky unveiled its Eligible Training Provider Listing (ETPL) website. This site represents an overhaul of the Kentucky system and a renewed emphasis on ETPL and providing the highest level of services to qualified participants. The system, which is web-based, represents a shift from the paper application system and allows for increased oversight, enhanced reporting and a much greater ease of access for all stakeholders. This system allows for all partners to operate easily within the framework of one system, thus significantly enhancing operational effectiveness. The system has been received positively from both providers and local workforce areas and praised for its ease of usage by WIOA participants.

The entire process is conducted completely online and can be used from a wide array of platforms and machines. The following is an overview of the steps involved in completing the application process. Step 1: Creation of account on ETPL website (https://etpl.ky.gov). Step 2: Complete the provider application. Step 3: Complete program application. Step 4: Register and upload student level data with the Kentucky Center Workforce Statistics (KYSTATS). Note: KEWES was created in 2012 to expand upon the work of the Kentucky P-20 Data Collaborative, including maintaining the Kentucky Longitudinal Data System (KLDS), which facilitates the integration of data from the Kentucky Department of Education (KDE), the Council on Post-secondary Education (CPE), the Educational Professional Standards Board (EPSB), the Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Education and Workforce Development Cabinet. KYSTATS has the authority to collect and link data to evaluate education and workforce efforts in the Commonwealth. This includes developing reports and providing statistical data about these efforts so policy makers, agencies, and the general public can make better informed decisions about Kentucky’s education systems and training programs, KRS 151B.132. The center must also ensure compliance with the federal Family Education Rights and Privacy Act, 20 U.S.C. sec 1232g, and all other relevant federal and state privacy laws, KRS 151B.133(12). Because of its expertise in data collection and an established systemic infrastructure, KYSTATS was the ideal partner for DWI to collect student level data to be used for determining performance data for the ETPL. Providers are given detailed instructions on how to register, as well as templates for submitting student data. Colleges and universities that submit their student level data to CPE are exempt from this step, as KYSTATS already has access to that data.

Specifically, the Kentucky Career Center's guidance for Eligible Training Provider List (ETPL) Application and Approval Process states as follows:

ETPL Application Process

The application process begins with the submission of three types of information:

1. Information regarding the Training Provider Agency or Entity
2. Information about Program Offerings
3. Student Data Collection

For information referenced in numbers 1 and 2, the information is collected via the ETPL website (https://etpl.ky.gov). The third piece is collected through a partner agency, the Kentucky Center for Statistics (KYSTATS).

The following is an overview of the steps required for completing the application process:

1. **Creation of ETPL Account**: Using the ETPL website (https://etpl.ky.gov), providers create an account to access the system. Providers must provide basic information such as Federal Employee Identification Number, email and designation of 'provider type.' Providers fall under one of four categories:

1. HEA Title IV Funded School
2. Proprietary School
3. Registered Apprenticeship
4. Other (includes non-profits and schools such as cosmetology, faith-based, and mortuary science schools that do not fall under the purview of Proprietary Education).

Please Note: Any private, for-profit provider of training classes within Kentucky must have registered and received a proprietary license issued by the Kentucky Commission on Proprietary Education before they may be included on the ETPL. More information about the Kentucky Commission on Proprietary Education can be found at http://www.kcpe.ky.gov/.

Upon creation of the ETPL account, the provider submits the necessary information to the state's ETPL Coordinator. Once the information is reviewed and the account is approved by the Coordinator, the provider receives approval to access the ETPL site.

2. **Completion of the Provider Application**: The Provider Application is located within the ETPL website and captures pertinent information about the provider. Providers must successfully complete this step before training programs will be considered for approval and inclusion. Information collected on the application includes:

- Year institution/entity established
- Proprietary license number (if applicable)
- Refund policy information
- Narrative discussions regarding ability to provide training to individuals who are employed; ability to provide training to those with barriers to employment; how the provider is partnered with local business; and how training services align with local, in-demand industry sectors and in-demand occupations
- Compliance with the 1990 Americans with Disabilities Act (ADA)
- Provider's ability to provide an accessible training site to those with limited mobility

- How provider collects student data (required for WIOA reporting)
- A copy of the provider's Equal Opportunity Employment Plan
- A copy of the provider's Limited English Proficiency Plan (LEP)

3. **Completion of Program Application***: Providers must complete an application for each program they wish to be included on the ETPL. Information collected for each program includes:

    a. Program name

    b. CIP code

    c. Training program description

    d. Date program established

    e. Tracking plan to gather student data (required for WIOA)

    f. HEA status (approved or not)

    g. Degree or certificate awarded

    h. Length of training program

    i. Availability of online program

    j. Costs of training program (tuition, textbooks, supplies, fees, miscellaneous costs)

    k. Address of training program (Providers with programs at multiple locations/campuses do not have to submit multiple applications; instead, they can list multiple locations for each program.) Please note that -- regarding WIOA performance indicators -- "Degree or Certificate Awarded" is the field designed to capture 'credential attainment' for each program submitted. In most areas of Kentucky, training investments have been explicitly linked to target industry sectors and high–demand occupations. These investments are individual training accounts (ITAs), and an area of focus for the Career Centers has been to expand their use of alternate training modalities, specifically employer–driven and work–based models, that might be shorter–term, more modular in nature, and more explicitly tied to the attainment of "stackable" industry-recognized credentials, which can act as a bridge to attainment of post-secondary credentials. Moreover, registered apprenticeships, on–the–job training, and customized training are all approaches that can be targeted for increased use and expansion in partnership with post-secondary institutions like KCTCS and others. The Commonwealth, its 10 LWDA Boards, its Council on Postsecondary Education and its Kentucky Adult Education Office (Skills U) work together to ensure sufficient numbers and types of training providers and programs are available to maximize customer choice while maintaining the quality and integrity of training services. DWI will use the information provided in the ETPL applications to inform customers and stakeholders about these choices and their attendant quality through the ETPL website, the KYSTATS website and other related public materials as well as the ETP annual performance report. Regarding the ETP annual performance report, as discussed above, KYSTATS has the authority to collect and link data to evaluate education and workforce efforts in the Commonwealth and develop reports and provide statistical data about these efforts. Because of its expertise in data collection and an established systemic infrastructure, KYSTATS was the ideal partner for DWI to timely and accurately collect data to

be used for the ETP annual performance report. Providers are given detailed instructions on how to register, as well as templates for submitting data. Currently, ETPs submit annual performance data in January. A provider commits a substantial violation of the requirement to timely and accurately submit all required information when the required annual report is not submitted.

4. **Register with and upload student data to KYSTATS:** The KYSTATS website, https://kystats.ky.gov, gives detailed instructions on how providers can register and submit student level data. **PLEASE NOTE:** In-state colleges and universities that submit their student level data to the Council on Postsecondary Education (CPE) are exempt from this step because KYSTATS already has access to CPE's information.

**Application Process for Registered Apprenticeship (RA) Programs:* Because of the difference in the nature and oversight of the programs, the path for application to ETPL is different for Registered Apprenticeship Programs. Per WIOA, all Registered Apprenticeship Programs that seek inclusion on the ETPL must be included.

Registered Apprenticeship Providers still must create an account and register on the ETPL website. However, they do not have to complete the Provider Application as their inclusion in the state's RA listing serves as approval. Once the RA program registers—and inclusion is verified on the state RA list -- the program will be approved by the state's ETPL Coordinator and placed on the ETPL website. *See* Application Process for Registered Apprenticeship programs *infra*.

ETPL Approval Process

Once the provider has completed all necessary application steps, the state ETPL Coordinator will review and approve programs. Programs that meet all requirements, and that fall within one of the in-demand industry sectors utilized by the ten local workforce development areas, will be approved. Programs that do not meet all requirements, or that fail to send complete information, will be placed in pending status until the issues can be resolved or requirements can be met. Programs that fall under the 'proprietary' category can also be placed in pending status if there is an issue with their good standing with the Kentucky Commission on Proprietary Education. Once issues are resolved, the proprietary school can be placed in good standing.

Removal from the ETPL

Removal from the ETPL may occur for various reasons, including

1. Training Provider representatives may, in writing, request to have their school and/or program removed from the ETPL for any reason at any time, and the ETPL Coordinator will oversee that removal within 15 days.

2. Training Providers that willfully and knowingly submit false information will be removed and will be notified of the removal in writing by the ETPL Coordinator within 15 business days.

3. Training Providers that fail to meet required Subsequent Eligibility Requirements will be removed and will be notified of the removal in writing by the ETPL Coordinator within business 15 days.

4. Training Providers that fail to maintain required certifications and licenses will be removed and will be notified in writing of the removal by the ETPL Coordinator within 15 business days.

Written appeals related to the removals described above in subsections (b), (c), and (d) will be accepted by the ETPL Coordinator for up to 15 days following the date of the removal notification. Said Coordinator will respond with a final decision within 15 business days.

A provider commits a substantial violation when the required annual report is not submitted.

Subsequent Eligibility Determination

Programs will be evaluated on a biennial basis to determine subsequent eligibility based on student performance data. In order to remain on the list, providers must maintain a completion rate of 20% and an entered employment rate of 50%.

Importantly, the coronavirus pandemic has again brought to light that rural citizens of Kentucky continue to struggle with access to digital services. While institutions of higher education have assisted in bringing better and wider delivery of digital services to rural areas, certain pockets of the state still have little to no access. In these circumstances, participants need access to local options that present little to no transportation obstacles, which is another long-standing concern for some of these rural areas. Access to local options is also an obstacle for many in our urban areas, but for different reasons. Urban areas typically offer reliable digital access, but the cost to that access and to enter training programs that depend on reliable access is sometimes too expensive for potential participants. In these circumstances, participants need a wide variety of available programs as do their rural counterparts. In both cases, DWI staff and providers are cognizant of the requirement to develop and offer programs that are accessible and tailored to the needs of each region in the Commonwealth. Programs that do not meet this criteria will not maintain their eligibility.

Regarding data collection, ETPL data collection is done in partnership with the Kentucky Center for Statistics (www.kystats.ky.gov). ETPL data provided through that partnership is available to other state agencies via the KYSTATS website.

Program Performance Listing on ETPL (Program Report Card)

In allowing for greater informed consumer choice, the following performance data for each program will be displayed with the program listing:

1. completion rate (number completed);
2. entered employment rate (employed second quarter after exit);
3. employment retention rate (employed fourth quarter after exit);
4. average earnings (median earnings second quarter after exit); and
5. skills credential.

Optional Local Board Performance Standards

Local boards, with the creation and implementation of local written policy, have the option of requiring higher levels of performance for programs, as well as requesting additional performance information from providers.

Submission of Student Level Data

Training Providers will be required to submit student level data on ALL participants in listed programs each year for inclusion on ETPL. This information will be submitted through the KYSTATS website, https://kystats.ky.gov. Programs cannot be approved until data submission has been accepted and passed necessary validation of completion. The list of required data is found on the KYSTATS website. All data must be submitted no later than January 31st of the following program year.

Exclusions from Performance Calculations

Individuals may be excluded from performance if they did not complete the course/program due to any of the following: 1) institutionalized; 2) health/medical or family care; 3) deceased; 4) member of military forces called to active duty; or 5) incarcerated.

Utilizing Out-of-State Training Providers

Kentucky allows out-of-state schools/programs to apply to be on the ETPL if the school or program accepts Kentucky Educational Excellence Scholarship funding (www.kheaa.com). Out-of-state providers must apply individually to be placed on Kentucky's ETPL

Compliance and Monitoring

Training Providers that receive federal financial assistance under WIOA Title I must comply with the Americans with Disabilities Act (ADA) of 1990 and the nondiscriminatory and Equal Employment provisions of federal law. Compliance for both is monitored through the application process and a desk review of submitted documents and plans. Performance monitoring of providers will take place through the yearly submission of student data and subsequent analysis.

Application Process for Registered Apprenticeship Programs

R.A. providers must create an account and register for the ETPL site. However, they do not have to submit the provider application in order to be included on the ETPL. DWI is currently updating the ETPL application process for R.A. programs to better align with the guidance contained in TEGL 8-19, Attachment 1, and impose a minimal burden on R.A. programs to opt in to the ETPL. This opt in application will require R.A. programs to provide basic information about their programs (i.e., occupations included within the R.A. program, name and address of the sponsor, name and address of the Related Technical Instruction provider(s), method and length of instruction, and number of active apprentices).

For R.A. programs that properly opt in for inclusion on the ETPL, the Commonwealth and its local areas will add them to the list. An R.A. program on the ETPL will remain on the list until the R.A. program notifies DWI and/or OEAS that it no longer wants to be included; the program becomes deregistered; the program has intentionally supplied inaccurate information; or the program substantially violated Title I of WIOA or the WIOA regulations.

Per TEGL 13-16, 4(d), "*Given that RAPs are a link to demonstrated hiring needs and WIOA provides automatic training provider eligibility to RAPs, ETA has determined that RAPs qualify as occupations in-demand in the local labor market. TEGL No. 08-19 notes on Attachment I, page I-9 that 'States may also give priority to ETPs that have established relationships with employers that are looking to hire.' … RAPs reflect in-demand occupations. Local program operators should not spend time determining 'occupational-demand status' for RAP sponsors that are hiring."*

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

The preliminary policy requires local areas to record the priority of service category in the state's case management system. Local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. DWI will conduct semi-annual desktop reviews and provide technical assistance to local areas that do not have the 50 percent or more, per the preliminary policy, of their adult participants enrolled into one of the priority categories. Participants served as incumbent workers are excluded from the priority calculation.

Local Workforce Development Areas (LWDAs) must develop policies to ensure compliance with WIOA priority of service requirements. Policies must include strategies by KCC operators and service providers to recruit individuals in the priority of service categories and how they will provide appropriate services to meet those population needs.

Operators are to regularly review the percentages of WIOA Title I Adult participants who are priority participants and adjust strategies as needed to reach the goal of enrolling at least 50 percent of adults as priority participants, per the preliminary policy.

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

Kentucky's Policy 16-008, Transfer of Funds between the Adult and Dislocated Worker Formula Funds, was developed by the Kentucky Career Center (KCC) Inter-agency Policy and Guidance Committee. It was distributed to and reviewed by system stakeholders and approved by the Committee and management. It is posted on the KCC Team of Experts website.

This policy provides the guidance and parameters for transferring up to 100 percent of a program year allocation for adult employment and training activities, and up to 100 percent of a program year allocation for dislocated worker employment and training services between the two programs. This authority is provided under WIOA as long as the request meets the governor's approval.

The policy includes information about requesting funds, funds not subject to transfer, considerations, and monitoring.

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]

The awarding of grants in a competitive or non-competitive process is completed in accordance with the Kentucky's procurement policy. When considering the ability of providers to meet performance accountability measures based on primary indicators of performance for the youth program, local boards will review performance history, stability of the program, collaboration with service providers and other components. Performance will be reviewed and analyzed both at the state and local level to ensure the youth elements are being made available to all youth and that youth are meeting expectations outlined in the grants.

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.

Developing youth programs to specifically target the out-of-school youth population remains a focal point of the state youth program design and the KWDB's strategic plans have combined a variety of approaches for expanding and enhancing outreach to youth. An example is the High School Outreach initiative designed to increase communication and collaboration between workforce boards and boards of education, technical education, post-secondary education, and economic development. Events coordinated between local boards, educational partners, and

employers frequently take place around the state to ensure Kentucky's youth are aware of industry needs. The Commonwealth continues to emphasize career pathway development and talent pipeline management in order to leverage and align core programs. Kentucky is planning to build a state- level work-based learning continuum with consistent definitions, performance metrics and high-quality service indicators across multiple state level partners. Local areas encourage youth to use one-stop services as needed. Areas have designed special referral processes for youth who come into one-stops and one area has developed a one-stop career center specifically for youth. Additionally, resources will be provided on a regional basis to assist in service redesign, training for service providers, and employer outreach efforts.

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]

The Commonwealth supports the local workforce areas in designing youth programs tailored to the needs of in-school and out-of-school youth in their local communities. Stated in the regulations at 20 CFR 681.420 (b), the KWDB's must describe the design framework for the youth program and ensure the availability of the 14 program elements amongst their service delivery plan. There must also be a formal partnership agreement in place between the local boards and all service providers incorporated in their framework. Monitoring and technical assistance continue to be provided to guarantee that local area policies and procedures meet requirements of the WIOA youth program design. Dedicated DWI youth program staff disseminate updates and guidance from the U.S. Department of Labor and others. Performance information, reports and trainings are provided to staff. Best practices are shared at all levels, including presentations at regional DOL events.

The paid and unpaid work experience program element is commonly executed throughout the Commonwealth. WIOA and 20 CFR § 681.590(a) require that a minimum of 20 percent of local area funds for Title I Youth Program be spent on work experience. This, in turn, has created an avenue to appropriate valuable pre-apprenticeship programs and work based learning opportunities around the state; collaborations with Advantage Alliance Kentucky, AMTECK, Metalsa, KY Fame, and TRACK are few examples that display accomplishment of this program element.

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.

The local board, with assistance from state level staff, shall establish a definition and eligibility documentation requirements for the "requires additional assistance to complete an educational program, or to secure and hold employment." The state has defined "requires additional assistance to complete an educational program, or to secure and hold employment" as:

- Has been fired from a job within the 12 months prior to application OR
- No previous work experience/never held a job OR
- Has never held a full—time job (30+ hours per week) for more than 13 consecutive weeks OR
- Difficulty with social interaction or behavioral problems OR

- History of family disruptions, such as divorce, legally separated parents, family violence, alcohol or drug abuse; one or more parents incarcerated OR
- A student participating in an alternative program/setting OR
- Has chronic attendance or discipline problems OR
- Functioning at least one or more grade levels below his/her age group in the areas of reading and math (for youth 18—24 if they are functioning at grade 11 or under) OR
- A student who has failed two or more subjects during the prior two years of school attendance OR
- One or more parent lack high school diploma/GED

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.

"Common school" defined — Attendance at public school and primary school program — Advancement without regard to age — Local boards to adopt policy establishing petition and evaluation process for students who do not meet age requirements.

(1) "Common school" means an elementary or secondary school of the state supported in whole or in part by public taxation. No school shall be deemed a "common school" or receive support from public taxation unless the school is taught by a certified teacher for a minimum school term as defined by KRS 158.070 and every child residing in the district who satisfies the age requirements of this section has had the privilege of attending it. Provided, however, that any child who is 6 years of age, or who may become 6 years of age by October 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by October 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(2) Beginning with the 2017—18 school year, any child who is 6 years of age, or who may become 6 years of age by Aug. 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by Aug. 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(3) Each local school board shall adopt a policy to permit a parent or guardian to petition the board to allow a student to attend public school who does not meet the age requirements of subsection (1) or (2) of this section. The policy shall include an evaluation process that will help determine a student's readiness for school and shall ensure that any tuition amount charged under this policy is the same amount charged to a student who meets the age requirements of subsection (1) or (2) of this section. Students enrolled under this policy shall be included in a school's average daily attendance for purposes of funding as provided in KRS 157.310 to 157.440.

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.

Kentucky's Policy 16-009, Definition of Basic Skills Deficient, was developed by the Kentucky Career Center (KCC) Inter-Agency Policy and Guidance Committee in collaboration with Adult Education. It was distributed to and reviewed by system stakeholders and approved by the committee and management for posting to the KCC Team of Experts website.

This policy is to provide direction on a statewide and system-wide understanding of the term "basic skills deficient." In addition to the definition provided by the Workforce Innovation and Opportunities Act (WIOA) 3(5)(A)(B), Kentucky seeks to expand and further clarify the definition for (B).

The policy includes the following information:

Per WIOA 3(5) (A)(B), the term "basic skills deficient" means, with respect to an individual,

(A) who is a youth, that the individual has English, reading, writing or computing skills at or below the eighth grade level on a generally accepted standardized test; OR

(B) is a youth or adult who 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.

For portion (B), the DWI provides the following additional clarification/guidance for making this determination by defining it as an individual who meets any one of the following:

• Lacks a high school diploma or equivalency and is not enrolled in secondary education OR

• Scores 8.9 or below on the Tests of Adult Basic Education (TABE) OR

• Is enrolled in a Title II Adult Education and Family Literacy Act (AEFLA) program (including enrolled for English as a Second Language (ESL)) OR

• Has poor English language skills (and would be appropriate for ESL even if the individual isn't enrolled at the time of WIOA entry into participation) OR

• The case manager makes observations of deficient functioning and records those observations as justification in a case note.

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).)

Not applicable

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

Not applicable

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

Not applicable.

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.

Not applicable

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.

Not applicable

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.

Not applicable

E. WAIVER REQUESTS (OPTIONAL)

WIOA State Plan 2022 Modification Waiver Request

Commonwealth of Kentucky

Statutory and Regulatory Requirement:

Kentucky is seeking a waiver from the requirements of Section 129(a)(4)(A) of the Workforce Innovation and Opportunity Act ("WIOA") and 20 C.F.R. § 681.410, which require use of funds to provide youth workforce investment activities for out-of-school youth ("OSY") in an amount not less than seventy-five percent (75%) of funds allocated to states under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and in an amount not less than seventy-five percent (75%) of funds available to local areas under subsection (c).

Background:

For the period 7/1/2020 through 6/30/2021, statewide statistics show that Kentucky's program served 1,523 OSY and 279 in-school youth ("ISY"). However, Kentucky statistics for 2019 estimated the percentage of ISY to be at eighty-four percent (84%) of the population fifteen to nineteen (15-19) years old, with approximately forty percent (40%) of those aged fifteen to twenty-four (15-24) categorized as OSY. Further, information garnered during the last twelve months indicates that nearly twenty-two percent (22%) of those under age eighteen (18) in Kentucky fall below the poverty level and, while just under one percent (1%) of our 2020 population is listed as homeless, nearly fifteen percent (15%) of the homeless population are under eighteen (18) years of age. It is important to note that while we have historically met the set measure for utilization of youth funds, the 75/25 split was adhered to due to compliance with the law not the desired needs of our state.

Since 2020, Kentucky has attracted significant economic development investments. Last year alone the Commonwealth announced $11.2 billion in private-sector investments. This year is on track to surpass that benchmark. A prime example of new investment is the Ford Motor Company/SK Innovation project slated to open in 2025. This development will open Twin Battery Plants in Glendale, Kentucky and employ a total of approximately 5000 individuals, many of whom will be hired in the years leading up to its opening. This announcement brings transformative automotive manufacturing into a new frontier. Manufacturing jobs will no

longer resemble what we know and will forever change the landscape of regional, rural economy and workforce in the Commonwealth.

These new investments create increased demand for workforce support, and we are eager to meet that need.

Waiver Request*:*

To best meet workforce needs, Kentucky requests permission to use youth program formula funds at a 50/50 level. A reduction from seventy-five percent (75%) to fifty percent (50%) would allow Local Workforce Development Boards (LWDBs) to meet the needs of ISY in the local demographic area as needed.

Reason for the Request:

The current 75/25 split does not meet the needs of Kentucky's workforce. The seventy-five percent (75%) OSY expenditure requirement limits the ability of local areas to:

- Direct resources, in consideration of local demographic needs, to youth populations determined to have the highest need; and
- Prevent at-risk ISY from dropping out of school thus increasing OSY numbers in the area.

A waiver allowing a 50/50 allocation would provide flexibility for local areas to deliver youth services to those most in need and meet the local area's specific workforce demands, such as increasing high school graduation rates, occupational skills credentialing for youth, and providing intensive work readiness preparation such as work-based learning programs that support entry level workers.

Serving out-of-school youth will remain a priority but lowering the expenditure requirement will enhance efforts to prevent in-school youth from progressing to that stage. As graduation rates have continued to rise across the Commonwealth, it has proven difficult to locate and reach OSY, particularly in more rural areas where barriers may be concealed by factors such as a family's social status, parents lack of involvement in their child's life, and/or financial penalization imposed on families by partner agencies for their OSY's participation, forced under their Law/Regulations. Therefore, flexibility to increase services to ISY provides a great opportunity to directly impact youth prior to graduation. It is important to note that local school systems and Family Resource Centers are aware of such family dynamics and can refer individuals for WIOA youth services while attending school, helping to streamline efforts to identify and locate those in need of assistance.

Adhering to current statutory requirements for WIOA expenditures and service ratios for serving ISY (25%) and OSY (75%), Kentucky is missing a golden opportunity to participate in the creation of career pathways in the K-12 arena and more importantly, providing employment and training opportunities for ISY who are economically disadvantaged with one or more barriers.

This waiver will enable local workforce areas to prepare youth still in school for career opportunities in a high-demand sector to include work-based learning opportunities such as pre-apprenticeships, apprenticeships, and provide aid in support of workforce ventures underway and anticipated.

This is our shining moment to develop and shape the future workforce of the region and that moment starts earlier in the youth life/career and employment cycle. Without this waiver Kentucky, and its WIOA programs, in particular, may not be deemed fully vested in development of future talent needs for its new corporate partners.

Actions Undertaken to Remove State or Local Statuary or Regulator Barriers:

Currently, no state or local statutory or regulatory barriers exist. Kentucky policy and regulation comply with relevant federal laws/regulations.

Goals and Outcomes:

Should US DOL grant this waiver, the Commonwealth will provide data on its impact. Approval of this waiver would permit LWDBs the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each LWDB. As such, goals are to:

- Increase outreach to ISY while maintaining a focus on serving OSY in order to develop a larger pool of young individuals qualified and prepared to meet the current and future needs of employers throughout the state;
- Increase low-income youth served;
- Increase post-secondary enrollment and completion; and
- Increase numbers served of youth with significant barriers.

Kentucky continues to expect local areas to recruit and prioritize OSY and make partner agencies serving OSY aware of local youth programs.

Individuals impacted by this Waiver:

This waiver will allow LWDBs to increase the number of ISY receiving services based on the demography of ISY in the designated area. This change will impact ISY who will receive the services as described in WIOA Section 123, Section 129 (c)(2), and 20 C.F.R § 681.420 as well as those aging out of foster care.

Description of the Monitoring Process:

The Kentucky Department of Workforce Investment and Local Workforce Development Boards will be responsible for monitoring the in-school participation rate and its anticipated increase during the annual monitoring on-site and desktop review ensuring among other criteria that the fourteen (14) programmatic elements required by WIOA for ISY are available.

This waiver was developed in consultation with LWDBs and is incorporated into the 2022 State Plan Modification submission.

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	Yes

The State Plan must include	Include
program's Disabled Veterans' Outreach Program (DVOP) specialist;	
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;	No
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	Yes

The State Plan must include	Include
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);	

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	73.0%		75.0%	
Employment (Fourth Quarter After Exit)	74.0%		76.0%	
Median Earnings (Second Quarter After Exit)	7,100.00		7,500.00	
Credential Attainment Rate	73.0%		75.0%	
Measurable Skill Gains	55.0%		60.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	76.0%		78.0%	
Employment (Fourth Quarter After Exit)	76.0%		78.0%	
Median Earnings (Second Quarter After Exit)	8,500.00		9,000.00	
Credential Attainment Rate	72.0%		74.0%	

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Measurable Skill Gains	70.0%		72.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	67.0%		69.0%	
Employment (Fourth Quarter After Exit)	70.0%		72.0%	
Median Earnings (Second Quarter After Exit)	3,800.00		4,000.00	
Credential Attainment Rate	60.0%		62.0%	
Measurable Skill Gains	50.0%		52.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

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 Commonwealth of Kentucky, Career Development Office currently staffs the provision of labor exchange services with merit staffing as well as Federally Funded Time Limited staff. It is the goal of the Career Development Office that future staffing will occur with subrecipient staff as we develop and implement a plan to outsource Wagner-Peyser services to the Local

Workforce Development Areas. As a result, the Commonwealth wishes to implement the flexibility of the *Wagner-Peyser Act Staffing Flexibility* final rule after July 1, 2020 and will submit the pertinent State Plan Modification once approved, which will include an implementation strategy for same.

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

Partner for Success

This initiative seeks to move the state from a group of separate agencies to a unified system focused on investment in workforce. The initiative seeks to streamline services to employers and customers and leverage resources and share the credit for outcomes while providing opportunities for individuals at all levels of the system to take ownership in the vision, direction and return on investment made by the department.

Kee Suite

KEE Suite is a comprehensive case management system for Workforce Development designed to collect data on job seekers and participants looking for assistance with Workforce services.

Citizen Connect - Citizen Connect is a portal which allow a citizen to self-register their information when requesting Workforce Information Services.

Business Connect – Business partners post opportunities for WIOA citizens and citizens receiving Medicaid to fulfill PATH requirements. Training providers post Offerings and enroll citizens in WIOA training.

Staff Connect - Staff register citizens, conduct assessments, determine WIOA eligibility, create employment plans, manage a citizen's case, and add services to citizen's profile.

Focus Suite

This system allows customers to search for jobs, employers to post jobs and search for candidates and enables staff to view and monitor the activity for eligibility compliance while ensuring customers and employers have provided all necessary information for the system to properly function. Focus/Career and Focus/Talent training is provided within two months of hire and a refresher course is offered three months after basic training is completed. Job Order Writing Training and Focus/Assist training are provided to staff with job order writing responsibilities. Training takes place as determined by local office management.

Reemployment Services and Eligibility Assessments (RESEA)

The Reemployment Services and Eligibility Assessments (RESEA) program is a grant program for states to assist individuals receiving unemployment insurance (UI) benefits.

The UI program is a required partner in the broader public workforce system and provides unemployment benefits to individuals who have lost their employment through no fault of their own and who otherwise meet initial and continuing UI eligibility requirements. Beginning in 2005, the U.S. Department of Labor, Employment and Training Administration funded the voluntary UI REA program to address individual reemployment needs of UI claimants, as well as prevent and detect improper benefit payments. In 2015, the Reemployment Services and Eligibility Assessment RESEA program replaced the REA program providing greater access to reemployment services in addition to services previously provided under the REA program.

In FY 2018, amendments to the Social Security Act permanently authorized the RESEA program and implemented several significant changes including formula-based funding and a series of

requirements intended to increase the use and availability of evidence-based reemployment interventions and strategies. The permanent RESEA program has four purposes:

1. Reduce UI duration through improved employment outcomes;

2. Strengthen UI program integrity;

3. Promote alignment with the vision of the Workforce Innovation and Opportunity Act (WIOA); and

4. Establish RESEA as an entry point to other workforce system partners.

Kentucky Career Center hubs conduct a weekly Kentucky Career Center orientation (KCCO). RESEA participants are required to attend these orientation. Kentucky Career Center partners work together in collaboration presenting the career center respective portfolio of products and service offerings. In addition, these orientations are open to all customers who have an interest in hearing/learning about career center services.

Personal Professional Development Training

All staff has the ability to participate in personal professional development courses offered to the agency by the Governmental Services Center. Staff can enroll in and attend courses to improve communication, problem—solving and business writing skills and a wide variety of topics to assist them in performing their daily job functions.

Supervisor Training

Upon promotion or hire into a management or supervisory position within the agency, all managers will be enrolled into the EWDC's Management Academy. The Management Academy currently consists of online courses including: merit system basics, hiring the best, investing in your people, solving problems, effective communication and conflict resolution. The program will eventually be expanded to include three additional courses on various leadership topics.

Program Specific Training

The agency offers a wide range of services tailored toward specific customers including military service veterans, disaster victims and large plant or employer closure customers. Training programs are developed for staff members to ensure they are able to deliver effective services to address customer needs. These training's are developed by the department to effectively deliver services to customers.

Develop Department Policies

As the agency grows, management will continue to review existing policies, adjust them to address current needs and develop new policies as the need arises. This will ensure the agency is operating and utilizing resources as effectively as possible.

From Unemployment Insurance's (UI) perspective, as people begin utilizing career centers for UI assistance, while they are in the building the staff can direct them to other employment services offered by the state. The plan involving increasing foot traffic in career centers is discussed in greater detail below.

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

UI and Workforce Employment Services both are under the umbrella of the Department of Workforce Investment. Professional staff members in each area communicate as needed and coordinate any UI law, program or service changes. Kentucky Career Center staff primary focus

is assisting job seekers re: job search and potential training opportunities. Customers can utilize the career center for filing UI claims and/or requesting UI benefit checks; however, they are required to contact the call center in Frankfort re: any questions and/or concerns re: their UI claim. When there are changes and/or eligibility issues addressed by Employment Services and WIOA staff members, step—by—step instructions are provided. Written guidance letters and processes are available via webinars, conference calls and informational printed materials.

Importantly, UI is currently reallocating staff resources to address some problem areas. Specifically, the claim processing times and our assistance line wait times. As part of this UI is now placing local field staff in hubs around the state to assist people with filing UI claims. Part of this effort includes working with the local staff and training them in identifying UI issues or problems in the applications. Many of the claims that need to be adjudicated result from individuals who do not fully understand how to complete the application. By placing staff in local offices where they can work directly with claimants, we believe we will decrease mistakes which will decrease claim processing times and result in more timely payment of benefits.

Regarding the decision to place Unemployment Insurance staff back into the Kentucky Career Centers, this decision was grounded in the fact that many of the customers coming into the Career Centers required hands-on assistance with filing for unemployment or requested information regarding their unemployment claims, and it became clear that the Commonwealth needed dedicated staff at the Career Centers to provide assistance with Unemployment Insurance issues. In addition, this change allows the customer to receive the full gamut of services that are provided at the Career Centers, and staff can easily direct customers to other employment services offered by the Commonwealth. The Local Workforce Development Areas have begun a cross training initiative across all programs and staff to ensure that everyone has the basic knowledge of each program in order to assist and refer the customer when necessary.

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

UI employment services staff members listen to issues from individuals and assist the individuals in the following ways:

using the UI website for information and other resources available to UI claimants;

providing current UI basic information, approved by UI, to the individual to assist in determining eligibility for claimant;

working with the claimant through the online application process.

Each Hub has dedicated phone lines located in the lobbies that directly dial the Unemployment Insurance Call center in order for claimants to receive direct contact with customer service representatives that can assist with issues, provide answers, or refer to additional services. The Call center is also equipped ot assist Spanish speaking customers as well as hearing-impaired customers.

There is also the option on the website for customers to email their issues or questions about their claims directly to customer service representatives with UI services.

As mentioned above, the UI office is now engaged in a multi-step rollout to increase UI trained staff in career centers. Under this new plan individuals will now be able to walk into a career center and received assistance in completing UI applications, and they are able to ask questions about the status of the claims. Additionally, the UI office intends to increase over time, the number of staff dedicated to assisting in UI claims. The initial roll out starts with dedicating 12 staff members to UI claims in career centers. It is our hope that as people find out that career

centers can now assist in filling out application and answering questions, the foot traffic in the career centers will significantly increase. Additional staff will be added in phases over time depending on volume. The state is also identifying local and regional offices that are not "one-stop-shops" that could benefit form UI services, and additional staff will be allocated as needed.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

As we place UI staff in career centers we anticipate an increase in foot traffic through the career centers. When people come in for UI assistance we are then better able to direct them other employment resources offered by the state. As discussed above, UI services were not previously offered in career centers. Offering UI services will drive foot traffic into career centers thereby increasing career centers ability to offer additional services.

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:

Wagner—Peyser (WP) services in local Kentucky Career Center offices 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 WP staff. Kentucky is currently exploring options to allow LWDAs to procure Wagner-Peyser services for their career centers going forward.

Workforce Employment Services staff make certain UI claimants stay on track with necessary services to utilize UI while working toward their next employment opportunity. Workforce Employment Services staff enter specific UI claimant information into the Focus Assist and Kee Suite computer database to track services accessed by claimant. UI software captures that data daily to assure claimants are participating in a full range of services to increase the opportunity and goal of employment.

*RESEA selects UI claimants identified as likely to exhaust their UI prior to gaining employment. These identified individuals are required to attend an in-person workshop at the Hub at approximately their 4th week of filing for UI benefits. This connects the individuals with Wagner Peyser staff at the center and allows them to receive more intensive reemployment services. The staff work with the individuals on ensuring they have a searchable resume, complete an assessment, provide labor market information, and refer to employment or other services.

State requires UI claimants be registered on the state labor exchange, Focus Career website, within a specific time period to secure UI benefits. The state also requires UI claimants to follow through with additional services, most generally provided by W—P staff, and as recommended by WP staff as a criteria to continuation of UI benefits, in a specific timeframe determined by UI and recorded in data base by WP staff.

*When claimants file their claim through the online system they are automatically pre-registered in the Focus Career website. The customers will be prompted to complete the full registration in Focus at the end of the filing process. This requires customers to either create or upload a resume to their account.

UI claimants are required to complete one documented work search weekly. Work searches are completed electronically during their bi-weekly payment request and sent directly to UI, and/or WP. Staff members review work searches to determine if searches fall within the UI guidelines and provide guidance on work search. If an eligibility question arises, WP staff would contact UI and provide information and documentation for UI to determine eligibility issues. UI claimants have access to all comprehensive services, support and assessment services available, as well as

individually designed service and guidance, if needed. All technological, individual and group opportunities are available and accessible to assist in job finding and placement.

KCC Resource Room, with available computers, and one—on—one assistance for job searching, resume creation, online application assistance is available to all job seekers. When individuals meet with a WP Employment and Training Specialist — referrals are made to partners and WP staff for a wide range of needs to increase current and future employment options. Included would be any application adaptation or assistance that may be needed for the job seeker and/or UI claimant. Examples include:

• Re Employment Services RESEA provided for UI claimants

• WIOA program referrals provided to eligible participants

• Office of Veterans Services available and referrals to Vets

• On—Site Tech College and Skills U services for GED assistance and other educational opportunities and options

• WP Employment and Training Specialists provide individual and group services

• WP Career Counselor referrals: assessments, WorkKeys, TABE are examples

• WIOA staff for eligible job seekers — services may include short term training to increase employment options and opportunities

• All referrals are entered into the database for informational purpose and follow up with jobseekers.

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.

Farm workers in the Commonwealth of Kentucky have unique needs of finding employment outside farm work and meeting their training needs. Currently the Commonwealth of Kentucky helps MSFW find employment through the 12 certified full service career centers throughout the state. These Career Centers offer services to help with resume preparation, interviewing skills, completion of applications and other services provided by Career center partners. The Career centers also provide training to develop the skills today's employers want. These training may be provided through the Career Center or the many partners. The partners included but are not limited to the KCTCS, WIOA, OVR, OTB, Kentucky Farm Works Program, Experience Works Program.

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

In Kentucky, the five top labor—intensive crops are tobacco, produce, livestock, row crops and industrial hemp. The months of increased agricultural activity in Kentucky are from July-December, and the geographic areas for prime activity are mainly in the Central and Western regions.

Because agricultural employers continually need more workers, employers rely heavily on hiring foreign workers due to the scarcity of a local agricultural workforce.

Tobacco companies are reducing the number and size of contracts with farmers. Most reduction in tobacco has taken place in the western part of the state with reduction up 25 percent. There is a projected increase in the production of industrial hemp. Over the next three years, there will be increase in the production of industrial hemp from 2,500 acres to more than 200,000.

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

During the peak seasons, Kentucky has approximately 9,000 Visa workers, 20,000 seasonal workers, and approximately 10,000 migrant workers. During the low season, there are approximately 1,500 Visa workers, 2, 500 seasonal workers and approximately 2,500 migrant workers. Mexico is the predominate country of origin of the MSFW in Kentucky, and most of these workers speak Spanish. Staff members provide outreach to MSFWs at various KCC offices across the state.

4. OUTREACH ACTIVITIES

Because this population is so transient, outreach to Migrant Education Program could be a source to contact additional farmworkers. The Migrant Education Program is an organization that reaches out to the children of farmworkers, so by using this organization, KCC could reach another cohort of the population. Kentucky will continue to reach out to other agencies to provide the best services possible to MSFWs.

Because this population is so transient, outreach to Migrant Education Program could be a source to contact additional farmworkers. The Migrant Education Program is an organization that reaches out to the children of farmworkers, so by using this organization, KCC could reach another cohort of the population. Kentucky will continue to reach out to other agencies to provide the best services possible to MSFWs.

Kentucky Career Centers also provide the job seekers with one-on-one employment services including resume writing, interviewing techniques and job application completion.

Additionally, KCC provides the job seeker with a Web-based program, Focus Career, which helps develop a resume and track job leads online.

Staff members are active in the regional business service teams and have a Web-based program, Focus Talent, which allows employers to search online for qualified candidates.

The MSFW Program works with all KCC statewide partners to ensure that MSFW participants receive all the services provided by KCC. All MSFW participants are made aware of farmworker rights with respect to the terms and conditions of employment.

All outreach staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed. Training modules and tools are provided by the National Monitoring Advocate Team.

KCC services including vocational rehabilitation; blind services; employment and UI services; the Kentucky Farmworker Program; and Experience Works, a service offering training through the Senior Community Service Employment Program (SCSEP) to low—income older workers in 60 counties in Kentucky, are available to all MSFW participants. All MSFWs have access to the KCC offices.

All staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed.

Staff members provide outreach to MSFWs at the more than 32 certified and uncertified KCC offices across the state. KCC provides the job seekers with one—on—one employment services including resume writing, interviewing techniques and job— application completion. Additionally KCC provides a Web—based program, Focus Career, that helps the job seeker develop a resume and track job leads on the Internet. Staff members also are active in the regional business service teams and have a Web— based program called Focus Talent that allows employers to search online for qualified candidates.

All staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed.

KCC and the Kentucky MSFW program work closely with the Kentucky Farmworker (NFJR Grantee) program to employ farmworkers throughout Kentucky in fulltime employment outside agriculture and high paying job within agriculture. The Kentucky MSFW program also works with Migrant Education and migrant health programs to provided needed services the MSFW participants.

KCC services are available to all MSFW participants, including vocational rehabilitation; blind services; employment and basic UI services; the Kentucky Farmworker Program; and Experience Works, a service offering training through the Senior Community Service Employment Program (SCSEP) to low income older workers in 60 counties in Kentucky.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

KCC provides the job seekers with one—on—one employment services including resume writing, interviewing techniques and job application completion. Additionally, KCC provides the job seeker with a Web—based program, Focus Career, which helps develop a resume and track job leads online. Staff members are active in the regional business service teams and have a Web—based program, Focus Talent which allows employers to search online for qualified candidates.

Posters are located in all KCC offices with instructions on how and where to file a complaint.

Information on the Agricultural Recruitment System is provided at employer meetings and at agricultural trade shows.

6. OTHER REQUIREMENTS

A. COLLABORATION

NFJP staff will continue have access to the systems used by the Kentucky Career Centers. KCC began establishing relationships with Kentucky Migrant Education Program and the Kentucky Migrant Health Care System over the last year. KCC will continue to build a better working relationship with both agencies.

B. REVIEW AND PUBLIC COMMENT

KCC will provide a copy of the AOP to NFJP grantees along with other agencies and organizations for comment and suggestion.

The agencies that will provide a copy of the AOP are:

- Kentucky Farm Worker Programs Inc.
- Kentucky Migrant Education Program
- Kentucky Migrant Health Care Program
- Kentucky Farm Bureau Federation
- Agriculture Workforce Management Association, Inc.

No comments were received regarding the AOP as part of the public comment period for this State Plan.

C. DATA ASSESSMENT

KCC has met its goals in regards to services to the MSFWs identified in the job service system. KCC plans to work with the other agencies to better reach the MSFW population and make it aware of KCC services. Kentucky continues to work towards better integrity of its data to ensure the accuracy.

Kentucky continues to work towards better integrity of its data to ensure the accuracy.

D. ASSESSMENT OF PROGRESS

Again, KCC has met its goals in regards to services to the MSFWs identified in the job service system. KCC plans to work with the other agencies to better reach the MSFW population and make it aware of KCC services.

E. STATE MONITOR ADVOCATE

The state monitor advocate has been involved with the AOP.

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	Yes

The State Plan must include	Include
timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	
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 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.	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	63.0%		65.0%	
Employment (Fourth Quarter After Exit)	60.0%		62.0%	

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Median Earnings (Second Quarter After Exit)	6,100.00		6,300.00	
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 developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

A. ALIGNING OF CONTENT STANDARDS

Kentucky Adult Education (KYAE) is governed by Title II, Workforce Innovation and Opportunity Act (WIOA) and the Kentucky Adult Education Act (Senate Bill 1, 2000 KRS 151B.055). KYAE recognizes the critical need for aligning adult education curricula to meet the higher demands of College and Career Ready Standards (CCRS), a subset of state standards recognized by the Office of Career, Technical, and Adult Education (OCTAE). Kentucky is setting the conditions to address the education and training needs of adult learners in the current pandemic environment and beyond to provide the opportunity for transformational change across the Commonwealth. The intent is to meet adult learners where they are utilizing both the in-person and online/virtual modalities as well as a hybrid modality when and where applicable as it relates to the needs of the student. Kentucky has adopted the Common Core State Standards developed by the National Governor's Association(NGA), Council of Chief State School at all educational levels (P-12), postsecondary and adult education. KYAE recognizes the critical need for aligning adult education curricula to meet the higher demands of College and Career Ready Standards (CCRS), a subset of state standards recognized by the Office of Career, Technical, and Adult Education (OCTAE).

CCRS offers a common, consistent, and clear understanding of what students are expected to learn. Designed to be robust and relevant to real-world expectations, the CCRS reflect and afford adult students the foundational knowledge, skills, and abilities (which have evolved substantially over the last decades) to pursue postsecondary education and training, as well as career aspirations.

KYAE's standards-based instruction and integration of digital literacy align with the content and format of the fifth edition of the GED® test used to award Kentucky's High School Equivalency (HSE) Diploma. Together, these provide KYAE's students the same opportunities for college and career readiness as graduating high school seniors.

Consequently, KYAE is part of an effort to create a seamless system for students to move from adult education to earning their GED®/HSE diplomas and then, subsequently, transitioning to postsecondary education and training and/or living wage jobs, ultimately contributing to the economic vitality of the Commonwealth.

To ensure successful instructional effectiveness, KYAE employs comprehensive, job-embedded, and intense professional learning (PL) (using professional learning communities [PLCs] and offering professional growth electives) that encapsulates standard-based andragogy, academic content, contextualization of instruction, digital literacy integration (e.g., EdReady), effective instructional strategies, and instructional leadership. KYAE PL offerings are available via face-to-face, online, and blended formats.

KYAE continues its partnerships with the Adult Education Academy at Morehead State University to provide instructional leadership and assistance to instructors focusing on Reasoning through Language Arts and Mathematics, and the National Center for Families Learning (NCFL) to provide curricula development and facilitation of online courses, including English Language Acquisition (ELA). Both partners are integral to the development and execution of professional learning communities targeting innovative practices.

KYAE continues to develop standard-based tools to assist instructors with aligning academic and workforce preparation instruction based on best practices and extant research. Instructional Framework content and associated pedagogical assets will be examined and implemented if applicable to provide a common instructional foundation for all of Kentucky's adult education providers. Local adult educators (who successfully aligned instruction with College and Career Readiness Standards [CCRS], student assessment criteria, and program performance metrics) will be embedded into this process. Building upon local providers' input, a state-level team will ensure the alignment of all instruction statewide with the Literacy Information and Communication System (LINCS) Professional Development Center Self-Assessment Tool, the LINCS Adult Education Teacher Competencies, the Data Recognition Corporation Test of Adult Basic Education (TABE) 11/12 Blueprints (based on the College and Career Readiness Standards), and the GED® High Impact Indicators.

The Mathematics and Reasoning through Language Arts (RLA) Frameworks are constructed to provide uniformity and ease of use. A CCRS Key is placed in the framework's introduction to assist users in understanding standards abbreviations; color-coding is used to signify the type and percentage of standards-based content at each TABE Level; and a horizontal crosswalk is used to illustrate specific CCRS applications aligned with specific hyperlinked instructional resources.

The English Language Proficiency (ELP) Instructional Framework is used to continue the same uniformity and ease of use associated with the Mathematics and RLA Frameworks. The resources in the ELP Standards (ELPS) Instructional Framework are organized in two ways. First, each ELP Standard is listed with level descriptors, aligned competencies, and resources. Second, resources are listed by proficiency level. The ELPS Framework is based on the five proficiency levels identified in the LINCS ELPS for Adult Education. As with the previous frameworks, the ELPS Framework is designed to ensure conformity in standards-based instruction.

Standard-based instruction continues to be supported and improved through development and sharing of resources and tools, sharing of best practices, and input and feedback across the local provider network.

KYAE plans to continue to align professional learning, tools, and resources to the LINCS repository resources. Additionally, KYAE has adopted a continuous improvement model as it relates to performance and providing adult education services. KYAE is committed to adopting more and various instructional technologies to accommodate the needs of students through and beyond the pandemic. KYAE is in the process of engaging all partners and stakeholders across the Commonwealth as well as on the national level to examine the use of current instructional technology, determining the best courses of action, and analyzing gaps in instructor competencies.

KYAE has launched Blackboard (Bb) as the Learning Management Software (LMS) to enhance instructor development through the Professional Learning Communities (PLC) process to improve overall adult learner/student outcomes across the 120 counties in Kentucky.

B. LOCAL ACTIVITIES

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Competitive process Section III(b)5.B.(i)]: KYAE released the Request for Applications (RFA) for AEFLA and Title II, WIOA funding for grant years 2022-2025 in January 2022. A competitive process will be conducted to determine the eligible providers that will be awarded funds starting July 1, 2022. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and State-Specific requirements that indicate the applicants' ability to produce measurable skill gains and other defined metrics based on State goals for enrollment and secondary diploma/equivalent attainment. Through this process, KYAE will identify, assess, and award multi-year grants to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

- Direct and equitable access Section III(b)5.B.(ii)]: All KYAE RFAs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA, Title II, WIOA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

The RFA will underscore criteria for individual eligibility of adult education services, which includes:

- Have attained 16 years of age;
- Are not enrolled or required to be enrolled in secondary school under state law (which is 18 years of age in Kentucky); and
- Who are:
    - Basic-skills-deficient;
    - Lacking a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
    - An English Language Learner (ELL)*.

Therefore and hereafter, adult education and literacy activities are defined as programs, activities, and services offered by eligible providers that include:

Adult education:

- Standards-based academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for attaining a secondary school diploma or its recognized equivalent, transitioning to postsecondary education and training, and obtaining employment.

Literacy:

- Ability to read, write, and speak English, compute, and solve

problems at levels of proficiency necessary to function on the job, in the family, and in society

English Language Acquisition:

- A program of study designed to help eligible individuals who are ELL achieve competency in reading, writing, speaking, and comprehension of the English language, leading to: attaining a secondary school diploma or its equivalent; transitioning to postsecondary education and training; and/or obtaining employment

Integrated English Literacy and Civics Education (IELCE):

- Services for ELLs that include literacy and ELA, as well as instruction on the rights and responsibilities of citizenship and civic participation; may include workforce training, enabling competency in the English language; and acquisition of basic and advanced skills to function effectively as parents, workers, and citizens

*English Language Learner is an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language and (1) whose native language is a language other than English; or (2) who lives in a family or community environment where a language other than English is the dominant language.

Workplace adult education and literacy activities:

- Services, defined above, offered in collaboration with an employer or employer organization at a workplace or an offsite location designed to improve incumbent worker productivity

Family literacy:

- Activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and better enable parents or family members to support their children's learning needs; must integrate all of the following activities:

*Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;

*Interactive literacy activities between parents or family members and their children;

*Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and

*An age-appropriate education to prepare children for success in school and life experiences

Workforce Preparation:

KYAE will continue to require standards-based, academic instruction to be contextualized, at a minimum, by using its Employability Standards. By strengthening contextualized instruction with online curricula courseware purchased with KYAE's and EWDC's incentive funds, students, while in a program of study, may earn a governor-endorsed Kentucky Essential Skills Certificate (KESC). Consequently, with all programs contextualizing standards-based, academic instruction, they need only to add training (occupational) partner activities, using common learning objectives and aligned curricula, to extend their efforts to implement Integrated Education and Training models and/or provide adult education support within more expansive career pathways programs. The state will leverage additional courseware pathways to include but not limited to college and career readiness standards instruction.

The KESC was designed to enrich essential-skills-contextualized, standards-based instruction, but it also meets the needs of students, allowing them to celebrate a milestone and earn a stackable credential on their way to pursuing a Kentucky College Readiness Certificate and/or high school equivalency diploma. Programs are equipped to provide workforce preparation activities.

Integrated Education and Training (IET):

With the advent of the Work Ready Kentucky Scholarship (WRKS) and subsequent initiation of various eligible co-enrollment models, e.g., career pathways that are eligible for Ability to Benefit (AtB) financial aid and other non- AtB eligible and/or abbreviated pathways, partners are in the process of establishing and launching initiatives to provide co-enrollment programs to Kentuckians. The student outcome goal remains the same; earn a GED®/HSE diploma and, at a minimum, one industry-recognized credential.

KYAE is in the process of collaborating with KCTCS and other partners to create a new program to replace the recently expired "GED®+Plus" program. KYAE leadership dependent upon approval of the Cabinet will meet with KCTCS as well as other partners to discuss marketing strategies, enrollment trends, and student success outcomes for new programs.

The Commonwealth initiated a Work Ready Kentucky Scholarship by Governor's Executive Order that is dedicated to funding tuition for up to 60 credit hours of occupational training services, including 350 programs, in Kentucky's in- demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides up to $400 for "mandatory fees" associated with occupational training service costs. HSE/GED®-seeking students are eligible for this scholarship pending the continued partnership with KCTCS via a new program.

While the WRKS provides $400 per year for mandatory fees, students frequently find occupational training service cost requirements, e.g., books, supplies, equipment, etc., prohibitive. KYAE encourages workforce partners to consider committing funding toward required occupational training service cost requirements as well as tuition. KYAE plans to continue to leverage the Free GED Initiative in Kentucky in which the first iteration of the GED test is at no cost to the adult learner/ tester. These measures will assist in removing barriers to enable students to remain co-enrolled and accelerate earning an HSE/GED® diploma and occupational credential.

In addition, KYAE continues to explore ways in which to partner with alternative organizations from the community and technical colleges to offer core adult education services concurrently with occupational skills training. While these services may not include all the wraparound support services as a fully articulated career pathway program, defined in WIOA Section 3 (Def. 7), they provide an opportunity for adult education providers to partner with training organizations to accelerate student learning by attaining adult education contextualized academic support and aligned occupational skills training simultaneously.

KYAE plans to provide intensive technical assistance to providers more frequently to ensure IET programming adheres to common learning outcomes and integrated academic education and occupational skills training.

Additionally, the KYAE Outreach and Strategic Partnership Division will enhance existing partnerships with local workforce innovation boards (LWIB) and Kentucky Career Centers to offer students opportunities to engage in work-based learning activities leading to potential job placements with community employers.

KYAE wants to grow and expand the concept of IET in Kentucky beyond the existing programs to include prospective collaborations with employers, pre- apprenticeship programs, public and private four-year universities, etc., to support the occupational training element of an IET model by offering a variety of ways students can accelerate their educational and career accomplishments.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

- Competitive process Section III(b)5.B.(i)]: During grant year 2022-23, KYAE has released a new competitive application process (RFA/RFP 2022-2025) for federal AEFLA, Title II, WIOA funding to determine the eligible providers that will be awarded funds starting July 1, 2022. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and aligned State-Specific Performance Requirements as well as other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

- Direct and equitable access Section III(b)5.B.(ii)]: All KYAE RFAs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

- With the reauthorization of WIOA, the RFA process included and will include the expectation that the following services are made accessible to inmates based on need and situational feasibility.These services include:

- Adult education and literacy activities (as defined above), including preparation for earning a GED®/HSE;

    - Appropriate instructional accommodations for inmates identified with learning differences/disabilities;
    - Workforce preparation activities as defined above; and
    - Transition coaching and CCR-standards-based instruction.

- Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.KYAE approaches corrections educational services through increasing educational levels and equipping inmates with skills to become self-sufficient to reduce the recidivism rate. Using a multi-pronged approach to corrections education, inmates are served both in adult state correctional and local correctional facilities such as independent jails.*Local Corrections Education*In local areas where full-service jails exist, adult education providers are required to partner with their local jailer to offer incarcerated adults contextualized (workforce preparation skills), standards-based academic instruction (a minimum of 10 hours of instruction per week is recommended, however, discretion is given to the adult education program director to determine if less than 10 hours of instruction per week is sufficient time to advance students). Notwithstanding the current second and third order effects of the pandemic, it is expected that jailers provide adequate space in a comfortable environment with student access to instructional materials to encourage additional study outside of the classroom setting.*State Correctional Institutions*Historically, the DOC employed KCTCS instructors to provide educational services in the 12 state correctional institutions. Currently, instructors are directly employed by the 12 institutions and primarily provide instruction during daytime hours. Counites within their respective regional service areas will serve inmates at state institutions based on the needs of the inmates/adult learners and or to supplement DOC employed instruction, which may include providing services primarily during evening hours. Correctional adult education students must meet the same eligibility criteria as any other adult student as described above. DOC is not funded with title II funds, however, the KYAE and DOC partnership enhances the delivery of adult education services to DOC residents and Kentuckians transitioning from a facility. KYAE understands the value of the full spectrum of adult education services, including integrated education and training, career pathways, concurrent enrollment, and peer tutoring and will conduct adult education and literacy activities, including preparation for earning a GED®/HSE diploma and preparation for incarcerated adults to transition with employability/essential skills while not excluding the aforementioned services. KYAE appreciates the benefits an accelerated co-enrollment program may have for inmates and seek opportunities to implement these programs. While inmates may currently have an opportunity to avail themselves of vocational/occupation skills training, they most often must pursue these offerings subsequent to earning their GED®/HSE. A co-enrollment program may permit inmates, especially those nearest release, to accelerate the process of earning both a GED®/HSE diploma and industry-recognized technical/occupational credential. Additionally, where situationally feasible, instruction may include peer tutoring.

- As re-entry services for ex-offenders has become a priority for DOC, KYAE has been diligent in identifying ways to recruit incarcerated individuals and re-entering ex-offenders without a GED®/ HSE diploma. KYAE will enhance the partnership with DOC re-entry services to establish and hopefully codify a referral system through probation and parole officers. The goal is to align the efforts of Local program directors and regional probation and parole officers to establish locally effective processes that are focused on outcomes that positively impact the ex-offender/adult learner and workforce

participation in the Commonwealth. In general, when ex-offenders are released and/or are required to meet with probation officers, they are given local adult education contact information and a referral to seek services. The goal is for the probation officer to alert the adult education provider through email and provides the individual's contact information. The provider is required by KYAE policies to attempt to contact the ex-offender a minimum of three times within a 30-day period. The contact attempts must be documented and are subject to review during monitoring and performance assessments. If the ex-offender does not seek adult education services, the adult education provider alerts the probation officer for further follow-up.While these steps have increased referrals, not all referrals seek services and of those who do seek services, they are plagued with insufficient hours of study to attain educational advancements. Therefore, KYAE continues to work closely with DOC to modify and refine the referral process to ensure better outcomes.Our ultimate goal in partnering with DOC is to ensure all incarcerated individuals without a high school diploma or its equivalent earn a HSE credential or set the conditions to receive other services along the adult education spectrum – preferably prior to release. If a credential is not earned prior to release, partners need to make inmates aware of services at local learning centers upon their release. The potential impact on recidivism rates could be significant.Unfortunately, Kentucky is a leading state in the opioid addiction epidemic. However, KYAE has reengaged with recovery programs to provide adult education services to residents of these center. Because recovery residents may be subject to restrictions to remain on campus and often do not possess a high school diploma or its equivalent, local KYAE providers are leveraging virtual/digital capabilities and realizing efficiencies by serving cohorts of recovering clients on campus versus in-center instruction. (See also State Leadership, Alignment).Not less than 82.5 percent of grant funds are used to award grants under section 231 to execute section. Of that amount, up to 20% may be used to support correctional education activities in section 225.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

As a result of the Request for Application released in January 2022, KYAE anticipates that multiple providers will apply for Section 243 funding. Utilizing pre-pandemic data from FY18-19, KYAE served 497 IELCE English language learners (ELLs) and attained 279 measurable skills gains in the following three Kentucky counties: Fayette, Jefferson, and Warren.

For eligible IELCE applicants of the RFA, the service area for which they apply for core services funds must have met a minimum of 2,000 ELLs. Applicants are required to submit separate forms describing the program's plan of service and indicate how resources would be allocated in the budget and budget narrative. The eligible applicants are required to provide the two (2) most recent fiscal years' data indicating the ELL total population, number of ELLs enrolled the previous two (2) years, and the projected number of ELL enrollments.

KYAE reinforced communication of IELCE requirements in the RFA. Eligible applicants are required to describe the program's plan of service and indicate how resources will be allocated in the budget and budget narrative as well as address the 13 considerations among other requirements annotated in the RFA 2022-2025. As a result of the monitoring process, KYAE will assess to ensure that all IELCE program components are fully integrated in those programs awarded IELCE funds as a result of the 2022 grant competition.

KYAE's purchase of Burlington English positively contributes to IELCE participants blended instructional experience, civics education, and career exploration. The courseware is CASAS-aligned and provides academic instruction for ELL students. Of particular interest is its inclusion of soft skills, career exploration courses, and comprehensive technical/professional learning support services.

2.Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

- Competitive process Section III(b)5.B.(i)]: During grant year 2022-23, KYAE has developed a competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2022. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.
- Direct and equitable access Section III(b)5.B.(ii)]: All KYSU RFAs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

Kentucky Adult Education (KYAE) currently provides adult education services utilizing a regional model with emphasis on regional service areas. There are 27 local providers executing services across the 120 counties in the state for FY 22. The number of local providers moving into FY 23 will be dependent upon the RFA 2022-2025 review and award process. KYAE recognizes the importance of adhering to all requirements associated with the IELCE process. The Program Administration, Performance and Compliance (PAPC) Division conducted evaluations of the three local IELCE program utilizing the desktop monitoring method due to pandemic restrictions during 2020-2021.

During 2022, PAPC, using Office of Career, Technical, and Adult Education (OCTAE) resources, is conducting technical assistance sessions specifically targeting IELCE program and Integrated Education and Training (IET) models.

The PAPC Division has experienced significant personnel turnover in 2021-2022. The entire Division consists of new hires with less than six months experience which includes the new Director who started on February 1, 2022. Consequently, it is apparent that a learning curve exists for the PAPC Division and thus KYAE is currently taking steps to ensure that all PAPC staff gain the requisite knowledge and subject matter expertise to properly ensure program administration, performance and compliance across the local provider network is in compliance with all applicable statutes, policies, and uniformed guidance.

KYAE has set up training sessions with the appropriate US DOE OCTAE Subject Matter Experts to gain greater levels of knowledge on all applicable requirements and guidelines. Although the personnel turnover is a significant challenge, the goal is to continue the training sessions to provide guidance for requirements during the current year as well as set the conditions to move forward to start the new RFA 2022-2025 cycle on 1 July, 2022.

The PAPC Division conducts periodic assessments to ensure strategies are being implemented and producing the desired outcomes. At the end of the fiscal year, each IELCE provider will be required to submit a one-page narrative and evaluation logic model to show evidence of demonstrated effectiveness. The evaluation logic model will serve as a monitoring tool for the PAPC Division to assess performance outcomes, ensure compliance, address barriers to implementation, provide technical assistance, and identify key strategies and best practices to support IELCE programming.

IELCE program students will have access to partnership programs, which is a co-enrollment integrated education and training program offered in partnership with fiscal agents like the Kentucky Community and Technical College System (KCTCS).

KYAE has 27 local providers who offer programs designed to meet labor market needs and increase credential attainment for adults. KYAE leadership meets periodically with KCTCS to discuss marketing strategies, enrollment trends, and student success outcomes.

The Commonwealth initiated a WRKS that is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky's in-demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to $400 for "mandatory fees". HSE/GED®-seeking students are eligible for this scholarship.

KYAE continues to explore ways in which to partner with alternative organizations from the community and technical colleges (e.g., YouthBuild's construction training) to offer core adult education services concurrently with occupational skills training. While these services may not include all the wraparound support services as a fully articulated career pathway program, defined in WIOA Section 3 (Def. 7), they provide an opportunity for adult education providers to collaborate with training organizations to accelerate student learning by attaining adult education contextualized academic support and aligned occupational skills training simultaneously.

Additionally, the KYAE Outreach and Strategic Partnerships Division is in the process of reengaging with local workforce innovation boards (LWIB) and Kentucky Career Centers to offer students opportunities to engage in work-based learning activities leading to potential job placements with community employers. The reengagement is necessary as the totality of the circumstances of the pandemic have impacted aspects of the partnerships.

KYAE wants to grow and expand the concept of IET in Kentucky beyond the current programs to include prospective collaborations with employers, pre-apprenticeship programs, public and private four-year universities, etc., to support the occupational training element of an IET model by offering a variety of ways students can accelerate their educational and career accomplishments.

As part of the changes implemented as a result of WIOA reauthorization, KYAE has reorganized and re-missioned the Coordinators in the Outreach and Strategic Partnership Division as well as the PAPC Division. The new focus is multi-fold, which includes but not limited to the following: connect and coordinate services and activities through Kentucky Career Centers (KCCs) and identify new and innovative opportunities to serve more students by liaising with and expanding local community partnerships.

While Coordinators strategically recognize potential partnerships, they coordinate with providers, who will provide services based on the needs of students/adult learners in support of MSG goals and State-Specific Performance Requirements. The Coordinators are in the process of collaborating with recovery centers (many recently established or extended due to the opioid crisis), where cohorts of individuals without a high school credential reside and the potential to provide adult education services exists. Services are frequently available on-site due to the restrictions placed on residents.

KYAE continually provides opportunities to connect local providers with local partners to enhance student access, support, and success.

Based on historical enrollment, KYAE is developing strategies to improve the referral process to increase referrals from employers, community agencies, and WIOA core partners per year. With the use of available resources, technical assistance, periodic monitoring, and offering additional trainings and workshops with our local partners, our IELCE providers will continue to help our state with identifying how to best align adult education activities with postsecondary, workforce, and local partner needs.

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

Alignment of WIOA partners: On June 27, 2019, House Bill 392 went into effect, moving all WIOA partners under one common "umbrella" cabinet. There were other organizational realignments, ultimately resulting in the following agencies falling under the EWDC's purview: Kentucky Department of Workforce Investment (DWI), Workforce Innovation Board (KWIB), Department of Libraries and Archives (KDLA), Center for Statistics (KYSTAT), Department of Education (KDOE), Commission on Proprietary Education, Educational Television (KET), Center for School Safety, Commission of the Deaf and Hard of Hearing, Governor's Scholars Program, Unemployment Insurance Commission, Early Childhood Advisory Council, Governor's School of Entrepreneurs, Office of Vocational Rehabilitation (OVR), Office of Career Development (CDO) [formerly Employment and Training], Employer and Apprenticeship Services, and Kentucky Adult Education. KYAE continues to forge and strengthen partnerships with WIOA and other partners, such as Kentucky Community and Technical College System (KCTCS), Kentucky Higher Education Assistance Authority (KHEAA), Department of Corrections, Career and Technical Education (CTE), Kentucky Cabinet for Health and Family Services (CHFS), and more.

Although the pandemic has impacted the indoctrination process into EWDC, KYAE had forged and nurtured partnerships with workforce partners, the reorganization has stimulated more opportunities to integrate services, including the following:

- Early Childhood - Head Start: KYAE, Early Childhood Advisory Council, and Kentucky Community Action (KCA) have met at the state level and are developing a strategy to partner at the local level. The intent is for the agency and local service provider staff to become aware of viable services available to their clients.

Additionally, KYAE will share access to its Lesson Bank and Digital Skills curriculum with local Head Start educators.

- Kentucky Department of Libraries and Archives (KDLA): KYAE has worked with KDLA in the past by encouraging local service providers to meet and share service information that can be communicated to their students/clients. In planning for FY 22, KYAE met with KDLA leadership to discuss strategies to better leverage the library system across the state. Additionally, state policy development includes examining how service and connection points to service could be available in all 120 counties and still accommodate

for county adult education demand. Based on the need to address services in many small, rural counties, the goal is to partner with community organizations to identify referrals to determine the best course of action to provide adult education services. Adult Education providers with greater in-demand services in other counties could still provide referrals, Career and College Navigator services, and access to computers and online courseware, connecting potential students to more robust center services more efficiently by establishing "connection points" with partners. Since libraries are often a prominent presence in most counties, they and other community organizations were targeted as apt partners to realize efficient use of services. By establishing connection points at the beginning of the program year, local providers are expected to evaluate and re-evaluate their effectiveness and modify for continued improvement of services. KYAE will monitor the strategy's successes and challenges in support of improved student outcomes.

- Perkins Leadership Grant Funds: KYAE was awarded leadership funds to reinforce its College and Career Navigator (CCN) support for FY 22. Providers must employ at least one full-time CCN per KYAE Implementation Guidance and add more CCN services (hires) as enrollment dictates.

The Perkins grant afforded KYAE the opportunity to hire a state level CCN coordinator. The Way Ahead in FY 23 for the CCN Coordinator is to ensure CCNs complete a Career Pathway Plan on everyone adult learner served across the local provider network to navigate adult learners towards their college and or career goals. The CCN Coordinator provides training sessions for local navigators in conjunction with the Instructor Development and Student Outcomes (IDSO) Division. Additionally, activity logs are used to capture CCN activities in relation to student outcomes. CCNs assist students with completing a career pathway plan that is designed for students to set educational and workforce goals based on interests, workforce needs, post-secondary education and training requirements, etc. A major responsibility of the local CCN is to be aware of and refer students to support services (e.g., public assistance, community-based services, etc.) to remove barriers to educational pursuits. The Coordinator keeps the local CCNs connected through Google docs and classrooms – forums in which the Coordinator can share important communications and local CCNs can ask questions, share best practices, etc. CCNs will also be integral as the "face" of connection points, job fairs, and other awareness-inducing events.

- Kentucky Workforce Innovation Board (KWIB): KYAE leadership serves on several KWIB committees – Workforce Participation and Sustainability and Education and Employer Engagement. The dashboard created by Kentucky Center for Statistics (KYSTATS), with the cooperation of individual agencies, is typically used to report out several metrics of interest for the KWIB, and one metric is adult education. KYAE shares KAERS data with KYSTATS to keep the dashboard up-to-date.

- WorkReady Communities: KYAE is a member of the Work Ready Communities review panel. The panel reviews proposals for certification, in-progress status, and recertification associated with WorkReady Community status. Kentucky's counties are awarded the WorkReady Communities distinction based on meeting a set of criteria. The criteria most potentially affected by adult education include the percent of the working age population (18-64) without a high school diploma or its equivalent, the percent of working age adults with "some college" (as defined by the American Community Survey), and the number of adults who have earned essential skills and/or career readiness certificates.

- Work Ready Kentucky Scholarship: The Commonwealth's WRKS is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky's in-demand sectors: advanced manufacturing, information technology and

business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to $400 for "mandatory fees". High-School-Equivalency- (HSE)/GED-seeking students are eligible for this scholarship. While the WRKS also provides $400 per year for mandatory fees, students frequently find course-required book, supply, equipment, etc. costs prohibitive. Kentucky offers free GED testing for first time GED test takers. KYAE plans to continue to wave the GED test fee for qualifying students dependent upon Cabinet approval and the availability of funds. These measures will assist in removing barriers to students remaining co-enrolled and accelerate earning an HSE/GED diploma and occupational credential.

- Kentucky Cabinet for Health and Family Services (CHFS): The KYAE Executive Director will coordinate with CHFS regarding the implementation of Kentucky's Medicaid Waiver. Representatives from various agencies review and approve proposed online courses for Medicaid recipients. By completing an approved course, Medicaid recipients are awarded banked "funds" that may be used for services, e.g., vision care, dental visits, etc. for themselves and family members. Although the courses are short in duration, the intent is to cultivate healthy and beneficial habits.

- Strategic Partnership Coordinators: Additionally, KYAE will require Coordinators in the Outreach and Strategic Partnerships Division to be more outcome focused on the development of partnerships with stakeholders and adult education partners. KYAE will transition from the regional model to a service demand model to better address the needs of both adult learners and partners as it relates to enhancing workforce participation and the talent management process. A significant component of their mission is to connect and coordinate services and activities through Kentucky Career Centers (KCCs) and identify new and innovative opportunities to serve more students by liaising with and expanding local community partnerships.

While Strategic Partnership Coordinators strategically recognize potential partnerships, they support the providers, who ultimately provide services within their geographic area of responsibility. The Coordinators are having some success in collaborating with partners in some counties across the State.

Other partnerships include collaboration with the National Center for Family Literacy (NCFL). The new NCFL President and new KYAE Executive Director and their respective staffs met in January 2022 to discuss strategies to enhance partnership opportunities to better address the needs of adult learners and their families. KYAE will work to collaborate with other organizations which include but not limited to the Prichard Committee and the KY Collaborative for Families and Schools Bluegrass Region to locally offer GED test preparation in conjunction with entry- level employment opportunities.

- High quality professional development: In FY 21, KYAE set the following goals: (1) Improve staff digital literacy and edtech proficiency of students and provider network via Professional Learning (PL) and promotion of digital growth mindset, (2) Support successful implementation of program-initiated innovation projects, (3) Offer every student a blended learning experience, and (4). The PL Model places emphasis on internal, continuous, job-embedded communities of inquiry interested in monitoring relevant data and improving student outcomes.

Program Directors, Assistant Program Directors, and instructors have been introduced to new instructional technology tools used to facilitate professional learning. Google Classrooms and Zoom Videoconferencing were adopted as part of the new model, and all providers were given an opportunity to practice using the technology at each of the live rollout events.

Professional Learning Communities (PLCs) are the centerpiece of the KYAE PL Model. PLCs emphasize student focus, provider voice, and local innovation. In the FY 21 33% of all distance

learning hours were for live distance learning and 25% of all distance learning hours were for paper products as opposed to 91% in FY 19. The goal is that PLCs will have long-term impact on cooperative problem-solving affecting local program performance.

Each of the 27 KYAE provider-based PLCs is assigned a PLC Coach tasked with facilitating PLC meetings targeted towards creating a product to remedy a data-based provider challenge. PLC Coaches also work with providers to ensure an array of new student-centric instructional resources are being used to support improved student outcomes. These resources include a new Instructional Framework Series designed to improve the quality and efficiency of Mathematics and Reasoning through Language Arts instruction; a new Student Persistence/Retention Framework containing strategies targeted to adult learners; a new website warehousing the PLC-developed culminating products, and an enhancement of the existing KYAE Lesson Bank.

KYAE Professional Learning Requirements are part of the overall KYAE PL Model re-design with an emphasis on digital capabilities in support of student outcomes. Learning requirements for Program Directors, Assistant Program Directors, and Experienced instructors working 500+ hours per year will be aligned with the re-design to allow for vertical integration and collaboration among veteran KYAE instructional staff.

Subsequently, in an effort to instill greater innovative approaches to recruiting, retaining, and awarding more credentials to students without a high school credential or its equivalent, KYAE is focusing on instructional technology and distance learning. College and Career Navigators have been integrated into the PL process as PLC coaches will facilitate the development and implementation of innovative project action plans. Local program directors have an opportunity to share successes and challenges across the local provider network.

KYAE plans to continue to use the PLC model to foster problem-solving and decision-making based on data analytics and to unite and focus program staff. KYAE has/will analyze qualitative and quantitative data to determine supportive themes for future PLC work. Themes will target elements that improve student outcomes in support of MSG goals and State-Specific Requirements and further KYAE's strategic goals of the development of partnerships, recruiting, retaining, results, and referrals to support quality services and successes for students.

- PL plans: Professional Learning Communities (PLCs) have been organized in two tiers: local and state. Locally, each of our 27 providers has its own provider-specific PLC. Statewide, PLCs are organized by instructional contexts shown to offer the greatest potential for statewide professional growth, as evidenced by performance data. These statewide PLCs include Corrections instruction, Mathematics instruction, Instructional Technology, and English as a Second Language instruction.

The KYAE Professional Learning Model will be further modified to address emerging statewide trends, such as the need for more robust, cohort-based, differentiated instruction. The work of PLCs will be leveraged to ensure needs are met. Specifically, emphasis will be placed on developing innovative models for cohort-based, differentiated instruction. This modification will include a multi-pronged approach.

KYAE launched Blackboard (Bb) as the new Learning Management System (LMS) during FY 22. The goal is to build all course shells and migrate all course content into shells prior to the end of FY 22. 67% of programs reported at least a 90% proficiency in utilizing a program LMS.

Successful, researched-based instructional innovations launched by provider-specific PLCs will be identified, modeled for other providers, and scaled. Special emphasis will be placed on local innovations that have shown success in student cohort development. Next, new digital literacy/distance learning initiatives will focus on harnessing instructional technology for differentiated instruction and cohort development.

The KYAE Professional Learning Model utilizes cloud computing, productivity tools, collaboration tools, software, and products. These resources, along with other adult education-centric instructional technologies, will provide the infrastructure for a statewide network of distance learning and learning center-based cohorts. Professional learning rooted in best practices for edtech-based differentiation will ensure differentiated cohort sustainability. Ultimately, the initiative will also provide 21st Century digital literacy skills for students and staff.

Additionally, professional growth electives and product pilots will be launched in direct response to data-based provider needs. These electives and product pilots will simultaneously allow for greater precision in targeted approaches to develop course outlines based on fine-tuned professional development options.

- Technical assistance: KYAE has a Program Administration, Performance, and Compliance (PAPC) Division which consists of four state-level employees (one Division Director and three Senior Coordinators), who provide technical assistance to KYAE-funded adult education providers in Kentucky. KYAE has transitioned from a regional model to Mobile Assistance Team Model which will consists of subject matter expert (SME) representatives from each of the four Divisions. The KYAE IT Support Coordinator works with all providers to provide technical assistance related to the Adult Education student information system called the Kentucky Adult Education Reporting System KAERS.

The use of KAERS data and reporting features are used to provide State staff and local providers with visibility of student assessment data and accountability measures using data analytics. KYAE also coordinates with the Kentucky Center for Statistics (KYSTATS) to migrate KAERS data into the KYSTATS Adult Education Feedback Report. In addition, KYAE and KYSTATS are in the process of developing a plan to add State-Specific Performance Requirements data per the 2022-2025 RFA to the Adult Education Feedback Report located on the KYSTATS website. Local Providers will have access this the Feedback Report and the goal is to mitigate some of the functionality challenges of KAERS. Other technical assistance opportunities have included KCTCS programs and partnerships with Probation and Parole, Supplemental Nutrition Assistance Program (SNAP), and Cabinet for Health and Family Services (CHFS).

Coordinators also conduct periodic engagements with all local program directors to review performance data and strategies for improving outcomes. Directors are asked to rate strategies for effectiveness. These engagements afford the directors the opportunity to address successes and challenges concerning their innovation, PLC plans and targets.

Throughout the year, new information relative to performance, WIOA, etc., is disseminated through training sessions, quarterly updates, mass e-mails, and other forms of online communication. KYAE State staff address local provider inquiries via telephone and e-mail correspondence and conduct site visits as requested. The Executive Director conducts state circulation visits to meet adult learners and to observe local provider operations and support the program Directors.

- Monitoring and Evaluation: KYAE is strongly committed to ongoing data analytics supporting local program success in producing quality student outcomes based on core indicators of performance. KYAE staff monitor, evaluate, share resources, and provide TA in a myriad of ways, both directly and indirectly. KYAE will coordinate with the Kentucky Center for Statistics (KYSTATS) to enhance the Adult Education Feedback Report to provide all stakeholders, specifically local providers visibility of their progress as well as areas for improvement as it relates to performance. Presented below are some of KYAE's major monitoring, evaluation, and program support components.

- KYAE's program administration, performance, and compliance (PAPC) Division serves as the primary point of contact for local programs regarding performance and compliance with adult education requirements. KYAE provides information on state and federal policy and procedures; monitors and evaluates program compliance and performance and assists in data-informed analysis and program plans for development; provides local programs with information on best practices; and promote the efficient and effective use of resources. In accordance with monitoring requirements and based on progress towards MSG and State-Specific Requirements goals, PAPC Division members as part of a Mobile Assessment Team will conduct on-site compliance visits, gathering information to ensure local provider compliance with all applicable laws, regulations and policies and in support of achieving performance goals. An end-of-year narrative is expected to be submitted by all local programs addressing end of year performance results and mitigation strategies if applicable based on the failure to achieve MSG targets, State Goals, or State-Specific Requirements.
- Monitoring activities are conducted throughout the program year. Desktop compliance checks are performed quarterly. Documentation is requested from local providers to demonstration compliance with implementation guidelines. Following a comprehensive review of KYAE's Kentucky Adult Education Reporting System, desk reviews are based on indicators that reflect meaningful and measurable achievement, and are aligned with established goals, and obtainable through KAERS. Additionally, a secondary data analysis further examines characteristics of performance. This action ensures that both KYAE and the local program directors are aware of and effectively use data to monitor program performance and accountability.

Each year 30 of the 120 counties served by KYAE are randomly selected for annual audits conducted by the Kentucky Auditor of Public Accounts. The audits consist of both performance and financial reviews and include a review of programs' compliance with KYAE policy. KYAE will continue this practice unless regulatory guidelines dictate differently.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Technology: KYAE has transitioned to having the full capability to provide all services with the full integration of technology in the classroom to maximize all resources and assets to improve student outcomes – use of technology in the classroom and remotely.

The Instructor Development and Student Outcomes (IDSO) Division is concentrating on instructional technology support for both state and local initiatives. Many innovation projects involved technology, online courseware is used by providers (including Kentucky Educational Television's [KET], Fast Forward, Burlington English, Aztec, EdReady, and others) and distance learning discussions. The intent is to emphasize reaching more students, new and innovative delivery mechanisms are necessary.

Google Classroom and Zoom Videoconferencing have been adopted as essential instructional tools in the KYAE PL Model. These tools provide no-cost, easy-access options for professional learning and instruction. The goal is to model the use of instructional technology tools in all professional learning initiatives, so instructors maximize the use of technology to improve student outcomes. For example, all 27 provider-based PLCs utilized 27 unique Google Classrooms to facilitate PLC interaction. The College and Career Navigator (CCN) Coordinator uses it to communicate with CCNs statewide as well.

Moving forward an Instructional Technology Framework will be utilized to provide and enhance all instructional services provided to students in all 120 counties across the state. This interactive framework is intended to be a living document that is open to feedback from instructors. The examples of instructional technology described in the framework are meant

to supplement, not supplant quality in-person and synchronous instruction. The framework supports the KYAE philosophy that sound instruction is designed around clear learning objectives. Integration of the technology tools highlighted in the new framework allow for greater contextualization and digital literacy needed for college and career success.

Professional learning will be delivered in face-to-face, online, or blended formats by PD contractors from the Adult Education Academy at Morehead State University and the National Center for Families Learning (NCFL).

The intent of the data-driven PL Model is to improve performance across the local provider network by enhancing the digital competence and instructional acumen of both the State and local provider network staffs.

The PL Goals for FY 23 include classroom observations targeting the bottom 1/3 providers based on quarterly performance rankings to identify challenges and implement research based best practices to improve student outcomes. Blackboard will be used as the KYAE LMS in support of PL pathways. These pathways will provide Math, RLA/Sci/SS. ESL, and Edtech PL tracks designed to incrementally improve instructional expertise and student outcomes. Observation data, feedback, and level setting training will be used in conjunction with performance data to re-align PL electives and PLC foci in support of improving student outcomes.

F. ASSESSING QUALITY

Professional Development

Pursuant to the local provider's contract with KYAE, the local provider is responsible for operating the program in compliance with the fiscal year's Kentucky Office of Adult Education Learning Plan. As the instructional leader of the program, the program director ensures all staff understand and fulfill the professional learning requirements included in KYAE's Professional Learning Handbook. IDSO staff track compliance throughout the year and non-compliance is noted in the provider's file for reference during periodic monitoring sessions, quarterly director update meetings, end of year performance reviews, and grant competitions review.

KYAE continues to use Kirkpatrick's Four - Level Evaluation Model to inform professional development. The Kirkpatrick Model includes evaluating participants' reactions, learning, behavior, and results relative to a specific professional development course.

KYAE utilizes PLCs for all experienced instructors, CCNs, assistant directors, and program directors working 500+ hours per year. These provider-based PLCs are required to meet four times per year under the direction of a PL coach. Currently, the 27 provider PLCs meet 10 times over the course of a fiscal year. KYAE-designed meeting templates, KYAE project templates, and PLC Google Classrooms are used to ensure consistency in process.

Furthermore, all PLCs are required to develop a capstone product designed to improve program performance. These products are assessed using a KYAE PLC product rubric. Products are further assessed by the KYAE ISDO Division before publication on the KYAE PL website.

KYAE has designed and implemented the KYAE Classroom Observation Tool based on the Adult Education Teacher Competencies™. The Tool provides program directors with an evidence-based profile of current instruction in their programs for the purposes of professional learning.

Program Administration, Performance and Compliance

KYAE is continuously seeking new ways to analyze and draw conclusions from the data. KYAE uses KAERS, however, the Kentucky Center for Statistics (KYSTATS) provides the Adult

Education Feedback Report to assist with the analysis of performance data across the local provider network and the 120 counties. Although local providers have been trained on the use of KAERS and reports that provide data by county, KYAE will enhance the partnership with KYSTATS to make the Adult Education Feedback Report more relevant to current operations and the Way Ahead to include aggregating performance data by local provider. The intent moving into FY 23 is to maximize the use of the Feedback Report on the KYSTATS website to monitor and evaluate program services, performance, student outcomes, state-specific requirements, etc. KYAE uses a data quality checklist and has provided guidance to providers on maximizing data quality.

KYAE, specifically the PAPC Division staff, is meeting with US DOE OCTAE Subject Matter Experts to review recent updates as well as increase the institutional knowledge of the new PAPC staff. The PAPC Division provides information on state and federal policy and procedures, monitors and evaluates program performance and assists in data-informed analysis and program plans for development, provides local programs with information on best practices, and promotes efforts to increase the use and understanding of technology in support of student outcomes.

KYAE is strongly committed to helping ensure local program success in producing quality student outcomes based on core indicators of performance. As mentioned under Perkins Leadership Grant Funding, local CCNs are intended to be an additional support mechanism to ensure students remain in the program and achieve their education and or career goals. CCNs refer students to appropriate community services to assist in overcoming non-educational barriers, complete the Career Pathway planning form with all students, and advise them based on their Pathway Plan, labor market needs, skill sets, and interests in pursuing a credential or career.

KYAE annually publishes *Implementation Guidelines* in which performance expectations are addressed among other KYAE requirements. These include but are not limited to, WIOA's common performance measures and goals emphasizing HSE attainment, measurable skill gains, and targeted enrollment. As of February 2022, the Implementation Guidelines are being reviewed and re-written to better address the needs of adult learners in Kentucky and to ensure local providers are achieving State-Specific Requirements and Goals, in compliance with OCTAE requirements, and administering adult education services consistent with the RFA 2022-2025. At year end, providers are required to identify potential areas of development. If providers are in the bottom 1/3 of the overall performance rankings at the end of the FY, immediate monitoring will be implemented at the beginning of the next FY which will include the development of a Performance Improvement Plan (PIP) that will address performance benchmarks, improvements, monitoring dates/times, and next steps based on documented progress or the failure to demonstrate continuous improvement.

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

The State Plan must include	Include
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	Yes

The State Plan must include	Include
through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	

AUTHORIZING OR CERTIFYING REPRESENTATIVE

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	KY Office of Adult Education, Department of Workforce Investment, Education and Workforce Development Cabinet
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Kish
Last Name	Price
Title	Commissioner
Email	Kish.Price@ky.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

- KYAE will take any and all necessary steps to ensure equitable access to, and participation in this Federally-assisted program for all populations across the Commonwealth of Kentucky. All adult literacy programs and services and associated functions executed in Kentucky will consider and address at a minimum the six types of barriers highlighted in the statute. The steps to mitigate challenges associated with barriers will include but not limited to the following: (1) Distributing brochures and other associated content about proposed programs and services to potential participants in their native language; (2) Making materials available on audio tape or in braille to accommodate specific student needs; and (3) Conducting outreach efforts to reach across all genders and identities.
- The State engages in an active process to identify accommodations and services related to potential obstacles for individuals with disabilities and or members of marginalized populations across the six types of barriers. The State's efforts include but not limited to: (1) making facilities accessible to all individuals to include persons with disabilities; (2) modifying work schedules and training sessions to accommodate all citizens regardless of demographics or disability status; and (3) provisions for readers and interpreters.
- The State will continue to review all services, programs and processes on a periodic basis to identify barriers that may impede access and to develop courses of action to address any gaps in equitable access across the adult education spectrum.
- The State provides equitable access to all staff projects, training events, and associated professional development activities for all citizens with consideration for the six types of barriers highlighted in the statute.
- Direct and equitable access Section III(b)5.B.(ii)]: All KYSU RFAs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFAs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same

rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated in the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

- Kentucky completed the RFA process for services under WIOA. As part of that RFA process, each applicant was directed to address the thirteen AEFLA considerations. Consideration number two addresses special needs populations and barriers. KYAE weighted heavily the responses provided in the considerations in the selection of applicants for service. Applicants addressed how they will serve special needs populations and students with barriers through ADA compliance, Office of Rehabilitation (OVR) assessment on physical disabilities, assistive technologies and other reasonable accommodations as well as partnerships with state agencies that provide support services to students with barriers or special needs. All programs have been supplied with the Burlington English product as one tool to use with non-English speaking students. In addition, all local programs sign contracts and affidavits that cover Title IX and affirm they will not discriminate on the basis of age, color, race or any protected class under Title VI and VII of the Civil Right Act of 1964, Age discrimination Act of 1975, Americans with Disabilities Act of 1990 and all applicable laws which prohibit discrimination. Programs are continually monitored by state staff of Administration and Accountability and on a rotating basis participate in an agreed upon procedures audit by the State Auditor of Public Accounts as to the terms of the contract.

- KYAE, an office of Education and Workforce Development Cabinet (EWDC), provides policy guidance, technical assistance and professional learning opportunities to state and local provider staff to support and ensure quality adult education services and student achievement. Skills U hosts quarterly program director meetings to provide information, technical assistance, and opportunities for feedback. Hiring directives (e.g., position descriptions, educational and skill requirements, etc.) guide the state and local providers to recruit and select qualified and degreed candidates. KYAE

- supports professional development to improve instruction strategies for instructors and instructional leaders with the goal of advancing high quality, standards-based academic instruction; workforce preparation and occupational technical education contextualization of content; and integration of digital literacy and other pertinent content into academic instructional practices. This has included yearlong institutes, online courses, and/or professional learning communities. The Program Administration and Accountability unit monitors provider compliance and provides technical assistance so that policy and procedures, designed to perpetuate quality services and student outcomes, are implemented.

- State employees are hired and operate according to the legislative, regulatory, and policy mandates of the Kentucky Personnel Cabinet and the EWDC. State employees may avail themselves of several development opportunities and provide feedback to administrative authorities. State employees are encouraged to express their concerns regarding existing or potential barriers or prohibitions to equal employment opportunity due to race, color, national origin, sex, age, religion, sexual orientation, gender identity, ancestry, veteran status, and disability in accordance with state and federal laws. EEO assistance is available by contacting the Human Resources EEO Counselor/Coordinator or the State EEO Coordinator.

- GEPA will be addressed through activities funded with leadership funds which includes professional development and a menu of training sessions that address both opportunities to address identified gaps as well as enhance existing knowledge, skills, and abilities. State-wide Local Provider Director meetings will to used for professional development via the train the trainer model. In addition, survey tools will be utilized to determine GEPA related training and development needs across the local provider network.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	45.0%	39.2%	45.0%	40.2%
Employment (Fourth Quarter After Exit)	44.0%	41.2%	44.0%	42.2%
Median Earnings (Second Quarter After Exit)	4,125.00	4,000.00	4,125.00	4,125.00
Credential Attainment Rate	48.0%	38.6%	48.0%	39.6%
Measurable Skill Gains	51.4%	45.2%	51.4%	46.2%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

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 agency's State Rehabilitation Council (SRC) is established under the Kentucky Revised Statues 163.470 and meet the requirements of 34 CFR 361.29. The SRC is a valued partner with the Office of Vocational Rehabilitation participating in the administration of the Vocational Rehabilitation Program under Title I of the Rehabilitation Act of 1973, as amended. The SRC meets quarterly to review policies, program information, and other pertinent issues.

As a part of the agency's commitment, OVR will provide funding support for the SRC to be used in reimbursement of expenses to council members, publication of the Annual report, and conducting the Consumer Satisfaction Survey and the Comprehensive Statewide Needs Assessment. OVR will work with the SRC to seek input for needed improvements and recommendations. This will occur through formal and informal communication including committee work of the members. OVR will work in partnership with the SRC in ensuring that individuals served receive the needed services and supports to gain independence through competitive integrated employment and increased skill acquisition.

Summary of Input of the State Rehabilitation Council

The Statewide Council for Vocational Rehabilitation has met quarterly with a full quorum in attendance from 10/1/2020 through 9/30/2021. There are six standing committees that drive the work of the council, and they meet quarterly on the same day as the SCVR meeting. Council members are self-appointed to committees. The committees are: 1) Executive Committee; 2) Public Awareness and Legislative: 3) Policy and Planning; 4) Consumer Services and Program Evaluation; 5) Nominating and Bylaws; and 6) Blind Services.

During 2020 and 2021 the Council played an active role and had input in the following:

The Strategic Planning Process

The SRC Annual Report

Statewide Public Hearings

Comprehensive Statewide Needs Assessment

The State Plan Goals Priorities and Strategies

Consumer Satisfaction Survey

Review of Field Services Metrics and Data

Reviewing and analyzing Center Operations

2021 Rehabilitation Services Monitoring

Order of Selection

October 26, 2020, Quarterly Meeting

The quarterly meeting was held with a full quorum in attendance. During the meeting the chair of SCVR presented the annual statewide Emplo9yer Awards. There were seven awards given to recognize employers who work closely with VR. A training was conducted for the SCVR members on Robert's Rules of Orders.

The Executive Director and Executive Leadership gave reports, and questions were taken. OVR staff gave an overview of the effects of the pandemic for service delivery, options for virtual service delivery, Order of Selection, personnel actions and program service metrics. Effective October 1, 2020, OVR suspended their consumer cost-sharing policy, Priority Category IV was opened, and all consumers were removed for the wait list effective October 1, 2020.

The Executive Committee met and discussed the needs of the Carl D. Perkins Vocational Training Center and Charles McDowell Rehabilitation Center for ongoing maintenance and repair and the proposed Capital Projects for the Center Operations. The discussion was prompted by OVR staff were engagement in discussions with the Rehabilitation Services Administration regarding prior approval for the projects. The Executive Committee for SCVR was asked to consider an amendment to the State Plan and the current statewide needs assessment to include a justification of need for the projects in the Capital Plan. A motion was

made by the Committee recommending the addition of the goal and additional language to the Statewide Needs Assessment.

The Nominating and Bylaws Committee continued their work on the current bylaws in conjunction with Cabinet legal staff. The process has been delayed due to the pandemic. There were no recommendations.

Blind Services Committee discussed the effects of the pandemic on services and the development of virtual services for consumers. The need for additional Orientation and Mobility staff was identified. There were no recommendations.

Consumer Services and Program Evaluation Committee had a comprehensive discussion about the Consumer Satisfaction Survey content considering the pandemic affecting services, changes to the UK Research Center and the combining of the two agencies. A motion was made to the full council recommending the Consumer Satisfaction Survey be distributed online with phone calls to be made to consumers that don't respond to the online version. Theresa Thomas seconded the motion with none opposed and the motion carried. The full council made the decision to table the motion until further discussion could occur at the next quarterly meeting.

The Policy and Planning Committee met and discussed the new drafts of Eligibility, Individual Plan for Employment and Individual Plan for Employment without Expanded definitions policies that were distributed via email to the committee prior to the meeting. The committee is aware of these new policies and have no recommendations. The Public Awareness and legislature received an update on the progress of the SCVR Annual Reprot. A recommendations was made to use the VR 100th Anniversary theme for the report.

January 25, 2021, Quarterly Meeting

The quarterly meeting was held with a full quorum in attendance. The Executive Director and the Executive Leadership staff gave reports, and questions and comments were taken. OVR staff gave an overview of service delivery during the pandemic, the RFP process for a new case management system, the establishment of a Transition Branch, Annual VR Awards Ceremony, the Career Pathway Grant final grant report to RSA, the RETAIN Grant, virtual service delivery at Perkins and McDowell, impacts of the pandemic on the Business Enterprises program, Order of Selection, personnel actions and program service metrics.

The Executive Committee met and discussed the OVR budget, matching funds and the effects of the pandemic on service delivery. OVR staff are adjusting to working remotely and acclimating to virtual service delivery. There were no recommendations.

The Nominating and Bylaws Committee continued their work on the revision of current bylaws. There were no recommendations.

Blind Services Committee had an in-depth conversation about specialized services to the blind and visually impaired and that some of these services simply cannot be delivered remotely. The committee discussed the need for individualized technology training across the state. There were no recommendations.

The Consumer Services and Program Evaluation Committee continued their discussions regarding the distribution method of the Consumer Satisfaction Survey. Discussion was held regarding the Consumer Satisfaction Survey considering the pandemic effect on services. The research center at UK is no longer operational requiring the Human Development Institute conduct the surveys internally until another entity is selected to conduct the survey. A motion was made for the Consumer Satisfaction Survey to be distributed online with phone calls to be made to consumers that don't respond to the online version and the motion carried. OVR staff gave an update on the Comprehensive Statewide Needs assessment. To date surveys have been conducted of the OVR counseling staff, Community Rehabilitation Program Staff, Career

Center Staff, Post-Secondary Disability Center, the public, consumers and Secondary Transition Staff. Case reviews are currently conducted monthly and OVR is gathering information to identify service trends. There were no recommendations.

The Policy and Planning Committee met and reviewed minor revisions to eight Service Fee Memorandums for the purpose of clarity to staff. There were no objections to the changes. These eight Service Fee Memorandums consisted of: 1. Benefits Analysis 2. Guidelines for Purchase of Supported Employment 3. CRP Pre-Employment Transition Services 4. Four Year and Graduate Degree Programs 5. Short Term Training Programs 6. Independent Contracting Agency Interpreting 7. Interpreter Fee Schedule 8. Community Work Transition Program Fee Schedule.

The Public Awareness and Legislature committee met and discussed areas of legislative interest. The group emphasized that the focus this year will be around the state budget.

April 26, 2021, Quarterly Meeting

The quarterly meeting was held in April, with a full quorum in attendance. At this meeting we did a review of what is required to conduct business consistent with the state's Open Meetings Act, KRS 61.805 to 61.850 specific to video teleconferencing meetings. The Executive Director and division directors gave reports, and questions were taken. OVR Executive Director and the Executive Leadership team gave an overview of the upcoming off-site federal monitoring schedule and highlights of the MTAG. Information was presented to the SCVR regarding the statewide needs assessment, OVR contracts and renewals, plan for returning staff to offices on a hybrid plan while adhering to Healthy at Work guidelines, updates on the Strategic Planning process, the 6-year Capital Plan, Business Enterprises and the Randolph-Sheppard Financial relief and Restoration funds, personnel actions and program metrics. OVR field services assistant director gave a presentation to the SCVR on Pre-Employment Transition Services.

SCVR Members participated in the Comprehensive Statewide Needs Assessment Stakeholder Forum during the quarterly meeting. University of Kentucky human Development Institute (UK HDI) staff introduced the Comprehensive Statewide Needs Assessment. The council members were broken into two groups to provide feedback and input. There were five questions asked to both groups based on major findings from the Needs Assessment from Fall 2020 and Spring 2021. The purpose of the forum was to build upon the major findings and identify ways to address the needs. Members provided feedback and it was collected by UK HDI representatives.

The Executive Committee met and had a discussion regarding the pandemic and vaccination requirements. The Executive Director emphasized how important informed consent is throughout this entire process. There were no recommendations.

The Nominating and Bylaws Committee completed their thorough review of the bylaws . There were significant discussions regarding grammar and wording content. A motion was made to call a special meeting in May to approve the bylaws. The motion was seconded and approve.

The Blind Services committee had a presentation from the Division Director of Blind Services regarding a comparison of virtual versus in person services.

The Consumer Services and Program Evaluation Committee had a presentation from the Community Rehabilitation Branch Manager of OVR on the needs identified for the potential expansion of the Individual Placement and Supports program. OVR would like to expand the successful program statewide with the addition of four new providers. Two of the providers would focus specifically on serving the intellectual and developmental disability population with the other two providers serving the transitional population (mental illness or drug abuse). Currently there are 25 agencies involved in the project across six counties. The

committee indicated this was an area of need identified in the SCVR stakeholder forums. There were no recommendations.

The Policy and Planning committee discussed a proposal for the process for tracking potential cases for Social Security re-imbursements to ensure Office of Vocational Rehabilitation receives all potential payments. A request was made for there to be a training provided to the SCVR at the next meeting on Social Security re-imbursements.

Public Awareness and Legislative Committee discussed the sub-minimum wage topic as well as issues surrounding unemployment. The committee mad a request for a presentation for the SCVR on Waiver Programs in Kentucky.

June 21, 2021, Special Meeting Nominating and Bylaws Committee

During the Special Meeting, there was discussion regarding grammar and wording throughout the bylaws document. There was significant discussion regarding Committees and member assignments to committees as well as identifying a more explicit definition of a quorum. There were additions to Article VII which is related to amendments to the bylaws. All the changes were recorded and made by OVR Staff and presented at the July quarterly meeting for approval.

July 26, 2021, Quarterly Meeting

The quarterly meeting was held in April, with a full quorum in attendance. The Executive Director and Executive Leadership Team gave reports, and questions and comments were taken. OVR staff gave presentations and updates on the offsite monitoring by RSA that started the week of July 19, the State regulations, Business Enterprises, the biennial budget submissions, the RFP for the new Case Management System, center operations, Learning Collaborative with the Institute for Community and Inclusion (ICI), program services metrics, personnel actions and Order of Selection.

During the July 26th, 2021, quarterly SCVR Meeting, University of Kentucky Human Development representative presented results for the most recent Consumer Satisfaction Survey and the Comprehensive Statewide Needs Assessment. Overall, the council reported being pleased with the satisfaction survey results, especially under the current circumstances of the pandemic. Regardless of case closure status, respondents indicated that overall services provided by the Office were good or very good (87.3%).

The Executive Committee discussed agency concerns at this time regarding the inability to recruit and maintain qualified staff in specialized positions with competitive wages. The Executive Director gave an update on the off-site federal monitoring with RSA and the effects the pandemic has had on the blind vendor program. There were no recommendations.

The Ad-hoc By-laws committee covered the suggested changes made from the special called meeting on June 21st. A motion was made to approve the suggested changes to the by-laws and the motion carried.

The Blind Services Committee received an update regarding Center services. The committee requested data specific to services for the blind and visually impaired be presented at the next meeting.

The Consumer Services and program Evaluation Committee discussed the information contained in the Statewide Needs Assessment. There were some suggested edits for the case closure letter for consumers to make them aware they will receive emails or phone calls from the University of Kentucky Human Development Institute. They requested that HDI determine the feasibility of switching to performing the surveys every quarter.

The Policy and Planning committee had a discussion on informed choice, specifically regarding choosing a vendor of services such as a community rehabilitation program. The committee

asked for clarification on the definition of a vendor and how OVR measures the services of vendors.

The Public Awareness and Legislative Review Committee brought up the request for training on different waiver programs. The OVR SRC liaison indicated we would follow up with Behavioral Health to get information on a presentation at a future council meeting.

October 25, 2021, Quarterly Meeting

The quarterly meeting was held with a full quorum in attendance. The Executive Director and Executive Leadership Team gave information, and questions were taken. OVR Executive Director informed the council of the anticipated results of the recent federal monitoring. OVR anticipates receiving 2 performance findings and three fiscal findings along with additional recommendations in the report. OVR staff gave updates on program metrics, residential services, hybrid schedules (staff are in the offices 3 days a week and telecommuting 2 days), Business Enterprises, staff vacancies and the State Plan.

The Council had a discussion regarding the best methodology for holding public hearings. The Council made the decision to hold the following virtual hearings:

November 30, 2021, from 11:00 a.m. to 1:00 p.m. eastern standard time

December 2, 2021, from 6:30 p.m. to 8:30 p.m. eastern standard time.

Comments were accepted by mail to the Office of Vocational Rehabilitation, 500 Mero,4th Floor Frankfort, KY 40621, via e-mail to cora.mcnabb@ky.gov at 502-782,3402. A draft of the State Plan Attachments was posted on the OVR website for public access in February.

The Executive Director gave a presentation on the OVR Strategic Plan and the goals and priorities of the plan. The following goals were presented to the SCVR for their review and input. The goals were sent to the full council electronically prior to the meeting.

The following goals are presented in priority:

Sound Fiscal Management: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

Quality Assurance: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Staff Resources: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

Center Operations: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Consumer Services: Implement innovative practices to improve quality outcomes.

Public Awareness: Implement an ongoing, flexible marketing plan and process to improve public awareness of VR programs, services, and agency employment.

The Executive Committee met and reviewed the method for holding state public hearings. The Executive Director provided an overview of the initial results of the of site federal monitoring. The committee was made aware Secretary Coleman has stepped down from her role of Cabinet Secretary.

The Nominating and Bylaws committee did not hold a meeting.

The Blind Services Committee received an update on center operations. They discussed the difficulty the agency is having in the recruitment of individuals with specialized experience and

knowledge in specific to serving the blind and visually impaired. The committee reviewed and confirmed their committee description is accurate.

The Consumers Services and Program Evaluation Committee received a report on work incentives and benefits counseling. The Human Development Institute at UK has secured a replacement provider to conduct the satisfaction survey that was previously conducted through the UK research center. The committee reviewed and confirmed their committee description is accurate.

The Policy and Planning Committee discussed the VR and referral application and gave feedback on how to make it more accessible with drop down menu. The committee reviewed and confirmed their committee description is accurate.

The Public Awareness and Legislative Committee reviewed and confirmed their committee description is accurate. They had a full agenda starting with a positive review of the OVR website. They discussed the SCVR annual report that was near completion except for adding the year end data from the case management system. The SCVR chair reported on the work of the Labor Task Force, updates to the sub-minimum wage bill and the different parental advocacy group that are looking at the issues of the termination of parental rights based on disability. There were no recommendations.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

Recommendation: A proposal was made to change the distribution method of the Consumer Satisfaction Survey. Discussion was held regarding the Consumer Satisfaction Survey changes in light of the pandemic affecting services. It was recommended that distribution of the survey be online because the center used for past surveys conducted by phone is no longer in existence. A motion was made for the Consumer Satisfaction Survey to be distributed online with phone calls to be made to consumers that don't respond to the online version and the motion carried.

Response: OVR accepts the recommendation to review the Satisfaction Survey with the council and gain input to the content of the survey. The Consumer Services and Program Evaluation Committee of the Council are at the quarterly meetings reviewing the questions and making recommendations for edits for the survey to assure the survey captures all the necessary components. The committee will make recommendations to the full council upon completion of their review for edits to the Satisfaction Survey.

Recommendation: The SCVR made a recommendation to add an additional goal to the State Plan amendment for the state-owned center operations as follows:

Carl D. Perkins Rehabilitation Training Center and McDowell Center for the Blind will operate at full capacity, leading and maximizing the delivery of services to the unserved and undeserved population. Strategies will follow the guidelines set forth by the Rehabilitation Services Administration to ensure prior approval under C.F.R. 200.

Response: OVR accepts the recommendation to submit an amendment to the plan including the additional goal and justification of need. OVR staff gave an overview of the capital plan for facilities and discussed the programmatic goals for the centers. The SRC chair participated in the strategic planning for the agency that included the setting of goals and strategies for the centers. The chair presented this information to the Executive Committee and the Council for consideration and approval. OVR shared the results of the monitoring report with the Council members and recommendations made by RSA regarding center operations to analyze the use and effectiveness of the McDowell Center and the Perkins center. OVR accepted the SRC recommendation and added the SRC approved goals and strategies concerning operations of the Carl Perkins Center and the McDowell Center in order to determine the effectiveness of services leading to the achievement of high quality employment outcomes.

Recommendation: The SCVR submitted a recommendation to use the VR 100 anniversary theme for the annual report.

Response: OVR accepts the recommendation.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

OVR did not reject any of the Council's input or 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;

The agency has not requested a waiver of state wideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

N/A

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

N/A

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

OVR maximizes all available resources in collaboration with all partners and agencies in assisting individuals with disabilities to achieve competitive integrated employment. This will ensure the provision of vocational rehabilitation services described in subparagraph (A) other than those specified in paragraph (5) (D), and in paragraph (1) through (4) and (14) of Section 103 (a) of the Rehabilitation Act Amendments of 1998, that are included in the individualized plan for employment of an eligible individual, including the provision of such vocational rehabilitation services during the duration of any dispute.

OVR as a key partner in the workforce system with established working relationships in all ten of Kentucky's workforce regions. OVR has five regional managers that serve on the local workforce boards. They are active in the development and implementation process of the Memorandums of Understanding and infrastructure agreements working closely with the OVR Executive Director. The regional managers as well as other OVR staff serve on local workforce committees and business services teams in coordination of services to individuals with disabilities. This assures that other workforce partners are well aware of OVR services for individuals with disabilities and staff are available to provide technical assistance as needed.

The Kentucky Workforce Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopting a plan to move Kentucky forward through workforce training and development. The OVR Executive Director is a member of the KWIB and participates on several of the board committees.

Reciprocal referral services with the Career Development Office and the Office of Vocational Rehabilitation: CDO and OVR have established reciprocal referral services which allow for more efficient services to individuals with disabilities. OVR plans activities to improve services in the state for individuals with multiple impairments, including individuals with dual sensory loss. The Central Office administrative functions for these workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners. The office participates in the ten Workforce local boards throughout the state as well as serving on different committees of those boards.

For more details regarding the Workforce initiatives in Kentucky see the Strategic Elements Section of this Combined State Plan.

The office has implemented an information and referral system to ensure that individuals who have disabilities will be provided accurate vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for, securing, retaining, or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them.

Appropriate referrals made through the system are made to Federal, State or local programs, including programs carried out by other components of the statewide workforce investment system in Kentucky that is best suited to address the specific employment needs of an individual with a disability; and include, for each of these programs, provision to the individual: a notice of the referral by the designated State agency to the agency carrying out the program.

Information identifying a specific point of contact within the agency carrying out the program; and information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, or regain competitive integrated employment.

All applicants and eligible individuals or, as appropriate, the applicants' representatives or individuals' representatives, will be provided information and support services to assist the applicants and individuals in exercising informed choice throughout the rehabilitation process, consistent with Section 102 (d) of the Rehabilitation Act Amendment of 1998. The Client Assistance Program is available for additional assistance and advocacy during the entire rehabilitation process.

OVR has collaborative relationships with several agencies and entities within and without the statewide workforce investment system both private and public agencies and programs. OVR works cooperatively with the following agencies to avoid the duplication of services and enhance the service delivery process for consumers.

OVR has representation on the State Interagency Council (SIAC) for services and supports to Children and Transition-age Youth. The (SIAC) is a group consisting of state agency representatives, a youth, a parent of a child or transition-age youth with a behavioral health need, and a member of a nonprofit family organization. SIAC conducts monthly meetings that are open to the public. Regional Interagency Councils (RIACs) operate as the locus of accountability for the system of care, providing a structure for coordination, planning and collaboration of services and supports at the local level to children, adolescents, and transition-age youth and their families, to help them function better at home, in school, in the community and throughout life. There are 18 RIACs across the commonwealth. OVR Executive Director represents the agency on the SIAC.

Kentucky's Commission on Services and Supports for Individuals with Intellectual and Other Developmental Disabilities (also known as HB 144 Commission) advises the Governor and General Assembly about the service system that impacts the lives of people with disabilities. A sub-committee of the HB 144 commission was established to address issues impacting employment for persons with developmental disabilities. Comprised of members representing state agencies, service providers, advocacy agencies, lawmakers and people with developmental

disabilities, the committee has set out to identify what must occur to create an efficient employment system that is supportive of people with developmental disabilities obtaining meaningful employment in the Commonwealth.

OVR Executive Director represents the agency on the HB 144 Commission.

OVR has representation through the Cabinet on the Commission on the Deaf and Hard of Hearing. (KCDJHH) advisory board that provides education, advocacy, and programs to eliminate barriers for deaf and hard of hearing Kentuckians.

Veterans Administration for the purpose of providing rehabilitation services including vocational guidance and counseling and job development and placement to veterans with disabilities. Collaboration and coordination of services occur between OVR and the Veterans Administration Rehabilitation and Employment Programs and utilized as a comparable benefit as appropriate.

173 school districts(including the School for the Deaf and the School for the Blind) statewide consisting of 1,477 schools inclusive of 26,675 students with IEP's and 504 Plans that are potentially eligible.

Nine special education cooperative networks across the state created to enhance educational opportunities for Kentucky's children providing technical assistance, training: professional development, specialized services and research.

Department of Behavioral Health, Intellectual and Developmental Disabilities through their 14 Regional MH/IDD Boards for supported employment. Each board has multiple locations in their covered counties.

Kentucky Drug Courts for the purpose of facilitating employment and independence goals of individuals with disabilities. Kentucky Cabinet for Health and Family Services for the purpose of educating consumers about their medical coverage options.

Social Security Administration for the purpose of partnerships on employment incentives through the Ticket to Work and other incentive programs.

Community rehabilitation providers in the provision of employment services.

Kentucky Association of Persons in Supporting Employment first whose mission is to "promote the improvement of Supported Employment services for persons with significant disabilities experiencing barriers to employment through education, advocacy, collaboration, policy change, elimination of barriers, empowerment and community participation". OVR has a staff person serving on the State APSE board.

Department of Medicaid Services and Department of Community Based Services

Kentuckians who receive Supplemental Nutrition Assistance program (SNAP) benefits and are eligible for the federally funded Employment and Training (E & T) program now receive assistance from Kentucky Career Centers to meet education and employment training needs. Department of

Community Based Services-Public Assistance Programs.

Local Ophthalmologists and Optometrists and their respective professional associations in accessing needed services for consumers. Staff attend state conferences, distribute marketing materials and maintain working relationships with local offices and the area ophthalmologists and optometrists (patient referral and services).

American Printing House for the Blind, the world's largest source for adapted educational and daily living products.

Kentucky School for the Blind, K-12 public school serving Kentucky students who are blind and visually impaired; Short Course program (one to 12 weeks) of specialized instructional is also available to students throughout the school year.

Kentucky Federation of the Blind an advocacy organization that improves blind people's lives through advocacy, education, research, technology, and programs encouraging independence and self-confidence. Kentucky American Council of the Blind strives to improve the wellbeing of all blind and visually impaired people by serving as a representative national organization of blind people. Staff are involved through representation at their state and national conventions and representation of this advocacy organization sits on the State Rehabilitation Council.

Local Chambers of Commerce - Staff represent the agency across the state on local chamber organizations

International Centers specializing in advocacy and services to the foreign born and serve refugees, asylees, and immigrants (Louisville, Lexington, Bowling Green).

Area Employers in the development of working relationships increasing the number of successful employment outcomes for consumers

University of Kentucky Human Development Institute is a University Center of Excellence established by federal legislation to promote team-based approaches to provide services for individuals with disabilities and their families.

Other community-based organizations such as Health clinics, HUD, Diabetes Foundation, The Lions Club and other community resources for consumers

The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

Visually Impaired Preschool Services offering service to infants, toddlers, and preschoolers who are visually impaired; and to maximize each child's developmental potential through direct services, advocacy, and community education.

Kentucky Outreach and Information Network (KOIN)- Kentucky Cabinet for Health and Family Services/Department of Public Health planning committee for communication and message distribution to special populations during a public health emergency or other disastrous event.

The Kentucky Functional Needs Collaborative (KFNC) is a project of the Kentucky Department of Public Health. Their goal is to ensure an effective public health emergency response system in Kentucky for populations with functional and access needs.

KY-SPIN is the statewide Parent Training and Information (PTI) center that provides training, information and support to people with all types of disabilities (birth through 26 years old), their parents and families, and the professionals who serve them.

Kentucky Association of Community Employment Services (KACES) for the purpose of increasing services for individuals with disabilities including most significant disabilities and enhancing partnerships with community rehabilitation programs.

Social Security Administration: Information Exchange Agreement to receive data regarding consumers' work history.

The Office works in coordination with the Statewide Independent Living Council (SILC). A member from SILC sits on the Agency State Rehabilitation Council and the Blind Services Division Director represents the Agency on the SILC. Staff work collaboratively with the Independent Living Centers across the state in the service delivery process for consumers with visual impairments.

The Carl D. Perkins Vocational Training Center cooperates with the Job Corps Center to implement a smooth referral process for the purpose of enhancing education opportunities for students with disabilities

Other federal, state, and local agencies related to the rehabilitation of individuals with disabilities such as the Department of Protection and Advocacy, Department of Probation and Parole, Department of Workers Compensation, Department of Disability Determination.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Kentucky Assistive Technology Services (KATS) Network (the state program carried out under Section 4 of the Assistive Technology Act of 1998) for making assistive technology (AT) information, devices and services easily obtainable for people of any age and/or disability, their families, employers and employment service providers, educators, healthcare and social service providers. The KATS network serves Kentucky residents of all ages with disabilities of all types, their families, employers and employment service providers, educators, health care and social service providers, and others seeking information about assistive technology (AT) and accessible information technology.

The Kentucky Office of Vocational Rehabilitation is the lead agency for the KATS Network. The KATS Network in turn collaborates with four non—profit organizations to operate assistive technology regional centers to provide assistive technology demonstrations and device loans. The Carl D. Perkins Vocational Training Center operates a fifth regional center in collaboration with the KATS Network. The KATS Network also collaborates with the Hear Now Foundation hearing aid program and audiologists around the state to facilitate applications for hearing aids for low—income individuals. In addition, the KATS Network collaborates with several healthcare providers and two universities to refurbish and redistribute used durable medical equipment to individuals who need it. The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

The Assistive Technology Alternative Financing Program (ATAFP) for Kentucky is the Kentucky Assistive Technology Loan Corporation (KATLC). KATLC provides financial loans for the purchase of assistive technology with its lending partner for individuals with disabilities or the parent or legal guardian of an individual with a disability. KATLC is funded by both private and public monies to assist Kentuckians with disabilities to obtain low interest loans for the purchase of assistive technology that will promote their independence and enhance their quality of life.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The USDA Rural Development makes available funding to rural Kentucky communities across the Commonwealth. One of the main goals of Rural Development is to work to improve not only small businesses but also to engage the communities surrounding the businesses and strengthen the local economies. They assist single families in securing loans and grants to improve their living situations. Agency staff are aware of these programs and provide information and referral to consumers for these programs to meet their individual needs.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

OVR serves out-of-school youth such as high school non-completers, students expelled from school or habitually truant, high school graduates and GED holders who are basic skills deficient, unemployed or underemployed, as well as those enrolled in postsecondary education.

This is an area identified to increase outreach and strengthen those existing relationships in order to reach and engage on a higher level out-of-school youth.

In Kentucky the vocational rehabilitation agency is one of two workforce programs that are fully integrated into the Kentucky Career Centers. This has strengthened our relationships with the other core programs of the workforce development system. OVR works collaboratively with the following additional agencies and groups of individuals.

Juvenile and Criminal Justice Systems. Juvenile Justice is responsible for prevention programs for at-risk-youth, court intake, pre-trial detention, residential placement/treatment services, probation, community aftercare/reintegration programs and youth awaiting adult placement or court.

Faith-based Organization (i.e., churches, Jewish Family Services, health clinics).

Community organizations like Big Brothers, Big Sisters and other community-based organizations.

Service Organizations (i.e., Lions, Rotary, Kiwanis, Elks)

Kentucky Cabinet for Health and Family Services that administers foster care and the division of family support (Medicaid, Foster Care and Supplemental Nutrition Assistance Program)

Employers

Kentucky Youth Career Center offices are located in Jefferson, Bullitt, and Shelby Counties, and are administered by KentuckianaWorks, the region's Workforce Development Board.

Overseeing and coordinating programs in the community for youth ages 16 - 21, the Youth Career Centers offer innovative education, employment and youth empowerment services. The Kentucky Youth Career Center offers resume and interview preparation assistance, GED tutoring and help with testing fees, help applying to colleges and job-training programs, and financial assistance for college and job training. Depending on the need, referrals are made to other community services such as housing, transportation, food, and physical or mental health services. The Kentucky Youth Career Center also creates engagement opportunities with employers through internship and summer job programs, and fosters connections to mentors as well as other youth, and provides an ongoing series of workshops on life-enhancing topics.

5. STATE USE CONTRACTING PROGRAMS.

Under the state procurement code, administered by the Finance and Administration Cabinet, there are preferences to be given by governmental entities and political subdivisions in purchasing commodities or services from specified entities. Specifically, first preference is given to the products made by the Department of Corrections and Division of Prison Industries. Second preference shall be given either to: (1) the Kentucky Industries for the Blind or any other nonprofit corporation (2) qualified nonprofit agencies for individuals with severe disabilities i.e., Community Rehabilitation Providers (CRP). This means that state and local governmental agencies are to purchase directly from Correctional Industries or an Industries contracted with by OVR and/or a CRP without having to utilize the competitive procurement processes.

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 OVR Transition Services Branch will coordinate with education officials on a state and local level in the planning and implementation of proving Pre-Employment Transition Services and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state inclusive of the Community Transition Program, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment.

Branch Staff are currently working on the revision of policies and procedures for the branch. OVR staff will receive training on all policies to assure to timely implementation of service delivery and the effective coordination of services. OVR has a focus on internal controls for the areas of documentation and accurate data entry to ensure the efficacy of reporting.

OVR works with many agencies to provide transition services and pre-employment transition services to students with disabilities. This is inclusive of the blind and visually impaired and the deaf and hard of hearing populations. All of the collaborations described below allow for transition and pre-employment transition services to be provided by either OVR or our partners.

OVR provides the following five required pre-employment transition services:

1. Job Exploration Counseling

2. Work Based Learning

3. Counseling on Post-Secondary Opportunites

4. Workplace Readiness Training

5. Insturction in Self -Advocacy

OVR has assigned counselors to each of Kentucky's 171 Local Education Agencies including the School for the Deaf and the School for the Blind for the purpose of ensuring that all students with disabilities are served. The counselors work with referrals from special education and general education staff as well as the individual with the disability, their family, and other agencies who assist students with disabilities who are in need of transition. These counselors coordinate and authorize pre-employment transition services for students with disabilities, age 14-21, who are eligible or potentially eligible for VR services. The counselors also provide general coordination, information, and outreach activities about vocational rehabilitation services to the local education agency and student for use in transition planning. OVR has pre-employment transition services coordinators that work in conjunction with the VR counselor in the provision of services. Service coordination activities may also include resource information about vocational rehabilitation, presentations, handouts, and staff development. The counselor and pre-employment transition service coordinators work in a collaborative team process along with the local education agency to develop the transition services section of the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) for transitioning students. Both the IEP and IPE will include, if appropriate, a statement of interagency responsibilities or any needed linkages by which the responsibilities of other entities are satisfied.

The student should be prepared to enter the competitive integrated workforce following the provision of necessary and needed services, as reflected in the IPE. The student should have ample opportunity to participate in pre-employment transition services before they graduate. The OVR counselor along with the pre-employment transitions coordinators will engage in providing services that would be most beneficial to an individual in the early stages of employment exploration, such as counseling and self—advocacy training. These services are provided to students who are eligible or who are potentially eligible for VR services.

OVR partners with the public-school districts, Department of Education and the University of Kentucky Human Development Institute to provide transition services and pre-employment transition services through the Community Work Transition Program (CWTP). The CWTP is designed to provide pre-employment transition services to all students with disabilities and provide transition services to assist VR eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. Student employment coordinators, funded by the local education agency, refer students to OVR in order to provide pre—employment transition services during their final three years of school. The CWTP contracts with the individual school districts to hire employment specialists to provide students with employment exploration and experiences, community-based evaluation, work experience and job placement while in high school.

OVR contracts with some of the technical colleges in the Kentucky Community and Technical College System in the provision of pre-employment transition services that will provide opportunities for potentially eligible Kentucky students with disabilities to enhance their skills and readiness for post- secondary employment and training.

OVR has a contract with the Jobs for American's Graduates (JAG) to provide pre-employment services to students with disabilities in the school system. JAG is a state-based national non-profit organization dedicated to preventing dropouts among young people who have serious barriers to graduation and/or employment.

Additionally, OVR has contractual agreements with some of the nine special education cooperatives in the provision of pre-employment Transition Services.

The office's executive director and Transition Branch staff work directly when needed, with the Kentucky Interagency Transition Council. These involvements help facilitate all of the partner's understanding of the unique transition needs of students with disabilities and assists in understanding the educational process of Public Schools in the State.

The Kentucky School for the Blind (KSB) serves students with visual disabilities from across the state. Students can live and attend classes at the school's Louisville location, or receive outreach services while attending their local elementary, middle and high schools. Staff in specialized positions actively participates in the vocational planning and academic progress of all of these students through collaboration and assistance with KSB's Community Based Instruction Program, and services such as vocational assessments, and annual Individual Education Plans. Staff collaborates on a variety of work-readiness and work-experience programs with KSB such as the Summer Work Program and The World of Work Program that provides work-based learning experiences in a competitive, integrated settings.

The Kentucky School for the Deaf (KSD) provides education to deaf and hard of hearing students from elementary through high school levels. It is a residential program in Danville, KY that also provides outreach services to students in their local schools. Vocational services include opportunities to prepare for work or continued education in the high school curriculum. An OVR Rehabilitation Counselor for the Deaf is assigned to students on campus.

The Office of Vocational Rehabilitation has staff trained to understand about the different problems people with hearing loss may have. Rehabilitation Counselors for the Deaf are proficient in American Sign Language and serve persons who are deaf and hard of hearing and

use this type of communication. Communication Specialists are trained about devices and ways to serve individuals who are hard of hearing or late deafened with auditory/oral communication. Rehabilitation Counselors for the Deaf and Communication Specialists are also skilled in serving people who have vision limitations in addition to a hearing loss or deafness. Individuals who are deaf use American Sign Language are served by a Rehabilitation Counselors for the Deaf. There are Rehabilitation Counselors for the Deaf statewide to provide OVR services.

Examples of specialized services are and not limited to:

Information and counseling about jobs Information and referral for other services

Assessment about job skills

Training programs with support services to learn job skills Technology (including training) - for work related technology Job placement assistance

Interpreting Services

The State Coordinator of Deaf-Blind Services (SCDB) works with, consults, and provides technical assistance to KY Office of Vocational Rehabilitation (OVR) staff including the Rehabilitation Counselors for the Blind (RCB), Rehabilitation Counselors for the Deaf (RCD), and Communication Specialists. Other staff include Managers, Blind Services Division Staff, and various other administrators within OVR. The SCDB also maintains relationships for service delivery with staff from the Helen Keller National Center (HKNC), Kentucky Commission for the Deaf and Hard of Hearing (KCDHH), The Kentucky Deaf-Blind Project, KY Mental Health Services for the Deaf and Deaf-Blind, Kentucky Association of Deaf-Blind (KADB), and several other Community Resource Providers (CRP). Kentucky has one of the largest Deaf-Blind census numbers with approximately 49,000 known individuals listed as being Deaf-Blind in the State. The SCDB also coordinates, plans, and oversees training and support for staff that work with this population.

INSIGHT - Post-secondary Preparation Program for Students Who Are Blind or Significantly Visually Impaired is a collaborative project between the Kentucky Educational Development Corporation Special Education Cooperative, Kentucky School for the Blind, Kentucky School for the Blind Charitable Foundation, the Office of Vocational Rehabilitation, MCP Orientation and Mobility Services, and Morehead State University. INSIGHT is a unique program designed to provide college bound students an opportunity to experience some of the challenges encountered when entering a university or community college. Participants gain an increased awareness of the educational, recreational, and social opportunities and challenges of the post-secondary environment.

Staff also participates with the Kentucky Deaf-Blind Project, which helps promote cooperative transition services for youth who are deaf-blind. OVR has a Deafblind Coordinator who is responsible for helping to facilitate pre-employment transition services, including all the previously described work readiness and summer work experience programs, for this population of students. OVR collaborates with the Kentucky Deaf-Blind Project to provide a weeklong summer camp for eight to nine students who are Deaf-Blind that addresses the five required Pre-Employment Transition Services. This program is unique to Kentucky, and other Deaf-Blind Projects across the nation are interested in replicating it in their states.

The PATH Program is a Pre-employment Transition Services program held either through a virtual platform or at the at the McDowell Center in Louisville, KY. This program is conducted in collaboration with the University of Kentucky's Teacher Preparation Program in Visual Impairments. Through the University of Kentucky, practicum students from the teacher preparation program are able to assist with the providing the Pre-employment Transition Services to up to fifteen blind or visually impaired students from across the state. The University

of Kentucky also provides staff such as Orientation and Mobility Specialists that assist the McDowell Center staff provide the five required Pre-employment Transition Services.

Workforce Development Boards: OVR counselors actively participate on their local Workforce Development Board's Youth and One Stop committees to enhance and make accessible the programs and services for transition age consumers.

KY AHEAD is a professional organization whose purpose is to promote communication among professionals in post-secondary education in order to improve the development and implementation of services for persons with disabilities. Campus Disability Services Centers are an essential resource for students with disabilities attending post-secondary educational institutions. VR counselors maintain relationships with disability service center staff and strongly encourage college students to utilize the services available at the centers so that they can receive individualized accommodations for their coursework. Every effort is made to arrange for a student to meet with staff at the disability center prior to entry into a post-secondary program in assuring a smooth transition for the individuals.

The Kentucky Special Education Cooperative Network consists of nine special education cooperatives located across the state. These cooperatives were formed to better meet the needs of the multiple school systems across Kentucky's 120 counties. All 171 local school districts, and the Kentucky Schools for the Blind and Deaf are members of a special education cooperative. Each cooperative has VI teachers and an AT specialist to assist students with visual needs. The school districts employ other specialty service providers such as Orientation and Mobility Specialists, Physical Therapists, and Speech Therapists. OVR works collaboratively with each cooperative network across the state in the provision of information and referral for students of all ages.

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 Office partners with the Kentucky Department of Education and the local education agencies statewide to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services.

The Office participates with the Kentucky Department of Education (KDE) and 21 other state agencies on the Kentucky Interagency Transition Council in the coordination among agencies in the delivery of transition services. OVR's current Memorandum of Understanding with KDE is in legal review. Within this agreement are strategies for the two agencies to work collaboratively in evaluating, serving, and planning for a seamless transition from school for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation ("VR") services. The intended result of these collaborative strategies and activities is that students will achieve their post-secondary goals as they make the transition from school to adult education, competitive integrated employment (including customized employment and supported employment), continuing and adult education, independent living, and community participation. Signed agreements are in place with the local educational agencies. These agreements are updated annually and they outline and identify the responsibilities of each party for the provision of services. These agreements are designed to facilitate the transition of students with disabilities from the receipt of educational services in school, to the receipt of vocational rehabilitation services.

Currently OVR, HDI the Center for Excellence at the University of Kentucky and KDE are meeting monthly to address policy and procedural changes to address the Community Work Transition

Program and transition services, pre-employment transitions services, data sharing agreements and a clear identification of each of the roles of the partners involved in the agreement.

OVR receives ongoing technical assistance from the National Technical Assistance Center on Transition for the area of pre – employment transitions services. NTACT staff provide guidance to assure we have a clear understanding and interpretation of the regulations and any other federal guidance received from the Rehabilitation Services administration. Based on feedback from NTACT and the results of monitoring reviews from other states, OVR is working on implementing a stronger internal controls system. OVR staff will be responsible for monitoring the delivery of pre-employment transition services provided by other entities to ensure the quality of services provided and the accurate reporting of services. Contracts agreements are in place so that OVR has more involvement in the approval of services for students with disabilities for services. OVR's current case management system and the ability to pull accurate information through the Web Intelligence program has not been as strong as it could be. Currently, two staff, including the VR Administrator responsible for monitoring, are learning about using Power BI as an alternative way to pull more accurate data from the case management system. OVR is in the RFP process for obtaining a new case management system.

OVR transition staff are members and participate in quarterly meetings of the Kentucky Interagency Transition Council for Persons with Disabilities. OVR provides ongoing technical assistance to providers of transition and pre-employment transitions services. OVR transition staff are members and participate in quarterly meetings of the Kentucky interagency Transition Council for Persons with Disabilities.

The Executive Director of the Office of Vocational Rehabilitation (OVR) was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth. The Executive Director or a designee attends monthly SIAC meetings to collaborate on the matters of the council as it relates to youth who are Kentucky students with disabilities. The monthly SIAC meetings gives OVR the opportunity to collaborate, plan and develop on going partnerships with other state agency representatives who serve mutual individuals with disabilities.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation. There is a total of 18 RIAC's across the commonwealth. An OVR regional representative attends monthly RIAC meetings to establish partnership with state, public and community agencies to address concerns that families have within the regions of Kentucky. OVR regional representation supports the momentum of the system level work that is occurring statewide. Strategies are set in place to promote a spectrum of effective, community-based services and supports for children and transition-age youth, with or at-risk behavioral health needs or other challenges, and their families that: is organized into a coordinated network; builds meaningful partnerships with families and youth and addresses their cultural and linguistic needs in order to help them function better at home, in school, in the community, and throughout life.

OVR and the Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment. Pre-Employment Transition Services will continue to represent the earliest set of services available under OVR for students with disabilities, which are short-term in nature and are designed to help students identify career interests.

OVR continues its work in expanding its relationship with the Kentucky School for the Deaf. A group of stakeholders is part of an Engage for Change group in Kentucky. This is a national effort through the National Deaf Center on Postsecondary Outcomes. OVR maintains strong relationships with the KY Deaf-Blind Project and the Kentucky School for the Blind continue, and the programs with these partners are frequently reviewed to improve the quality of these

services. Some pre-employment transition service providers are working students with disabilities in the Department of Juvenile Justice, Foster Care, and homeschool programs to reach these populations.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Under IDEA, schools are responsible for initiating transition planning at the age of 16 for each student identified with a disability. In Kentucky, as stated in Kentucky Special Education Regulation 707, KAR 1:320, Section 7:1, transition planning can start in the child's 8th grade year or when the child turns age 14, or earlier if the ARC deems it appropriate, in alignment with the child's Individual Learning Plan (ILP). Since school faculty and staff are academic specialists, it is very important for the VR counselor to have early influence on the student's vocational future helping to avoid weak or unrealistic vocational training. The VR counselor acts as a vocational specialist forging the educational and future vocational needs of the child realistically together. The VR counselor is educated on the federal and state laws associated with transition and acts as an advocate for the student and parents. VR counselors attend transition related meetings as early at age 14 and act as a consultant in the student's IEP. Early contact and intervention not only save the VR counselor considerable time and effort, but it also allows the student and parents the opportunity to plan a realistic vocational path that will lead them to the vocational goal of their choice.

In October 2020, OVR created the Transition Services Branch to engage with and provide Pre-Employment Transition Services and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment.

VR counselors attend student IEP meetings starting at age 14. The school system will continue to have the primary responsibility for accommodations and student's educational needs. Once the student graduates OVR will become the primary agent. It is mandatory that the IPE be developed with the student 90 days after eligibility or prior to graduation, whichever comes first.

An IPE is developed for each student determined eligible and that meets the current order of selection for vocational rehabilitation services. The IPE should address the student's pre-employment transition services needs in the areas of job exploration counseling, work-based learning experiences, counseling regarding post-secondary training opportunities, workplace readiness training to assist in the development of social and independent living skills, and instruction in self-advocacy.

OVR recognizes that it is the responsibility of Kentucky schools and OVR to coordinate and provide transition planning and services for students with disabilities. The VR counselor will provide consultation and technical assistance to assist the school as well as pre-employment transition services based on the student's needs. OVR recognizes that transition planning is an ongoing process and that a student may choose to go in a different direction requiring a

change in their vocational goal. Ongoing exploration, work exposure, and vocational counseling will be provided to assist students in the decision-making process.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Memoranda of agreements at the local level are used in order to further the collaborative efforts detailed in the interagency cooperative agreement between the Kentucky Department of Education and the agency. These memoranda of agreements will define the basic tenets of the Community Work Transition Program (CWTP).

The rights and responsibilities of OVR and the local education agency for implementing and carrying out the CWTP are also detailed in these memoranda of agreements. OVR authorizes payment of services needed to determine eligibility and for any services provided that do not fall under the responsibility of the school district. OVR provides payment for pre-employment services such as job exploration counseling, work-based learning experiences, counseling on post-secondary education, workplace readiness training and instruction in self-advocacy.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Outreach and Involvement of the VR Counselor begins at age 14. OVR obtains a list of the number of students between the ages of 14 and 21 per county that are accessing modified instructional materials due to their visual disability. Rehabilitation counselors for the Blind receive information regarding the number of students that receive these materials to help identify where unserved students are located in the school districts. Staff conduct outreach to school staff, inclusive of Teachers of the Visually impaired to strengthen partnerships and increase awareness of available services. This includes pre-employment transition services.

The CWTP is designed to provide pre-employment transition and transition services to all students with significant disabilities to assist in transitioning from high school to competitive integrated employment. Employment Specialists, funded by the local education agency, refer students to OVR for services.

Should the student need individualized transition services during this time, OVR counselors work with the Employment Specialists to ensure that community vocational services provided lead to the completion of an individualized vocational evaluation and the development of individualized programs (IEP and IPE) to ensure successful transitioning from high school to post school activities, including employment. Upon completion of the IPE, further community—based vocational services are provided to the student in the form of training for the planned vocational goal. The desired outcome for participants in the CWTP Transition Services is a post—school outcome or competitive, integrated employment.

Outreach to students also occurs through OVR's contractual agreements with the Kentucky Career and Technical Educational College System, Jobs for American Graduates (JAG) and the nine Special Education Cooperatives for pre-employment transition services.

Jobs for Kentucky's Graduates (JAG KY) operates its curriculum program in conjunction with the Kentucky Office of Vocational Rehabilitation to service students in their program who have disabilities and who are potentially eligible and/or eligible for the Office of Vocational Rehabilitation. JAG provides a curriculum for in-school youths with disabilities who have significant barriers to success that includes academic, physical, psychological, work related, and/or environmental. JAG KY provides a curriculum or the target population of in-school youths with disabilities between the ages of 14 and 21 and have significant barriers to success. The area for the curriculum will includes career development, job attainment, job survival, basic skills, leadership and self-development, personal skill, life survival skills workplace and

economic empowerment. JAG KY employs and certify "Specialist" who are assigned to the schools that have a JAG KY Program through Kentucky.

The Kentucky Special Education Cooperative Network consists of nine (9) Special Education Cooperatives located across the state.

Central Kentucky Educational Cooperative (CKEC)

Green River Regional Educational Cooperative (GRREC)

Greater Louisville Education Cooperative (GLEC)

Kentucky Educational Development Corporation (KEDC)

Kentucky Valley Educational Cooperative (KVEC)

Northern Kentucky Cooperative for Educational Services (NKCES)

Ohio Valley Educational Cooperative (OVEC)

Southeast/Southcentral Education Cooperative (SESC)

West Kentucky Educational Cooperative (WKEC)

OVR has the opportunity to enter into contracts with each of the Educational Cooperatives. Upon contract implementation, Pre-employment Specialists are hired by the cooperatives to provide the five required services to qualified students through individual and group activities. The activities will be determined by individual student need(s). The Cooperatives collaborate and utilize the student's individual education program (IEP), the student need(s), or the ARC committee decisions to determine what Pre-employment activities the student need. Outcomes are determined by multiple data points, such as evidence of participation and evaluation of readiness and engagement in the activities.

The Community Rehabilitation Program (CRP) provides Pre-employment Transition Services on a Fee Schedule in groups or individual. Proposals for the provision of pre-employment services are submitted to the OVR CRP Branch. CRP programs provide the five required pre-employment services: Job exploration counseling, work-based learning experiences, post-secondary counseling, workplace readiness training, and self-advocacy. CRPs provide in-school and after-school Pre-employment.

The Kentucky Office of Vocational Rehabilitation (OVR) in accordance with Section 511 of the Workforce Innovation and Opportunities Act (WIOA) requires OVR to perform certain actions prior to an employer paying an individual a wage that is below the standard minimum wage (subminimum wage). In addition, in accordance with 34 CFR 397.31, OVR assures to not enter into a contract or any other arrangement with an entity for the purpose of operating a program for youth under which work is compensated at a subminimum wage.

OVR ensures that all OVR staff are trained to understand the process that a youth (24 or under) with a disability must complete prior to entering a subminimum wage employment:

Youth must be determined eligible.

Youth must have an approved Individualized Plan for Employment.

Youth must have worked toward their vocational goal for a reasonable amount of time with appropriate supports, without success and have their OVR case closed.

Pre-employment transition services and/or Transition services, supported employment and/or customized employment are provided as appropriate.

Career Counseling is provided and information regarding resources and other available programs in support of competitive integrated employment.

OVR provides subminimum wage facilities within the Commonwealth access to:

A Career Counseling video that is to be shown to individuals according to the requirements set forth in WIOA.

The Career Counseling Participation Form is completed on each individual and provided to the Community Rehabilitation Program (CRP) Branch of OVR, per Federal requirement.

Offer multiple Pre-Employment Transition Services (Pre-ETS) opportunities for youth with a disability to ensure that this WIOA mandate is met.

Provides individuals with available resources in their community to help with services for obtaining employment and support.

OVR continues to:

Monitor and provide technical assistance to subminimum wage facilities to ensure WIOA requirements are met.

Retain records on all individuals that receive Career Counseling.

Provide individuals during first year, Career Counseling twice.

Provide individuals during subsequent years, Career Counseling annually.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

OVR maintains agreements with providers of private, non-profit vocational rehabilitation service providers to support achievement of successful competitive integrated employment outcomes for individuals with disabilities. OVR works with Community Rehabilitation Providers (CRPs) through a vendor application process to ensure quality services to agency consumers.

OVR currently works with 108 CRP's. Currently, 71 CRPs provide Employment and Retention services, another 93 provide supported employment services resulting in competitive integrated employment. Other agreements with private, non-profit OVR service providers will be made as necessary.

To provide services with the agency, the process is as follows:

1. The potential vendor obtains the vendor application, vendor manual, and CRP manual from the OVR website or from an OVR staff.
2. The potential vendor reviews the manuals to ensure to apply for appropriate services.
3. The potential vendor completes the application and provides required supplemental documentation (dependent on types of services applying for) to OVRVendors@ky.gov
4. Central Office staff monitor the web box, and reviews submitted application and any documentation provided.
5. Central Office staff provides application, all documentation provided, and all internal review completed to CRP branch.
6. CRP branch reviews to ensure no additional documentation or clarification is needed.
7. Application is approved, Vendor notified.

8. Vendor completes Vendor Registration Process by: a) Completing Finance Cabinet paperwork to have Vendor Number established b) Reviewing and signing a Vendor Agreement and c) Reviewing and signing a CRP Agreement.
9. CRP Branch assists the Vendor with training and other information.
10. All CRP vendors are required to participate in the Supported Employment Training Project provided through the University of Kentucky Human Development Institute.
11. All CRP vendors are monitored by the CRP Branch Staff for programmatic review.
12. All CRP vendors are monitored by Central Office staff for financial review.
13. All CRPs are audited annually.
14. CRP Branch ensures all CRPs have the mandated 15 hours of continuing education units (CEUs) annually.
15. CRPs are required to review and sign a CRP agreement every two (2) years. **NOTE:** Current ones are good through 06/30/2022

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Community Rehabilitation Program providers across the Commonwealth who are providing supported employment services are verified through written applications with the Office of Vocational Rehabilitation. The application process includes written verification of the CRP's funding for extended services. The Community Rehabilitation Program Branch evaluates all vendors to ensure that services are appropriately provided, and funding is available for extended services.

Kentucky's fourteen Regional Boards for Mental Health or Individuals with an Intellectual Disability are a primary source for extended services in KY. Cooperative budget planning is done between OVR and the Kentucky Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) so that state funds for all phases of supported employment can be sought by each agency. A cooperative agreement is also in place.

The Division of Behavioral Health (DBH) and OVR partnered together, and in 2010, Kentucky became the 12th state to participate in the Dartmouth College, Johnson and Johnson, Supported Employment Initiative to demonstrate the effectiveness of the IPS model for supported employment (Individualized Placement and Support, an Evidence—Based Practice). The first local pilot projects were launched prior to the close of 2010. Through the Dartmouth Project, a new SE funding partner was added when the Greater Cincinnati Health Foundation provided funding for 2 of the local pilots in Northern KY. IPS Supported Employment now includes all 13 Kentucky Community Mental Health Centers. In FY 2016 the partnership with Behavioral Health continues with the addition of 5 IPS sites outside of the Community Mental Health Centers and 2 sites serving those with substance abuse.

In FY 20-21, the establishment project contract process was initiated for the purpose of expanding IPS SE to unserved and underserved areas and populations. Four CRP's, Voices of Hope, Communicare, Life Skills, and Build Inclusion, were identified as possible contract recipients. Communicare and Build Inclusion are being considered for IPS expansion to individuals with intellectual disabilities. This is the first such initiative in KY.

United Way funding is utilized in minimal amounts for supported employment services. Ongoing follow-up services are provided through these United Way monies. These dollars are generally not "disability specific" and could assist in expansion of services to groups other than those served by the 14 community mental health centers.

Vendor status in the OVR Supported Employment Outcome-based Reimbursement program requires written verification of the provider's funding for extended services. Monitoring and technical assistance is provided by the OVR's Community Rehabilitation Program Branch to assure that services are provided and funded appropriately. CRP agreements are developed bi-annually and reviewed annually.

In 2019, the OVR implemented four agreements to increase capacity for Customized Supported Employment services in high need areas throughout Kentucky. Four CRP providers were awarded these contracts after submission of Request for Proposals (RFP). RFPs were sent to non-profit agencies throughout Kentucky that resulted in a total of eight submitting their proposal for review.

In October of 2021, the OVR surveyed VR staff to continue to identify and address the need around customized employment. The OVR will identify 4-5 new CRP's to further expand customized employment support opportunities through the utilization of establishment project contracts.

The CRP Branch works closely with Kentucky APSE (Association of People Supporting Employment First) and its committees, and the 874K Coalition (a statewide Disability Advocacy Group) in a unified effort to secure additional state dollars for supported employment extended services.

The CRP Branch has been active in the development/improvement of Kentucky's Medicaid Waivers to create workable systems for coordinating supported employment services for eligible participants. Expansion of the supports for Community Living Waiver (Kentucky's Medicaid Waivers for individuals with Developmental Disabilities) and the Michelle P Waiver has resulted in increased referrals to OVR for supported employment services for mutually eligible participants. The self—determination and Participant Directed Services within Medicaid hold much promise for supported employment funding for extended services. There is a Medicaid Waiver specific to service definitions and fee structures that support, and fund supported employment services.

The CRP Branch works cooperatively with the Arc of Kentucky, among other groups, such as the Kentucky Association of Supporting Employment First (KYAPSE), the Department of Behavioral Health and Developmental and Intellectual Disabilities (BHDDID), the Kentucky Rehabilitation Association (KRA), UK Human Development Institute, EKU Center of Excellence, most of the Comprehensive Care Centers in the state, and many Supported Employment providers, to educate families about supported employment and enlist their assistance in impacting additional funds for supported employment.

OVR continues to advocate for expanded/improved Supported Living services, which are utilized by many supported employment participants to meet their needs for as independent a lifestyle as possible. The Hart Supported Living Program in KY offers very flexible state dollars available for all phases of independent living. However, statewide dollars are very limited.

OVR continues to work collaboratively with the Department of Behavioral Health, Developmental and Intellectual Disabilities, the Kentucky Council on Developmental Disabilities, Human Development Institute (HDI) (University of Kentucky), and the Arc of Kentucky to provide quality training on fundamentals of supported employment through the Supported Employment Training Project (SETP). This training is valuable in assuring that personnel who provide supported employment services have the necessary skills, values, and tools to deliver effective services. The Leadership Series program developed through HDI at the University of Kentucky, provides advanced training in systematic instruction, Discovery, Job Developing, and Social Role Valorization, and is designed to assist job seekers in acquiring customized employment.

The OVR has representation on KY's Behavioral Health Planning Advisory Council, in collaboration with the Department of Behavioral Health to further educate and assist in the expansion, training and funding of IPS throughout KY. The OVR also continues to participate in the KY IPS Implementation Team, IPS VR Liaison Team, and the IPS International Community.

OVR staff collaborate with Special Education planning units throughout the commonwealth to develop supported employment services for students exiting schools. As with all supported employment services, additional funding is needed for extended services to adequately serve students. The Supported Higher Education Project (SHEP) began in 2010, and funded through a grant to the University of Kentucky's Human Development Institute. The purpose of the project was to demonstrate the effectiveness of Community Rehabilitation Programs (CRP) working together with Post-Secondary Education programs to include people with developmental disabilities in classes and other college campus activities. OVR created a Service Fee Memorandum that would be utilized by CRPs to allow for supported education services. This project was discontinued in 2016. In 2018, focus group meetings took place in Morehead, Murray, and Lexington in effort to identify barriers to students enrolling in higher education. As a result, the University of Kentucky's Human Development Institute received state appropriated funds to revitalize higher education programs and create new programs. This also resulted in the development of a statewide technical assistance center and funding being distributed to Comprehensive Transition Centers throughout the state. OVR continues to utilize a Supported Higher Education Service Fee Memorandum that can be accessed by CRPs to ensure higher education support services are available for students with intellectual disabilities.

The OVR is implementing strategies through the current Service Fee Memorandum structure to provide extended services to youth participating in Supported Employment. This results in hourly payments to CRPs for extended services once stable employment has been achieved and transition to extended services has occurred.

The CRP Branch continues efforts to utilize Social Security Work Incentives, including PASS (Plan for Achieving Self-Support) and IRWE (Impairment Related Work Expenses), for extended services when appropriate. Training opportunities are offered through the University of Kentucky Human Development Institute to provide technical assistance for supported employment personnel to learn more about these work incentive programs. In summary, the following potential funding sources for supported employment have been identified:

- Local and county government
- Kentucky Commonwealth Council on Developmental Disabilities (grant opportunities only)
- United Way
- Social Security Work Incentives Plan for Achieving Self-Support (PASS) and Impairment Related Work Expenses (IRWE)
- Natural Supports
- Division of Behavioral Health
- Division of Developmental and Intellectual Disabilities
- Hart Supported Living Funds
- Private pay agreements

Supports for Community Living Waiver, Michelle P, and Brain Injury Medicaid Waivers. Information regarding these potential funding sources is updated and shared by the Supported Employment Branch on a statewide basis to encourage increased funding for all phases of

supported employment. The OVR CRP Branch continues to explore innovative strategies with partnering state agencies to leverage funding to expand evidenced-based supported employment models (IPS) throughout Kentucky. Additionally, exploration continues to be conducted to identify underserved areas for those individuals with the most significant disabling conditions that may not be best suited for a labor market position but would be better equipped to gain success and independence in a customized employment position, therefore leading to potential opportunities for CRPs to provide Customized Supported Employment which requires a unique and specialized skill set.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

The Department of Workforce Investment (DWI) in partnership with local and state workforce organizations is dedicated to providing proactive business services and industry skills development. Through local Kentucky Career Center Business Service networks, this partnership has laid a foundation for coordinated business services that leverage the assets of the Office of Employer and Apprenticeship Services (OEAS).

Kentucky Career Center Business Services offer a streamlined approach to assisting businesses with recruiting talent, training new and existing employees, and developing tomorrow's workforce. At its core, the Business Service strategy consists of five primary organizations who provide direct resources and services to businesses:

Local Workforce Development Boards (LWDB)

Kentucky Education and Workforce Development Cabinet (EWDC)

Kentucky Cabinet for Economic Development (CED)

The Kentucky Chamber's Workforce Center (Workforce Center)

Kentucky Community and Technical College System (KCTCS)

These partnering agencies strive to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth. The Kentucky Career Center Business Service strategy has four primary components:

Identify a single point of contact for business development within each WIOA region

Streamline workforce resource delivery

Unify and coordinate outreach and information

Leverage multiagency data sharing systems

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES).The OVR Employer Services Branch is dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This enables the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expand direct employer interaction statewide.

OVR employs twelve job placement specialists across the state. These specialists are responsible for developing relationships with local employers to facilitate the placement of OVR consumers into competitive integrated employment. Employer engagement activities may include: 1)

technical assistance to employers on hiring individuals with disabilities; 2) disability awareness training 3) ongoing and regular contact with employers 4) attending meetings of local Chambers of Commerce, Society of Human Resource Managers (SHRM), and other business-related groups; and 5) no cost accessibility surveys to employers.

OVR employs a statewide Employer Services Branch Manager who is responsible for the supervision and oversight of staff and statewide employment activities. This is inclusive of providing training and technical assistance to the Job Placement Specialists, developing agency-wide relationships with large employers, and acts as the agency contact for the National NET and TAP programs managed by CSAVR.

OVR recognizes that it has two customers the job seeker and the employer and works collaboratively with partner organizations in providing quality services on all levels. OVR is in a position to provide valuable services to 503 Federal Contractors with utilization goals of 7% of their workforce, employees with disabilities. DWI shares with OVR the list of federal contractors it maintains, and staff are assigned to contact those employers individually making them aware of vocational rehabilitation services available to them.

The Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's State Rehabilitation Council (SRC), and the Employment First Council includes several employers and a representative of the Workforce Investment Board who provide important input on agency policy and activities related to employment. OVR, in conjunction with SCVR, conducts a Job Placement Month annually in October which includes many events around the state that promote collaboration with employers. Regional Employer Recognition Awards are given out during the month to employers who have hired OVR consumers. OVR will also continue to partner with local initiatives like Project SEARCH in Northern Kentucky and the Coalition for Workforce Diversity in Louisville, Lexington, Ashland, and Mayfield to identify and educate employers willing to develop new programs specifically designed to focus on hiring and training individuals with disabilities.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

OVR currently has in place innovative programs that provide high school students with a variety of work-based learning, financial literacy, self-advocacy training, job exploration, career counseling, and workplace readiness training opportunities that exist in the community with employers, in our rehabilitation center, and in post-secondary institutions. A variety of partnerships are needed in order to market the benefits of a variety of earn and learn opportunities, including registered apprenticeships to Kentucky business for individuals with disabilities including youth and students with disabilities. OVR will work with its existing partnerships among workforce, economic development, education and business entities in fostering work-based learning opportunities.

OVR has contractual agreements with some of the nine special education cooperatives and Jobs for American Graduates.in the provision of pre-employment Transition Services. As well, OVR has contracted with some of the schools in the Kentucky Career and Technical College System in the provision of pre- employment transition services that will provide opportunities for potentially eligible Kentucky students with disabilities to enhance their skills and readiness for postsecondary employment and training.

Kentucky's registered apprenticeship program continues to be a national model in preparing individuals for successful entry into the workforce. This administrative move builds momentum by harnessing KEWDC's existing statewide network to connect employers with potential employees and provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 600+ different programs currently representing 200+ unique occupations.

The Registered Apprenticeship model is a flexible, employer-driven approach that provides high-quality job training and produces skilled, competent employees for Kentucky employers. The division is responsible for registering apprenticeship programs that meet federal standards, issuing nationally recognized and portable Credentials of Completion to apprentices, and promoting the development of new programs through education, outreach and technical assistance.

The Community Work Transition Program (CWTP) is designed to provide pre-employment transition services to all students with disabilities and provide transition services to assist VR eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. There will be a Supported Employment Consulting fee available with the CWTP) for seamless transition into competitive integrated employment. There are specific programs in place with specialized services for the blind and visually impaired.

The PATH Program focuses on job exploration, workplace readiness training, and self-advocacy and is an intensive three-week program that introduces employability skills to students with disabilities. The curriculum is specific to individuals that are blind or visually impaired. The Summer Work Experience Program is in collaboration with Community Rehabilitation Providers. CRPs are paid to find work experiences in competitive integrated settings for transition aged individuals. The goals of the work experience are to provide community-based career exploration and the opportunity to practice work readiness skills. It is also hoped that by participating in the work experience program, employers will be open to providing more opportunities for individuals who are blind or visually impaired in their communities.

The Summer Work Program is in collaboration with the Kentucky School for the Blind, Kentucky Kingdom, the American Printing House for the Blind, and the Louisville Zoo. The World of Work Program is another program in which the OVR and KSB provide work-based learning experiences to students. The program provides competitive integrated work experiences to students that attend the Kentucky School for the Blind. The INSIGHT Post-Secondary Preparation Program is held each summer at Morehead State University. Students are able to participate in college classes, live in the dorm, and participate in social activities both on and off campus during this eight-day program. They receive counseling on post-secondary opportunities and are taught the self-advocacy skills necessary to succeed in a post-secondary environment along with workplace readiness skills.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

In Kentucky, The Cabinet for Health and Family Services (CHFS) is home to most of the state's human services and health care programs, including Medicaid, the Department for Community Based Services and the Department for Public Health. Medicaid Services purchases quality healthcare and related services that produce positive outcomes for persons eligible for programs administered by the department.

OVR has worked with the Department of Medicaid Services to attempt to expand the Medicaid Works, Kentucky's Medicaid Buy-In program, to maximize the opportunities for OVR consumers to get employed in competitive, integrated employment. Eligibility requirements remain restrictive and very few individuals have qualified for Medicaid Works. OVR still feels a revised buy-in would help more individuals with disabilities become successfully employed. As detailed below in (2), Medicaid Waiver funding is utilized to provide long term supports for supported employment consumers, increasing the numbers of individuals who can benefit from supported employment services. OVR serves on numerous councils that also have representation from the Department for Medicaid Services. The agency will work to insure the provision of vocational rehabilitation services and if appropriate, accommodations or auxiliary aides and services.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

The Department for Behavioral Health, Developmental and Intellectual Disabilities is the agency that provides quality information, services and support for individuals with needs related to mental illness, intellectual disability or other developmental disability and their families.

OVR is an active member of the Commonwealth Council for Developmental Disabilities participating in their strategic plan development and collaborating on projects to promote independence and employment for the specific population.

OVR works with the Division of Developmental and Intellectual Disabilities (DIDD) to improve quality Supported Employment Services and provide a smooth transition from VR Supported employment services to Long Term Support Services through the Supports for Community Living (SCL) and Michelle P. Medicaid waivers. KYOVR and DIDD jointly fund the Supported Employment Training Program at the University of Kentucky's Human Development Institute to train all Supported Employment Specialists in the state.

OVR serves on numerous councils, boards, and planning committees, such as, the Commonwealth

Council for Developmental Disabilities, as well as the Kentucky Advisory Council on Autism and the HB144 Commission relating to persons with developmental disabilities.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

The Division of Behavioral Health (DBH) is responsible for the administration of state and federally funded mental health and substance abuse treatment services throughout the commonwealth. Publicly-funded community services are provided for Kentuckians who have problems with mental health, developmental and intellectual disabilities, or substance abuse, through Kentucky's 14 regional Boards for Mental Health or Individuals with an Intellectual Disability (Regional MHID Boards). Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 which serve residents of a designated multi-county region. Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 (see Related Links) which serve residents of a designated multi-county region.

OVR has partnered with the Division of Behavioral Health (DBH) to implement the Individual Placement Service (IPS) Model, an evidenced based practice in Supported Employment for consumers with severe mental illness. Currently, there are 18 IPS programs throughout Kentucky. In 2019, OVR participated in meetings with the Cabinet for Health and Family Services to initiate efforts to expand IPS Supported Employment services to individuals with opiate use conditions. OVR will continue to collaborate with other state partners to expand IPS and provide services to underserved populations. OVR serves on numerous councils that also have representation from the DBH.

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;

(i) The Kentucky Office of Vocational Rehabilitation maintains a system to collect and analyze, on an annual basis, data on qualified personnel needs and personnel development. The Executive Leadership Team (ELT) reviews this information as well as the State Rehabilitation Council. This ensures that the provision of quality services is consistent throughout the Commonwealth. The number of personnel, category, and qualifications of personnel needed by OVR, and a projection of the numbers of personnel that will be needed in five years are calculated.

These calculations are based on projections of the number of individuals to be served. Personnel training files are maintained electronically through a state provided learning management system and contains records of everyone's training activities. Training accomplishments are reviewed at a 6-month interim review and annually in the Employee Performance Evaluation.

OVR has developed and maintains a Case Management System for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analysis. The office solicits input to identify areas of understaffing, or of specific needs.

The Kentucky Office of Vocational Rehabilitation organizational design includes the Executive Director's Office and 4 divisions. There are currently 368 classified and unclassified positions, 2 Federally Funded Time Limited (FFTL) positions and 63 contracted positions for a total of 433 positions.

The **Office of the Executive Director** includes a total of 10 classified, non-classified and contract employees. Executive Director (1) that supervises executive leadership functions such as Deputy Executive Director (1), Division Directors (4), Program Policy and Support Branch Manager (1), Executive Staff Advisor (1), VR Program Administrator (1), and an Administrative Specialist III (1). Number anticipated in five years: 12

The Program Policy and Support (PPS) Administrative Branch Manager supervises the branch that has 15 classified, non-classified and contract employees. There are VR Program Administrators (3), Program Coordinators (2), Resource Management Analyst (5), Grant Specialists (3) and Assistants (2). Number anticipated in five years: 17

Office of Executive Director Number of Individuals Served by Personnel Category (Personnel Category Total/Cases Served/Eligible Cases)

This information reflects the number of individuals served as well as eligible cases by personnel category. Executive Director (1/34,022/17,177) that supervises executive leadership functions such as Deputy Executive Director (1/34,022/17,177), Division Directors (4/8,506/4,294), Program Policy and Support Branch Manager (1/34,022/17,177), Executive Staff Advisor (1/34,022/17,177), VR Program Administrator (1/34,022/17,177), and an Administrative Specialist III (1/34,022/17,177).

The Program Policy and Support (PPS) Administrative Branch Manager supervises the branch that has 15 classified, non-classified and contract employees. There are VR Program Administrators (3/11,341/5,726), Program Coordinators (2/17,011/8,589), Resource Management Analyst (5/6,804/3,435), Grant Specialists (3/11,341/5,726) and Assistants (2/17,011/8,589).

The **Division of Field Services** supervises all functions that occur within field offices including specialized counseling services for the deaf and hard of hearing and blind and visual disabilities. This division houses the ancillary supports for services. There are 273 classified, unclassified and FFTL employees in this division. This includes: Assistant Directors (2), Regional Managers (5), Field Branch Managers (23), Counselors (114), Interpreters (6), Office Support Assistants (2), Assistants (86), Employer Services Branch (12), Community

Rehabilitation Program Branch (5), Rehabilitation Technology Branch (12), Transition Branch (5), Social Security Reimbursement (1). Number anticipated in 5 years: 300

Division of Field Services Number of Individuals Served by Personnel Category (Personnel Category Total/Cases Served/Eligible Cases)

This information reflects the number of individuals served as well as eligible cases by personnel category. Assistant Directors (2/17,011/8,589), Regional Managers (5/6,804/3,435), Field Branch Managers (23/1479/747), Counselors (114/298/151), Interpreters (6/5,670/2,863), Office Support Assistants (2/17,011/8,589), Assistants (86/296/200), Employer Services Branch (12/2,835/148), Community Rehabilitation Program Branch (5/6,804/3,435), Rehabilitation Technology Branch (12/2,835/148), Transition Branch (5/6,804/3,435), Social Security Reimbursement (1/34,022/17,177).

The **Division of Blind Services** supervises independent living services, older individuals who are blind, deaf/blind, orientation and mobility, bioptic driving, employment/AT services and other services provided through the Charles McDowell Center. There are 34 classified, unclassified and contracted staff in this division. The division consists of: Facility Administrator (1), Branch Manager (1), Administrative Section Supervisors (2), Administrator (1), Assistants/Support Staff (6), Orientation and Mobility (2), Instructors (5), IL/OIB Specialist (7), Work Experience Counselor (1), Psychologist (1), Patient Aide (1), Maintenance (1), Residential Aide (3), Consumer Services Coordinator (1), Community Resource Specialist (1). Number anticipated in 5 years: 36

Division of Blind Services Number of Individuals Served by Personnel Category (Personnel Category Total/Cases Served/Eligible Cases)

This information reflects the number of individuals served as well as eligible cases by personnel category. Facility Administrator (1/34,022/17,177), Branch Manager (1/34,022/17,177), Administrative Section Supervisors (2/17,011/8,589), Administrator (1/34,022/17,177), Assistants/Support Staff (6/5,670/2,863), Orientation and Mobility (2/17,011/8,589), Instructors (5/6,804/3,435), IL/OIB Specialist (7/4,860/3,454), Work Experience Counselor (1/34,022/17,177), Psychologist (1/34,022/17,177), Patient Aide (1/34,022/17,177), Maintenance (1/34,022/17,177), Residential Aide (3/11,341/5,726), Consumer Services Coordinator (1/34,022/17,177), Community Resource Specialist (1/34,022/17,177).

The **Division of Carl D. Perkins Vocational Training Center** is a residential facility that provides educational opportunities both away from home and coordinators services as needed with consumers in the area that do not need residential services. There are 96 employees in this division in classified, Federal Funded Time Limited (FFTL), unclassified or contracted. The Division Director is assisted by Administrators (4), Admissions Counselor (1), Assistants (10), Assistant Director (1), Branch Managers (3), Childcare Staff (2), Counselors (4), Dorm Counselors (2), Driver (3), Evaluation Aide (1), Facilities Security (6), Financial (2), Instructor (15), Janitor (2), Maintenance (5), Mental Health Counselors (2), Nurse (6), Occupational Therapy (4), Patient Aide (2), Physical Therapist (1), Pre-Employment Transition Services (2), Speech Pathologist (2), Staff Assistants Contracted in various roles (15), and Vocational Evaluator (1). Number anticipated in 5 years: 100

Division of Carl D. Perkins Vocational Training Center Services Number of Individuals Served by Personnel Category (Personnel Category Total/Cases Served/Eligible Cases)

This information reflects the number of individuals served as well as eligible cases by personnel category. Administrators (4/8,506/4,294), Admissions Counselor (1/34,022/17,177), Assistants (10), Assistant Director (1/34,022/17,177), Branch Managers (3/11,341/5,726), Childcare Staff (2/17,011/8,589), Counselors (4/8,506/4,294), Dorm Counselors (2/17,011/8,589), Driver (3/11,341/5,726), Evaluation Aide (1/34,022/17,177), Facilities Security (6/5,670/2,863), Financial (2/17,011/8,589), Instructor (), Janitor (2/17,011/8,589),

Maintenance (5/6,804/3,435), Mental Health Counselors (2/17,011/8,589), Nurse (6/5,670/2,863), Occupational Therapy (4/8,506/4,294), Patient Aide (2/17,011/8,589), Physical Therapist (1/34,022/17,177), Pre-Employment Transition Services (2/17,011/8,589), Speech Pathologist (2/17,011/8,589), Staff Assistants Contracted in various roles (15/2,268/1,145), and Vocational Evaluator (1/34,022/17,177).

The **Kentucky Blind Enterprise Division** supervises the vendor program. They currently have 5 employees: Assistant Director (1), Program Coordinator (2), Assistant (1) and Mechanic (1). Number anticipated in 5 years: 6

Division of Kentucky Business Enterprises Services Number of Individuals Served by Personnel Category (Personnel Category Total/Cases Served/Eligible Cases)

This information reflects the number of individuals served as well as eligible cases by personnel category. Assistant Director (1/34,022/17,177), Program Coordinator (2/17,011/8,589), Assistant (1/34,022/17,177) and Mechanic (1/34,022/17,177).

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

The **Office of the Executive Director** includes a total of 10 classified, non-classified and contract employees. Executive Director (1) that supervises executive leadership functions such as Deputy Executive Director (1), Division Directors (4), Program Policy and Support Branch Manager (1), Executive Staff Advisor (1), VR Program Administrator (1), and an Administrative Specialist III (1).

The Program Policy and Support (PPS) Administrative Branch Manager supervises the branch that has 15 classified, non-classified and contract employees. There are VR Program Administrators (3), Program Coordinators (2), Resource Management Analyst (5), Grant Specialists (3) and Assistants (2).

The **Division of Field Services** supervises all functions that occur within field offices including specialized counseling services for the deaf and hard of hearing and blind and visual disabilities. This division houses the ancillary supports for services. There are 273 classified, unclassified and FFTL employees in this division. This includes Assistant Directors (2), Regional Managers (5), Field Branch Managers (23), Counselors (114), Interpreters (6), Office Support Assistants (2), Assistants (86), Employer Services Branch (12), Community Rehabilitation Program Branch (5), Assistive Technology Branch (12), Transition Branch (5), Social Security Reimbursement (1).

The **Division of Blind Services** supervises independent living services, older individuals who are blind, deaf/blind, orientation and mobility, bioptic driving, employment/AT services and other services provided through the Charles McDowell Center. There are 34 classified, unclassified and contracted staff in this division. The division consists of: Facility Administrator (1), Branch Manager (1), Administrative Section Supervisors (2), Administrator (1), Assistants/Support Staff (6), Orientation and Mobility (2), Instructors (5), IL/OIB Specialist (7), Work Experience Counselor (1), Psychologist (1), Patient Aide (1), Maintenance (1), Residential Aide (3), Consumer Services Coordinator (1), Community Resource Specialist (1).

The **Division of Carl D. Perkins Vocational Training Center** is a residential facility that provides educational opportunities both away from home and coordinators services as needed with consumers in the area that do not need residential services. There are 96 employees in this division in classified, Federal Funded Time Limited (FFTL), unclassified or contracted. The Division Director is assisted by Administrators (4), Admissions Counselor (1), Assistants (10), Assistant Director (1), Branch Managers (3), Childcare Staff (2), Counselors (4), Dorm

Counselors (2), Driver (3), Evaluation Aide (1), Facilities Security (6), Financial (2), Instructor (15), Janitor (2), Maintenance (5), Mental Health Counselors (2), Nurse (6), Occupational Therapy (4), Patient Aide (2), Physical Therapist (1), Pre-Employment Transition Services (2), Speech Pathologist (2), Staff Assistants Contracted in various roles (15), and Vocational Evaluator (1).

The **Kentucky Blind Enterprise Division** supervises the vendor program. They currently have 5 employees: Assistant Director (1), Program Coordinator (2), Assistant (1) and Mechanic (1).

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.

Counselor Information: Of the 114 counselors in the Division of Field Services there are 50 or 44% who are Certified Rehabilitation Counselors. Data provides the following snapshot of current counselor experience within the agency. Those with 30 years of service or more were 2%. Those with 20 – 29 years of service were 9%. Those with 10 – 19 years of service were 25%. Those with 5 – 9 years of service were 25%. Those with less- than 5 years of service were 41%.

Personnel Departures: There were a total of 48 classified employees that left the agency during this reporting period and 8 contractors. Of the classified employees 14 retired, 31 resigned 2 were terminated and 1 passed away. Twenty-Two of the departures were counselors and 9 of them were certified rehabilitation counselors. Fifteen of the counselor departures were resignations, 2 were terminations and 5 were retirements. Of the counselors that resigned, 1 had been with the agency for 14 years and the remainder for 10 or less. All counselors met the Kentucky standards for a qualified rehabilitation counselor. All 8 contractors resigned their positions.

Personnel Hires: There were 40 classified, and 15 contract employees hired for a total of 55. Thirteen of the new hires were counselors and 1 has their CRC. The contracted employees hold various support positions within the agency. Positions titles hired include Assistants, Admissions Counselor, Administrator, Cooks, Dorm Counselor, Employment Specialists, Evaluation Aide, Instructor, Maintenance, Orientation and Mobility and Pre-Employment Transition Coordinator. Eight of these new employees have resigned and two of those resignations were counselor positions.

Personnel Status for Retirement Eligibility: Based on years of services there are a total of 21 staff currently eligible to retire and 26 that will be eligible to retire in the next 5 years based on a calculation of 27 years of service. Those currently eligible are: 4 assistants, 7 counselors all Certified Rehabilitation Counselors, 1 disability resource driver, 2 employer services, 3 managers, 1 speech pathologist, 2 vocational rehabilitation administrator and one vocational rehabilitation technology specialist. Those eligible with five years include: 2 assistants, 9 counselors with 7 of them Certified Rehabilitation Counselors, 3 assistant directors, 2 division directors, 1 employer services, 1 fiscal officer, 2 instructors, 4 managers, 1 program coordinator and 1 security guard.

Consumer Information: There were 34.022 individuals served with the average cases served by caseload at 233 and the number of potentially eligible cased served 17,177 and the average potentially eligible cases served by caseload was 114. There were 2,756 individuals obtained or maintained employment after receiving services. The large caseload size is due to counselor vacancies. Case coverage was absorbed by other counselors and branch managers due to difficulty in filling vacant positions.

Residential services were heavily impacted by the pandemic. The data reported emphasizes the overall impact of the mandates applied to services in this facility. Total cases were 67, total potentially eligible cases 30, average cases served by caseload 13, average potentially eligible cases served by caseload 6, percentage of potentially eligible cases by caseload 44.78 and new referrals 2.

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The University of Kentucky (UK) offers a Master of Arts in Counseling degree with a specialty focus in either Clinical Mental Health Counseling, Rehabilitation Counseling or Counselor Education. According to the university website, the specialty area curricula align with the Council on Accreditation for Counseling and Related Educational Programs (CACREP) standards, and the Rehabilitation Counseling specialty is accredited through 2022. The Clinical Mental Health specialty area is pending CACREP accreditation. The university offers a doctoral degree in Rehabilitation Counseling Education, Research, and Policy, which is also accredited by CAPCREP through 2021." This is the only institution in the state that offers a master's with a Rehabilitation Counseling focus.

The online Accelerated Distance Learning Master's program can be completed in sixteen months without on-campus attendance and at in-state tuition rates. Participants in the program are eligible to test for rehabilitation counselor certification after completing 75% of their course work in their final semester.

OVR collaborates with the University of Kentucky. Staff attend advisory board meetings to encourage communication between the agencies. OVR counselors that do not have their MRC are encouraged to apply for scholarships when offered by this university or hybrid online university programs that provide rehabilitation counseling specific programs. Information about scholarships and grants from UK and other universities with MRC programs are shared with staff through electronic announcements. The state agency no longer aids with tuition or related costs of attending school due to the loss of the in-service training grant. The agency does allow participants who apply and are approved for an out-of-state hybrid MRC program to request approval to attend required on-campus sessions without taking personal leave. If approved by the cabinet the individual can travel to the location without using annual leave, but the agency does not cover travel expenses. Approval for out-of-state travel for these programs is not guaranteed and final approval is with the Cabinet.

OVR does not currently have staff participating in any MRC programs. The agency covers the cost of the CRC examination fee for those eligible to sit for the exam and continues to provide the renewal fee costs for all employees that maintain their CRC. The agency provides for exam fees and renewal costs of other applicable certifications required for professionals to perform the functions of their job. A new service offered through CRCC is a review of educational transcripts to determine eligibility or provide an outline path to eligibility for the individual. The agency also covers this cost.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

OVR obtains information from University of Kentucky annually regarding the number of students enrolled and the number graduating from the Master of Counseling programs. The counseling program provides specialized tracks for Clinical Mental Health, Rehabilitation Counseling and Counselor Education. According to the information provided by the university, there were 46 students enrolled in fall 2020 with 17 in the Clinical Mental Health Counseling track, 24 in the Rehabilitation Counseling track and 5 in the Counselor Education track. In the

spring 2021 there were 51 students enrolled in the Master of Counseling program with 11 of those in the Clinical Mental Health, 20 in the Rehabilitation Counselor track and 20 in the Counselor Education track.

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.

Of the number identified above for fall 2020, there were 9 that graduated from the mental health track and 8 graduated from the rehabilitation counseling track. One person in the mental health track took the CRC examination but didn't pass. There were 4 that took the CRC for the rehabilitation counseling training with 3 of those passing the exam. Of the number identified above for spring 2021, there were 4 that graduated from the mental health track and 6 from the rehabilitation track. Of the mental health track students there were 3 that sat for and passed the CRC examination and of those in the rehabilitation counseling track there were 3 that sat for the exam and 2 passed.

All of those who graduated achieved eligibility for licensure. Based on the agency definition of a qualified rehabilitation counselor, all of those graduating from the three programs at the University of Kentucky meet the defined eligibility standard for the Kentucky Office of Vocational Rehabilitation Counselor grade 13 and those that achieved their certified rehabilitation counselor status are also educationally eligible for the Kentucky OVR VR Counselor Certified positions of grade 14 and 15 once they acquire the required experience for those positions.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the Designated State Unit (DSU) and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

OVR aggressively recruits, equips, trains, and works to retain qualified professionals through coordination with institutions of higher education, professional and paraprofessional associations including personnel from minority backgrounds and individuals with disabilities. Kentucky Personnel Cabinet utilizes a web-based system for hiring of personnel. The system uses online application submission and through rigorous personnel process the applicants are vetted to ensure that they meet the required qualifications for the classification they are applying for. The Commonwealth Personnel Cabinet now utilizes external job recruitment sites to advertise positions.

In 2020 the agency hired and retained 13 VR Counselors in the Division of Field Services and those 13 individuals achieved the following education levels: Master's degree (7) and bachelor's degree (6). All meet the classification requirements for a VR Counselor position within the state personnel system. This includes 2 years of required experience for those hired with BA only. The master's degree subject areas were Rehabilitation Counseling (1), Education (1), Psychology (1), Occupational Therapy (1), Public Administration (1), Social Work (1), and Human Services (1). Only one counselor hired had obtained their rehabilitation counselor certification. Of those with a BA only the following outlines their educational background.: Social Work (3), Psychology (2) and History (1).

OVR strives to achieve a more diverse workforce by working with state personnel systems to recruit and hire individuals from protected classes. Recruitment of individuals with disabilities and those from minority backgrounds enables the agency to have highly competent individuals

from all segments of society to accomplish its mission. Potential applicants are identified through recruitment, posting, and advertising according to the cultural diversity initiative and the agency's Affirmative Action goals. The following excerpts are from the Executive Branch Affirmative Action plan as it relates to personnel recruitment, development, and retention: (1) The Office of Diversity & Equality (ODET) will collaborate with the Division of Career Opportunities to develop innovative ways to increase the number of female and minority applicants for State government employment.

(2) The Office of diversity & Equality will produce a Minority & Female Recruitment Resource Guide to share with the various cabinets and agencies and their recruiters. This guide will identify regional demographic information, along with up-to-date information on educational institutions, minority and female organizations, and other avenues for developing a diverse applicant pool. (3) All of the recruiting sources used by the State will be informed of the State's policy regarding Equal Employment Opportunity and will be asked to refer qualified candidates without regard to their race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity, genetic information, or veteran status. The Executive Branch Affirmative Action Plan also address selection and promotion through the following action items through professional development opportunities, new employee orientation includes information on Equal Employment Opportunity, Affirmative Action and Diversity and Cabinets/Agencies will encourage participation in the Governor's Minority Management Trainee Program.

The Office of Diversity, Equality and Training (ODET) has a Minority Management Trainee Program (GMMTP). This is a recruitment and development tool to increase the representation of minority managers in state government. This program offers an experience that enables participants to cultivate the skills needed to serve Kentucky's citizens in an effective and responsive manner. Participants receive in-depth, practical training through classroom instruction, on-the-job experience and special projects. Individuals must meet the following criteria to be eligible for the program: 1) be an ethnic minority, 2) Have one (1) year of state government service, 3) qualify for a grade 10 or higher job classification and 4) Aspire to be a manager and demonstrate exceptional management potential. As part of the personnel process the individuals within this program are exposed to varying aspects of job availability within state government. The GMMTP group is very actively involved in the Governor Leadership and Diversity Conference that takes place annually.

The following are also used for recruitment and identification of qualified candidates for vacant position and promotional opportunities:

In 2021 agency leadership identified the need for a Diversity Team to explore opportunities in the agency to increase diversity initiatives and improve cultural diversity within the agency. The team is comprised of leadership and staff from the agency as well as staff from the Education and Workforce Development Cabinet. The agency created an Accessibility Team to address internal accessibility compliance. This team meets monthly to discuss progress and plans towards 100% compliance with internally developed resources as outlined in the newly developed Strategic Plan. The agency has representation on the Accessibility Team developed by the Kentucky Personnel Cabinet that meets regularly to discuss overall accessibility within the software programs utilized for state personnel initiatives.

Work closely with consumer groups, attending local chapter meetings, national meetings.

Partners with human resources within the Personnel Cabinet and agency human resource division to hire the most qualified individuals and an agency OVR strives to promote cultural diversity in recruiting disabled or minority candidates inclusive of bilingual candidates.

Encourage existing minority staff to play an active role in policy and program development, service delivery, program monitoring activities and professional development to prepare for promotional opportunities when available.

Ensure that programs are accessible to minorities.

Encourage staff partnerships with local job fair opportunities throughout the state to broaden the recruitment for agency positions and educate high school and college students on the services and job opportunities within the agency.

Follow EEO guidelines and Affirmative Action Procedures.

Encourage minorities and individuals with disabilities to play an active role in the Office of Vocational Rehabilitation State Rehabilitation Council, participate in forums and provide input into policy and procedures.

Utilize Field Services demographic and population data to determine the number of minorities and individuals with disabilities in regions and develop strategies to increase recruitment from these regions.

OVR recognizes our staff as our greatest resource and is committed to training state personnel to ensure the provision of quality services to individuals for competitive integrated employment outcomes. OVR will remain current on rehabilitation trends and best practices and disseminate the information through internal training and by securing external training opportunities for its personnel. This includes utilizing online training resources that provide quality information in a cost-effective manner and partnering with other agencies to share training and resources that is mutually beneficial.

OVR has a personnel classification system in place, but it lacks salary competitiveness with other states and often other state agencies. States surrounding the northern and western borders of Kentucky offer higher entry-level salaries based on state demographics and wage studies. The agency has worked diligently within the current constraints of the personnel system to provide re-classifications and resign/reinstates to higher pay levels as well as using awards programs to address some of the salary issues that exist. The agency is also actively pursuing salary increases across all positions within the agency to be competitive in the new employment market and to address retention issues within the agency.

The agency encourages the use of university grants for those employees interested in obtaining their Master of Rehabilitation Counseling degree, but the agency does not offer monetary assistance to them in their pursuit of a degree. OVR works with the University of Kentucky in providing students of the MRC program opportunities to complete their practicum including opportunities for virtual internships during the pandemic. The agency has also increased opportunities for internship and practicums to employees and potential applicants in degree programs from related fields. These opportunities are beneficial to the student by giving them an opportunity for hands on field experience as well as a recruitment tool for OVR.

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

Based on the new WIOA regulations the agency has modified the "Qualified Vocational Rehabilitation Counselor" definition. The agency now defines a qualified rehabilitation counselor as one who meets the following criteria:

1. A Certified Rehabilitation Counselor (CRC) is preferred.

2. Master's degree from an accredited university in master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education with emphasis in vocational counseling or a related; OR
3. Meets the Kentucky Personnel Cabinet standard to be certified as for the starting position of Vocational Rehabilitation Counselor, Grade 13. The Vocational Rehabilitation Counselor, Grade 13 position requires a master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education with emphasis in vocational counseling or a related field. In the absence of a master' degree a bachelor's degree in one of the above areas plus two years of professional experience in vocational rehabilitation, vocational assessment, employer relations or rehabilitation technology is required.

Based on the above criteria of Vocational Rehab Counselor, all employed vocational rehabilitation counselors meet or exceed the criteria. The following professional/para-professional certifications are considered primary within the agency. Staff qualifying for certification within the job classifications are assisted with maintenance fees. Those new qualifiers may receive assistance with examination fees based on one time pass or fail. Managers of VR Counselors are also required to meet the minimum qualified standards for their classification and are encouraged to obtain their CRC.

Primary certifications currently utilized within OVR are as follows:

Certified Rehabilitation Counseling (CRCC/CRC)

Assistive Technology Professional (ATP/RESNA),

Certified Interpreters (RID)

Certified Driver Rehabilitation Specialist (CDRS)

The agency also has need of professionals to fulfill medical and specialized services provided at Carl D. Perkins Vocational Training Center and the Charles McDowell Center. To fulfill those needs there are additional licensed or certified personnel such:

Driver and Traffic Safety Training Certification - for those that provide on-the-road driver instructions to students

Certified Daycare Director - for the childcare program

Orientation and Mobility (COMS)

Kentucky Professional Teaching - for the vocational instructors

Certified Speech Pathologists

Certified Public Account

Certified Maintenance Employees and Drivers– plumbing, electric and CDL

Nursing Staff

Some critical services in the residential facilities must be contracted to provide specialized counseling services and those include.

Licensed Clinical Social Worker

Licensed Alcohol and Drug Abuse Counselor

Licensed Psychologist

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.

OVR utilizes best practices promoting retention among direct support professionals. At the end of 2020 there were 114 counselors in the Division of Field Services and 4 additional located at the Carl D. Perkins Vocational Training Center Division (CDPVTC). Of those from Field Services there were 50 or 44% who were Certified Rehabilitation Counselors (CRC) and of the 3 at CDPVTC are CRC's. Of the new hires for 2020 there are 6 that will not meet the required standard of Vocational Rehabilitation Counselor until they complete their probation period. Their probation ends as follows: December 2021(1), February 2022 (2) and April 2022 (2).(1). There are 95% of Vocational Rehabilitation Employees in the field that meet the required standard for the agency. All 3 of the Vocational Rehabilitation Counselors (3) located at the Carl D. Perkins Vocational Training Center meet the required personnel standard. The VR Counselors in the field have the following educational backgrounds: 27 with bachelor's degree only: Rehabilitation Counseling (1), Psychology (11), Social Work (8), Human Services (4), Sociology (2), and History (1). The remaining 87 have master's degrees in: Rehabilitation Counseling (52), Social Work (9), Counseling (5), Clinical Psychology (1), Psychology (3), Mental Health Counseling (2), Human Services/Development (4), Education (2), Criminal Justice/Addiction Studies (1), Family Counseling (1), School Counseling (2), Occupational Therapy (1), Public Administration (1), Sociology (1) and Special Education (2).

Of the managers supervising the VR Counselors, there are 19 total and of that number all meet the qualifying standard for their classification. Fifteen are Certified Rehabilitation Counselors and the remaining 4 have their master's degree in rehabilitation counseling or related field.

The agency also has 29 other employees that maintain their CRC and supports them in the maintenance of this certification.

The agency Assistive Technology Branch provides assistive technology services to the field for consumers as well as to employees as needed. There are 16 employees in this branch including the manager. The branch manager is certified as an Assistive Technology Professional (ATP). Upon merging with the Kentucky Office for the Blind all assistive technology providers, merit employees (9) and contracted employees (7) were combined in one branch. Certified staff within the branch include ATP, Certified Driver Rehabilitation Specialist and Durable Medical Equipment Specialist. The agency hosts an annual AT Summit to provide specialized training to staff in this branch and opens the training to other staff within the agency. Staff in this branch provide training to new employees on the ADA, processes within the agency for AT requests, generating accessible documents, and general AT training reviews.

The Carl D. Perkins Vocational Training Center (CDPVTC) has unique staffing needs based on the services they provide to consumers and their residential structure. In 2020, CDPVTC employed 98 personnel to provide services in the residential facility. There are 4 VR Counselors, and all meet CSPD standards for the agency and 3 are CRC. The supervisor of these counselors is also a CRC. The counselors do not determine eligibility but do help with planning and monitoring of vocational goal progress. Other personnel staffing classifications for CDPVTC include vocational evaluators, dorm staff, maintenance personnel, security officers, financial specialists, instructors, certified drivers and medical personnel to meet the diverse needs of the students served in this residential setting.

The Charles McDowell Center provides services unique to individuals with visual disabilities and falls under the Blind Services Division. In 2020, there were 25 employed at the facility supervised by the Blind Services Division Director (1). Staff at the McDowell Center including Facility Administrator (1), Assistants (3), Program Administrator (3) Community Resource Specialist (1), Consumer Services Coordinator (1), Instructor (5), Patient Aide (1), Psychologist

(1), Receptionist (1) a Work Experience Counselor (1), Orientation and Mobility Instructors (2), Dorm Residential Aide (3 contracted) and 1 maintenance person (contracted). In addition to the services provided at McDowell, the Blind Services Division also provides oversight for the Independent Living Older Blind Program with one branch manager, IL/OIB counselors (7) and an assistant.

The two facilities continue to explore new opportunities to share expertise and services for all consumers. Staff are trained on services provided by each facility and how to access these for their consumers. This includes tours of the facilities for a better understanding of the unique services provided at each location.

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 agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving positive employment outcomes for agency consumers. Training plans are based on: federal laws, RSA monitoring findings, agency goals and directions, continuous improvement initiatives, training needs assessment, staff and consumer input. The agency utilizes both in-person and online resources for training.

Onboarding for the State of Kentucky, the Cabinet and Office of Vocational Rehabilitation now includes web-based trainings offering more timely engagement. All of the required trainings must be completed within 30 days of employment. These include: Anti-Harassment, Workplace Violence Prevention, State Government Ethics, Security Awareness for Technology, Performance Evaluation Orientation and Accurate Time Reporting. New employees are also required to take an online training on the Client Assistance Program (CAP) developed by the coordinator of that service. The training provides an overview of the services provided to consumers and processes for consumers to enlist the services of CAP if needed.

The agency was selected to participate in the Center for Innovative Training in Vocational Rehabilitation, an RSA grant through George Washington University. One of the first benefits of this program included access to online training through the VR Development Group. All staff who were in the Division of Field Services with the agency were approved for the grant program. As well, after approval new employees and staff recommended by their immediate supervisors participate in course work. The courses online include: The History of Vocational Rehabilitation, Basics of VR/ Overview of the State-Federal Program, Eligibility Determination, Conducting a Comprehensive Assessment, Developing an Individualized Plan for Employment (IPE), Job Development and Placement and Case Closure. The agency was also selected by the grant administrators for participation in the personalized development of new employee orientation online through the San Diego State Interworks agency to allow Kentucky to include state specific policy and procedures into online training materials. The agency Counselor Mentor Leadership team were the primary contributors of the materials and feedback regarding the development of this online program. The program is projected to be available for use in May 2022.

In addition to the online training opportunities, this grant has afforded the agency insight into trainings in development and resources available through other VR state agencies. Initially the team met monthly and has now transitioned to quarterly in order to discuss updates within each state and resource sharing. The grant administrators developed a community of practice where participants may ask questions of the group. The introduction for the VR Development Groups YesLMS program is another benefit of participation in this grant as it provides access to

already developed VR specific training in an online format. The agency successfully obtained access to this resource for all agency staff and is in the process of implementing these training as part of the orientation process. This includes five courses in Medical Aspects, Ethics, general introductions to vocational rehabilitation, transition and other disability specific training. All trainings developed by the VR Development Group have certified rehabilitation counselor credits approved and available upon successful completion of the courses and quizzes associated. Building on the CIT-VR online training, OVR requires new employees to attend a face-to-face training for onboarding. As part of the orientation process, the agency utilizes subject matter experts from within the agency to deliver the training. The subject matter experts include the Division of Field Services Director, Division of Field Services Assistant Directors, Division of Field Services Regional Mangers, Employer Services Branch Manager, Rehabilitation Technology Branch Manager, Social Security Administrator and members of the counselor mentoring program. The topics covered are: the agency mission, philosophy, values, federal and state laws, appropriations, budget, eligibility, assessment, vocational goal development, plan development, pre-employment transition services, community based work transition services, confidentiality and ethics, supported employment, assistive technology (based on the Assistive Technology Act of 1999), diversity, disability awareness, Social security Administration (SSA), Ticket to Work, Workforce Investment Opportunities ACT (WIOA) specific disabilities. Training programs for all staff emphasize informed consumer choice in order to maximize the consumer direction of individualized rehabilitation plans. Information regarding current research is disseminated to all staff via email and formal training opportunities. This training occurs at least 2 times during the calendar year or as often as needed to accommodate new hires. During the pandemic, employees attended training via Zoom. The breakout room feature was used for small group dialog covering case statuses from referral to closure. Each small group was facilitated by a regional manager. Due to the individualized nature of services, it is known that each group may have different ideas regarding vocational goal development, plans, etc. In order to address that upon completion of processes within the small group, the staff then merged back to a larger group setting to discuss the outcome of their group session to compare processes, thoughts and entertain questions regarding the materials covered.

New counselors within the agency also have the opportunity to receive training and guidance from an OVR Counselor Mentor. The rehabilitation counselor mentoring program was implemented in June 2002 with pilot programs in six districts. The pilot program was a success and has been active since the completion of the pilot in 2003. Currently there are 20 counselors actively involved in the program. There is a team that oversees the training development and policies associated with this program. The team consists of an administrator from central office, two field managers (one representing services to the blind and the other representing all other disability services) and appointed counselor mentors with required mentoring experience. There are 14 out of 19 districts represented. Certified mentors receive no additional pay for their services and are required to undergo additional training to maintain their mentor credentials. The development of the skills and knowledge required to perform this specific role provides an opportunity to build their resume' and prepares them to assume other leadership roles within the agency.

Eligibility requirements for an individual to apply for the OVR Counselor mentor program area as follows: an applicant must have the minimum of a Bachelor's Degree in a field of study reasonably related to vocational rehabilitation, such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, and economics. An applicant must also have a minimum of three (3) years of experience as a Vocational Rehabilitation Counselor, a Rehabilitation Counselor for the Blind (RCB), or a Rehabilitation Counselor for the Deaf (RCD) for the state of Kentucky and submit a recommendation from their supervisor. The applicant must have successfully completed probation. Applicants must complete a questionnaire with

essays regarding their reasons for applying for the mentor program and submit a sanitized case that reflects their best casework. When the case is reviewed, the team reviews the application to determine if the deadline for submission was met, the appropriate documents for the application were provided, the case was sanitized and that the case contains the required documents as per federal law and agency policy. The Mentor Leadership Team reviews the application and case provided to determine admission into the program. If approved, the applicant attends an orientation that contains an overview of the mentor handbook. All mentors are required to attend annual training designed by the mentor leadership team to hone their skills and knowledge for the mentoring process. The pandemic and salary discrepancies are variables that have impacted our ability to provide consequential data regarding the formal mentoring process on retention and improved competitive integrated employment outcomes. OVR leadership has charged the mentoring team to refocus their review to include updated data tracking the impact of this program on the areas identified.

The agency communicates available training opportunities to staff on a regular basis and maintains a master calendar within the Outlook program to track training opportunities that have been announced via mass email distribution. The Outlook calendar includes details regarding registration, appropriate audience and necessary approval processes for participation.

One of the benefits of the pandemic is the increased opportunity for staff to participate in national trainings for associations and other professional groups because they were moved to an online format. Due to limited approvals for attending out-of-state conference the staff often must receive training information secondhand rather than participating personally in the events. The online formats allowed for a broader audience and receiving the information firsthand. The Council of State Administrators of Vocational Rehabilitation, the National Council of State Agencies for the Blind, Kentucky Rehabilitation Association and Association for Persons for Supported Employment are just a few of the opportunities that were afforded to staff due to an online training presence.

The agency utilizes webinar resources to deliver training to new employees when it is an appropriate method for the topic. In 2019 the online training programs include: Assistive Technology, Driver Tech Processes, Case Management, Case Management System, Kentucky Business Enterprise Vendor Program Training, Introduction to Eligibility and Introduction to IPE. These trainings were recorded to be utilized with all new employees. Platforms that are accessible to all are utilized for webinars and online training.

Managers are encouraged to arrange for new counselors to visit the Carl D. Perkins Vocational Training Center and the Charles McDowell Center for an in-person opportunity to review their programs and the facilities so that they can accurately relay this information to consumers on programs appropriate for the achievement of their vocational goals. The pandemic limited in-person tours, but an online tour is available.

CDPVTC employees are required to take training programs online to fulfill the requirements for their Commission on Accreditation of Rehabilitation Facilities (CARP). These trainings include: Identification of Critical Incidents, Promoting Wellness of Consumers, Reporting Abuse & Neglect of Vulnerable Adults and Consumer rights.

The agency partners with the KATS Network, Kentucky AgrAbility and Protection and Advocacy to coordinate a statewide training on current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by OVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists and other professionals that have in interest in or contact with AT. OVR administers the KATS Network, the Commonwealth's Assistive Technology program.

The agency uses online training and webinars developed by other state entities. Kentucky Employee Assistance Program and Kentucky Department of Library and Archives regularly distributes training opportunities for employees. They explore topics such as depression awareness, anxiety disorders and mental health awareness, budgeting and dealing with angry customers.

The agency also encourages staff to utilize the training offered through other entities within and outside of state government. The information for registration and participation is disseminated via email to all staff. One partner in this endeavor is the University of Kentucky Human Development Institute (UKHDI) from the University of Kentucky. Employees also utilize the webinar series topics offered by UKHDI during a spring, summer and fall training program. Topics of 2020 included: Universal Design, Employment for Youth with Disabilities, Service Animals and the ADA and Disabilities and the Arts. The agency worked with HDI on their first Annual Assistive Technology Summit in March 2019. A multi-agency collaborative training took place in April 2019 titled "Nothing About Us Without Us" hosted by the University of Kentucky, HDI, Kentucky Autism Training Center, the Office on Autism and OVR. Information is disseminated to all staff for 4th Thursday ADA topics provided through HDI that include such topics as: AT as a Reasonable Accommodation, ADA & Employment, ADA & Public Accommodations, A Snapshot of the ADA: The Legislations and History of the Disability Movement.

College and university level classes are highly encouraged for staff though the agency does not provide educational assistance at this time. Obtaining an education degree may result in a reclassification if the reclassification is a result of additional material duties assumed by the employee. The agency shares information with staff regarding formal educational training such as the MRC. Included in the information are details about scholarships and grants that may be available to assist with educational expenses.

The agency continues to see the retirement of agency leaders and is cognizant of the need for leadership succession. The agency has utilized various opportunities to achieve this goal including the training resources available through the Office of Diversity Equality and Training (ODET) in the Kentucky Personnel Cabinet. Examples of approved and required courses include: Foundations of Leadership, Coping with Difficult Behaviors, Conflict Management, Hiring and Selection Process, Managing Employee Performance, Leadership Communication, Managing Work Relationships, Personal Accountability and Shared Accountability. The Education and Workforce Development Cabinet implemented an Emerging Leaders Program where multiple OVR staff applied and were accepted to participate in the program.

Agency staff are encouraged to participate in the Leadership and Diversity Conference hosted by the Kentucky Personnel Cabinet Office of Diversity Equality and Training. The most recent training took place in September 2020. As with many other conferences, this one took place in a virtual format which created a positive outcome of more employee participating in the event.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

Resources on research and national training/communication on trends and updates in the field of rehabilitation are shared with all staff via email. The agency subscribes to emails distribution lists that provide frequent updates on rehabilitation research to share with staff.

OVR makes every effort to have representation at and participate in national and regional and state training events. In 2020 OVR staff represented the agency at the following virtual conferences: National Rehabilitation Association Annual Conference, , Kentucky Rehabilitation Association Annual Conference, Kentucky Association of Persons for Supported Employment Conference, Kentucky AHEAD, Kentucky Governor's Diversity Conference, Access University,

Sagebrush Conference for Randolph-Sheppard, Council of State Administrator of Vocational Rehabilitation (CSAVR), National Council of State Agencies for the Blind, National Federal for the Blind, American Federation for the Blind, VR Technical Assistance Webinars and Southeast Rehabilitation Institute on Deafness (SERID).

In June 2020 the agency was selected to participate in the Center for Innovative Training in Vocational Rehabilitation (CIT-VR) along with nine other state agencies. Through this program the staff have been participants in training developed through CIT-VR and their partnership programs such as VR Development Group and San Diego State University Interworks. In 2022 the Interworks program will have completed an individualized training program for Kentucky OVR. This development has been a work in progress for 5 months.

The agency also communicates available training from a myriad of entities both locally and nationally. This includes trainings developed through Vocational Rehabilitation Technical Assistance Centers, University programs offering professional development training such as University of Arkansas Currents and University of Wisconsin Stout SVRI. The agency maintains a Master Planning Calendar on Outlook that is updated with information disseminated via email to allow staff an easy reference to training opportunities that have been offered to them for professional growth and development.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

OVR is committed to establishing and maintaining practices that ensure that existing staff is trained and knowledgeable of resources to assure consumers receive the appropriate modes of communication. To address the diverse individual cultural needs of individuals OVR has designated counselors with specialized skills assigned to handle caseloads serving individuals who are deaf, deaf/blind, blind and visually impaired. Recruitment of individuals with specialized skills occurs utilizing the Kentucky Personnel Cabinet through their online job's portal. Classifications for these positions specifically outline the necessary skills required to fill the position. The Deaf and Hard of Hearing Services Branch actively provides internship and volunteer opportunities for students graduating from the American Sign Language program at Eastern Kentucky University and those graduates that need training hours for their certification. This gives the graduates a chance to learn and gain exposure to working within the state agency as an employee or serving as in an ASL contracted employee for the state.

Communication specialists are recruited from within the existing agency counselor group and provided with the necessary training to provide services to individuals who are hard of hearing. Currently there are 62 designated communication specialists training to provide these services. The agency maintains a personnel database that easily identifies the counselors approved as communication specialists.

The Rehabilitation Counselors for the Deaf (RCD) have sign language skills and the Rehabilitation Counselors for the Blind are trained on the unique communication needs of their consumers. Some of their training occurs prior to hiring, but the agency provides ongoing support for participation in opportunities for professional development in the specialized areas to ensure that staff maintain/update their skills. Both groups are trained to coordinate together on services for individuals who are deaf/blind. The agency also employees a deaf/blind statewide administrator dedicated to service provision for deaf/blind consumers. The agency has a strong working relationship with the Helen Keller National Center as additional support for services provided to consumers who are deaf/blind. All counselors work with consumers to meet their communication needs to successfully participate in their rehabilitation plan.

The manager of the Deaf and Hard of Hearing Branch works to ensure that all employees have adequate American Sign Language skills resources to communicate with consumers who are deaf by using staff interpreters or those engaged by contract. Certified sign-language

interpreters are available to consumers and employees to ensure full participation in the rehabilitation programs.

As meetings, webinars and online training opportunities increase, the agency utilizes platforms that are accessible for staff. ASL interpreters are included. Trainers are coached to provide descriptive wording for visual elements to insure those with visual disabilities can fully participate in the training. Automated transcript services or Communication Access Realtime Translation (CART) recorders are utilized as appropriate for the training medium utilized.

When language and communication needs exist for consumers that are beyond the scope of personnel resources within the agency or with the state government there are additional measures employed to ensure that individual have necessary access. These include, but are not limited to the following:

American Sign Language interpreters are available on staff, but due to high demand the agency will contract with outside resources as needed to ensure the communication resources are available. The services for outside vendors for ASL are coordinated through our Deaf and Hard of Hearing Branch.

Foreign Language Interpreters are contracted as necessary to ensure that individuals who are from diverse cultural backgrounds in need of interpreters to access services will be able to communicate in their native languages. Language access lines are available to staff to utilize for interpreting needs.

OVR also has used a language telephone interpreting service that is available to all staff across the state. This enables staff to effectively communicate with individuals who walk into OVR offices without an appointment and who do not speak English. OVR works with vendors across the state that can provide qualified foreign language interpreters as well as written translation. This enables OVR to arrange for in-person interpretation when meeting one-on-one with a non-English speaking individual and allows OVR to provide written reports in their native language upon request.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, 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 Act.

OVR shall coordinate its CSPD plans within the Kentucky Personnel System, to match the standards and qualifications of our personnel with personnel development under the Individuals with Disabilities Education Act (IDEA), and the standards under the Rehabilitation Act, as amended.

The Kentucky Interagency Transition Council meets on a quarterly basis to address continued fulfillment of the Kentucky Interagency Agreement on Transition Services for Youth with Disabilities. The Office of Vocational Rehabilitation and the Department of Education are two of the eleven state agencies that are parties to the agreement. One of the provisions of this agreement is cooperative training and staff development concerning transition issues. OVR staff attend Community Work Transition training offered by the University of Kentucky's Human Development Institute (HDI). Staff attend the Kentucky AHEAD Conference (professionals in post-secondary education providing services to persons with disabilities) each year receiving valuable training and resources.

Rehabilitation counselors work collaboratively with the special education cooperatives, high school education teachers, local directors of special education, and job coaches for students transitioning from high school into employment. OVR Vocational Rehabilitation Counselors

attend IEP and ARC meetings working with the team in establishing a vocational goal. This assures the development of the students IPE in conjunction with the vocational rehabilitation IEP. OVR provides support to teaching instructors, school staff and job coaches regarding rehabilitation issues and other areas of expertise such as Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore, OVR staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

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;

This report provides a summary and the findings of the activities of the Kentucky Office of Vocational Rehabilitation (KYOVR)in an effort to comprehensively assess the various vocational rehabilitation (VR) needs in the Commonwealth of Kentucky conducted in 2021. This assessment was conducted for strategic planning purposes and to meet the comprehensive needs assessment requirement of the Rehabilitation Services Administration (RSA) as defined in 34 CFR 361.29. This federal regulation requires the agency to assess the following areas related to VR:

1. Services to individuals with the most significant disabilities, including their need for supported employment services.

2. Services to individuals who are minorities or in unserved or underserved populations.

3. Services provided to individuals with disabilities through various components of the workforce development system

4. Youth and students with disabilities, including their need for transition services.

5. The need to establish, develop or improve community rehabilitation programs

KYOVR previously conducted a comprehensive needs assessment in 2018. It was conducted jointly in 2018 with both KYOVR and KYOFB taking into account that effective October 1, 2018, the blind and general agencies in Kentucky would be combined. Federal regulation requires the needs of individuals with disabilities in the state be assessed every three years. The current study (2021) is also intended to identify and provide recommendations for trends in the service needs, disability populations and any environmental factors possibly impacting Kentuckians with disabilities. Information from the current survey is intended to allow a more informed strategic planning process, seeking to address the identified trends and prioritize them based on data identified in the needs assessment. The current comprehensive needs assessment was conducted in 2021 with guidance provided by the Kentucky Statewide Council for Vocational Rehabilitation (KYSCVR), as required by 34 CFR 361.17(h)(3). KYSCVR and the SRC offered input into the methodology and data analysis of the assessment, assuring the research would adequately reach the target population, would return valid and reliable data, and would produce recommendations that would guide the strategic planning and budget development process.

Kentucky's 2021 Comprehensive needs assessment contains both quantitative and qualitative data addressing the needs of the state vocational rehabilitation system. The data collection included:

1) a review of OVR metrics data of individuals receiving services.

2) demographic information for Kentucky.

3) a review of the Satisfaction Survey of closed cases successful and unsuccessful.

4) input from stakeholder focus groups.

5) input from online surveys.

6) facilities assessment of maintenance needs.

7) strategic planning; and

8) data reports and feedback from the Rehabilitation Services Administration off site monitoring and the draft monitoring report.

A Comprehensive Statewide Needs Assessment (CSNA) was implemented to identify gaps in existing services that can be reduced through programs and policies by the Kentucky Office of Vocational Rehabilitation (OVR). A mixed method of online surveys and forums was used to collect insights about the rehabilitation needs of Kentuckians with disabilities. The insights gained from the CSNA will provide the information needed for the development of the State Plan for services. The Needs Assessment was carried out by the staff and faculty at the Human Development Institute (HDI). HDI staff worked closely with OVR staff to ensure that the approach would meet OVR needs.

A mixed method approach was used to collect information from varied stakeholders. An online survey was sent to OVR consumers, OVR consumers of pre-ETS (employment transition services), OVR counselors, OVR staff, Community Rehabilitation Provider staff, Disability Resource Coordinators, and Kentucky Career Centers. Online forums were conducted with the public, OVR staff, counselors, and the State Vocational Rehabilitation Council. Survey results were used to inform the questions used in the online forums. This approach allowed evaluators to collect more in-depth information. . A descriptive analysis of the survey results and a thematic analysis of the textual data (collected through open-ended survey questions and online forums) was conducted.

The most recent CSNA identified gaps in existing services to assist OVR in determining what programs and policies could be increased or established. Surveys and public forums were utilized to collect information from various stakeholders, consumers and staff across the commonwealth. Below are the trends highlighted from the report.

1. Counselors indicate that the highest-rated needs are job placement, support s services, mental restoration and vocational guidance and counseling.
2. The greatest increase in services were for consumers with a mental illness, drug and alcohol use and criminal background.
3. Barriers are listed as transportation, job search skills and qualified service providers.
4. The highest-rated needs identified are vocational guidance and counseling.

For complete details and results of the assessment, visit the following link:
https://bit.ly/3C5NwxB

Counselor Survey

Sixty individuals completed the Vocational Rehabilitation Comprehensive State Needs Assessment Counselor Survey. More than half (53.3%) of the respondents had worked at OVR for between 1 and 10 years (6-10 years – 22.67%, 1-5 years – 22.7%). Regarding technology needs, half said their technology needs were met (50.0%); and concerning technology use, most said they were using more technology than before COVID-19 (91.7%). Participants were asked about their average caseload size. The most common responses were “51-100 cases” and “201-

250 cases" (21.7% each). Participants were asked about their highest level of educational training. The most common response was "Master's Degree" (85.0%). Participants were asked about what primary impairments they see most often on their caseload. The most common response was "Mental Health/Psycho-social impairments" (58.3%). Participants were asked about who makes the majority of referrals to them. The most common response was "Self or other consumers" (21.7%). Participants were asked to rate the level of need for various services for Kentuckians with disabilities. Participants could select from a four-point scale (1 – No Need, 2 – Low Need, 3 – High Need, 4 – Very High Need). Of the fourteen services listed, the service with the highest rated level of need was "Job Placement," with a mean score of 3.49, indicating an average response between "High Need" and "Very High Need." The survey next asked participants to identify any employment related needs/services that have become more apparent or requested since March 2020 (during the COVID-19 pandemic). Among the 32 responses, three themes emerged: technology, job placement services, and work from home. Participants were asked to rate the barriers they feel prevent or hinder Kentuckians with disabilities from gaining and maintaining employment and leading fuller and more independent lives. Participants could select from a four-point scale (1 – Not a Barrier, 2 – Low Barrier, 3 – High Barrier, 4 – Very High Barrier). Of the fifteen barriers listed, "Transportation" was rated as the highest barrier with a mean score of 3.64, indicating an average response between "High Barrier" and "Very High Barrier." The lowest rated barrier was "Access to Healthcare," with a mean score of 2.51, indicating an average response between a "Low Barrier" and "High Barrier." Participants were then asked to identify additional high or very high barriers that were not listed on the survey. Of the 16 responses to this question, answers varied. Barriers included "Lack of technology," lack of "Internet service for consumers," "Lack of training and skills," and "underlying health issues." Participants were asked to identify for which services they routinely refer consumers to CRPs. Participants could choose multiple options. The most common response was "Traditional Supported Employment" (89.1%). The least common response was "Adjustment Services." Participants were asked how many different Community Rehabilitation Programs (CRPs) they generally refer consumers to in a given year. The most common response was two (26.3%). Participants were then asked to rate their level of agreement with three statements about CRPs. Participants could select from a four-point scale (1 – Strongly Disagree, 2 – Disagree, 3 – Agree, 4 – Strongly Agree). The highest rated statement, "CRPs provide quality services that meet identified needs of my consumers," was still relatively low, indicating an average response between "Disagree" and "Agree" with a mean score of 2.59. The lowest rated statement was "There are enough CRPs to serve consumers in need of services in my area" with a mean score of 2.14, also indicating an average response between "Disagree" and "Agree." Participants were asked if they felt additional or enhanced Supported Employment services were needed in their area. The most common response was "Yes" (77.2%). Only 12.3% responded "No." Participants were then asked to provide any other information they feel would be useful for the Agency to consider when determining the needs for future CRP services. Of the 19 responses to this question, three themes emerged: need for more training, need for more CRPs in their areas, and a need for more quality services. Participants were asked approximately how many consumers they referred for Carl D. Perkins Vocational Training Center (CDPVTC) services in the past three years. The most common response was "0-5 Consumers" (60.7%). Participants were then asked what additional services or programs they would suggest CDPVTC consider to better serve individuals on their caseload. Participants offered a wide variety of suggestions for new programs including transportation (Bioptic driving and how to ride a city bus), job placement (and how to use the Internet to job search), welding, small engine repair, working with animals, administrative certification, and evaluation. Participants were asked approximately how many consumers they referred for Charles D. McDowell Center (McDowell) services in the past three years. The most common response was "0-5 Consumers" (85.2%). Participants were then asked what additional services or programs they would suggest McDowell consider to better serve individuals on their caseload. Six participants shared suggestions including: "Apprenticeships," "job shadowing, job training and job carving. Participants were asked which statement best describes their technology needs as

it relates to doing their job. The most common response was "My technology needs are met" (50.0%). Participants were asked how much they are using technology to do their job. The most common response was "More than before COVID-19" (91.7%). Participants were asked when they last had a consumer utilize the services of the local Kentucky Career Center. The most common response was "Between 3 months and 1 year" (44.8%).

The highest rated needs identified by the OVR Counselor survey were: 1) job placement; 2) Support Services; 3) Mental Restoration and 4) Vocational Guidance and Counseling.

The highest rated barriers identified by the OVR Counselor survey were: 1) Transportation; 2) Job Search Skills; 3) Social Skills and 4) Qualified Service Providers. The greatest increase in services were consumers with mental illness, drug and alcohol use and criminal backgrounds.

Staff Survey

Eighty-seven OVR staff completed the Comprehensive State Needs Assessment Staff Survey. Around 40% of the respondents had worked at OVR for between 1 and 10 years (6-10 years – 20.7%, 1-5 years – 19.5%). Nearly half of the responses (45.3%) worked in one of three locations: Central Office (17.4%), Carl D. Perkins Vocational Training Center (16.3%), or Louisville (11.6%). Regarding technology needs, nearly three fourths said their technology needs were met (72.1%); and concerning technology use, more than three fourths said they were using more technology than before COVID-19 (83.7%). The OVR Staff were asked to identify any employment related needs/services that have become more apparent or requested since March 2020, (COVID-19)." Among the 27 responses, four themes emerged: technology, training, internet access, and employment. The OVR staff were asked to rate fifteen barriers they felt prevent Kentuckians with disabilities from gaining and maintaining employment and leading fuller and more independent lives. Respondents could select from a five-point scale (1 – Not a Barrier, 2 – Low Barrier, 3 – High Barrier, 4 – Very High Barrier, N/A – Not Applicable/Don't Know). Respondents were asked to choose "Not Applicable/Don't Know" if they were not able to rate the item. The highest rated barrier, with a mean score of 3.51, was "Transportation," indicating an average response between "High Barrier" and "Very High Barrier." The lowest rated barrier was "Co-worker Attitudes" with a mean score of 2.73 indicating an average response between "Low Barrier" and "High Barrier. The OVR staff were asked to identify additional high or very high barriers not listed on the survey. Of the 11 responses, one theme emerged: technology.

The highest rated needs identified by the OVR staff survey were: The highest rated needs identified by the OVR staff survey were: 1) Vocational Guidance and Counseling; 2) Mental Restoration; 3) Support Services and 4) Assistive Technology. The highest rated barriers identified by the OVR Staff survey were: 1) Transportation; 2) Social Skills and 3) Job Search Skills.

Community Rehabilitation Provider Survey Report

Seventy-six Community Rehabilitation Provider staff completed the Comprehensive State Needs Assessment CRP survey. Around one third of the responses indicated that their organization had provided services to OVR consumers for 1-5 years (34.2%). Nearly half of the responses indicated that they received fewer than 10 referrals from OVR on a yearly basis (46.1%), and more than half of the responses indicated that they made fewer than 10 referrals to OVR on a yearly basis (60.0%). More than half of the responses indicated that they employed fewer than 10 staff (57.9%). Regarding technology needs, more than three fourths said their technology needs were met (81.6%); and concerning technology use, more than three fourths reported using technology more now than before COVID-19 (86.8%). On issues that impact their ability to provide services, more than half of the responses cited the Slowing Economy (55.8%) and Lack of Referrals (54.4%). The CRP survey asked how many staff are employed by the organization. The most common response was "Fewer than 10 staff" (72.1%).

The CRP survey asked with which of KY OVR offices the participants' organization regularly work. The most common response was "Louisville" (25.6%). The CRP survey asked respondents to rate the level of service for ten populations. Respondents could select from a four-point scale (1 – No service provided, 2 – A little service provided, 3 – Some service provided, 4 – A lot of service provided). The highest rated service need was "Cognitive Disability" with a mean score of 3.28, indicating an average response between "Some service provided" and "A lot of service provided." The lowest rated population served was "Veterans" with a mean score of 1.74, indicating an average response between "No service provided" and "A little service provided". The CRP survey asked respondents to identify any employment related needs/services that have become more apparent or requested since March 2020 (COVID-19). Among the 54 responses, four themes emerged: technology, referrals, virtual challenges, COVID-19 related job losses. The CRP survey asked respondents to rate fifteen barriers they felt prevent Kentuckians with disabilities from gaining and maintaining employment and leading fuller and more independent lives. Respondents could select from a five-point scale (1 – Not a Barrier, 2 – Low Barrier, 3 – High Barrier, 4 – Very High Barrier, N/A – Not Applicable/Don't Know). Respondents were asked to choose "Not Applicable/Don't Know" if they were not able to rate the item. The highest rated barrier, with a mean score of 3.04, was "Transportation," indicating an average response between "High Barrier" and "Very High Barrier." The lowest rated barrier was "Qualified Service Providers" with a mean score of 2.03 indicating an average response between "Low Barrier" and "High Barrier." The CRP survey asked respondents to identify additional high or very high barriers not listed on the survey. Of the 14 responses, one theme emerged: in-person communication. One respondent said, "During a time when individuals must rely more heavily on technology for communication purposes due to social distancing guidelines as a result of the COVID-19 pandemic, many individuals with disabilities have difficulty utilizing modern technology as their sole means of communication. It is my opinion that the loss of in- person communications has drastically impacted the Vocational Rehabilitation program [causing it] suffer in terms of how effective we can be in terms of providing support." The CRP survey asked respondents to rate how quickly they were able to initiate services after receiving a referral from OVR. Respondents could select from a five-point scale (1 – Same Day as Referral, 2 – Within a Week, 3 – Between One and Two Weeks, 4 – Between Two and Three Weeks, 5 – More than Three Weeks). The most common response was "Within a Week" (53.5%). The least common response was "More than Three Weeks" (4.2%). The mean score of all responses was 2.37, indicating an average response between "Within a Week" and "Between One and Two Weeks." The CRP survey asked respondents if they currently had a wait list for services. Respondents could select from three options (Yes, No, Don't Know). The majority of responses indicated "No" (84.5%). The CRP survey asked respondents to rate the quality of coordination with Special Education providers with whom they coordinate their Pre-employment services. Respondents could choose from a four-point scale (1 – Poor, 2 – Fair, 3 – Good, 4 – Excellent). The mean score of all responses was 2.74, indicating an average response between "Fair" and "Good." The CRP survey asked respondents to select which issues impacted their organization's ability to provide services to persons with disabilities. Respondents could select from a list of eleven responses, and they could select more than one response. The most common responses were "Slowing economy" (55.9%) and "Lack of Referrals" (54.4%). The least common responses were "Rising cost of commodities" and "Increase in consumers with multiple disabilities (both 14.7%). The CRP survey asked respondents the open response question what are the supports (related to employment) that you would you like to have to serve your clients effectively? Forty respondents provided responses to the question. Three themes emerged from the responses – Transportation supports, Technology supports, Communication supports with OVR. The CRP survey asked respondents the open response question what are the gaps in employment services that Kentuckians with disabilities are facing? Forty-one respondents provided answers to the question. Three themes emerged – Employer education, availability of jobs, customized employment. The CRP survey asked respondents the open response question what are the employment service needs that your clients have? Thirty-nine respondents provided answers.

Three themes emerged in these responses – In-Person services, Job acquisition skills, person-centered consideration.

The highest rated barriers identified by the OVR Staff survey were: 1) Transportation; 2) Social Skills and 3) Job Search Skills.

Disability Resource Coordinator Survey

Eleven individuals completed the Disability Coordinator Comprehensive State Needs Assessment Eleven individuals completed the Disability Coordinator Comprehensive State Needs Assessment Survey. Nearly three fourths of responses indicated that the proportion of their students who require a referral to OVR is less than 20% (70.0%). The most common services provided were Testing Accommodations and Physical Accessibility to Campus (90.0%). When identifying issues in their role as Disability Resource Coordinator, all responses identified Technology (100.0%) and most identified the Number of Professional Support Staff (90.0%).

Participants were asked to identify the type of post-secondary institution with which they were associated. Participants could provide more than one response. The most common response was a University (50.0%). Participants were asked: "What proportion of their students require a referral to the Office of Vocational Rehabilitation (OVR) upon enrollment at your institution?" The most common response was "Less than 20%" (70.0%). working with the Office of Vocational Rehabilitation. Participants could select from a four- point scale (1 – Strongly Disagree, 2 – Disagree, 3 – Agree, 4 – Strongly Agree). The highest level of agreement was with the statement, "VR counseling assists the students in resolving issues related to academic performance" with a mean score of 3.2, indicating an average response between "Agree" and "Strongly Agree." The lowest rated statements were "VR counseling staff are able to connect students to needed support services" and "VR counseling staff build good rapport with you as a coordinator and with the student," both with a mean score of 3.0, also indicating an average response of "Agree". Participants were asked to indicate which skills are crucial in the transition process. Participants could provide more than one response. The three areas that all participants (100%) felt were crucial for the transition process were "Time Management Skills," "Self- Initiative" and "Self-Management Skills." One individual answered with an "Other" response that included "Case management advising/ tutoring."

Consumer/Public Survey

Seven hundred and sixty-two individuals completed the Comprehensive State Needs Assessment Consumer/Public Survey. Around 80% of the respondents were Individuals with a disability (80.6%). Nearly two thirds were current consumers of the Office of Vocational Rehabilitation services (62.1%). Regarding technology needs, nearly three fourths said their technology needs were met (74.0%); and concerning technology use, slightly less than half reported using technology more now than before COVID-19 (43.0%). A majority of the respondents were female (60.1%) and white (87.9%). Over half of the respondents were working (Full time – 34.4%, Part time but not because of COVID – 15.5%, and Part time because of COVID 2.9%). Among those who were working, the average response for work support was between "Somewhat Supported" and "Very Supported" (3.45 out of 4), and the average response for job security was between "Somewhat Secure" and "Very Secure" (3.32 out of 4). Participants were asked which statement best describes their technology needs. The most common response was "My technology needs are met" (74.0%). Participants were asked how much they are using technology to do their job. The most common response was "About the same as before COVID-19" (49.7%). Participants were asked what kinds of technology they are using to do their job. Participants could choose multiple options. The most common response was "Smartphone" (84.1%). Participants were asked to rate the level of need for various services for Kentuckians with disabilities. Participants could select from a four-point scale (1 – No Need, 2 – Low Need, 3 – High Need, 4 – Very High Need). Of the fourteen services listed, the service with the highest

rated level of need was "Help Finding Jobs" with a mean score of 3.12, indicating an average response between "High Need" and "Very High Need." The survey next asked participants to identify any employment related needs/services that have become more apparent or requested since March 2020, (COVID-19). Among the 277 responses, three themes emerged: technology, greater assistance in job search, PPE/Vaccine availability. Participants were asked to rate the barriers they feel prevent or hinder Kentuckians with disabilities from gaining and maintaining employment and leading fuller and more independent lives. Participants could select from a four-point scale (1 – Not a Barrier, 2 – Low Barrier, 3 – High Barrier, 4 – Very High Barrier). Of the sixteen barriers listed, "Employer Attitudes" was rated as the highest barrier with a mean score of 2.86, indicating an average response between "High Barrier" and "Very High Barrier." The lowest rated barrier was "Access to Healthcare," with a mean score of 2.51, indicating an average response between a "Low Barrier" and "High Barrier." Participants were then asked to identify additional high or very high barriers that were not listed on the survey. Of the 139 responses to the question, three themes emerged – "Need for more/Better help from OVR", "Financial/Poverty Barriers".

The highest rated needs identified by the Public/Consumer survey were: 1) Help Fining Jobs; 2) Job training; 3) Mental Health Counseling and 4) Assistive Technology. The highest rated barriers identified by the Public/Consumer survey were: 1) Employer Attitudes; 2) Transportation; 3) Job Search Skills; 4) Long Term Support and 5) Social Skills.

Youth Transition Survey

Seventy-two individuals completed the Vocational Rehabilitation Comprehensive State Needs Assessment Youth Transition Survey. Over half were currently enrolled in postsecondary education (38.9% College or University, 13.9% Community or Technical College). Regarding technology needs, more than three fourths said their technology needs were met (78.6%); and concerning technology usage, more than half said they were using more technology than before COVID-19 (59.2%). Nearly one third reported that they are currently working (part time – 23.2%, full time 7.3%). Seventy-one people responded to the question "Please check one or more of the following which describes your disability(s) or those of the individual you represent:" The most common type of disability selected was "autism spectrum disorder." Sixty-nine people responded to the question "Which of the following describe your work situation?" The most common statement was "I have not had a paid work experience in the last five years. Seventy-one people responded to the question "Which of the following describes your current living situation?" The most common statement was "I live with other people (family, roommates, group home). For those who have answered "I am working part time (less than 30 hours)" or "I am working full time (more than 30 hours)," they were able to respond to the statement "I currently make…" The most common response was "at least or more than minimum wage ($7.25 per hour) in my main job." Fifty-three people responded to the question "Which of the following services would be useful to you now or in the near future?" The results of this question are "Independent Living Skills (Laundry, Money, Shopping, Cooking, Cleaning, etc.)." Respondents were asked "How would you rate yourself in the following areas?" Respondents could select from a four-point scale (1 – Needs Improvement, 2 – Fair, 3 – Good, 4 – Great). The highest rated area was "Attendance and Punctuality," indicating an average response between "Good" and "Great.

The highest self-ratings for job skills were: 1) Attendance and Punctuality; 2) Orientation and Mobility Skills and 3) Working with Others. The lowest rated job skills were: 1) Job Seeking Skills; 2) Money Management and 3) Asking for Accommodations.

Career Center Partner Staff Survey

Five individuals completed the Vocational Rehabilitation Comprehensive State Needs Assessment 2020: Kentucky Career Center Survey. Respondents rated the working relationship with OVR as "Good" (an average of three on a four-point scale). Participants were asked to

answer the following question "Are individuals with disabilities able to access and participate in the same level of services as other center customers?" All five participants answered "yes" (100.0%). Participants were asked what resources they used when accommodating a job seeker with a disability in the Career Center. Participants could choose more than one option. The most common responses were "Office of Vocational Rehabilitation Staff" and "Ask the job seeker or the referring employer" (both 60.0%).

The most requested trainings were:

- The Americans with Disabilities Act
- Social Security Work Incentives

The respondents needed the most help with:

- Assistive technology and how to obtain assistive devices through various funding sources.

Online Stakeholder Forums

Four groups were invited to participate in online forums to discuss survey results – OVR Counselors, Staff, Public/Consumers, and members of the Statewide Council for Vocational Rehabilitation (SCVR). Over forty individuals participated in these forums. There were five questions posed to the forums.

The first question dealt with challenges of the common needs identified across stakeholder groups including vocational guidance/counseling, mental restoration, job placement and support services.

- The Counselor forum participants discussed the turnover/lack of providers, and the lack of services in rural areas.
- The Staff forum participants talked about greater accessibility, the high need for in-person services, and a lack of sufficient funding.
- The Public forum participants outlined the need to start in early childhood building a foundation for pre-employment transition services and build stronger relationships between educators and OVR.
- The SCVR forum participants noted the lack of accessibility in services to be a major challenge.

The second question dealt with populations identified by counselors as having an increased need for services over the past three years. These included: people with mental health conditions, people with substance use disorders, people with felony backgrounds, and people with cognitive disabilities.

- The Counselor forum participants discussed the need to educate employers and deal with the stigma of employing people with substance use disorders, people with felony backgrounds, and people with cognitive disabilities.
- The Staff forum participants noted the need to deal with the stigma and the lack of trained staff.
- The Public forum participants highlighted the need to educate employers on these populations.

- The SCVR forum participants talked about the need to educate and train staff and employers on mental health conditions.

The third question dealt with specific strategies to provide for the increasing service needs of people with substance use disorders, people with felony background, and people with cognitive disabilities

- The Counselor forum participants highlighted educating employers.
- The Staff forum participants noted the need to educate people on stigma and mental health.
- The SCVR forum participants mentioned reducing the stigma of employing these groups.

The fourth question dealt with other groups that the forum participants perceived to be currently underserved by OVR.

- The Counselor forum brought up people with Social Security benefits.
- The Staff forum participants highlighted need for customized employment .
- The Public forum participants mentioned especially students with disabilities.
- The SCVR forum participants discussed the need to involve families and support networks.

The fifth question dealt with emerging challenges as communities navigate COVID-19 and its aftermath.

- The Counselor forum participants highlighted limited resources.
- The Staff forum participants mentioned the need for flexibility and the lack of funding.
- The Public forum participants noted safety concerns and the removal of sheltered workshops.
- The SCVR forum participants discussed the need for increased flexibility.

2020 Satisfaction Survey Results Analysis

As part of federal requirements, OVR has collaborated with the State Rehabilitation Council and the University of Kentucky Human Development Institute (HDI) since1996 to coordinate the annual OVR Consumer Satisfaction Survey. The most recent survey was for completed assess closed between October 2019 – September 2020. Participants randomly were selected. The Evaluation Unit at HDI emailed and/or telephoned consumers to request participation in the survey between January 17- May 8, 2021. HDI compiled the results, and the final report was reviewed by the SCVR Consumer Services and program evaluation Committee prior to HDI presenting to the entire council during the July 2021 quarterly meeting.

A total of 539 individuals participated in the survey with responses received from each of the 17 regional districts. The overall statewide consumer satisfaction was 87.5% while the highest satisfaction was reported from the west Blind District (100%). For access to the full report visit https://bit.ly/3B62kLr.

Highlights from the report include the following:

1. Regardless of closure status, 87.3% of respondents indicated that services were good or very good
2. Overall rating was the highest for those who closed with a Positive Employment Outcome, 95.3% indicated good or very good.

3. Almost three fourths of respondents whose cases were closed successfully felt that OVR helped prepare them for their current job.
4. 92% of consumers said they would return to OVR in the future.
    a. 91.2% of consumers who were employed indicated they are satisfied with the kind of work they do.
    b. 83.1% reported being satisfied with the salary they receive.
    c. 87.3% reported overall satisfaction with the quality of services as good to very good.

OVR Strategic Planning

OVR in conjunction with he State rehabilitation Council utilized the strategic planning process to develop a plan of action that includes goals, strategies and timeframes of completion. The strategic planning process was used as a part of the triennial Comprehensive Statewide needs Assessment (CSNA). Information collected through this process was used to inform the State Plan.

OVR worked with the Facilitation Center at Eastern Kentucky University (EKU). The first session was a Strategic Planning Kick Off virtual meeting with 22 attendees, including the Executive Leadership Team, Regional Managers, Cabinet Staff, The State rehabilitation Council Chair and Branch Managers. During the session the group identified key components of the strategic plan focusing on key concepts/ideas for the newly revised mission, vision and core values. A Strengths, Opportunities, Aspirational and Results Analysis was utilized to develop broad goal areas and key ideas.

In the second session approximately 10 attendees from the Executive Leadership team met and analyzed the ideas generated during the first meeting. The group compiled a draft mission vision and core values and began working on goal statements and objectives. In the third session, the Executive Leadership team met virtually to work on finalizing the draft objectives, measures and core values. A fourth session was held to complete the work on the plan. The following goals were established in priority order:

Sound Fiscal Management: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

Quality Assurance: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Staff Resources: maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

Center Operations: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Public Awareness: Implement an ongoing, flexible marketing plan and process to improve public awareness of VR programs, services, and agency employment.

State Plan Public Forums

Two virtual open forums were held to gain input regarding the State Plan of services on November 30, 2021, from 11:0o a.m. to 1:00 p.m. eastern standard time and December 2, 2021, from 6:30 p.m. to 8:30 p.m. eastern standard time. At the first open forum there were 40 attendees and 10 at the second forum. A summary of the results of those open forums are as follows.

Recommendations:

Consider a Comprehensive Awareness Campaign of all Services.

Utilize Apprenticeships for individuals with disabilities.

Benefits Planning.

Expansion of Customized Employment

Expansion of Individualized Placement and Supports (ISP).

Employment First.

Utilize technology to create system efficiencies.

Give providers positive reinforcement for successes.

Establishment projects for CRPs to develop ISP, Customized Employment and specialized skills for CRP staff in serving the deaf and hard of hearing and the blind and visually impaired.

Expansion of programs at the world port of UPS through pilot projects using the model of an embedded job coach specifically surrounding innovative employer engagement. Establishment projects to expand the successful program.

OVR would develop communications for consumers and other community base organizations sent out through a list serve.

Transportation Applications

Virtual service Delivery

Focus on Supported Employment

Increase support in Job Search and Placement

Outcome Payments

Identified Needs:

Individuals with Disabilities are underserved in employment

Transportation (especially in rural communities)

Residential Stability Housing Supports

Lag in Service Deliver

Minority Population is underserved

Life Skills are needed prior to pre-employment transition services

Return to Work Services

Trauma Informed Care

Lack of Orientation and Mobility Services

CRP's mentioned low referrals and slowed processes in accessing authorizations

Counselors have unmanageable caseloads.

Soft skills

Slow State Process for authorizations

RSA Monitoring and Data Reports

OVR participated in off site monitoring with the Rehabilitation Services Administration during the time period of July 16, 2021, through August 20,2021. During the time OVR received technical assistance from RSA for multiple topical areas. The RSA Monitoring Process and Performance Data will be utilized to develop a plan of action. OVR received their draft monitoring report on January 22, 2022 and formulated a response to RSA. OVR received their final report on March 3, 2022. After a thorough review of the recommendations, findings and corrective actions, OVR will utilize the information in formulating a plan of corrective action to address the following issues identified by RSA regarding the Vocational rehabilitation and Supported Employment Programs. OVR had findings in the following areas for Performance: 1) Insufficient Internal Controls for Management of the Federal Award and 2) Non-Compliant and Outdated State Education Agreement. OVR had findings in the following areas for Financial Management: 1) Missing/Insufficient Internal Controls and Financial Management Deficiencies.

Throughout the year, RSA has conducted quarterly performance data reviews that has assisted OVR in identifying areas of concern from the RSA data dashboards. This allowed for comprehensive discussions and RSA provided technical assistance during the sessions. During the monitoring visit RSA shared ten performance tables as well as an additional six tables regarding Other Measures that Matter for review and discussion.

One area of need identified where there are clear gaps in services was the area of engagement of individuals with disabilities throughout the VR process as evidenced by the significant numbers of individuals existing the program as applicants. Another area was performance related issues due to inaccurate data reporting. Through the monitoring process, RSA and OVR identified the need to look at how the Executive Leadership and managers use Data to inform performance and management of the agency operations of the VR and Supported Employment Programs inclusive the states owned and operated centers. There is a need for the agency to implement sufficient internal controls for both financial and performance management. OVR has identified the need to purchase a new case management system to meet the growing needs of the agency.

Given the monitoring process was completed in September of 2021 and the report was just received, OVR has just begun the process of reviewing the plan and identifying needed corrective actions in response to the report. This will be a work in progress over the next several months.

Assistive Technology Branch

A high tech driving system is one in which electronic gas, brake, and/ or steering is required to allow an individual to safely and independently operate a motor vehicle. In 2021, high tech driver evaluations were completed for 11 consumers. Of these, six were repeat vehicle modifications. Repeat modifications are relatively streamlined because evaluations can be completed in the consumer's current vehicle and training is not typically required. The five remaining evaluations were for new high tech drivers. On average, for the new drivers, it took approximately 120 days from referral before a completed evaluation report was returned to the Office of Vocational Rehabilitation.

While referrals were made as early as March, 2021, consumers were not seen until much later. Two were seen in September, and one each in October, November, and December. The delay in services is, in part, due to the lack of availability of a high-tech driving evaluation van in Kentucky. Currently, a van is borrowed from Superior Van and Mobility when a high-tech evaluation needs to be completed. However, the van available through Superior is shared among states where Superior has dealerships and its availability is limited. For the five consumers who had evaluations in 2021, one is waiting on an exception, one has been completed, and three are waiting on the availability of a van to receive training.

Once an individual is evaluated and a driving system recommended, they must have an IPE approved for the modification before services can continue. This process typically takes about one to two months. With the IPE approved, training authorizations are obtained immediately. However, due to the lack of availability of the van, services are delayed two to three months while waiting for a van for training. Once the van is available, the minimum training time for a high-tech vehicle is 20 hours and can be up to about 60 hours. Where possible, training is completed in 2 to 4 weeks. It is important to complete the training at one time because driving is a skill that is lost if not practiced regularly. It is not effective to train for a day and then wait a few weeks and train another day. The van has to be available for an extended period that matches the expected training time of the consumer before training is started. Vehicle setup is also an issue in providing efficient services. It can take a day to properly set a vehicle up and this time takes away from training time when a van is borrowed. With our own van, OVR could set up the vehicle and leave it set for the consumer until training is complete. Then the setup could be switched for the next consumer.

The lack of an evaluation vehicle creates a significant delay for consumers. It can be three to four months before they are evaluated and another three months before training can begin. If the agency owned a vehicle, the evaluations and training could be scheduled much more quickly and consumers would have the independence they need to go to work.

Kentucky Business Enterprises

Kentucky Business Enterprise's (KBE) mission is to provide opportunity and independence to blind entrepreneurs. This mission will continue as we come out of the pandemic, while working to replace opportunities, improving efficiencies, while maintaining and updating current locations. KBE's goal is to increase independence and the abilities of its vendors through technology.

As more agencies and businesses allow staff to work from home, it reduces the opportunities for blind vendors in those locations. The continued telecommuting trend means modifications to KBE sites may be necessary. This will likely require updating equipment, changing the service line from a snack shop to a micro market, utilizing self-ordering technology, and other possibilities which may not even be on the market yet. The food service industry has been quick to embrace rapidly changing technology, with the intention of reducing costs and/or decreasing labor. This creates a unique challenge for KBE as we look at fiscal planning for the future of the program. Much of the technology we will be purchasing in a year or two may be only in the development stage right now.

The future of vending, as we have known it, is uncertain. KBE will need the funding to embrace new technology as it comes on the market, although we cannot put a dollar value on it now . We will look to industry groups (Kentucky Restaurant Association, National Restaurant Association, National Automated Merchandisers Association) consumer groups (National Association of Blind Merchants, Randolph Shepard Vendors of America, Kentucky Committee of Blind Vendors), and other stakeholders (General Services Administration, Department of Defense, Kentucky Finance Cabinet) to identify the future technology which will provide new or greater independence to blind vendors, and superior service to the locations we serve.

Ongoing education and training will be essential for Kentucky's vendor population and agency staff, over the next three years, this includes new vendor training. As always, traditional industry trainings are important, and training on emerging technology will be vital. In addition to technology, vendors need education and training in all areas from customer service and food safety to business practices. These trainings may be provided by agency staff, or be industry and specialty led. These training opportunities may be, but are not limited to, national industry events that require travel and the associated costs, including the cost of accessible, independent travel for the vendors. Vendor participation in industry events increases active

participation from the vendors in the assessment of needs and the purchasing process for new equipment.

With dwindling sales due to building staff permanently telecommuting, many vendors will no longer be able to make a sustainable wage at those locations. There will be an increased need for KBE to provide additional opportunities by obtaining new sites for blind vendors, while maintaining the current locations. As history has shown, KBE will not willingly be awarded locations that are lucrative for others. In many cases, this involves legal battles with federal and state entities to defend the Randolph- Sheppard priority against those who do not recognize it, or the comparable state law. Legal options should always be a last resort, but in most cases, have proven to be both necessary, and quite costly. These legal expenses are often prolonged over time and can necessitate a long-term financial outlay by the agency. KBE will always provide the location and vendor with the most current and advanced assets that meet all stakeholders needs.

An immediate need moving forward is a modified box truck. Until a few months ago, KBE could borrow one from a sister agency. That option is no longer available to us. It has become a hardship as a box truck is needed on a regular basis to move equipment across the state to our blind vendors. The truck we need must meet certain criteria, including a high weight liftgate, the ability to secure items while in route, and the capacity for moving large amounts of equipment at one time. The liftgate is necessary as KBE moves equipment statewide and many locations do not have loading docks or receiving areas.

Having a box truck will allow KBE to meet the needs of our locations and vendors in a timely manner. Many times, we need to move things with only a day's notice. Currently, if we need a box truck, rental agencies can't always accommodate us, as it is hit or miss whether they have a truck available with the modifications we need. We may have to wait for an extended time before one becomes available. This is not good business practice as our vendors and locations depend on us and are left without machines that should be serving their customers and earning income for the vendor. The cost of this purchase would also need to include maintenance, repair, and fuel needs for the life of the vehicle.

Case Management System

The current VR case management system is approximately twenty years old. The system processes are cumbersome, time consuming, and plagued with technical problems. System modifications take time, which means we can focus only on the critical additions and changes with little time for effective process improvements. The current process combines paper and electronic data, and is not time-efficient for staff.

With the Covid Pandemic, we were caught without an electronic system to operate and service the citizens we serve. We were forced to move to a paperless process with the current system which is not built or set up to these needs. This has magnified our need for a more robust, user friendly system that can fully meet the demands for data collection in a streamlined paperless process.

With a streamlined process, staff would be saved the time of dual entry, document conversion and emailing for electronic signature, as well as improved access to information when needed. This would free up more time to provide direct consumer services and would reflect the KWIB goal of a consistent focus on assisting those with barriers to employment.

OVR is seeking a commercial off-the-shelf vocational rehabilitation case management system to track the life cycle of a VR consumer's case from referral to closure and post-employment, collecting data for each status and requiring the completion of RSA-mandated reporting elements as the customer's case progresses. The ideal system will provide tools for VR counselors to manage the customer's case, such as to-do reminders, case notes, vendor

management, communication, and budgeting. The system would enable document retention and data integration with other existing systems.

COVID 19 Pandemic Needs

This is a great area of need identified as VR needs to make employment for individuals a priority in an environment where there yet many unknown variables. The complexity of the COVID-19 pandemic on the workforce is not fully known. Employment is a struggle for all populations and if you are an individual with a disability the difficulty can be magnified. During the pandemic, individuals with disabilities in Kentucky were impacted by the lack of technology to learn or access services remotely. There is a lot of research on this issue titled the "digital divide" and its impact on students and adults. Another factor affecting services, even after the availability of vaccinations, some individuals with disabilities are at a higher risk due to different health condition. In Kentucky, public transportation has been interrupted by staffing shortages; and consumers report that they do not feel safe accessing rides. Social distancing created isolation and loneliness increasing the occurrence of mental health conditions. All of these factors contribute to the fact that individuals that have lost their employment are slower to re enter the workforce.

OVR and employment service providers and other stakeholders in Kentucky are working together to mitigate risks for themselves and the individuals they serve in order to provide needed services for employment. This is complicated by staff shortages, rapid changes in the job market, changing hiring needs and a lack of resources. Prior to the pandemic, health and economic disparities existed among individuals with disabilities in Kentucky and this has been heightened over the past two years.

The State Exchange on Employment & Disability (SEED) convened the COVID-19 Policy Collaborative for an inclusive Recover. The Collaborative identified four broad areas that the SEED highlighted as needed to ensure a disability-inclusive recovery. They were: 1) Inclusive Safety and Health Policies and Plans, 2) Inclusive COVID-19 Vaccination Policies, 3) Inclusive Covid-19 Mental Health Policies and 4) Inclusive Workforce Readiness Policies. This document will assist OVR in looking at strategies to mitigate the effects of the Pandemic.

This will require OVR to provide supports in an innovative way to face the challenges of the current environment. OVR will need to have a focus moving forward to ensure our methods of service delivery meet the needs of individuals with disabilities. This includes making sure accessible services modes to counter the digital divide, a focus on Employment First initiatives, training for individuals that leads to sustainable employment in high demand industries and staff training to better meet the needs of individuals with disabilities. OVR has addressed these areas in setting goals for the next three years. OVR's work in Employment First and the RETAIN Grant provide an avenue to address inclusive worker issues and early return to work initiatives across the state.

B. WHO ARE MINORITIES;

Ethnically, Kentucky remains a surprisingly homogenous state. According to the (2021 American Community Survey), Kentucky is 87.5.4% Caucasian and Black or African Americans compose 8.5% of the population in Kentucky. The Hispanic population in the state is estimated at only 3.9%. The Asian population of Kentucky is 1.6%. Seventy-three (9.6%) African Americans participated in the surveys and 49 (6.5%) respondents identified themselves as belonging to all other minority groups.

The needs and barriers identified by minority respondents were similar to those identified by all respondents to the public/consumer survey with some differences. The top needs identified by minorities were "Help Finding Jobs" (3.09 out of 4, indicating an average rating between "High Need" and "Very High Need"), and "Support Services Including Transportation, Rental Assistance, etc." (2.88 out of 4, indicating an average between "Low Need" and "High Need"). All

10 need areas had a slightly lower average need rating for respondents from minority backgrounds than for all respondents. The lowest rated need for minority respondents "Transition Services" (2.41) also had the greatest difference in average response compared to the overall average (0.18 lower for minority respondents than the overall average). When filtered for minority groups only 21% said they were employed full-time as compared to 34% of all respondents. The primary barriers to gaining and maintaining employment and leading fuller and more independent lives identified minority respondents were "Transportation" (2.94 out of 4, indicating a rating between "Low Barrier" and "High Barrier"), "Information about Available Jobs" (2.92 out of 4, indicating an average rating between "Low Barrier and "High Barrier"). Minority respondents had a higher average barrier rating for 9 of 16 barrier areas. For example, the highest rated needs for minority respondents' "Transportation" and "Information about Available Jobs" were also rated higher than the overall average (0.10 and 0.14 higher for minority respondents than the overall average, respectively).

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Populations in Kentucky identified through the needs assessment that are unserved or underserved are individuals with mental illness, individuals with criminal backgrounds, out of school youth, the blind and visually impaired and the deaf and hard of hearing. The Kentucky Justice and Public Safety Cabinet identifies the following as underserved in the State: 1) Persons with one or more disability; 2) People who are deaf/heard of hearing; 3) Geographically isolated individuals; and 4) those affected by poverty.

The second question asked during the open forums for the needs assessment dealt with populations identified by counselors as having an increased need for services over the past three years. These include people with mental health conditions, people with substance use disorders, people with felony backgrounds, and people with cognitive disabilities.

A Customized Supported Employment (CSE) needs assessment survey was sent to OVR field staff in fall of 2021 in effort to identify current need for customized SE services throughout the state. As expected, the results illustrate an extensive need for CSE throughout the state. Eighty-five percent (85%) of the counselors polled, stated that they have a need for CSE in their area. Forty-six percent (46%) have identified at least 4 or more individuals on their caseload that could benefit from this service. Sixty-two percent (62%) state that CSE is not readily available to their consumers. Overall, this clearly illustrates that there are many job seekers throughout the state that need CSE services but do not have unrestricted access to it.

OVR is an active partner of the statewide IPS Implementation Team that provides oversight of the development and implementation of IPS programs throughout the state. KY has been an active member of the International IPS Learning Community since 2010 and provides information to the community regarding effective strategies being utilized in KY that aide in the expansion and effectiveness of IPS. KY seeks to initiate innovative ideas, such as utilizing IPS for individuals with intellectual disabilities. This is not a common practice but has been utilized by other states. KY seeks to utilize this evidenced based model for individuals with intellectual disabilities and provide comparative data specific to other models to members of the learning collaborative. The Department of Behavioral Health has been the primary partner in the development and implementation of IPS programs throughout the state. Therefore, OVR seeks parallel DBHs long standing commitment by implementing Establishment Projects to further IPS expansion efforts.

Specifically, Appalachian Eastern Kentucky remains an underserved region of the state. The Appalachian area was determined by counties listed by the federal Appalachian Regional Commission (arc.gov). Its rural nature and persistent economic distress often result in an uneven and inadequate delivery of services. Thirteen of Kentucky's 54 counties are listed as at risk. The remaining 38 counties are designated as distressed. No Kentucky ARC county is designated as competitive or attainment. This is a serious concern, as the number of distressed

counties in Kentucky has not changed despite improvement in the Commonwealth's overall economic condition before COVID – 19.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

In Kentucky the Kentucky Workforce Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopting a plan to move Kentucky forward through workforce training and development. Kentucky offers a wide range of workforce education and training activities tailored to meet the needs of employers and job seekers in varied and unique communities across the state. The certified Kentucky Career Centers (KCC) are the storefront, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one-stop partner services reach into communities as well.

OVR has five regional managers that are assigned as liaisons with the local workforce areas in their regions. As the liaison they work closely with the local managers and operators for their areas. They serve on the local workforce boards and their respective committees. The Regional Managers submit reports quarterly to the Field Services Director and the Executive Director summarizing activities and projects on the local area.

In an effort to assess VR needs of individuals with disabilities served through other components of the state workforce investment system, an online survey of the Kentucky Career Centers was conducted. Each center has a manager of operations with the responsibility of general oversight of the facility.

KYOVR surveyed the managers of these centers via an email distributed through the Kentucky Career Centers distribution list. The response to the survey was limited. Five individuals completed the Vocational Rehabilitation Comprehensive State Needs Assessment 2020: Kentucky Career Center Survey. Respondents rated the working relationship with OVR as "Good" (an average of three on a four-point scale). Participants were asked to answer the following question "Are individuals with disabilities able to access and participate in the same level of services as other center customers?" All five participants answered "yes" (100.0%). Participants were asked what resources they used when accommodating a job seeker with a disability in the Career Center. Participants could choose more than one option. The most common responses were "Office of Vocational Rehabilitation Staff" and "Ask the job seeker or the referring employer" (both 60.0%).

The most requested trainings were:

- The Americans with Disabilities Act
- Social Security Work Incentives

The respondents needed the most help with:

- Assistive technology and how to obtain assistive devices through various funding sources.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Eleven individuals completed the Disability Coordinator Comprehensive State Needs Assessment Nearly three fourths of responses indicated that the proportion of their students who require a referral to OVR is less than 20% (70.0%). The most common services provided

were Testing Accommodations and Physical Accessibility to Campus (90.0%). When identifying issues in their role as Disability Resource Coordinator, all responses identified Technology (100.0%) and most identified the Number of Professional Support Staff (90.0%). Regarding crucial supportive service areas, all responses identified Assistive Technology (100.0%) and most identified Orientation and Mobility (90.0%). Participants were asked to identify the type of post-secondary institution with which they were associated. Participants could provide more than one response. The most common response was a University (50.0%). Participants were asked: "What proportion of their students require a referral to the Office of Vocational Rehabilitation (OVR) upon enrollment at your institution?" The most common response was "Less than 20%" (70.0%). working with the Office of Vocational Rehabilitation. Participants could select from a four- point scale (1 – Strongly Disagree, 2 – Disagree, 3 – Agree, 4 – Strongly Agree). The highest level of agreement was with the statement, "VR counseling assists the students in resolving issues related to academic performance" with a mean score of 3.2, indicating an average response between "Agree" and "Strongly Agree." The lowest rated statements were "VR counseling staff are able to connect students to needed support services" and "VR counseling staff build good rapport with you as a coordinator and with the student," both with a mean score of 3.0, also indicating an average response of "Agree". Participants were asked to indicate which skills are crucial in the transition process. Participants could provide more than one response. The three areas that all participants (100%) felt were crucial for the transition process were "Time Management Skills," "Self- Initiative" and "Self-Management Skills." One individual answered with an "Other" response that included "Case management advising/ tutoring."

Seventy-two individuals completed the Vocational Rehabilitation Comprehensive State Needs Assessment Youth Transition Survey. Over half were currently enrolled in postsecondary education (38.9% College or University, 13.9% Community or Technical College). Regarding technology needs, more than three fourths said their technology needs were met (78.6%); and concerning technology usage, more than half said they were using more technology than before COVID-19 (59.2%). Nearly one third reported that they are currently working (part time – 23.2%, full time 7.3%). Seventy-one people responded to the question "Please check one or more of the following which describes your disability(s) or those of the individual you represent:" The most common type of disability selected was "autism spectrum disorder." Sixty-nine people responded to the question "Which of the following describe your work situation?" The most common statement was "I have not had a paid work experience in the last five years. Seventy-one people responded to the question "Which of the following describes your current living situation?" The most common statement was "I live with other people (family, roommates, group home). For those who have answered "I am working part time (less than 30 hours)" or "I am working full time (more than 30 hours)," they were able to respond to the statement "I currently make…" The most common response was "at least or more than minimum wage ($7.25 per hour) in my main job." Fifty-three people responded to the question "Which of the following services would be useful to you now or in the near future?" The results of this question are "Independent Living Skills (Laundry, Money, Shopping, Cooking, Cleaning, etc.)." Respondents were asked "How would you rate yourself in the following areas?" Respondents could select from a four-point scale (1 – Needs Improvement, 2 – Fair, 3 – Good, 4 – Great). The highest rated area was "Attendance and Punctuality," indicating an average response between "Good" and "Great.

The highest self-ratings for job skills were: 1) Attendance and Punctuality; 2) Orientation and Mobility Skills and 3) Working with Others. The lowest rated job skills were: 1) Job Seeking Skills; 2) Money Management and 3) Asking for Accommodations.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Seventy-six Community Rehabilitation Provider staff completed the Comprehensive State Needs Assessment CRP survey. Around one third of the responses indicated that their organization had provided services to OVR consumers for 1-5 years (34.2%). Nearly half of the responses indicated that they received fewer than 10 referrals from OVR on a yearly basis (46.1%), and more than half of the responses indicated that they made fewer than 10 referrals to OVR on a yearly basis (60.0%). More than half of the responses indicated that they employed fewer than 10 staff (57.9%). Regarding technology needs, more than three fourths said their technology needs were met (81.6%); and concerning technology use, more than three fourths reported using technology more now than before COVID-19 (86.8%). On issues that impact their ability to provide services, more than half of the responses cited the Slowing Economy (55.8%) and Lack of Referrals (54.4%). The CRP survey asked how many staff are employed by the organization. The most common response was "Fewer than 10 staff" (72.1%). The CRP survey asked with which of KY OVR offices the participants' organization regularly work. The most common response was "Louisville" (25.6%). The CRP survey asked respondents to rate the level of service for ten populations. Respondents could select from a four-point scale (1 – No service provided, 2 – A little service provided, 3 – Some service provided, 4 – A lot of service provided). The highest rated service need was "Cognitive Disability" with a mean score of 3.28, indicating an average response between "Some service provided" and "A lot of service provided." The lowest rated population served was "Veterans" with a mean score of 1.74, indicating an average response between "No service provided" and "A little service provided". The CRP survey asked respondents to identify any employment related needs/services that have become more apparent or requested since March 2020 (COVID-19). Among the 54 responses, four themes emerged: technology, referrals, virtual challenges, COVID-19 related job losses. The CRP survey asked respondents to rate fifteen barriers they felt prevent Kentuckians with disabilities from gaining and maintaining employment and leading fuller and more independent lives. Respondents could select from a five-point scale (1 – Not a Barrier, 2 – Low Barrier, 3 – High Barrier, 4 – Very High Barrier, N/A – Not Applicable/Don't Know). Respondents were asked to choose "Not Applicable/Don't Know" if they were not able to rate the item. The highest rated barrier, with a mean score of 3.04, was "Transportation," indicating an average response between "High Barrier" and "Very High Barrier." The lowest rated barrier was "Qualified Service Providers" with a mean score of 2.03 indicating an average response between "Low Barrier" and "High Barrier." The CRP survey asked respondents to identify additional high or very high barriers not listed on the survey. Of the 14 responses, one theme emerged: in-person communication. One respondent said, "During a time when individuals must rely more heavily on technology for communication purposes due to social distancing guidelines as a result of the COVID-19 pandemic, many individuals with disabilities have difficulty utilizing modern technology as their sole means of communication. It is my opinion that the loss of in- person communications has drastically impacted the Vocational Rehabilitation program [causing it] suffer in terms of how effective we can be in terms of providing support." The CRP survey asked respondents to rate how quickly they were able to initiate services after receiving a referral from OVR. Respondents could select from a five-point scale (1 – Same Day as Referral, 2 – Within a Week, 3 – Between One and Two Weeks, 4 – Between Two and Three Weeks, 5 – More than Three Weeks). The most common response was "Within a Week" (53.5%). The least common response was "More than Three Weeks" (4.2%). The mean score of all responses was 2.37, indicating an average response between "Within a Week" and "Between One and Two Weeks." The CRP survey asked respondents if they currently had a wait list for services. Respondents could select from three options (Yes, No, Don't Know). The majority of responses indicated "No" (84.5%). The CRP survey asked respondents to rate the quality of coordination with Special Education providers with whom they coordinate their Pre-employment services. Respondents could choose from a four-point scale (1 – Poor, 2 – Fair, 3 – Good, 4 – Excellent). The mean score of all responses was 2.74, indicating an average response between "Fair" and "Good." The CRP survey asked respondents to select which issues impacted their organization's ability to provide services to persons with disabilities. Respondents could select from a list of eleven responses, and they could select more than one

response. The most common responses were "Slowing economy" (55.9%) and "Lack of Referrals" (54.4%). The least common responses were "Rising cost of commodities" and "Increase in consumers with multiple disabilities (both 14.7%). The CRP survey asked respondents the open response question what are the supports (related to employment) that you would you like to have to serve your clients effectively? Forty respondents provided responses to the question. Three themes emerged from the responses – Transportation supports, Technology supports, Communication supports with OVR. The CRP survey asked respondents the open response question what are the gaps in employment services that Kentuckians with disabilities are facing? Forty-one respondents provided answers to the question. Three themes emerged – Employer education, availability of jobs, customized employment. The CRP survey asked respondents the open response question what are the employment service needs that your clients have? Thirty-nine respondents provided answers. Three themes emerged in these responses – In-Person services, Job acquisition skills, person-centered consideration.

The highest rated barriers identified by the survey were: 1) Transportation; 2) Social Skills and 3) Job Search Skills.

A thorough review of existing and prospective agencies was conducted by OVR. OVR conducted several meetings with Department of Behavioral Health (DBH) staff throughout the state to obtain information of existing agencies that have longitudinally strong relationships with DBH, and that also exemplifies high quality service delivery. The purpose of such a selection process is to increase the likelihood of success among programs. This process aided in the identification of potentially new and existing providers that could be used in expanding IPS to those in unserved or underserved areas, as well as provide an evidenced based model of IPS SE to individuals with intellectual disabilities. Voices of Hope was an agency that was mentioned by multiple experts, on separate occasions, for the expansion of IPS to single mothers with serious mental illness and/or substance use concerns. Life Skills was identified as a high-quality provider that could be used to expand IPS in to unserved or underserved areas. Communicare, Inc. and Build Inclusion are providers that were identified as high-quality providers that serve individuals with intellectual disabilities. The agencies successes in serving the ID population are the basis for their selection. The OVR followed up with the KY IPS Implementation Team for discussion and approval. Finals steps included presenting information the OVR Executive Leadership Team for discussion and approval. The primary purpose of this project is to expand the evidence-based model of IPS SE throughout this 4-year period to the greatest extent possible to individuals who do not have access to this type of service.

A CSE needs assessment survey was sent to OVR field staff in fall of 2021 in effort to identify current need for customized SE services throughout the state. As expected, the results illustrate an extensive need for CSE throughout the state. Eighty-five percent (85%) of the counselors polled, stated that they have a need for CSE in their area. Forty-six percent (46%) have identified at least 4 or more individuals on their caseload that could benefit from this service. Sixty-two percent (62%) state that CSE is not readily available to their consumers. Overall, this clearly illustrates that there are many job seekers throughout the state that need CSE services but do not have unrestricted access to it. In some areas, CSE may be available, but job seekers may spend long periods of time on a waiting list. In fall of 2021 there were only 11 CRPs statewide who participated in and completed some Marc Gold & Associates training gateways which allows a CRP to provide CSE in KY. CRPs across the state have provided feedback that training, and start-up costs are barriers to participation in this type of service.

OVR in partnership with UPS and a community rehabilitation provider established the UPS Transitional Learning Center (TLC) several years ago in order for individuls to obtain competitive integrated employment through hands-on training. The TLC offers a two-week training program that is staffed and operated by UPS training supervisors as well as the

community rehabilitation providers. The program uses both classroom training and a simulated work environment to teach participants about job responsibilities, safety procedures and soft skills. This program has met a large need for the employer serving as a staffing solution for the company. Given the current workforce crisis, OVR is examining how this program can be replicated to meet the unmet staffing needs of employers in other areas of the state. This could be a potential area of expansion encompassing additional establishment projects with community rehabilitation providers.

A current barrier OVR identified through the statewide needs assessment is gaps in services for providing work experiences, job coaching, and job placement supports for specialized populations. There are not sufficient numbers of Community Rehabilitation Providers with the needed experience and expertise in serving job seekers who are visually impaired, blind, deaf, deafblind and hard of hearing.

In July of 2021, the Blind Services division was accepted into the Progressive Employment (PE) Development Project through Explore VR/Institute for Community Inclusion. OVR has implemented the Progressive Employment model for consumers served through the McDowell Center for the Blind. To fully implement the PE model, OVR's McDowell Center will provide work-based learning services, such as job shadowing, informational interviews, paid work experiences, and employer site tours. A core team meets biweekly inclusive of Blind Services staff and other stakeholders. The model depends upon having Community Rehabilitation Providers as a crucial partner in developing work experience sites and supporting consumers through the process (i.e. engaging with businesses, coordinating tours, and providing on-site supervision) Successful implementation of this mode across the state requires CRPs to hire and train staff in the area of serving individuals with sensory impairments. Consumers served by OVR with vision impairments have varying needs based on their vision. They represent a range of educational attainment, work history and a diverse range in terms of blindness skills proficiency (i.e., assistive technology/computer & tech skills, cane skills, home management skills). CRP staff lack specific training and experience in working with individuals with sensory impairments and are unfamiliar with the assistive technology used in work settings. CRP services are extremely scarce or non-existent in some areas of the state, making it more challenging to find businesses and support consumers in work experiences. OVR has identified a need for the establishment project with CRPs to focus on preparing and supporting individuals with sensory disabilities in competitive integrated employment. This would allow for higher numbers of consumers engaging in , work readiness and career exploration services. if OVR were able to provide the type of funding and support needed for CRPs to focus preparing and supporting individuals with sensory disabilities for the workforce.

OVR State Owned and Operated Rehabilitation Centers

The Charles W. McDowell and Carl D. Perkins Vocational Training Centers are the State-owned and operated comprehensive rehabilitation centers in Kentucky, a community rehabilitation program providing necessary vocational rehabilitation services to individuals with disabilities. In order to keep the center operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State. " Master Agreements are in place for scheduled routine maintenance and inspection of the facility.

The Carl D. Perkins Vocational Center, located in the rural Eastern Appalachian region, and the Charles W. McDowell Center for the Blind, in Louisville are the State-owned and operated comprehensive rehabilitation centers in Kentucky providing necessary vocational rehabilitation services to individuals with disabilities. The centers provide supports, training, and resources to the most unserved and underserved populations in Kentucky to maximize their opportunities to

obtain competitive integrated employment. The centers serve individuals, largely from rural areas of the state, with significant, complex or multiple disabilities such as sensory impairments, criminal justice backgrounds and mental illness.

The Carl D. Perkins Rehabilitation Center

The Carl D Perkins Vocational Training Center at Thelma, KY is a multidisciplinary comprehensive residential rehabilitation and vocational training facility opened in 1973. The Perkins Center's mission is to assist Kentuckians with disabilities achieve suitable employment, maximize independence, and gain self-respect through individualized comprehensive services. The Perkins Center is the only comprehensive, post-acute residential rehabilitation facility within Kentucky and regularly provides services to rehabilitation consumers throughout the Commonwealth. OVR Counselors located throughout Kentucky make referrals to the Perkins Center for a variety of rehabilitation programs and services based on the needs of eligible persons. Five programs of operation (Vocational Evaluation, Job Readiness Training, Vocational Skills Training, Assisted Living/Physical Restoration/Outpatient Rehabilitation and the Lifeskills Enhancement Program comprise the majority of the Center's operation, and meet high standards for program quality. The Commission on Outpatient Rehabilitation Facilities (CORF) accredits the Outpatient Rehabilitation Program within the Assisted Living Branch. The Commission on Accreditation of Rehabilitation Facilities (CARF) accredits the Evaluation and Training Units of the Perkins Center. To maintain quality program services, retain CORF and CARF accreditation, while adequately serving individuals with the most significant disabilities the Perkins Center must have adequate technology, a sufficient number of staff, and be able to continue to make improvements to the facility which allows consumers, including those with the most significant disabilities to access the facility. The following needs were identified by facilities and maintenance personnel:

1. Renovate Assisted Living Unit Restrooms and Replace all PTAC's- The need was identified in the Assisted Living Unit of the building interior on July 8, 2020, when facilities maintenance staff conducted a thorough assessment of the building. Renovation is needed to increase capacity in the assisted living unit by making the restrooms accessible. Many of these existing restrooms, built in 1973 are not accessible and require the use of a common shower area within the Unit. The work needed includes selective demolition, removal and replacement of plumbing systems, replacement of existing light fixtures, concrete slab replacement, doors/frames/hardware replacement, interior finishes including tile work (walls, floors and base), drywall, painting and restroom accessories. The Assisted Living Unit is joined structurally to the existing building and does not constitute a separate building and costs do not exceed the appraised value of the buildingWe currently have full capacity assigned to those 13 rooms and 24 consumers on the waiting list for vacancies as they are available. Completion of this project would increase room space to 14, allow consumers to use their own accessible restroom area, allowing the Perkins Center to meet consumer needs timely while increasing the numbers served due to our continuous waiting list for the Assistant Living Unit. The Perkins Center has 113 PTAC (Package Terminal Air Conditioner) units located in dorm rooms and offices. These units are 15 years old or older and have become costly to repair, if that is possible. The HVAC industry recommends such units be replaced if such units are more than 10 years old and functioning properly becomes an issue.

2. Industrial Truck/Forklift Training area- This program is designed to meet entry level workforce needs of any business that employs industrial truck/forklift operators. Perkins Center consumers enrolled in this program will have the opportunity to obtain a 3-year renewable OSHA approved Industrial Truck/Forklift Operator's license. Upon completion of this training, consumers typically go to work in a multitude of businesses including, but not limited to retail stores, manufacturing plants,

warehouses, wholesalers, or distribution centers. The outdoor training area is a tennis court that was built more than 30 years ago and has an asphalt surface. The surface has deteriorated over time, allowing the program to only use about one half of the entire surface for training purposes currently. The program's Industrial Trucks are stored in a building on campus and require them to be driven to the training area. This program has grown tremendously in recent years and the following numbers will further explain our need for this project:

2017

20 completed 11 received license Units/hrs. of service total 2,834

2018

27 completed 19 received license Units/hrs. of service total 4,635

2019

28 completed 26 received license Units/hrs. of service total 6,024

2020 and 2021 have been difficult years for our programs due to COVID restrictions. However, this program has continued to serve consumers with over 1500 hours of training during 2021. Utilize old tennis court location to construct 5000 sq. ft. steel, engineered building to provide storage and training area for forklift operations program. Concrete building pad should be at least 10,000 sq. ft. to accommodate outdoor training area as well. Building would require minimum temperature control, supply air/ventilation system for exhaust from propane powered fork trucks. Building should be equipped with minimum of one, 10' roll up door, one 36" utility door for access. Lighting should be high bay LED style and be no lower than 12' above floor. One multi use bathroom should be included in the design. Suitable electrical, plumbing and internet systems should be included in the design. Completion of this project will allow the Perkins Center to train consumers timely, during all seasons and in an environment similar to the jobs available in this field.

3. Fire Panel System and HVAC BAS software/controls Renovation-A large part of our facility fire monitoring system continues to run on a decades old system that needs to be merged into one active panel. This upgrade would allow us to get all of our monitoring points up to code and eliminate the myriad of problems along with inconveniences of the old panel. The Center HVAC system controls in the main building are obsolete and operating on a system that cannot be upgraded or repaired if there is any major repair required. A new system with remote access, server operable, provides user interface for both graphics and logic operation while being capable of trending and data storage is needed. The system will need to interface with all building systems in use and sized for future needs. The system should also be capable of interfacing with multiple energy meters for the purpose of monitoring and data storage. Replace obsolete BAS controls in main building with current version equipment. New system must provide remote access, be server operable, provide for user interface for both graphics and logic operation, be capable of trending and point data storage. Any remote modules must be able to be downloaded from remote connection. Must be able to interface with all building systems presently in use and sized for future needs. System must be able to interface with multiple energy meters for the purpose of monitoring and data storage.

4. Site Access Security - The Perkins Center presently has two driveways onto the property and 22 doors allowing access into the building. The current layout is difficult for security to monitor and poses a safety threat for staff and students. The property is contained on three sides by fencing but is open to the road in the front. To further complicate the situation, the security office and camera monitoring station is in the rear of the building with no easy access to the front of the property. In February of 2019, it

was recommended by the Center Safety Committee that a single point of entry onto the property be established. This entrance will be gated and maintained by security guards. The project would involve rerouting the current primary driveway and extending it around the side of the building. A shelter will need to be constructed roadside for security staff to be housed. An automatic gate with key card and remote operation will also be necessary. The overall objective is to provide a secure and safe environment.

5. Site Drainage and River Bank Erosion-The frontage property of the Perkins Center is lower than the main road and the buildings on the property. Drainage piping is there and has been for many years. The original drain leading to the rear of the property is compromised and causes water to pond in low lying areas of the site during wet weather. The original drain needs to be assessed to determine if all or part of it can be replaced/repaired to allow water to drain from the property. Mowing and caring for this part of the Perkins Center property is often difficult and requires extra labor due to the condition of the ground. It also presents as a hazard to consumers on-site when there is standing water. Erosion/Slippage Area-There is significant erosion of property near the Big Sandy River, which joins the property. The goal of this project is to stabilize the erosion/slippage area at rear of property boundary. This section of the property is bordered by the Levisa Fork of the Big Sandy River. As the rivers water level rises and falls, it has eroded approximately 100 feet of shoreline at the rear of the property. This has left drain lines exposed and is undermining the security fence. It is a safety concern for those using the adjacent soccer field. This will require an engineering study to determine project scope.

6. Plumbing -Building Drain lines-Plumbing systems have been repaired and replaced as needed over the years. The manhole in our Courtyard area is central to the drain system of our kitchen and dormitory areas. An assessment of that drain to the sewer plant is needed along with those systems leading from the dormitory into it. Frequent repairs have been made to maintain the interior drain lines from inside the building, however these failures have steadily increased in recent years. A complete assessment of these plumbing/drain systems is needed to determine the extent of what is in need of repair/replacement.

7. Exterior Security Lighting-Areas around the main and perimeter buildings are adequate but should be updated to LED type to provide longer life and reduce enrgy costs. However there are issues with site perimeter lighting that need to be addressed. This includes repair parking lot lighting and additional lighting installed around the perimeter of the property. This will require removal of asphalt to repair the underground line, or another method of lighting such as solar be established. The front perimeter of the property, adjacent to main street does not have any lighting, making it very dark the entire 950' of frontage and 100'onto the property. The other area of concern is along the adjacent street (Riverview Drive), and it spans an area of 450' of property frontage by approximately 50' onto Perkins Center property. Correcting these concerns would provide a much safer and secure environment for consumers and alleviate issues security staff encounter when monitoring those areas by video and in person.

8. Renovation/Replacement of Store Front Windows - The glass "store front style" windows surrounding the interior of the main building and half of the physical therapy area, leaks whenever it rains. Towels must be kept throughout the building to catch the water from those windows when there is precipitation. There is rust and corrosion present. It is unclear if new structure is needed or replacement glass and seals to resolve the issue. Most of the glass and structure is original to the building built in 1973. The interior glass measures 2,608 sq ft. and the physical therapy glass is 225 sq. ft.

9. Resurface Gymnasium Flooring - The current gym surface (73'5'' long x 39'5'' wide) is badly worn and in need of repair. It is original to the construction of the gym. It will need installation of a layer of Tarkolay over existing floor, then a 5+2 pad and pour system, game lines painted, vinyl base along walls, and a vinyl reducer along doorways and openings.

10. The Perkins Center front entrance- The main entrance to the Center needs a canopy constructed to allow those loading/unloading to safely do so without concern for snow, rain and other weather conditions that may occur. Often, consumers, family members and staff must load/unload vehicles packed with clothing, food items, electronics and other items at our front entrance where there is no cover from the elements. Using a wheelchair lift is also a task that often becomes difficult due to rain, snow or adverse conditions where the pavement may become slick or hazardous. A canopy has also been identified as a need on our Accessibility Plan performed by an Occupational Therapist.

11. Perkin's Center Hot Water Systems -Replacement of aging Hot Water Heaters throughout the Facility - The site currently operates its hot water supply by utilizing twenty separate hot water heating units, eleven of which are near specified end of life service for these types of units and are not performing at full capacity. A planned replacement schedule should be determined and implemented before a failure constitutes an emergency situation.

12. The Carl Perkins Center Rooftop HVAC Units – The facility operates heating and cooling for all areas except the student dormitory by means of RTU's (rooftop HVAC units) located on the rooftops of various sections of the buildings. There are 23 individual units, 21 of which are 2001 or older manufacture. These units are beyond the specified 15-20 year service life cycle and are expensive to operate and maintain. Many of the units are not performing at 100%. All units provide cooling utilizing R-22 freon which is now obsolete to manufacture. Several units are either non-operational or operating in a limited capacity at this time. Based on evaluations of all RTU units, a scope for replacement is being developed to provide a timeline and an accurate cost determination.

13. The Carl Perkin's Vocational Rehab Facility Waste Water Treatment Plant – The facility is served by an onsite Waste Water Treatment Plant that was installed in 2004/2005. This plant has a capacity to process up to 25k gallons of waste water per day. The primary tank structure typically has a lifespan of 25-30 years. The support structure and decking, piping, electrical controls, blowers, pumps and other hardware has a service life of 10-15 years. Based on an assessment completed by the original manufacturer, it is recommended that these system components and hardware be renovated and suspect parts be replaced. The goal of this renovation would be to make the Plant viable for another 8-10 years before full replacement would be required.

The Charles W. McDowell Center

The Charles W. McDowell Center is a rehabilitation facility serving individuals form across the Commonwealth, owned and operated by the Kentucky Office of Vocational Rehabilitation (OVR). The facility housed the McDowell Center residential and training program for the blind and visually impaired; as well as office and meeting space for OVR Field Services Division Staff. OVR's East Jefferson District staff and the Central Blind District field staff (i.e., VR counseling staff, assistants, assistive technology staff, community rehabilitation branch staff) are housed in the building. This greatly increases the foot traffic of VR participants and other stake holders in the building. The East Jefferson District served around 2,300 individuals in the current program year. The McDowell center training program receives referrals from all across the state. The number of staff housed at the Center is around 65 when fully staffed.

The McDowell Center, located in Louisville, is the only facility in the state of Kentucky which provides blindness skills training to adults, making it a singular and particularly important resource for individuals who are blind and visually impaired wishing to adjust to their vision loss and pursue competitive integrated employment. The McDowell Center offers training in vocational preparation, personal adjustment services, independent living skills, orientation and mobility, Braille, assistive technology, academic remediation, career assessment, vocational planning, work adjustment and work experience.

Master Agreements are in place for scheduled routine maintenance and inspection of the facility. On a monthly basis, elevator inspections and pest control occur. The HVAC system and backflow and pressure valve testing, water treatment is on a quarterly maintenance schedule. Semi-annually the kitchen equipment, grease traps and electrical systems for fire alarms are inspected and maintained. On an annual basis, maintenance and inspections of the sprinkler system and kitchen hood occur.

State facility staff performed an assessment of the facility needs in 2019 and 2020. In 2021, state facility staff engaged architecture and engineering consultants to provide further review of the building and mechanical systems.

The results are as follows:

1. Complete Building Renovation- (to include Interior Architectural and Mechanical, Electrical, Plumbing) All MEP systems must be evaluated for replacement based on current operating condition, equipment life expectancy, and energy usage. All systems should be evaluated to determine the most effective means of controlling building spaces to desired set points for humidity and temperature.

All Building automation systems (BAS) should be upgraded to current standards and must provide for remote access via internet, centralized served storage, and application software. User interface must allow access to logic programming, graphics, data logging, trend data, alarms, and self – diagnostics.

All building sanitary drain piping must be replaced due to systemic failure of current piping system materials. All proper engineering standards and Housing building Construction (HBC) plumbing codes must be followed. Architectural renovation to allow improved and expanded ability to serve consumers should also be included in this process, including but not limited to: lighting, tactile surfaces, training areas, safety, interior design improvements for visually impaired and ADA for mobility affected students.

This project may require completion in two phases based on work scope, building occupancy and timing of work.

2. Dormitory Restroom Accessibility and Safety-Three dorm rooms require renovation to accessible "ADA" shower areas. Wheelchair users cannot navigate into the shower for safe transfer, and controls for the shower are located outside the shower. Water from the shower is not contained and is a safety concern. Updates Needed: Recess concrete slab in order to lower the shower panel, which would prevent water from draining out into the main bathroom area. Renovation to showers allowing for transfer and access to controls.

3. Public Right of Way – Back of building lacks access to a public right of way from all emergencies exits. Campus grounds are not fully accessible. Updates needed: Paved access encircling facility. Paved access allowing safe exit from building and safe cane training for consumers. Create a walking path with various terrains that would allow for enhanced orientation and mobility training on campus.

4. Exterior Repairs-Student dorm patio roofing repair. Service dog outdoor enclosure.

5. IT updates to facilitate remote instruction and staff meetings

6. Replace all exterior lighting with LED upgrade to improve longevity and reduce energy consumption.

7. Renovate Consumer training kitchen to facilitate improved work space and layout to accommodate students using a wheelchair.

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

Transition services continue to be an unmet need among individuals with disabilities. Vocational Rehabilitation plays a vital role in this complex process collaborating with local school districts in the provision of transition and pre- employment transition services.

The National Center for Education indicated in 2019-20, the number of students ages 3-21 who received special education services under the Individuals with Disabilities Education Act (IDEA) was 7.3 million, or 14 percent of all public-school students. Among students receiving special education services, the most common category of disability (33 percent) was specific learning disabilities.

There are 173 school districts(including the School for the Deaf and the School for the Blind) statewide consisting of 1,477 schools inclusive of 26,675 students with IEP's and 504 Plans that are potentially eligible.

For people with disabilities the employment rate for people with disabilities in Kentucky was 30.8% (2019 Disability Compendium State Reports). The employment rate for people without disabilities in Kentucky was 76.2%.

WIOA allows KY OVR to address these particular issues by allocating funds for pre-employment transition services. WIOA mandates 15% of all federal funds be set aside to provide pre-employment transition services. Indications of post-school success are broken into categories in 'Predictors of Post-School Success in Taxonomy 2.0. (Test, et al., 2009) clearly noting areas where Vocational Rehabilitation may play vital roles. The predictors are (possible VR role in parentheses): Student Development (assessment, employment skills attainment, supports), Student-focused planning (IEP development ant IPE participation), and Family engagement (family involvement, family empowerment, and family preparation), Program Structures (strategic planning, high expectation, and high involvement), Interagency Collaboration (collaborative framework, and collaborative service delivery).

Youth adults with disabilities face multiple challenges in obtaining successful post-school employment outcomes. In Kentucky for the 2019-2020 Post-School Outcomes were not met for competitive employment, enrolled in higher education or enrolled in other education or training .

Following the directives of the Workforce Innovations and Opportunity Act (WIOA, 2014) VR is partnering and collaborating with local school agencies to build the necessary bridge for students to cross from school life to post school life. Transition services were identified as an 'unmet need'.

In October 2020, OVR created the Transition Services Branch to engage with and provide Pre-Employment Transition Services and Transitions Services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, six (6) Pre-Employment Transition Services Coordinators, and one (1) Administrative Specialist.

The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-employment and Transition services throughout the state, including specific contracts with service providers. Each serve as a point of contact for their area and assure services are administered in keeping with the federal guidelines and in compliance with state and federal laws. They represent the agency on state and federal teams, boards and commissions for the area of transition and pre-employment transition services.

The Pre-ETS Coordinators are assigned to specific regions. They work directly with schools and providers to receive referrals, coordinate services, and monitor student progress to help determine when it is appropriate for a student to apply for OVR services.

The Administrative Specialist provides clerical support to the branch.

The Office partners with the Kentucky Department of Education (KDE) to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services. The current memorandum of Understanding with KDE is in legal review. Within this agreement are strategies for the two agencies to work collaboratively in evaluating, serving, and planning for a seamless transition from school for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation ("VR") services. The intended result of these collaborative strategies and activities is that students will achieve their post-secondary goals as they make the transition from school to adult education, competitive integrated employment (including customized employment and supported employment), continuing and adult education, independent living, and community participation. Signed agreements with the local educational agencies outline and identify the responsibilities of each public entity relating to the provision of services shall be in place. These agreements are designed to facilitate the transition of students with disabilities from the receipt of educational services in school, to the receipt of vocational rehabilitation services.

OVR has representation on the State Interagency Council (SIAC) for services and supports to Children and Transition-age Youth. The (SIAC) is a group consisting of state agency representatives, a youth, a parent of a child or transition-age youth with a behavioral health need, and a member of a nonprofit family organization. SIAC conducts monthly meetings that are open to the public.

Regional Interagency Councils (RIACs) operate as the locus of accountability for the system of care, providing a structure for coordination, planning and collaboration of services and supports at the local level to children, adolescents, and transition-age youth and their families, to help them function better at home, in school, in the community and throughout life. There are 18 RIACs across the commonwealth and OVR staff are involved in their local areas.

The Office participates with the Kentucky Department of Education (KDE) and other state agencies on the Kentucky Interagency Transition Council.

The Executive Director is a member of the State Advisory Panel for Exceptional Children (SAPEC) in Kentucky in the Department of Education. The advisory panel advises and assists the Kentucky Department of Education (KDE) on special education and related services for children with disabilities.

OVR and Kentucky Department of Education continues to meet regularly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment.

Pre-Employment Transition Services will continue to represent the earliest set of services available under OVR for students with disabilities, which are short-term in nature and are designed to help students identify career interests.

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

According to data from the 2019 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.8% of Kentucky civilians living in the community report having a disability. According to this resource, Kentucky's overall population is 4,384,951 people. Using the percentage in 2019 and applying it to the population numbers, there is an estimated 779,842 people in the state of Kentucky who have a disability. The overall rate of individuals with a disability in the United States is 12.7% for 2019. The rate in Kentucky is higher than the rate nationally by 5.1%.

The percentage of residents of working age (18-64) in Kentucky who are employed is 32.8% for 2019. The national average was 38.8% in 2015. In this instance of employment, the rate in Kentucky is lower than the rate nationally.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The following data that represents estimated performance for FY 2022 under this State Plan based on historical data from prior years. The estimated service and category numbers are reflective of the average number of new applicants that we expect to receive in 2022 and it is inclusive of the carryover of consumers from the prior year. The information reflects the estimated numbers taking into consideration that OVR is serving all categories of service. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post- employment services.

Estimated number to be served in FY 2022 under the combined agency is 20,220 with 2,025 positive employment outcomes. The estimated number to be served in FY 2023 under the combined agency is 22,978 with 2,980 positive employment outcomes.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

OVR as a Combined Agency for FY 2022 estimates that it will serve around 2,250 individuals with a total estimated associated costs of around $2,705,330. In FY 22 we estimate around 320 employment outcomes with an average estimate of around $1,283,900. For FY 2023, OVR estimates that it will serve around 3,025 individuals with a total estimated associated costs of around $3,637166. In FY 23 we estimate around 340 employment outcomes with an average estimated costs of around $1,364,144.

Expenditures exceeding the Title VI-B 2019 allotment will be covered with funds from the 110 program. OVR designates Part B of Title IV funds to serve individuals with the most significant disabilities as further reflection of the Office's continued dedication to serving those individuals. The estimates found in the table are based on a trend analysis of data extracted from RSA data, and KYOVR expenditure data from fiscal years 2020 and year to date 2021. Policies, practices, and priorities potentially influencing expenditures were considered in the development of these estimates.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

OVR is under an order of selection with all Four Categories open. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post-employment

services. These costs are reflective of the estimated direct service costs to consumers for the fiscal year October 1, 2021, through September 30, 2022. These estimates are based onhistorical costs taking into account the unpredictable effects of the pandemic.

The number below are for Fiscal Federal year October 1, 2021, through September 30, 2022. The total number estimated to be served is 20,220 with 2,025 employment outcomes.

Estimated number to serve under Category One is 16,478 with 1,634 successful employment outcomes.

The estimated number to serve under Category Two is 2,523 with 316 successful employment outcomes.

The estimated number to serve under Category Three is 1,213 with 73 successful employment outcomes.

The estimated number to serve under Category Four is 6 with 2 successful employment outcomes.

The numbers below are for Fiscal Federal year October 1, 2022, through September 30, 2023.

The total number estimated to be served is 22,978 with 2,980 positive employment outcomes.

Estimated number to serve under Category One is 18,842 with 2,294 successful employment outcomes.

The estimated number to serve under Category Two is 2,747 with 590 successful employment outcomes.

The estimated number to serve under Category Three is 1,383 with 94 successful employment outcomes.

The estimated number to serve under Category Four is 6 with 2 successful employment outcomes.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

OVR has all four Categories open and there are no individuals on the waiting list.

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.

These costs are reflective of the estimated direct service costs to consumers for the fiscal year October 1, 2021, through September 30, 2022 and the unpredictable effects of the pandemic. The total number estimated to be served is 20,220 with 2,025 positive employment outcomes.

FY 2022

Category One

Estimated to be served — 16,478

Total Estimated Associated Costs – $16,547,443

Average Estimated Costs per person per closure - $3,140

Estimated Employment Outcomes —1,634

Category Two Estimated to be served — 2,523

Total Estimated Associated Costs - $1,327,975

Average Estimated Costs per person per closure-$2,379

Estimated Employment Outcomes - 316

Category Three Estimated to be served — 1,213

Total Estimated Associated Costs - $555,334

Average Estimated Costs per person per closure - $2,089

Estimated Employment Outcomes -73

Category Four Estimated to be served - 6

Total Estimated Associated Costs — $25,396

Average Estimated costs per closure: $2,750

Estimated Employment Outcomes: 2

FFY 2023

The costs are reflective of the estimated service cost to consumers for the fiscal year October 1, 2022, through September 30, 2023, and the unpredictable nature of the pandemic.

Estimated number served is 22,978 with 2,980 positive employment outcomes.

Category One

Estimated to be served — 18,842

Total Estimated Associated Costs – $16,921,172

Average Estimated Costs per closure -$2,814

Estimated Employment Outcomes - 2,294

Category Two

Estimated to be served — 2,747

Total Estimated Associated Costs - $2,189, 500

Average Estimated Costs per person per closure-$2,854

Estimated Employment Outcomes - 590

Category Three

Estimated to be served — 1,383

Total Estimated Associated Costs - $590,900

Average Estimated Costs per person per closure - $2,072

Estimated Employment Outcomes -94

Category Four

Estimated to be served - 6

Total Estimated Associated Costs — $25,396

Average Estimated costs per closure: $2,750

Estimated Employment Outcomes: 2

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

The 2021 CSNA was conducted by OVR with input from the State Rehabilitation Council (SCVR). This plan contains goals and priorities based on the identified needs through the FFY 2021 Comprehensive Statewide Needs Assessment (CSNA). The Council for the Combined agency reviewed, gave input and approved the goals for this state plan.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The following goals are presented in priority order with estimated timeframes for completion by year:

Sound Fiscal Management

Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

Objective 1.1: Develop internal controls that are embedded throughout service delivery.

Strategies:

1. Conduct a risk analysis and identify needed procedures for internal controls. (2022)
2. OVR staff work closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements. (2022)
3. Develop needed policies and procedures. (2022)
4. Initial training of staff on established policies and procedures. (2022-2023)

Measures:

Completion of the risk analysis

Completion of the development and implantation of written policies and procedures

Staff training Completed

Objective 1.2: Best practices and effective policies are embedded in day – to- day operations.

Strategies:

1. Dedicated staff are assigned to quality assurance monitoring over the internal control processes. (2022-2023)
2. Development of a quality assurance plan. (2022)

3. Metrics are established for internal control processes. (2022)

Measures:

Clean audit with no findings

Reduction of Case Review Errors

Timely submission of required federal reports with no errors.

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Objective 2.1: Enhance program compliance through the development and maintenance of policies and procedures

Strategies :

1. Identify an agency standard of accessibility. (2022)
2. Develop a structure to maintain, update, and review policy and procedures. (2022)
3. Train staff on process for policy and procedure. (2022-2023)

Measure:

Completion of a formal policy and procedure manual

Objective 2.2: Consistently analyze and use data to inform planning.

Strategies:

1. Implement a consistent development and review process to inform management and performance. (2022-2023)
2. Obtain input of leadership and management to identify outcome data needs. (2022-2023)
3. Designate staff to develop a strong data process. (2022)
4. Partner with internal and external stakeholders in education and workforce data sources. (2022-2023).

Measure: Executive Leadership Team and management utilize data driven information in the decision-making process to inform performance and management.

Staff Resources

Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

Objective 3.1: Expand opportunities for staff to provide virtual services

Strategies:

1. Acquire updated technology. (2022)
2. Purchase and implementation of a new case management system (2022- 2024)
3. Provide staff training in the latest technology (2023).

Measures:

100% of Staff are using Sara

Implementation of New Case Management System

Objective: 3.2: All forms and documents meet accessibility standards

Strategies:

1. Ensure staff use accessible forms and documents (2022 – 2023)
2. Designate staff responsible for creating forms that meet accessibility standards.(2022)
3. Policies and procedures are in place for compliance. (2023)
4. Train staff on accessibility and compliance. (2023)

Measure:

Completion of accessibility polices and staff training

Center Operations (The Charles McDowell Center and the Carl D. Perkins Center).

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes. Carl D. Perkins Rehabilitation Training Center and McDowell Center for the Blind will operate at full capacity (occupancy), leading and maximizing the delivery of services to the unserved and undeserved population.

Objective: 4:1 Upgrade building facilities to provide a safe and accessible environment

Strategies:

1. Develop a formal plan for ongoing regular maintenance (2022).
2. Follow and adhere to all state and federal processes for prior approval and purchasing. (2022-2023).
3. Implement approved projects in the established Capital plan in a timely manner. (2022-2024)

Measure: All facility projects are completed and operational as identified on the Capital Plan

Objective 4.2: Increase service capacity to offer statewide services that increase competitive, integrated employment outcomes.

Strategies:

1. Conduct a cost benefit analysis of both Perkins and McDowell to inform decisions regarding center operations (2023-2024) to determine the effectiveness of programs that lead to competitive integrated employment. Identification of areas of deficiency and the development of a plan to ensure centers offer programs that prepare individuals for careers that lead to self-sufficiency and higher quality employment outcomes.
2. Develop and implement a plan to ensure adequate resources for the learning format expansion (career pathways, post-secondary training). (2022)
3. Address hardware, software, and connectivity access barriers (2023)
4. Expand learning formats to include a variety of online and hybrid programs (2022-2023).
5. Centers will increase outreach efforts to all 120 counties in the state in order to increase capacity. (2023).

Measures:

Cost benefit analysis completed and plan implemented to address area of needed improvement by 2024.

Establish baseline measures in 2022 (number served, number placed, number of credentials).

Increase the number of training participants enrolled in career pathways by 25% in for both Centers annually in 2023 and 2024 that leads to employment in their field of study.

Increase competitive, integrative employment by 25% for both Centers annually in 2023 and 2024.

Objective 4.3: Maximize job readiness training and work experience opportunities.

Strategies:

1. Establish relationships to strengthen business engagement activities to provide work-based experiences expanding employment opportunities for individuals attending the Perkins Center. (2022-2023).
2. Expand job readiness training and work experience opportunities at the McDowell Center (2022-2023).

Measures:

Establish baseline measures in 2022 (number of employers, number of work-based experiences, number leading to employment).

75% of McDowell Center participants enrolled in services annually will complete a work experience annually.

The McDowell Center will expand employer relations by six annually.

Perkins Center will expand work-based experiences by 25% annually in 2023 and 2024.

Students completing job readiness training at Perkins will increase by 25% in 2023 and 2024.

Consumer Services

Goal 5 : Implement innovative practices to improve quality outcomes.

Objective 5.1: Increase the number vendors with credentials

Strategies:

1. Incorporate vendor recruitment as a part of the marketing plan (2023)
2. Train staff on new vendor processes for vetting and credentialing (2022)
3. Recruit new vendors for increased consumer choice. (2022-2023)
4. Maintain a strong application/recruitment/retention vendor process (2022- 2023).

Measure: All vendors are credentialed

Objective 5.2: Consumers have access to industry-driven training, career, and other resources.

Strategies:

1. Develop a list and expand the list of agency-approved vendors. (2022)
2. Develop a plan for consumers to have access to technology and virtual services.(2022)

3. Counselors will place an emphasis on informed choice in the guidance and counseling process. (2023)
4. Training of staff on informed choice (2023)
5. Increase the timeliness of high tech driver evaluations through the purchase of an agency owned vehicle.

Measure:

Increase the number of consumers completing training by 10%

Objective 5.3: Strengthen existing workforce partnerships, develop new partnerships, and expand learning opportunities.

Strategies:

1. Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors. (2023)
2. Increase work-based learning opportunities in targeted sectors. (2023)
3. Train staff using career pathways strategy guides.(2022)

Measures:

10% increase in competitive, integrated employment outcomes in targeted sectors

Objective 5.4: Counselors implement a career pathways approach to increase quality employment outcomes.

Strategies:

1. Expand types of employment placements into higher paying, lower turnover jobs. (2023)
2. Increased use of Labor Market Information in employment goal development through guidance and counseling. (2022)
3. Increase consumer engagement in the VR process through guidance and counseling. (2023)
4. Implement policies and procedures that guide the implementation of the career pathway approach through team-based, early intervention strategies. (2023)
5. Add measures to the counselor performance evaluation to reflect expectations. (2023)

Measure: Annual increases in the required federal common measures in order to meet set goals

Public Awareness

Goal 6: Implement an ongoing, flexible marketing plan and process to improve public awareness of VR programs, services, and agency employment.

Objective 6.1: Implement a comprehensive marketing plan for OVR

Strategies:

1. Create a marketing plan for consumers and vendors (2022)
2. Develop marketing materials that reflect current information and are engaging and in accessible formats. (2023- 2024)

3. Marketing materials are made available to staff and consumers. (2023-2024).

Measures:

Marketing plan is developed

Materials are developed, easily accessible and distributed

Social media presence on most popular accessible sites

Objective 6.2: Recruit Talent

Strategies:

1. Identify a staff liaison to work with Cabinet and Personnel Cabinet on issues related to talent recruitment. (2022)
2. Expand the quantity and types of internship programs with university programs. (2023)
3. Develop and implement and internship agreement. (2022)
4. Leverage social media as a tool for recruitment. (2023)

Measure: Open positions are filled with qualified candidates and OVR Retention Rate increases.

The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Kentucky has set the following goals to assist with increase employment outcomes for adults and youth with a significant disability

Goal 1: Increase the number of CRP's providing Supported Employment Services

Objective 1.1: Recruit more providers for supported employment for unserved and underserved areas.

Strategies:

1. Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.(2022)
2. Create Establishment Projects to replicate the UPS Transitional Learning Center model and expansion of the IPS and Customized employment models to increase a network of services providers. (2022-2023)
3. Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute. (2023)
4. Hold outreach opportunities for potential providers. (2023)
5. Provide training on new polices related to customized employment, ISP and person-centered planning (2022-2023).

Measures:

Increase the number of providers by 5%.

Implementation of new service fees

Implementation of Establishment projects

Of Trainings Provided

Increase in the number of competitive integrated outcomes for individuals

Goal 2: Monitor Service Quality of Providers

Objective 2.1: Develop strategies for continuous quality improvement in collaboration with the Program Policy and Support Branch.

Strategies:

1. Ensure agency compliance to WIOA requirements of Section 511 (annually)
2. Ensure CRP compliance with the terms of their signed service agreements through annual audits and monitoring (annually).

Measures:

Annual Audits of Services

Corrective Action Plans

Scorecard

Goal 3: Seek alternative strategies for providing and funding Extended Services

Objective 3.1: Provide another source of extended services is available so there will be no interruption of services for individuals with significant disabilities.

Strategies:

1. Seek input from staff and other stakeholders such as education, service providers and individuals with disabilities on extended services. (2022)
2. Identify potential strategies for the provision of services. (2023)
3. Identify potential funding sources. (2023)
4. Update the Supported Employment Service Fee Memorandum to include extended services to youth. (2022).

Measure:

Additional funding secured

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 2021 Comprehensive Statewide Needs Assessment informs the Office of Vocational Rehabilitation strategic and state plans; meets the Federal regulatory requirements of 34 CFR §361.29; and provides vital information on the State VR program which is used by both public and private disability advocacy agencies. The State Rehabilitation Councils along with the Office of Vocational Rehabilitation worked collaboratively to assess the needs of individuals with disabilities.

The Rehabilitation Act of 1973 was amended by the Workforce Innovation and Opportunity Act (WIOA) and signed into law on July 22, 2014. WIOA mandates that each state and its State Rehabilitation Council (SRC) conduct a comprehensive statewide assessment every three years. This study examines the rehabilitation needs of Kentucky residents with disabilities. In addition, we seek to clarify the needs of individuals with the most significant disabilities, minorities, individuals who have been unserved and underserved, individuals with disabilities served through other components of the statewide workforce development system, and youth

and students with disabilities and the need to establish, develop or improve community rehabilitation programs.

OVR contracted with the University of Kentucky Center for Excellence, The Human Development Institute (HDI) to conduct a needs assessment as a part of its statewide CSNA. OVR utilized the following information: 1) the HDI CSNA assessment results; 2) strategic planning; 3), the RSA monitoring process and draft report; 4) the satisfaction survey; 5) facilities assessment; 6) RSA performance data sets and7) data from the OVR case management system. The information was used to identify services gaps, challenges and set goals and priorities for the VR agency.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

OVR submits the annual Performance Report annually, the first of October along with the other workforce system partners.

The RSA team has reviewed with Kentucky the quarterly data dashboards as well the comparative Performance for PY 2020. For the Median Earnings PY 20 OVR is in the 1st Quartile at $5,540. OVR is in the 4th Quartile for the 2nd Quarter Employment rate at 25.8% the 4th quarter Employment Rate at 23.0% and Credential Attainment Rate at 13.2%. For Measurable Skill Gains for PY20, OVR is in the 3rd Quartile at 35.6%.

OVR is seeking Technical Assistance from the VRTAC-QE for employment and the VRTAC-QM for quality management. OVR has established the following goals that includes strategies that address OVR's performance on the WIOA accountability measures.

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Center Operations

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Consumer Services

Goal 5 : Implement innovative practices to improve quality outcomes.

Kentucky is committed to acquiring systems that gathers the collective data required under section 116 of WIOA for all the core partners. Currently, Kentucky is in process of the procurement of a system that will collect, track, measure and report data needed under section 116 of WIOA. Currently, the workforce partners use different systems and tracking mechanisms. The current Kentucky OVR Case Management System (CMS) is over 15 years old. OVR is in process of procuring a new system. The new system(s) should allow OVR to have paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity.

Core programs and partners have access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). This allows for tracking of the Employer measures.

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.

OVR leadership and the State Rehabilitation Council examined a number of statistics, estimates and internal program data from our Case Management System as well as other documents and publications.

These included:

Comprehensive Statewide Needs Assessment State Plan

Annual Report

Strategic Plan

Satisfaction Survey of Closed Cases (successful and unsuccessful)

The 2021 RSA Draft Monitoring Report

The RSA Data Dashboards

Caseload Statistics Metrics Reports.

RSA conducted an offsite review of OVR during the COVID-19 pandemic. The review activities were held from July 16 through August 20,2021 and consisted of information, documents and data submitted by OVR. RSA assessed the performance of and reviewed the financial management of the VR and Supported Employment programs. The RSA Team provided technical assistance during the review as well as made recommendations for additional TA through the technical assistance centers.

The RSA Monitoring Process and Performance Data will be utilized to develop a plan of action. OVR received their draft monitoring report on January 22, 2022. OVR received off site monitoring during the time period of July 16, 2021, through August 20,2021. During the time OVR received technical assistance from RSA for multiple topical areas. RSA conducted a thorough review and discussion of the performance data with OVR staff. OVR, after a thorough review of the recommendations, findings and corrective actions will utilize the information in formulating a plan of corrective action to address the following issues identified by RSA regarding the Vocational Rehabilitation and Supported Employment Programs.

Performance

Insufficient Internal Controls for Management of the Federal Award.

Non-Compliant and Outdated State Education Agreement

Financial Management

Missing/Insufficient Internal Controls

Financial Management Deficiencies

Throughout the year, RSA has conducted quarterly performance data reviews that has assisted OVR in identifying areas of concern from the RSA data dashboards. This allowed for comprehensive discussions and RSA provided technical assistance during the sessions. During the monitoring visit RSA shared ten performance tables as well as an additional six tables regarding Other Measures that Matter for review and discussion.

One area of need identified where there are clear gaps in services was the area of engagement of individuals with disabilities throughout the VR process as evidenced by the significant numbers of individuals existing the program as applicants.

Another area was performance related issues due to inaccurate data reporting. Through the monitoring process, RSA and OVR identified the need to look at how the Executive Leadership and managers use Data to inform performance and management of the agency operations of the VR and Supported Employment Programs inclusive the states owned and operated centers. There is a need for the agency to implement sufficient internal controls for both financial and performance management. OVR has identified the need to purchase a new case management system to meet the growing needs of the agency.

Given the monitoring process was completed in September of 2021 and the report was just received, OVR has just begun the process of reviewing the plan and identifying needed corrective actions in response to the report. This will be a work in progress over the next several months.

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

OVR utilizes a multimodal approach to assessing the resources available to allow the agency to provide vocational rehabilitation services to all eligible individuals who apply, such as:

Population data related to disability incidence

Short and long—term budgetary outlook short and long—term staffing projections Comprehensive Needs Assessment

Waiting list for services

VR Counselor Caseload size and expenditures. SRC input Public Forum Input

The agency carefully analyzes information from these sources to predict its ability to provide quality services to eligible individuals with disabilities as required by the Rehabilitation Act of 1973 as Amended. OVR will continually monitor influencing factors to determine the need to close categories.

According to data from the 2019 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.8% of Kentucky civilians living in the community report having a disability. According to this resource, Kentucky's overall population is 4,384,951 people. Using the percentage in 2019 and applying it to the population numbers, there is an estimated 779,842 people in the state of Kentucky who have a disability. The overall rate of individuals with a disability in the United States is 12.7% for 2019. The rate in Kentucky is higher than the rate nationally by 5.1% . The percentage of residents of working age (18-64) in Kentucky who are employed is 32.8% for 2019. The national average was 38.8% in 2015. In this instance of employment, the rate in Kentucky is lower than the rate nationally.

In FFY 2020, 2021 and year to date FY 2022, agency staff along with fiscal and the State Council of Vocational Rehabilitation reviewed on a quarterly and often monthly basis data on numbers served and agency fiscal resources to determine the need to open or close categories. During FFY 2019 and year to date in 2020 budgets and fiscal resources were reviewed monthly by the agency Executive Leadership Team (ELT). Information was presented to the State Rehabilitation Council at each meeting.

B. THE JUSTIFICATION FOR THE ORDER

OVR utilizes a multimodal approach to assessing the resources available to allow the agency to provide vocational rehabilitation services to all eligible individuals who apply, such as:

Population data related to disability incidence

Short and long—term budgetary outlook short and Long—term staffing projections

Comprehensive Needs Assessment

Waiting list for services

VR Counselor Caseload size and expenditures.

SRC input Public Forum Input

The agency carefully analyzes information from these sources to predict its ability to provide quality services to eligible individuals with disabilities as required by the Rehabilitation Act of 1973 as Amended. OVR will continually monitor influencing factors to determine if individuals on the waitlist will be served in FY2020 and beyond.

According to data from the 2018 American Community Survey, published in the annual Compendium of Disability Statistics, 17.4% of Kentucky civilians living in the community report having a disability. This is higher than the national average of 12.7%). The employment rate for individuals with disabilities in Kentucky was 29.4%. In comparison the national rate for individuals with disabilities 18 – 64 years that were employed was 37%. Kentucky percentage of individuals who fall below the poverty line at 34%. (8% higher than the national rate of 26%). According to the Social Security Administration, in 2017, 19.7% of Kentuckians receive blind and disabled Supplemental Security Income benefits. The Institute for Community Inclusion (ICI), in 2016, reported the percentage of SSI recipients in Kentucky who were working was 2.9%. These statistics provide a description of the potentially high demand for OVR services based on the number of individuals in the state with disabilities.

In FFY 2019 and year to date FY 2020, agency staff along with fiscal and the State Council of Vocational Rehabilitation reviewed on a quarterly and often monthly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories. During FFY 2019, 2020 and year to date in 2021 budgets and fiscal resources were reviewed monthly by the agency Executive Leadership Team (ELT). Information was presented to the State Rehabilitation Council at each meeting.

Effective April 1, 2020 OVR opened all Priority Categories.

C. THE SERVICE AND OUTCOME GOALS

The numbers below outline the current service population numbers and costs. Service Numbers and costs for 2022 and 2023 and are estimated based on historical data and current numbers year to date from queries run in the Case Management System (CMS). Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post—employment services.

The estimated year end actual outcomes and costs are reflective of the program year for July 1, 2020, through June 30, 2021, in order to match the federal program year under WIOA for quarterly reporting. The following FY 2022—2023 estimates are based on a trend analysis of data from the previous years, adjusted to account for the current OOS and anticipated and historic changes in various environmental factors such as budget, personnel, etc.

The complexity of the COVID-19 pandemic on the workforce is not fully known. Employment is a struggle for all populations. If you are an individual with a disability the difficulty can be magnified. Individuals with disabilities are impacted by the lack of technology to learn or access services remotely. Many individuals with disabilities are at high risk due to different health conditions even with the availability of vaccinations. Public transportation has been interrupted or individuals do not feel safe accessing rides. Social distancing has created isolation, loneliness increasing the occurrence of mental health conditions.

OVR conducted a comparison of services metrics from 2019 through 2021 and identified the following trends. Cases served decreased by 18%. The number of individuals that were in job ready status decreased by 28%. OVR found that cases in training status stayed level and actually increased in 2020 which is reasonable given individuals could participate in remote learning in secondary settings. The number of successful closures for competitive integrated employment decreased by 21%.

FY 2022 SERVICE GOALS and OUTCOMES:

Priority Category I Active Cases GOAL: 16,478 Outcomes GOAL: 1,634 Priority Category 2 Active Cases GOAL: 2,523 Outcomes GOAL: 316 Priority Category 3 Active Cases GOAL: 1,123 Outcomes GOAL: 73

Priority Category 4 Active Cases GOAL: 6 Closed Outcomes GOAL: 2 TOTAL Active Cases GOAL: 20,220 Outcomes GOAL: 2,025

SERVICE COSTS ESTIMATE FY 2022: $18,456,148 *Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs.

FY 2023 SERVICE GOALS:

Priority Category I Active Cases GOAL: 18,842 Outcomes GOAL: 2,294

Priority Category 2 Active Cases GOAL: 2,747 Outcomes GOAL: 590

Priority Category 3 Active Cases GOAL: 1,383 Outcomes GOAL: 94

Priority Category 4 Active Cases GOAL: 6 Closed Outcomes GOAL: 4

TOTAL Active Cases GOAL: 22,978 Outcomes GOAL: 2,980

SERVICE COSTS ESTIMATE FY 2023: $20,973,559 * Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

FY 2022 YEAR END ESTIMATED OUTCOMES TIMEFRAMES

10/1/21 THROUGH 9/30/22 YEAR END ESTIMATED OUTCOMES

Priority Category One - # served 16,478 and 1,634 positive employment outcomes (2 years from application to closure)

Priority Category Two - # served 2,523 and 316 positive employment outcomes (3.5 - 4 years from application to closure)

Priority Category Three - # served 1,213 and 73 positive employment outcomes (4 - 4.5 years from application to closure).

Priority Category Four - #6 served and 2 positive employment outcomes (2 years and less from application to closure).

FY 2023 YEAR END ESTIMATED OUTCOMES TIMEFRAMES

10/1/22 through 9/30/23

Priority Category One - # served 18,842 and 2,294 positive employment outcomes (2 years from application to closure)

Priority Category Two - # served 2,747 and 590 positive employment outcomes (3.5 - 4 years from application to closure)

Priority Category Three - # served 1,383 and 94 positive employment outcomes (4.5 - 5 years from application to closure).

Priority Category Four = # served 6 and 2 positive employment outcomes (2 - 2.5 from application to closure)

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

Once eligibility is determined, the significance or non-significance of the disability must be established. As part of the eligibility decision, the counselor determines whether the individual has a physical or mental impairment or combination of impairments that seriously limit one or more functional capacities in terms of employment outcome. In order to be considered significantly disabled, an individual is expected to require multiple vocational rehabilitation Services one of which is assumed to be vocational rehabilitation counseling and guidance.

Presumption of Eligibility for Social Security Recipients and Beneficiaries means that an individual who has been determined eligible under Title I or Title XVI of the Social Security Act is:

Considered to be an individual with a significant disability; and Presumed to be eligible for vocational rehabilitation services under Title I (provided the individual intends to achieve an employment outcome consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual) unless the office can demonstrate by clear and convincing evidence that such individual is incapable of benefiting from vocational rehabilitation services in terms of employment outcome due to the severity of the disability of the individual.

If the Executive Director and State Rehabilitation Council determine that the agency lacks available funds and/or staff resources to serve all consumers, the office shall follow an order of selection to give priority for services according to a ranking of categories of consumers based on the severity of the disability. The Executive Director of the Office of Vocational Rehabilitation shall direct the order of selection by designating in written memorandum, the priority categories to be served.

Order of Selection will not use any of the following factors in determining eligible individuals Residency duration, type of disability; age, gender, race, color, or national origin, source of referral, type of expected employment outcome, need for specific services or anticipated cost of services, or the income level of the individual or its family.

The order of selection shall be implemented on a statewide basis.

The order of selection shall be implemented to assure that eligible individuals with the most significant disabilities are provided services before other eligible individuals.

The order of selection shall not affect: The acceptance of referrals and applicants; the provision of assessment services to determine whether an individual is eligible for vocational

rehabilitation services, and the individual's priority under the order of selection; services needed by any eligible individual who has begun to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post-employment services. The office will ensure that all funding arrangements for providing services under the State plan, including third-party arrangements and awards under the establishment authority, are consistent with the order of selection.

An eligible individual shall be immediately reclassified into a higher priority category whenever appropriate justification exists in the case record of the individual.

The office shall conduct an assessment to determine whether an individual is eligible for vocational rehabilitation services and the individual's priority under the order of selection. The VR Counselor determines the eligibility of the individual and their priority category based on a review of the data from the assessment.

In the order of selection each eligible individual within a closed priority category shall be placed on a waiting list until such time as the priority category is opened. The process for the waiting list is as follows:

Once an individual has been determined eligible within a closed priority category by the Vocational Rehabilitation Counselor the individual will receive notification through the counselor in writing of:

Their assignment to a particular category.

The priority categories currently being served.

Their right to appeal their category assignment and the availability of the Client Assistance Program (CAP); Information and referral services; and

They are given the option to be placed on a waiting list by date of application until such a time the priority category can be opened, and the individual employment plan can be developed and initiated.

The waiting list will be maintained by the Director of Field Services.

The waiting list will be reviewed quarterly by the Director of Field Services and Regional Managers.

Consumers will be contacted annually to inform them the status of Order of Selection and their specific priority category. Additional information (I & R) will be given. The consumer will be asked regarding their preference for remaining on the waiting list.

At the time when funds become adequate, and a priority category will be opened the following sequence of action will occur for those individuals in a closed category:

Priority Category Two (2) will be opened and individuals on the waiting list will be served by date of application. The office will assure that eligible individuals, who do not meet the order of selection criteria for the priority categories, shall have access to services provided through the information and referral system in accordance with the 1973 Rehabilitation Act. These services will include referral to other Federal and State programs including the statewide workforce investment programs. The process for this is as follows: The agency will provide the individual with a notice of referral; The notice will contain a point of contact for the program or service an individual is being referred to and; any relevant information regarding services for the individual relating to the preparation, securing, obtaining or retaining of employment; and documentation of the nature and scope of information and referral services provided will be included in the individual service record and entered in the Case Management System (CMS).

Individuals who are presumed to be significantly disabled because they receive SSA benefits will be further assessed to determine if they meet the agency's criteria for "individual with a most significant disability."

Consumers making the decision not to be placed on a waiting list after they receive notification of their priority category will be closed. They will receive notification from their VR Counselor that their case will close and of their right to appeal the agency's decision, including information on how to contact CAP. The notification will include information on how they may reapply for services in the future if their circumstances change or if the agency makes changes to order of selection.

When a request for services by an eligible individual is affected by the order of selection, the individual shall be immediately notified of such in writing and provided with information on procedures for individual rights for appeal, and how the Client Assistance Program may provide help in the process.

Quarterly, the Executive Director, State Rehabilitation Council and Executive Leadership Team along with fiscal staff will reevaluate the agency circumstances to determine whether or not the agency's resources are sufficient in serving all individuals or there is a need to implement, establish or make changes in order of Selection. At such time that the agency finds that it is able to serve those individuals in any closed priority category, that category will be re-opened. If the Agency finds that they have the resources to serve some individuals but not all individuals in a priority category the date of application will be utilized as a criterion for ranking individuals within a priority category. The timeline for this would be a year, unless the agency's financial situation should change drastically. Circumstances that would allow this to occur include a decrease in the number of referrals or other sources that would result in additional funds, which could be utilized to serve these individuals.

When a priority category is to be opened for services, the Executive Director shall issue an implementing memorandum to staff, with instructions that appropriate services delayed under the order of selection may be provided.

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

The State has not elected to serve eligible individuals regardless of any established 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

The Office of Vocational Rehabilitation is committed to the principle that individuals with the most significant disabilities (MSD), including those who have not traditionally experienced competitive integrated employment, are capable of engaging in employment in integrated settings. The agency and State Rehabilitation Council have agreed upon the goals and priorities in this section for Supported Employment. The goals and priorities in this section reflect the commitment of OVR to increase competitive integrated employment outcomes for individuals with most significant disabilities through supported employment.

Based on the information gathered and analyzed from the comprehensive statewide needs assessment conducted in FFY 2021, the Agency's performance, the monitoring report, real time data from the case management system, the Strategic planning process, process and other sources of information the following goals for the distribution of Title V, Part B Funds were

set. A review of the set goals and priorities will occur annually for any needed revisions for the State Plan.

OVR will distribute funding from Title VI, Part B through its established network of Supported Employment Providers. Yearly agreements are developed with each Supported Employment Provider. Fees—for—service and outcome fees, along with policies and procedures for each, have been developed and will be followed by each Provider. All services are monitored by the Community Rehabilitation Branch Staff, consisting of one Branch Manager and four Supported Employment Consultants. The CRP branch collaborates with the Program Policy and Support Grant Specialist staff and Cabinet legal staff. OVR, through the Community Rehabilitation Branch, will assure choice and quality services for its consumers served in supported employment by: 1) thoroughly reviewing all vendor applications for Supported Employment, 2) monitoring extended supports provided by each agency, 3) verifying the provider's ability to fund ongoing supports using funds other than VR, 4) conducting annual reviews of each vendor and 5) being available to consult with individuals, their families, service providers, and others using person—centered planning approaches.

OVR will seek to improve the competency of current and future service providers by:

1. Providing technical assistance and training for provider staff (through a contract with University of KY—Human Development Institute's Supported Employment Training Project).
2. Utilizing local teams (where appropriate) to evaluate services and plan for technical assistance.
3. Presenting Basics of Supported Employment regularly for agency staff orientation training (Skills Enhancement Training); and h. developing and keeping updated policy and procedural and CRP manuals on supported employment for staff via OVR docushare drive , and for Providers via Internet and other means.

Below are the goals for the program:

The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase the number of CRP's providing Supported Employment Services

Objective 1.1: Recruit more providers for supported employment for unserved and underserved areas.

Strategies:

1. Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.(2022)

2. Create Establishment Projects for to replicate the UPS Transitional Learning Center model and expansion of the IPS and Customized employment models to increase a network of services providers. (2022-2023)

3. Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute. (2023)

4. Hold outreach opportunities for potential providers. (2023)

5. Provide training on new polices related to customized employment, ISP and person-centered planning (2022-2023).

Measures:

Increase the number of providers by 5%.

Implementation of new service fees

Implementation of Establishment projects

Of Trainings Provided

Increase in the number of competitive integrated outcomes for individuals

Goal 2: Monitor Service Quality of Providers

Objective 2.1: Develop strategies for continuous quality improvement in collaboration with the Program Policy and Support Branch.

Strategies:

1. Ensure agency compliance to WIOA requirements of Section 511 (annually)

2. Ensure CRP compliance with the terms of their signed service agreements through annual audits and monitoring (annually).

Measures:

Annual Audits of Services

Corrective Action Plans

Scorecard

Goal 3: Seek alternative strategies for providing and funding extended Services

Objective 3.1: Provide another source of extended services is available so there will be no interruption of services for individuals with significant disabilities.

Strategies:

1. Seek input from staff and other stakeholders such as education, service providers and individuals with disabilities on extended services. (2022)

2. Identify potential strategies for the provision of services. (2023)

3. Identify potential funding sources. (2023)

4. Update the Supported Employment Service Fee Memorandum to include extended services to youth. (2022).

Measure:

Additional funding secured

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

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by-case basis dependent upon each individual's need for services.

OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities.

Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a "youth with a disability". OVR will work with providers to ensure another source of extended services is available so there will be no interruption of services for individuals with significant disabilities.

The Office will collaborate with the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) to expand supported employment options to unserved and underserved groups, as well as youth with most significant disabilities without delay.

1. Participation in Commissions established as a result of state legislation, including Commission on Services and Supports for Individuals with an Intellectual Disability and other Developmental Disabilities (HB 144); Commission on Services and Supports to People with Mental Illness and Dual Diagnoses (HB 843); and the Advisory Council on Autism Spectrum Disorders.
2. Development of partnerships with Kentucky Medicaid Waiver Programs (Supports for Community Living, Michelle P, Home and Community Based Waivers, and Acquired Brain Injury Waivers) so that these sources of extended support funding can be fully utilized; and
3. Utilization of interagency workgroups to develop better understanding and expand awareness of work incentives (such as in SCL Waiver, Social Security, etc.).
4. Developing and implementing the IPS Supported Employment programs for consumers with severe mental illness within the community mental health centers.

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.

The Office will seek to expand services to unserved and underserved counties as well as unserved and underserved disability groups, including youth with the most significant disabilities and will encourage continuous improvement in supported employment by monitoring the state fiscal climate for opportunities to partner with KY APSE (Association for Persons in Supporting Employment First) to advocate for increased state funding for extended services. OVR will continue to maximize existing dollars for extended services through collaborative agreements and contracts, increasing knowledge of Kentucky's plan for self—determination strategies, especially within the Medicaid Waiver (Supports for Community Living, Michelle P) programs, continuing partnerships with local Community Mental Health Centers, recruiting new Providers, provide training and technical assistance to new supported employment agencies, and providing consultation and technical assistance to OVR staff and providers as needed, researching better ways to fund and/or deliver services. Currently, meetings are ongoing with the Department of Behavioral Health and Developmental and intellectual Disabilities to strengthen the partnership by leveraging funding to expand IPS SE services in unserved areas, as well as exploring possibilities of implementing IPS services for individuals with intellectual disabilities, which would be one of the first endeavors for this evidenced based practice. For example, an enhanced fee for Vocational Profile development has been developed, piloting and expansion of new programs through Memorandums of Agreement (MOAs), and training providers in the use of strategies for individualized services specific to customized employment. Additionally, customized employment processes under the Marc Gold & Associates model have been incorporated into the current Service Fee structure. These processes consist of Planning Meeting, Visual Resume, Needs Analysis and Job Analysis.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

In order to provide some context to our analysis of the needs of individuals with disabilities, OVR followed the guidelines established for a Comprehensive Statewide Needs Assessment and the Vocational Rehabilitation Needs Assessment Guide established by the Rehabilitation Services Administration and The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, signed into law on July 22, 2014.

The goals and strategies listed in this plan were developed for the established goals and priorities with the input of the State Vocational Rehabilitation Council. The focus areas and goals are as follows:

Sound Fiscal Management

Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Staff Resources

Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

Center Operations

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Consumer Services

Goal 5 : Implement innovative practices to improve quality outcomes.

Public Awareness

Goal 6: Implement an ongoing, flexible marketing plan and process to improve public awareness of VR programs, services, and agency employment.

Supported Employment

Goal 1: Increase the number of CRP's providing Supported Employment Services

Goal 2: Monitor Service Quality of Providers

Goal 3: Seek alternative strategies for providing and funding Extended Services

Additionally, through quality assurance processes OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. Internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys,

Comprehensive Statewide Needs Assessment, the State's performance under the performance

accountability measures of section 116 of WIOA and the Strategic Planning Process.

Real time data is pulled and evaluated from the Web Intelligence system (WEBI) and Crystal Reports monthly or as needed (daily, weekly). The data is reviewed for positive or negative issues and trends in services, data integrity. Any issues that arise are addressed with staff as soon as possible.

Retain Kentucky is a U.S. Department of Labor grant focused on assisting individuals who have a non-work-related injury or illness continue to work. The Department of Workforce, Vocational Rehabilitation and other workforce partners administer the grant. Through immediate customized intervention and supports, RETAIN KY helps employers keep valuable staff, and helps employees keep their worker identify. OVR staff refer individuals to RETAIN and RETAIN staff refer individuals to OVR. All enrolled participants in RETAIN have support of a Return-to-Work Coordinator. This is a strategy OVR will use for individuals in work re-entry.

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 agency currently employs eleven Assistive Technology Specialists, one Vehicle Modification Specialist, one Accessibility Coordinator, two assistants, one branch manager who provide a full spectrum of Assistive Technology (AT) services throughout the Commonwealth. Six of the ten staff serve consumers who are blind and visually impaired. The agency is in the process of hiring one additional Assistive Technology Specialist. The AT Branch provides a comprehensive array of services including, but not limited to, the following: assessment, referral, and consultations on vehicle modifications, home modifications, workplace accommodations consultation, etc. The Accessibility Coordinator assists the agency with providing accessible documentation for employees, consumers, and the public. The availability of full- time staff allows the opportunity for the consumer to access these services during the assessment phase, during IPE development and implementation and in the job placement phase of the case.

The agency partners with the KATS Network, Kentucky AgrAbility and Protection and Advocacy to coordinate a statewide training on current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by OVR staff , AT professionals, educators, Occupational Therapists, Physical Therapists and other professionals that have in interest in, or contact with AT.

OVR administers the KATS Network, the Commonwealth's Assistive Technology program. The KATS Network coordinates a statewide network of organizations to enhance the availability of AT devices to individuals with disabilities of any age. There are 5 Regional AT Resource Centers. These sites provide services related to: Device Demonstration, AT Loan, AT Reutilization, Training and Technical Assistance, Public Assistance. The Agency employs a KATS coordinator and continues to seek opportunities for increased collaboration and growth among the network and OVR. The KATS Network will continue to promote the reuse and reutilization of assistive technology and durable medical equipment through CARAT (Coordinating and Assistive the Reuse of Assistive Technology, a project first funded by a grant through the Health Resource Services Administration (HRSA). The project has been extended to include the entire state.

Partners include the Kentucky Appalachian Rural Rehabilitation Network, Appalachian Regional Healthcare, and The Center for Excellence in Hazard, the University of Kentucky Physical Therapy Program, the Kentucky Appalachian Rural Rehabilitation Network (KARRN), the Carl D Perkins Vocational Training Center, Spalding University in Louisville, HDICATS in Lexington, and Lourdes Hospital in Paducah. The agency will continue to seek to expand its services by adding additional staff, continuing to partner with existing AT stakeholders, and increasing

professional awareness of assistive technology best practices through training and presentations.

Rehabilitation Counselors for the Blind (RCB) work with AT Specialists and the McDowell Center for the Blind's AT instructors to provide necessary assistive technology used by individuals who are blind or visually impaired, such as laptop computers, tablets, braille writers, pocket recorders for notetaking, closed-circuit televisions to magnify documents, hand- held magnifiers, and computer software including screen readers and magnification (ZoomText), speech (JAWS, Window Eyes) and Braille displays. AT Specialists work closely with employers to ensure that consumers have the tools and training necessary to perform jobs in a wide variety of settings, such as customer service call centers, law firms, universities, and utility companies.

The Office is also responsible for the administration of the Kentucky Assistive Technology Loan Corporation, as authorized by the AT Act. This program offers low interest loans for qualified applicants through its relationship with Fifth Third Bank. KATLC can provide loans for modified vehicles, hearing aids, adapted computers, mobility devices, augmentative communication devices or any other type of equipment or home modification that will improve the quality of life or increase the independence of Kentuckians with disabilities. The KATLC is available on a statewide basis to any qualified individual in need of AT services.

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

OVR is committed in its effort to build the capacity to effectively serve individuals with most significant disabilities who are minorities. OVR will provide vocational rehabilitation services to all individuals who have disabilities who are eligible for services regardless of gender, race, national origin, religion, color, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities to the same extent as it provides services to other significant populations or individuals.

In 2021, OVR created a diversity committee to address diversity and inclusion inequities within OVR. The OVR Diversity Committee team is made up of OVR staff, Office of Employer Apprenticeship Services (OEAS) and representation from the state Office of Diversity, Equity and Training and the State Employee Assistance. An agency-wide survey was distributed in September of 2021. OVR's main purpose is to lead the way in moving from a culture of talk to one of action. Representatives of ODET from the Personnel Board provide feedback and share their expertise to keep the committee focused and aware of state level initiatives. OEAS is taking the knowledge they are learning from OVR to bring back to their agency to replicate best practices. The committee created a strategic plan with the following goals to address this area:

Staff Diversity

Goal: Recruit, hire and retain a diverse and inclusive staff to provide high quality services to Kentuckians with Disabilities.

Objective 1: Increase recruitment and hiring to fill vacant positions with staff who are representative of the population we serve.

Objective 2: Increase staff retention to ensure continuity of high quality of services to Kentuckians with disabilities and to increase diversity at all agency levels.

Consumer Diversity

Goal: Ensure equitable service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

Objective 1: Develop a system to periodically review data regarding consumer diversity as well as policies, and practices that impact service provision.

Objective 2: Raise awareness of OVR services in underserved communities through targeted outreach.

Objective 3: Create a more welcoming and inclusive environment for all VR stakeholders.

The OVR Executive Director is a member of the CSAVR Diversity, Equity and Inclusion professional Network. This allows for OVR to participate in a national workgroup addressing racial disparities specific to the field of vocational rehabilitation.

Management and staff shall focus on the agency mission, which is competitive integrated employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minority and individuals with disabilities receive. OVR works to develop outreach activities to minorities to facilitate increased consumer referrals to the Agency. OVR encourages staff to get to know key community leaders and minority organizations to facilitate outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures. The Office encourages existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

The Office provides cultural diversity training to staff in order to develop a better

understanding of different cultures and value systems. Staff participates in the Governor's Equal Employment Opportunity Conference. Service demographic and population data is utilized to determine the number of minorities in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting minority populations. This will include usage of the "Language Line" that will enable our staff to communicate with non-English speaking applicants in their native language.

Individuals who are minorities have equal access to vocational rehabilitation services. OVR is committed in its effort to build the capacity to effectively service individuals with most significant disabilities who are minorities. OVR will provide vocational rehabilitation services to all individuals who have visual disabilities who are eligible for services regardless of gender, race, national origin, religion, color, sexual orientation, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities residing in the state to the same extent as it provides services to other significant populations or individuals residing in the state. The following outlines the actions in OVR's outreach plan for 2021 - 2022:

Management and staff shall focus on the agency mission, which is employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities.

Staff shall provide leadership in implementation of the Career Center Systems throughout the Commonwealth. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services than non-minorities and individuals with disabilities receive.

Recruit and hire Rehabilitation Counselors from minority and culturally diverse groups. Improve system linkages with the Department of Workforce in order to reach more minorities across the state. Collaboration with other entities will allow for effective coordination of services and referrals.

Integrate internal controls through quality assurance to identify areas where there is successful outreach and best practices and identify areas needing additional outreach.

Develop outreach activities to minorities to facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and minority organizations to facilitate outreach.

Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

Provide cultural diversity training to staff in order to develop a better understanding of different cultures and value systems.

Utilize service demographic and population data to determine the number of minorities in regions and develop strategies to increase percentages.

Encourage minorities to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

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)

In Kentucky there are 171 school districts consisting of 1,477 schools. There are a total number of approximately 26,000 students with IEPs that are potentially eligible in the state according to the Kentucky Department of Education. Currently, the Department of Education has no way to count the number of students with 504 plans or those who would qualify as a student with a disability that do not have an IEP or 504 plan. The number of students in private or home schools that would qualify as students with disabilities is also not readily available.

OVR will use a variety of methods to improve and expand VR services for students. As stated in this section internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, 107 Monitoring, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

As stated earlier in this section, OVR conducts a statewide comprehensive needs assessment in order to satisfy requirements in the Rehabilitation Act of 1973, as amended. The assessment has a component that identifies additional VR service needs of both students and youth. A part of the assessment is tailored to this population to identify emerging needs. Information gained through this process is then analyzed to develop conclusions and potential action strategies in serving this population.

OVR uses the strategic planning process as one of its methods to ensure the effective implementation of rehabilitation programs and services to this target population. Through quality assurance processes OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. OVR will utilize the case review process to Improve Professional Skills to review transition cases.

OVR continues to receive technical support from the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). A KY NTACT team has been formed to develop an Intensive Technical Assistance Plan to achieve goals related to data-sharing and quality transition services. This is collaborative effort between KY OVR and KY Department of Education and with other community partners providing services to transition age youth.

OVR created the Transition Services Branch in October 2020 to engage with and provide Pre-Employment Transition Services and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment. Pre-ETS Coordinators do not determine eligibility or develop IPEs. They only work with Potentially Eligible students.

This Branch will be responsible for:

Formulates, develops and interprets policies, standards and procedures.

Maintains a comprehensive knowledge of and assures that OVR adheres to all Federal and State Regulations, administrative rules and policies for transition and pre- employment transition services.

Assists in the evaluation of the effectiveness of agency transition policies and procedures.

Coordinates the activities of transition/Section 511.

Coordinates the activities of Pre – Employment Transition Services.

Facilitates the development and maintenance of agency fee schedules and cooperative agreements.

Collaborates regularly with partners by participating in workforce partner meetings, community rehabilitation, OVR team meetings, vendors/contractors and Department of Education staff.

Facilitates effective communication with the Executive Leadership, Field Services Management and field staff to assure the attainment of agency goals.

Represents the agency by participation and representation on Transition Related events and Councils.

The Transition Services Branch has the following goals for the next three years:

1. Develop and implement strategies to increase the number of students applying for VR service through engagement

2. Implement a system for approving new Pre-ETS provider to ensure high quality services are provided statewide.

3. Launch Pre-VR data system to facilitate referral and monitoring process

4. Develop a process to implement a data sharing agreement with partner agencies.

5. Identify underserved populations by partnering with community agencies and KDE.

6. Evaluate service efficacy through SWOT analyses.

7. Seek feedback from providers and OVR staff to facilitate continuous improvement

8. Build provider capacity.

OVR receives technical assistance from the NTACT: C to ensure that OVR is meeting RSA requirements. Transition Services Branch staff participate in webinars and communities of practice to learn about different ways to deliver services and complying with the latest guidance from NTACT: C.

The Transition Services Branch continues to refine ways to do outreach to identify more students, to ensure that providers are following established guidelines, and to ensure students receive high quality transition services. Technical assistance will be sought out from NTACT: as needed.

To assure the coordination of services to facilitate the transition students from school to postsecondary life (including the receipt of VR services, post-secondary education, competitive integrated employment, and Pre-Employment Transition Services) OVR utilizes the following process. The Pre-ETS Coordinator and VR Counselor is responsible for the schools located in their assigned region. Pre-ETS Coordinators and VR Counselor work with school staff and service providers to identify potentially eligible students assuring that they are given the opportunity to apply for services starting at age 14. While the student is enrolled in school, the Pre-ETS Coordinator and VR Counselor work with school staff to ensure that student receives the needed services to aid in the transition to post-secondary life. The Pre-ETS Coordinators will work with Potentially Eligible students who only require Pre-ETS. These Coordinators will monitor students' progress and will transfer the students to a VR Counselor for application when they require other VR services. The VR Counselor will then take applications, determine eligibility and determine appropriate services to help students achieve Competitive, Integrated Employment.

Services include but are not limited to

Pre-Employment Transition Services,

Other VR services and programming offered by OVR, and

Other services specific to transition aged students by school districts and other entities.

VR Counselors provide individualized services and where gaps in services are identified, staff work to developed new and innovative services in the students' home area to better serve this population.

As stated in other sections of the plan, OVR has representation and involvement in several organ izations and councils as follows:

OVR was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation.

OVR and Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post- secondary school and employment.

OVR has an draft agreement with the KDE for transition planning and service delivery for secondary students with disabilities.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

OVR continues to encourage CRP involvement as it relates to student and youth services through the implementation of Pre-Employment Transition Services, with a primary focus of Work Based Learning Experience services. In 2020, OVR had agreements with 32 CRPs for the implementation and provision of Pre-employment transition services.

OVR has a goal to create establishment projects for expansion of the IPS and Customized employment models to increase a network of services providers in the next two years. (2022-2023).

OVR has set the following goal area:

Goal 1: Increase the number of CRP's providing Supported Employment Services

Objective 1.1: Recruit more providers for supported employment for unserved and underserved areas.

Strategies:

1. Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.(2022)

2. Create Establishment Projects that replicate the UPS Transitional Learning Center model and for expansion of the IPS and Customized employment models to increase a network of services providers. (2022-2023)

3. Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute. (2023)

4. Hold outreach opportunities for potential providers. (2023)

5. Provide training on new polices related to customized employment, ISP and person-centered planning (2022-2023).

In 2019, the OVR implemented agreements with four CRPs to improve capacity and quality of Customized Supported Employment (CSE) services in Kentucky. This was a direct result of a needs assessment conducted by the OVR that indicated a need for customized employment services for individuals requiring supporting employment. There were only four CRPs in the state that had at least one Employment Specialist who had completed the required Certification process by the KY OVR to effectively provide Customized Supported Employment services. As a result, OVR increased CRP participation and the number of employment services provided CSE by 200%. Ongoing efforts continue in effort to assist in building capacity for this much needed service centered around customized employment.

A needs assessment survey was sent to OVR field staff in fall of 2021 in effort to identify current need for customized SE services throughout the state. As expected, the results illustrate an extensive need for CSE throughout the state. Eighty-five percent (85%) of the counselors polled, stated that they have a need for CSE in their area. Forty-six percent (46%) have identified at least 4 or more individuals on their caseload that could benefit from this service. Sixty-two percent (62%) state that CSE is not readily available to their consumers. Overall, this clearly illustrates that there are many job seekers throughout the state that need CSE services but do not have unrestricted access to it. In some areas, CSE may be available, but job seekers may spend long periods of time on a waiting list. In fall of 2021 there were only 11 CRPs statewide who participated in and completed some Marc Gold & Associates training gateways which allows a CRP to provide CSE in KY. CRPs across the state have provided feedback that training, and start-up costs are barriers to participation in this type of service.

All CRPs who specialize in customized employment must complete the Marc Gold & Associates training as provided by the University of Kentucky's Human Development Institute. This

training is made available through a long-standing contract between OVR and UK-HDI. Participants must complete 4 gateways: Social Role Valorization, Discovery, Job Development, and Systematic Instruction. All, but Social Role Valorization, offer certification opportunities.

OVR has a goal to create establishment projects for expansion of the IPS and Customized employment models to increase a network of services providers in the next two years. (2022-2023).

KY OVR works closely with the Department of Behavioral Health for the implementation and provision of Individual Placement and Support (IPS), an evidenced based model of supported employment for individuals with Serious Mental Illness (SMI) and substance abuse conditions. Currently, there are 18 CRP's that are credentialed to provide IPS, with at least 77 counties having access to this service. This is an increase of 3 counties over the prior year. The CRP Branch of the KY OVR continues to meet regularly with partners to ensure quality IPS services are readily available.

The OVR is an active partner of the statewide IPS Implementation Team that provides oversight of the development and implementation of IPS programs throughout the state. KY has been an active member of the International IPS Learning Community since 2010 and provides information to the community regarding effective strategies being utilized in KY that aides in the expansion and effectiveness of IPS. KY seeks to initiate innovative ideas, such as utilizing IPS for individuals with intellectual disabilities. This is not a common practice but has been utilized by other states. KY seeks to utilize this evidenced based model for individuals with intellectual disabilities and provide comparative data specific to other models to members of the learning collaborative. The DBH has been the primary partner in the development and implementation of IPS programs throughout the state. Additional funds to CRPs from this partner are limited, which has stifled the growth of IPS SE in KY. Therefore, the OVR seeks parallel DBHs long standing commitment by implementing Establishment Projects to further IPS expansion efforts.

A thorough review of existing and prospective agencies was conducted by OVR. OVR conducted several meetings with Department of Behavioral Health staff throughout the state to obtain information of existing agencies that have longitudinally strong relationships with DBH, and that also exemplifies high quality service delivery. The purpose of such a selection process is to increase the likelihood of success among programs. This process aided in the identification of potentially new and existing providers that could be used in expanding IPS to those in unserved or underserved areas, as well as provide an evidenced based model of IPS SE to individuals with intellectual disabilities. Voices of Hope was an agency that was mentioned by multiple experts, on separate occasions, for the expansion of IPS to single mothers with serious mental illness and/or substance use concerns. Life Skills was identified as a high-quality provider that could be used to expand IPS in to unserved or underserved areas. Communicare, Inc. and Build Inclusion are providers that were identified as high-quality providers that serve individuals with intellectual disabilities. The agencies successes in serving the ID population are the basis for their selection. The OVR followed up with the KY IPS Implementation Team for discussion and approval. Finals steps included presenting information the OVR Executive Leadership Team for discussion and approval.

It is intended to discontinue contractual agreements specific to IPS expansion after year 4, with the expectation that each CRP will be sustainable. Year one of the agreement would be July 2022 to June 2023, with plans to continue yearly until completion of the project which would be June 2026.

The primary purpose of this project is to expand the evidence-based model of IPS SE throughout this 4-year period to the greatest extent possible to individuals who do not have access to this type of service. Currently, IPS is in 70 of the 120 counties in KY and it's the goal of VR and the IPS Implementation Team to strive to make IPS SE available in all 120 counties as well as other

disability groups. Information gathered will be compiled and shared nationally with members of the IPS International Learning Community. Specifically, the goal of implementing IPS SE to individuals with intellectual disabilities is of great importance.

The KY OVR revamped the Supported Employment Service Fee Memorandum (SFM) payment structure to CRP's, which included outcome payments that extended to 90 days. More specifically, it included increased payments to CRP's when outcomes of stable employment were achieved for 30, 60 and 90 days. This change was implemented for all models of supported employment. OVR also made changes to the SFM to incorporate specific processes related to customized employment.

Another potential area for expansion would be the establishment of pilot projects in other areas of the staff that replicate the transitional learning center at UPS Worldport to expand competitive integrated employment opportunities for individuals. UPS Worldport is the worldwide air hub for the United Parcel Service.

State Owned Rehabilitation Centers

The Charles W. McDowell and Carl D. Perkins Vocational Training Centers are the State-owned and operated comprehensive rehabilitation centers in Kentucky, a community rehabilitation program providing necessary vocational rehabilitation services to individuals with disabilities. In order to keep the center operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State. " Master Agreements are in place for scheduled routine maintenance and inspection of the facility.

The Carl D. Perkins Vocational Center, located in the rural Eastern Appalachian region, and the Charles W. McDowell Center for the Blind, in Louisville are the State-owned and operated comprehensive rehabilitation centers in Kentucky providing necessary vocational rehabilitation services to individuals with disabilities. The centers provide supports, training, and resources to the most unserved and underserved populations in Kentucky to maximize their opportunities to obtain competitive integrated employment. The centers serve individuals, largely from rural areas of the state, with significant, complex or multiple disabilities such as sensory impairments, criminal justice backgrounds and mental illness.

OVR has put in place the following Goal areas for Center Operations to address the needs identified in the CSNA.

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Objective: 4:1 Upgrade building facilities to provide a safe and accessible environment

Objective 4.2: Increase capacity to offer statewide services that increase competitive, integrated employment outcomes.

Objective 4.3: Maximize job readiness training and work experience opportunities.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

Kentucky is committed to gathering the collective data required under section 116 of WIOA for all the core partners. WIOA Section 116 (b) (2) (A) and its implementing regulations 34 CFR 361.155 (a) (1) establish the six primary indicators of performance. They are as follows:

Employment Rate in the 2nd Quarter After Exit

Employment Rate in the 4th Quarter After Exit

Median Earnings in the 2nd Quarter After Exit

Credential Attainment rate

Measurable Skill gains (MSG) Rate

Effectiveness in Serving Employers (Statewide)

Kentucky Center for Statistics (KYSTATS) and state agencies work with the Kentucky Workforce Investment board to ensure required reports for the performance accountability are completed to the best of the state's ability. KYSTATS collects and integrates education and workforce data so that policymakers, practitioners and the public can make the best-informed decisions possible.

Kentucky assesses the overall effectiveness of the workforce investment system in relation to the strategic vision and goals of the KWIB and information from all the core programs. The ultimate goal is to increase the long—term employment outcomes for individuals seeking services, especially those with barriers to employment, to improve services to employers and demonstrate continuous improvement. Kentucky will assess the effectiveness, physical and programmatic accessibility in accordance with Section 188 and the Americans with Disabilities Act of 1990 (42U.S.C. 12101 et seq.), and continuous improvement of the career center.

Kentucky has a certification process in place to ensure that KCC offices are ready to serve all qualified persons in the regional and local areas as expected. The certification policy is fundamental to aligning programs, policies and activities in the workforce system. Workforce agencies and partners are engaged in this assessment and continuous high—quality improvements to ensure that all related activities are being coordinated in a way that allows partners to review relevant information and take action to improve the system.

KYSTATS works with all relevant state agencies to integrate data storage activities which, hitherto, were being carried out separately. This ensures that data about all persons seeking services from any of the core programs are captured and matched so as to avoid duplication of service delivery.

Storing all WIOA—related data in a common data warehouse will enhance data retrieval and analysis, which will help KCC to efficiently assess the quality of our workforce service providers. Kentucky will review data to track provider success in meeting the targets in the following areas:

learning gains;

entry into employment in required quarters;

obtaining a secondary credential and enrollment into post—secondary or training; obtaining a secondary credential and gaining employment;

and gaining a post—secondary credential.

Having all core programs' data integrated will enable service providers to conduct regular audits to determine which program service providers are challenged in meeting targets and in need of technical assistance beyond the standard leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

KYSTATS and state agencies will continue to work with KWIB to ensure required reports for the

performance accountability are completed to the best of the state's ability. KYSTATS has a variety of tools on their website to access. OVR staff had a training on the various tools surrounding Labor Market information, Career explorer and the Family Resource Simulator.

Currently, in Kentucky the work continues to identify a plan for collecting, tracking, measuring and reporting data from the workforce partners. This requires substantial work on several levels prior to the development and implementation of a system to capture the data. Changes under WIOA have required significant modifications in the current manner that data is collected. This is further complicated by the fact that the workforce partners use different systems and tracking mechanisms.

The current Kentucky OVR VR Case Management System (CMS); a web-based system used to collect required data, enforce workflow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology - a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

The current CMS system is approaching its useful life expectancy and upgrades to the current system as well as the purchase or licensing of other systems that would meet both the needs of the agency and those of common measure reporting. OVR is in process of procurement of a new system. OVR and the partners access to a Customer Relationship Management system via the SalesForce application.

As already stated, Kentucky is committed to acquiring systems that gathers the collective data required under section 116 of WIOA for all the core partners. Currently, Kentucky is in process of the procurement of a system that will collect, track, measure and report data needed under section 116 of WIOA. Currently, the workforce partners use different systems and tracking mechanisms. OVR is in process of procuring a new system. The new system(s) should allow OVR to have paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity.

In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. The current system has allowed for us to collect the necessary data and produce accurate reports for the Rehabilitation Services Administration and common measures reporting.

OVR is seeking Technical Assistance from the VRTAC-QE for employment and the VRTAC-QM for quality management. OVR has established the following goals that includes strategies that address OVR's performance on the WIOA accountability measures.

The RSA team has reviewed with Kentucky the quarterly data dashboards as well the comparative Performance for PY 2020. For the Median Earnings PY 20 OVR is in the 1st Quartile at $5,540. OVR is in the 4th Quartile for the 2nd Quarter Employment rate at 25.8% the 4th quarter Employment Rate at 23.0% and Credential Attainment Rate at 13.2%. For Measurable Skill Gains for PY20, OVR is in the 3rd Quartile at 35.6%.

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Center Operations

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Consumer Services

Goal 5 : Implement innovative practices to improve quality outcomes.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

The Kentucky Workforce Investment Board serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and to adopt a plan to move Kentucky forward through workforce and training and development.

The OVR Executive Director is appointed to serve on the KWIB representing vocational rehabilitation. By serving on the board the Executive Director can work collaboratively with other workforce partners in ensuring Kentucky's Workforce system is inclusive and accessible to individuals with disabilities in the Commonwealth.

The Executive Director and management staff participated in stakeholder State Plan meetings across the state to develop strategies for the combined section of the 2022 Kentucky State Plan.

The Department of Workforce Investment has established reciprocal referral services which allow for more efficient services to individuals with disabilities.

The Central Office administrative functions for workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners. The Workforce Development Leadership team meets bimonthly to cover pertinent issues within the department.

The office participates in the ten Workforce local boards throughout the state as well as serving on different committees of those boards. All five of the core partners are represented on the team. Kentucky strategies have and will continue to support WIOA's focus on low-income adults and youth who have limited skills, lack work experience, and face other barriers to economic success. Vocational Rehabilitation is a full and actively engaged partner in Kentucky in the workforce system. OVR is actively engaged in the planning process, on committees and staff serves as project directors on some of the KWIB initiatives. They are advocates in the workforce system for individuals with disabilities.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

OVR followed the guidelines established for a Comprehensive Statewide Needs Assessment and the Vocational Rehabilitation Needs Assessment Guide established by the Rehabilitation Services Administration and The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, signed into law on July 22, 2014. As specified by the guidelines, a number of data sources were used for this report. In order to provide some context to our analysis of the needs of blind and visually impaired Kentucky residents, this CSNA also examines a number of statistics and estimates provided at the state and national levels.

Based on the information gathered and analyzed from the comprehensive statewide needs assessment conducted in FFY 2021, the Agency's performance, the monitoring offsite visit and draft report, stakeholder meetings with workforce partners, RSA data dashboards and comparative studies, real time data from the case management system, the Strategic Planning process and other sources of information. OVR set specific strategies for the priority areas of 1) Financial Management, 2) Quality Assurance, 3) Consumer, 4) Center Operations, 5) Staff Resources, 6) Public Awareness and for the area of Supported Employment.

OVR will follow the process as outlined in this section in monitoring the progress of carrying out the strategies set for the state goals and priorities in this state plan. Goals are assigned to an OVR Administrator or work group to assure that each strategy action step is carried out and goals are met. The designated staff person or work group will report quarterly on a grid for each goal strategy. A quarterly report will be compiled of the results of the steps taken in

meeting the set goals and reviewed by the OVR Executive Leadership Team and State Rehabilitation Council. The Council through its committees and the Executive Leadership Team will quarterly review the summarized reports monitoring the agencies performance in meeting the State Plan Goals and Priorities.

Additionally, through quality assurance processes OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. Internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys,

Comprehensive Statewide Needs Assessment, the State's performance under the performance

accountability measures of section 116 of WIOA and the Strategic Planning Process.

Real time data is pulled and evaluated from the Web Intelligence system (WEBI) and Crystal Reports monthly or as needed (daily, weekly). The data is reviewed for positive or negative issues and trends in services, data integrity. Any issues that arise are addressed with staff as soon as possible.

The strategies are outlined below:

Conduct a risk analysis and identify needed procedures for internal controls. (2022)

OVR staff work closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements. (2022)

Develop needed policies and procedures. (2022)

Initial training of staff on established policies and procedures (2022-2023)

Dedicated staff are assigned to quality assurance monitoring over the internal control processes. (2022-2023)

Development of a quality assurance plan. (2022)

Metrics are established for internal control processes (2022)

Identify an agency standard of accessibility. (2022)

Develop a structure to maintain, update, and review policy and procedures. (2022)

Train staff on process for policy and procedure. (2022-2023)

Implement a consistent development and review process to inform management and performance. (2022-2023)

Obtain input of leadership and management to identify outcome data needs. (2022-2023)

Designate staff to develop a strong data process. (2022)

Partner with internal and external stakeholders in education and workforce data sources. (2022-2023).

Acquire updated technology. (2022)

Purchase and implementation of a new case management system (2022- 2024)

Provide staff training in the latest technology (2023).

Ensure staff use accessible forms and documents (2022 – 2023)

Designate staff responsible for creating forms that meet accessibility standards. (2022)

Policies and procedures are in place for compliance. (2023)

Train staff on accessibility and compliance. (2023)

Develop a formal plan for ongoing regular maintenance (2022).

Follow and adhere to all state and federal processes for prior approval and purchasing. (2022-2023).

Implement approved projects in the established Capital plan in a timely manner. (2022-2024)

Conduct a cost benefit analysis to inform decisions (2023-2024).

Develop and implement a plan to ensure adequate resources for the learning format expansion. (2022)

Address hardware, software, and connectivity access barriers (2023)

Expand learning formats to include a variety of online and hybrid programs (2022- 2023).

Centers will increase outreach efforts to all 120 counties in the state. (2023).

Establish relationships to provide work-based experiences at the Perkins Center. (2022-2023).

Expand job readiness training and work experience opportunities at the McDowell Center (2022-2023).

Incorporate vendor recruitment as a part of the marketing plan (2023)

Train staff on new vendor processes for vetting and credentialing (2022)

Recruit new vendors for increased consumer choice. (2022-2023)

Maintain a strong application/recruitment/retention vendor process (2022- 2023).

Develop a list and expand the list of agency-approved vendors. (2022)

Develop a plan for consumers to have access to technology and virtual services. (2022)

Counselors will place an emphasis on informed choice in the guidance and counseling process. (2023)

Training of staff on informed choice (2023)

Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors. (2023)

Increase work-based learning opportunities in targeted sectors. (2023)

Train staff using career pathways strategy guides.(2022)

Expand types of employment placements into higher paying, lower turnover jobs. (2023)

Increase use of Labor Market Information in employment goal development through guidance and counseling. (2022)

Increase consumer engagement in the VR process through guidance and counseling. (2023)

Implement policies and procedures that guide the implementation of the career pathway approach through team-based, early intervention strategies. (2023)

Add measures to the counselor performance evaluation to reflect expectations. (2023)

Create a marketing plan for consumers and vendors (2022)

Develop marketing materials that reflect current information and are engaging and in accessible formats. (2023-2024)

Marketing materials are made available to staff and consumers. (2023-2024).

Identify a staff liaison to work with Cabinet and Personnel Cabinet on issues related to talent recruitment. (2022)

Expand the quantity and types of internship programs with university programs. (2023)

Develop and implement and internship agreement. (2022)

Leverage social media as a tool for recruitment. (2023)

Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.(2022)

Create Establishment Projects for expansion of the IPS and Customized employment models to increase a network of services providers. (2022-2023)

Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute. (2023)

Hold outreach opportunities for potential providers. (2023)

Provide training on new polices related to customized employment, ISP and person-centered planning (2022-2023).

Ensure agency compliance to WIOA requirements of Section 511 (annually)

Ensure CRP compliance with the terms of their signed service agreements through annual audits and monitoring (annually).

Seek input from staff and other stakeholders such as education, service providers and individuals with disabilities on extended services. (2022)

Identify potential strategies for the provision of services. (2023)

Identify potential funding sources. (2023)

Update the Supported Employment Service Fee Memorandum to include extended services to youth. (2022).

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

OVR will use innovation and expansion funds to support the following activities: To support the Statewide Council for Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction; the Annual Report of the council and the comprehensive statewide needs assessment. OVR currently provides funding in the amount of $65,000 annually in support of the Statewide Independent Living Council (SILC). Currently there is proposed legislation that would appoint the Department of Workforce, Office of Vocational Rehabilitation as the administrator of the Employment First Initiative as well as the Advisory Council attached to that project.

Other activities are:

It is anticipated the tasks identified in the current plan would provide expansion and innovation related to Supported Employment and the state owned and operated facilities and public community rehabilitation programs.

The plan will also focus on innovation related to counselor training, staff recruitment, and quality assurance.

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.

OVR has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age. The agency takes into consideration the needs of staff in correlation to the service needs of individuals with disabilities in Kentucky specifically for: Individuals with the most significant disabilities, including the need for supported employment services; and individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program. We will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101—336, and applicable federal regulations relating to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the US Department of Labor Final Rule on Federal Executive Order 11246.

In 2021, OVR created a diversity committee to address diversity and inclusion inequities within OVR. The OVR Diversity Committee team is made up of OVR staff, Office of Employer Apprenticeship Services (OEAS) and representation from the state Office of Diversity, Equity and Training and the State Employee Assistance. An agency-wide survey was distributed in September of 2021. OVR's main purpose is to lead the way in moving from a culture of talk to one of action. Representatives of ODET from the Personnel Board provide feedback and share their expertise to keep the committee focused and aware of state level initiatives. OEAS is taking the knowledge they are learning from OVR to bring back to their agency to replicate best practices.

OVR has an accessibility workgroup that focuses on ensuring all materials and electronic communications are accessible to VR participants. Information is provided to individuals participating in services in their preferred language. OVR is committed to assuring that all individuals with disabilities have equal access to participate in services using the provision of reasonable accomodations and assistive technology and other available auxiliary aids and services.

The OVR Executive Director is a member of the CSAVR Diversity, Equity and Inclusion professional Network. This allows for OVR to participate in a national workgroup addressing racial disparities specific to the field of vocational rehabilitation.

Office of Vocational Rehabilitation is committed to a policy of equal opportunity to all qualified applicants without regard to race, color, national origin, gender, age or disability. OVR encourages applications for employment from persons who are members of groups that have been traditionally underrepresented in the workplace such as members of racial or ethnic minority groups, women, and those with disabilities. There is an explicit commitment to assuring equal access for all communications through outreach, media contact of any form inclusive of social media, websites, online learning or flyers, and other announcements or correspondence under the project.

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

Priority I: Develop and implement strategies to improve OVR's performance on the required accountability measures under section 116 of WIOA.

Priority II: Provide excellent customer service and maintain collaborative working relationships with the WIOA partners in the Career Centers.

Priority III. Provide supported employment services that lead to competitive integrated employment and improve the number of successful outcomes for supported employment cases across the state.

Goal 1: Recruit, employ, retain the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective 1.1: Examine staff patterns and service capacity in order to effectively deliver quality vocational rehabilitation services.

Strategies: Identify crucial positions to be filled with qualified candidates Strategies: Staff Utilize sector strategies regional, industry—focused approaches to building skilled workforces that result in job opportunities for all workers across a range of industries

Measure: Increase staff retention rates

Measure: Crucial positions identified are filled with qualified candidates

Objective 1.2: Training and mentorship opportunities to facilitate advancement to prevent gaps in services

Measure: Programs are developed for all class specifications.

Objective: 1.3 Increase salaries as a method to address employee retention

Measure: Increase staff retention rates by 5%

Progress: A process is in place to review all requests to fill positions and a tracking mechanism is utilized to track the position request from its initial posting through the entire personnel position. Executive Leadership members along the with Human Resources at a Cabinet Level submitted a plan to State Personnel for salary increases. At the writing of this plan, there is no formal approval of the plan. OVR staff are reviewing job classifications for the VR series and request an increase in the in-range hiring for applicants. The job specifications were changed to broaden the scope of allowable degrees given that many candidates that apply do not qualify for positions given how stringent the specifications of the job are written. Turnover rates for all organizational units within OVR in 2020 ranged from 15.38% to 44.44% and we expect turnover rates for 2021 to be equal to the 2020 rates or higher. OVR has found it increasingly difficult to retain current employees, the majority of whom are in positions that have specialized education and skill requirements, due to significantly higher recruitment salaries offered by other employers. The higher recruitment salaries offered by other employers have also resulted in OVR being unable to attract new talent. Due to the resulting low staffing level, caseload weights are exceptionally high, which impacts services to consumers. There were changes made to the entry level salary managers can offer candidates. Currently, there is consistency in candidates turning down the entry level wage as well as an offer of 10% above the entry level refusing the offer of employment. This has however created inequity in salaries across the agency. The Kentucky Center for Economic Policy recently released a report regarding the state workforce crisis. OVR is struggling to hire and retain employees and the COVID -19 Pandemic has contributed to the severity of the issue.

Goal 2: Develop and implement training that adequately address the needs of staff under WIOA and changes to policies and procedures under the combined agency.

Objective 2.1: Assess the training needs of staff as they apply to combined policies and procedures and WIOA.

Measure: Needs Assessment completed

Objective 2.2: Develop and deliver identified training to staff that aligns with a shared vision and mission of the combined agency.

Strategies: Assess the training needs of staff as they apply to combined policies and procedures and WIOA. Measures: needs assessment completed of staff training delivered on WIOA of staff training delivered relating to policies and procedures

Measure: Staff trained on WIOA

Measure: Staff training on policies and procedures

Progress: A training needs assessment survey was conducted in June of 2019 and the results were analyzed for trends. Staff receive resources on an ongoing basis regarding training opportunities weekly. As a result of the reorganization a new employee training was held to address concerns of the Rehabilitation Counselors for the Blind. A statewide common measures training was held in October of 2019 that included policies established for common measures. Ethics and social media training were conducted as well as a variety of zoom trainings on policy. New employees are mandated to attend a face-to-face training for onboarding. As part of the orientation process, the agency utilizes subject matter experts from within the agency to deliver the training. The subject matter experts include the Division of Field Services Director, Division of Field Services Assistant Directors, Division of Field Services Regional Managers, Employer Services Branch Manager, Assessment Technology Branch Manager, Social Security Administrator and members of the counselor mentoring program. The topics covered are: the agency mission, philosophy, values, federal and state laws, appropriations, budget, eligibility, assessment, vocational goal development, plan development, pre-employment transition services, community based work transition services, confidentiality and ethics, supported employment, assistive technology (based on the Assistive Technology Act of 1998), diversity, disability awareness, Social Security Administration (SSA), Ticket to Work, Workforce Investment Opportunities Act (WIOA) specific disabilities. Training programs for all staff emphasize informed consumer choice and maximizing consumer direction of individualized rehabilitation plans. Information regarding to current research is disseminated to all staff via email and formal training opportunities. This training occurred during the calendar year for new hires. In June 2020 the agency was selected to participate in the Center for Innovative Training in Vocational Rehabilitation (CIT-VR) along with nine other state agencies. Through this program the staff have been participants in training developed through CIT-VR and their partnership programs such as VR Development Group and San Diego State University Interworks. In 2022 the Interworks program will have completed an individualized training program for Kentucky OVR. This development has been a work in progress for 5 months. OVR distributes available training resources that are applicable to partners in the workforce system.

Goal 3: Develop the policy and procedures manual, Service Fee Memorandums, and other written materials to be concise, accurate, and accessible in order to support staff, eliminate confusion, and improve the function of the combined agency.

Objective 3.1.: Ensure the provision of consistent and quality services for individuals with disabilities in the Commonwealth.

Strategies: Assign staff to specific work teams Strategies: Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

Measure: Completion of the combined policies and procedures manual

Measure: Revision and Implementation of Service Fee Memorandums Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

Measure: Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures. All materials produced in accessible formats

Objective 3.2: Develop operations manual

Measure: Completed, staff trained and manual distributed.

Progress: This goal was set as a result of the Reorganization and the combining of the blind and general agency in 2018. Completion of the manual occurred. All performance plans for Counselors have been updated to reflect goals for common measures. Service Fee Memorandum revisions and updates have occurred to reflect the combined agency but there is still work to be done in this area. An administrative operations manual to assure OVR has sufficient internal controls has not been completed.

Goal 4: Effectively utilize staff and fiscal resources in order to provide statewide services to all eligible consumers and increase competitive integrated employment outcomes.

Objective 4.1: Effective and efficient fiscal operations Measure: Elimination of the waiting list by category Measure: Serve open categories keeping with the OOS policy Measure Open categories under Order of Selection

Measure: Operating budget

Measure: Accurate and timely reporting.

Objective 4.2: Maximize effectiveness of the Employer Services Branch Measure: Mission Clarification

Measure Implementation of Quality Controls

Measure: Services available in every county of the state Objective 4.3: Expedite services in order to increase outcomes

Strategies: Counselors will address and distribute a Benefits Planning Fact Sheet, developed by the SSA Coordinator for Vocational Rehabilitation, for eligible consumers, especially during discussion of the Individualized Plan for Employment (IPE).

Strategies: Provide instruction in self—advocacy, benefits planning, and financial readiness at Carl D. Perkins Vocational Training Center (CDPVTC) and Charles W. McDowell Center Strategies: Participate in the Kentucky Career Center Business Service Teams and make business contacts statewide.

Strategies: Collaborate with the Coalition for Workforce Diversity in Louisville and explore expanding the model statewide.

Measure: Average time between eligibility and plan reduction of 10%

Measure: All applicants who receive SSA benefits will receive information on benefits planning and at least 50% of them will receive a benefits analysis.

Progress: Fiscal staff assigned to OVR operations are new to their positions (length of service under six months). Technical support was requested from RSA, and this is ongoing as well technical assistance from the Quality Technical Assistance Center. The Quality Technical Assistance Center team provided a training for Executive Leadership and managers on documenting reasonable and allowable expenditures. DB101 (an online tool for Social Security and SSI Disability beneficiaries) has been purchased and staff as well as community partners have been trained in its use. This online resource can be utilized by anyone including

the consumer's assists with benefits planning. The agency provides benefits and financial planning to consumers through a fee-for-service or in-house through statewide contracts. VR counselors can refer directly to their local WIPA or (if not eligible) they can refer to the contracted in-house services. In-house services are highly encouraged or the fee-for- service since they are not held to any time constraints with a greater emphasis on financial planning and follow-up. OVR has conducted presentations to Community Rehabilitation Programs (CRPs) and non-profit providers to consider providing benefits planning services. The agency is encouraging the CRPs and non-profit providers to participate in "Introduction to Social Security Disability Benefits, Work Incentives, and Employment Support Programs" offered by Virginia Commonwealth University (VCU) in hopes that some staff might become interested in pursuing certification to provide those services.

OVR has all four priority categories open.

The KATLC website offers online financial education and empowerment resources for consumers. The agency also seeks to partner with other entities to promote and expand financial empowerment activities for individuals with disabilities. The agency is partnering with Louisville Metro Government, Kentucky Coalition against Domestic Violence, and Bank on Louisville. The agency also collaborates with the Kentucky Career Centers to provide financial education as appropriate.

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES).The OVR Employer Services Branch is dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This enables the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expand direct employer interaction statewide with the business services teams.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The following factors impeded the achievement of the Goals and priorities.

OVR had a decrease in the number of individuals applying for services. Over the past three years individuals determined eligible for OVR services often did not remain engaged through the entire VR process.

Issues related to inaccurate data reporting. Timely and accurate entry of the required data fields in the case management system by staff remains an ongoing training issue. OVR is in process of procuring and replacing its current legacy system. The new system although it won't solve the issue completely will assist with more efficient and accurate data reporting.

OVR faced challenges in the recruitment, hiring and retention of qualified professional staff. OVR is experiencing high turnover rates that effect VR service delivery. There is a lot of stress for hiring managers that are investing a lot of the time covering vacant positions and training new employees. This is an issue that impacts consumers receiving services as well.

The combining of the two agencies into a combined agency in 2018 had an impact on the achievement of the goals and priorities for the current state plan. As with any merger or reorganization there is major work associated with the combining of policies, procedural operations. The process is good in many respects because agencies must closely examine operations, and this bring about change that often benefits the organization. Change on this level also brings resistance from staff and requires adjustment on the part of the organization's employees. Over the past two years, OVR made progress in this area; however, the impacts of

COVID during the second half of 2020 until the present time have created other barriers that have impeded the accomplishment of goals.

Given there also two reorganizations of the fiscal operations in Kentucky in the past 3 years, turnover increased and this has had a major impact on OVR's ability to complete federal reports in a timely manner. Turnover created the loss of veteran knowledge creating an environment where staff have needed training on every aspect of the VR program.

In August of 2020, there was an additional reorganization for the Education and Workforce Development Cabinet that shifted the unemployment insurance and other workforce programs to the Labor Cabinet that had an affect on operations. At this time there is a planned reorganization of the Education and Workforce Development Cabinet and the Labor Cabinet that would combine the two Cabinets into the Labor and Education Cabinet.

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

Goal 1: Improve efficiency and effectiveness of CRP services

Objective 1.1 Increase the number of CRP's providing Supported Employment Services

Strategies: Recruit more providers for supported employment by holding outreach opportunities for potential providers and support providers for unserved and underserved areas.

Measure: Increase in the number of providers (5%)

Objective 2.1: Improve monitoring and exploration of additional strategies to improve CRP service quality and compliance

Strategies: Involve job coaches with transition students by the last semester of school.

Strategies: Train staff on new policies related to customized employment and person—centered planning.

Strategies: Require notes to be submitted by Supported Employment Providers by the 5th day of each month.

Strategies: Continued monitoring by the Section 511 Implementation Team to ensure agency compliance to WIOA requirements related to OVR relationships with sheltered workshops.

Measure: Scorecard

Objective 3.1: Seek alternative strategies for providing and funding Long Term Support Services.

Strategies: Gather input from staff, education partners, and service providers, individuals with disabilities, their families and other stakeholders.

Measure: Two alternative strategies implemented by 2021.

Progress:

Four additional providers expanded services to include Customized Supported Employment via contract opportunities. There are now 93 CRPs throughout Kentucky that provide SE services. The increase in the number of SE providers, although small is still significant given the impact of COVID-19.

The team explored the development and implementation of a CRP Qualitative Assessment scale. The CRP Qualitative Survey was distributed in October of 2020. Staff conduct ongoing education and collaboration with the Department of Behavioral Health to access Medicaid Waiver Programs.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

At the beginning of 2018, Kentucky went through a merger of the two VR agencies. As with any merger or reorganization there is major work associated with the combining of policies, procedural operations. The process was good in many respects because OVR has had to closely examine operations that benefited the organization. However, change on any level brings resistance from staff. During this time staff were required to make adjustments and this was difficult for many of them. The COVID -19 pandemic has impacted the delivery of services for this area. Many individuals chose to shelter at home during the early onset of the pandemic when vaccinations were not available and that has continued to be the mindset of some individuals. From March 17, 2020, until June 11, 2021, OVR staff worked remotely at home as an alternate location. At first, for some staff technology was an issue slowing processes for service delivery. OVR leadership and management worked hard to solve issues surrounding remote service delivery. Individuals with disabilities have historically been underrepresented in the workforce and the pandemic has exacerbated the issues surrounding employment. Community Rehabilitation Providers experienced staff shortages and high turnover during the time people. A lack of referrals for the providers impacted their line item budgets and funding. In Kentucky there were some providers that stopped providing supported employment due to budget issues.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

WIOA Section 116 (b) (2) (A) and its implementing regulations 34 CFR 361.155 (a) (1) establish the six primary indicators of performance. They are as follows:

Employment Rate in the 2nd Quarter After Exit

Employment Rate in the 4th Quarter After Exit

Median Earnings in the 2nd Quarter After Exit

Credential Attainment rate

Measurable Skill gains (MSG) Rate

Effectiveness in Serving Employers (Statewide)

Kentucky is committed to gathering the collective data required under section 116 of WIOA for all the core partners. KYSTATS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability.

OVR is seeking Technical Assistance from the VRTAC-QE for employment and the VRTAC-QM for quality management. OVR has established the following goals that includes strategies that address OVR's performance on the WIOA accountability measures.

The RSA team has reviewed with Kentucky the quarterly data dashboards as well the comparative Performance for PY 2020. For the Median Earnings PY 20 OVR is in the 1st Quartile at $5,540. OVR is in the 4th Quartile for the 2nd Quarter Employment rate at 25.8% the 4th

quarter Employment Rate at 23.0% and Credential Attainment Rate at 13.2%. For Measurable Skill Gains for PY20, OVR is in the 3rd Quartile at 35.6%.

The current Kentucky OVR VR Case Management System (CMS); a web-based system used to collect required data, enforce workflow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology - a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

The current CMS system has reached its useful life expectancy. OVR is in process of procurement of a new system. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. The current system has allowed for us to collect the necessary data and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

OVR will use innovation and expansion funds to support the Statewide Council for Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction; the Annual Report of the council; and support of the Statewide Independent Living Council (SILC).

The Kentucky Office of Vocational Rehabilitation (OVR) will provide the amount of $65,000 each year for a grant total of $130,000 for innovation and expansion activities from Basic Support Grant Funds for 2021 and 2022. The SILC will provide OVR a resource plan that outlines the funding allowable under 34 CFR 361.35 Innovation and Expansion Activities Resource Plans for Statewide Independent Living Councils. The funds will be utilized for the support of the salary of the SILC Coordinator and expenses of the Council. The Division Director of Blind services represents the agency on the Council. The SILC is housed under the Department of Aging and Independent Living (DAIL) in Kentucky.

Statewide Council for Vocational Rehabilitation Annual Report

The recommended theme for the 2021 Annual Report was Diligently Flexible signifying the amount of change and flexibility the COVID 19- Pandemic had imposed upon agency services, staff, partners and consumers. The council was supportive of the agency and the challenges we were facing during the pandemic. The annual report contained a summary of agency statistics, consumer stories and an overview of the agency programs and successes throughout the year.

OVR Satisfaction Survey

Since 1996, the Human Development Institute (HDI) at the University of Kentucky has coordinated the annual Kentucky Office of Vocational Rehabilitation Consumer Satisfaction Survey at the request of the Statewide Council for Vocational Rehabilitation. As part of the federal requirements, OVR collaborated with the University of Kentucky Human Development Institute (HDI) to conduct the most recent survey of closed cases between October 2029 and September 2020. Participants were randomly selected. The Evaluation Unit at HDI emailed and/or telephoned consumers to request participation in the survey between January 17 – May 8, 2021. HDI compiled the results, and the final report was reviewed by the SCVR Consumer Services and Program Evaluation Committee prior to HDI presenting to the entire council during the July 2021 quarterly meeting. A total of 539 individuals participated in the survey with responses received from each of the 17 regional districts. The overall statewide consumer

satisfaction was 87.5% while the highest satisfaction was reported from the West Blind District (100% satisfaction). For access to the full report visit https://bit.ly/3B62kLr.

Highlights from the report include the following:

Regardless of closure status, 87.3% of respondents indicated that services were good or very good.

Overall rating was the highest for those who closed with a Positive Employment Outcome, 95.3% indicated good or very good.

Almost three-fourths of respondents whose cases were closed successfully felt that OVR helped prepare them for their current job.

92% of consumers said they would return to OVR in the future.

91.2% of consumers who were employed indicated they are satisfied with the kind of work they do.

83.1% reported being satisfied with the salary they receive.

87.3% reported overall satisfaction with the quality of services as good to very good.

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

Supported employment offers more than just the assistance needed to find and learn a job. It provides the necessary ongoing support to help an individual maintain employment. Kentucky has identified 93 supported employment providers throughout the state. Individualized strategies are also utilized to arrange for supported employment services outside of "organized programs" when necessary (i.e., coworkers at the job site may provide support paid for with various resources; independent supported employment specialists may be hired, etc.). More than three-fourths of Kentucky's 120 counties have access to supported employment programs. The lack of accessible and dependable transportation often limits access to supported job opportunities.

Extended services are provided by each local supported employment program utilizing funds from a myriad of sources, including the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) , the Kentucky Council on Developmental Disabilities, city and county governments, United Way, fund-raising campaigns, PASS funding, Medicaid, Supports for Community Living Waiver funds, Michelle P waiver funds and other resources. Most programs utilize a combination of funding sources for the provision of extended services. Natural supports are encouraged (such as co-workers, peers, etc.) and are carefully monitored by the supported employment provider.

Kentucky OVR's partner, the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), has developed a new Medicaid Waiver that would more adequately fund supported employment services for people with developmental disabilities. The Supports for Community Living Waiver 2 (SCL2) effective in 2014 calendar year increased the fee structure and modified the service definitions for supported employment.

Kentucky's supported employment programs have primarily served individuals with intellectual disability and individuals with chronic mental illness. This is largely due to greater availability of funding for extended services for these two groups. Individuals with other disabilities are served if funding for extended services is available and if the supported

employment provider has the expertise to meet that individual's needs for employment training and support.

Kentucky has become the 12th state to participate in the Individual Placement and Support (IPS) model of supported employment, which is an evidenced-based practice. The goal is to demonstrate the effectiveness of the IPS model for supported employment for people with serious mental illness throughout Kentucky. In July 2011, four sites in Kentucky began pilot site implementation. In 2012, two sites were added. In 2013, three sites were added. In 2014 BHDDID required that all Community Mental Health Centers implement the IPS program as one of the four evidence-based practices required in their state plan. A Statewide Coordinator, employed through the University of Kentucky, Human Development Institute, oversees the pilot sites.

Currently there are 18 providers in KY that provide IPS supported employment services, which serves 70 of the 120 counties in Kentucky. OVR has implemented an agreement with the University of Kentucky for the purpose of increasing technical and fidelity monitoring to support new IPS providers. OVR is planning establishment projects for prospective expansion initiatives with community rehabilitation providers.

A second coordinator was hired in late 2013. The Office of Vocational Rehabilitation and the Kentucky Division of Behavioral Health collaborate as Team Leading agencies for the project. The Kentucky Association for Persons in Supported Employment (KY APSE) has been successful in creating greater supported employment awareness among the legislators in Kentucky's General Assembly. These awareness/advocacy efforts will continue with the goal of increased statewide funding allocations and possible supported employment legislation to create a more solid funding base for extended services.

QUALITY Pursuant to federal regulations, supported employment services provided by approved vendors must contain these elements: 1) competitive work; 2) integrated work settings; and 3) provision of extended services. In order to ensure that supported employment services are provided according to regulation, the following guidelines must be met:

1. Services will be provided to individuals with the most significant disabilities who have a documented need for supported employment services, including extended services.

2. Work will be performed on a full-time or part-time basis. Each individual in supported employment and his/her OVR counselor shall jointly establish in the IPE an appropriate goal for the number of hours per week that will maximize the individual's vocational potential.

3. Work must take place in integrated settings where most workers do not have disabilities.

4. Wages must be in compliance with Fair Labor Standards Act. Each supported employee will have a goal of earning at least minimum wage. Kentucky's supported employment providers adhere to the following principles:

The supported employment concept assumes that all persons, regardless of degree of disability, have the capacity and should be afforded the opportunity to participate in real employment with appropriate support.

Emphasis is placed on recognizing and maximizing opportunities in the workplace rather than just providing skills training.

The purpose of the program is employment with all of the general expectations of a job such as wages, job security, and performing meaningful work. Job Development rather than Job Placement is the focus.

Ongoing, extended services are tailored to meet each individual's needs.

Individuals are offered choices in the selection and maintenance of jobs. Decisions about appropriate services are made jointly with the individual and/or the family, the supported employment provider, and the VR counselor.

Integration on the job site is recognized as necessary and important. Opportunities are available for non-work interactions with non- disabled workers. Interactions with non-disabled co-workers are a part of regular job responsibilities. "Natural supports" are developed and emphasized.

Extended services are proactive, not merely reactive. For example, plans are developed with individuals in anticipation of career advancement rather than merely waiting for a job loss, lay off, company closing, etc., before seeking other opportunities. The primary staff responsible for providing supported employment services are "job coaches," "job trainers," and/or "supported employment specialists." Positions are both full and part-time, depending on the size and service territory of the local provider. Training and Consultation for staff is provided by the Supported Employment Branch according to the needs of the provider. Supported Employment Training Project core values training is required for all vendors in the SE Outcome-based Reimbursement System. This is funded collaboratively using Department of Behavioral Health Developmental and Intellectual Disabilities/OVR dollars and is implemented by the Supported Employment Training Project at the University of Kentucky Human Development Institute.

Technical assistance is also provided by the OVR CRP Branch staff. A resource manual and other policies and guidelines memorandum were developed for vocational rehabilitation counselors. These are periodically revised and updated so that staff may better understand the rehabilitation process in regard to supported employment. This is a useful tool for supported employment providers as well. Seminars, workshops, and training/awareness sessions are arranged and/or participated in throughout the state with various agencies and organizations that can assist with funding, conversion, employment, and other related supported employment issues. Meetings of this nature are regularly held with such groups as The Arc of Kentucky, the Kentucky Commonwealth Council on Developmental Disabilities, Community Mental Health Centers, Kentucky Consortium for Values Based Training, KY APSE, Kentucky Rehabilitation Association and others. The quality of supported employment outcomes is assessed individually. Such issues as Consumer satisfaction, earnings, benefits, employee and employer satisfaction, the degree of integration, availability of dependable transportation, co-worker support, socialization, work environment, and provision of support services are important. On a regular basis, the CRP Branch staff conducts technical assistance visits with each provider for quality assurance purposes. As well, each supported employment provider has established on-going strategies to measure customer satisfaction. EXTENT As a part of the eligibility determination process for the Office of Vocational Rehabilitation services, supported employment will be considered as a possible vocational outcome for individuals with the most significant disabilities. The agency is now in an order of selection, serving all priority categories of services. The Office of Vocational Rehabilitation will be able to provide supported employment services through approved vendors and/or individual providers.

These services include:

1. Development of a Person-Centered Employment Plan (PCEP). Vocational Profile, or Career Profile with recommendations for job- development.
2. Individually designed job development services, including assistance with customization, job carving, reasonable accommodation, technology and/or other support strategies.
3. Intensive on-the-job skills training and other support services provided by supported employment specialists and/or co-workers and employers.

4. Time-unlimited follow-up services (including regular contact with employer, trainee, parent, guardian, or others deemed appropriate).
5. Other services needed to support the individual, such as travel, training, employment advocacy, non-employment advocacy, and counseling.
6. Development of a Long-Term Support Plan, which includes an outline of the extended services to be provided, and a plan for review and update. The amount, frequency and type of services will be based on the needs of each individual once eligibility is established for supported employment. If off-job-site monitoring is determined to be appropriate, the monitoring, at a minimum, will consist of two meetings per month with the individual and one meeting each month with the employer. Extended services for individuals not considered as youth will be the responsibility of other relevant state agencies, private organizations, and other sources of funding. These services will be considered and planned for prior to an individual receiving the services listed above. Vendor status is not approved unless assurance is made of the availability of extended services. If extended services are not fully assured at the onset of the IPE, the Vocational Rehabilitation counselor and the OVR CRP Branch staff will participate with the provider in making arrangements for these services before the Vocational Rehabilitation case is closed.

The Office of Vocational Rehabilitation conducted a statewide survey of field counselors to explore the need and availability of Customized Supported Employment services for individuals with the most significant disabilities. It was expected, due to Section 511 of WIOA, that there would be an increase in the need and demand for Customized Supported Employment Services. Fifty-two percent (52%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 62% also stated that it's not readily available due to limited staff or oversized caseloads. Around 93% of the counselor's state that only 3 or fewer of their individuals have been able to utilize this service due to lack of availability. When asked if there was a need for CSE in their area, overwhelmingly, 85% stated that there was a need. Over 46% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 17% state that they have at least 8 or more consumers that need this service.

As a result, the OVR is exploring possible contract scenarios to assist in making this service readily available to individuals with the most significant disabilities in the areas of the state that need it most. This need continues to grow, as indicated from the data retrieved from a recent survey. OVR is also exploring the implementation of a customized employment fidelity scale.

The CRP Branch within the OVR is making this a main priority to ensure the needs of the individuals being served are met, which will assist them in accomplishing their vocational goals and dreams.

The timing of transition to extended services.

Transition from Title VI, Part B funds to various other individually determined funding sources begins 90-days post-placement in the job. The transition to extended services funding is completed (generally) after 90 days on the job. Monitoring of services continues for a minimum of 90 additional days to assure that the job is stable. Extended services then continue by the provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback. Extended services are funded and made available without delay for youth with the most significant disabilities.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Transition from Title VI, Part B funds to various other individually determined funding sources begins 90-days post-placement in the job. The transition to extended services funding is completed (generally) after 90 days on the job. Monitoring of services continues for a minimum of 90 additional days to assure that the job is stable.

Extended services then continue by the provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback. Extended services are funded and made available without delay for youth with the most significant disabilities.

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by case basis dependent upon each individual's need for services. OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities.

Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a youth with a disability. OVR will work with providers to ensure another source of extended services to youth are available so there will be no interruption of services for individuals with significant disabilities.

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

Office of Vocational Rehabilitation

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

Education and Workforce Development Cabinet

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

Cora McNabb

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

Executive Director

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	Cora McNabb
Title of Signatory	Executive Director
Date Signed	March 14,2022

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 State Plan must include	Include
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	No

The State Plan must include	Include
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)	
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	

The State Plan must include	Include
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 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	

The State Plan must include	Include
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	

The State Plan must include	Include
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 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	33.0%	60.0%	34.0%
Employment (Fourth Quarter After Exit)	40.0%	32.0%	50.0%	33.0%
Median Earnings (Second Quarter After Exit)	$5,540.	$5,600.	$5,575	$5,700
Credential Attainment Rate	23.0%	23.0%	30.0%	30.0%
Measurable Skill Gains	38.0%	38.0%	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 developed and this data will not be entered in the 2022 State Plan modifications.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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.

ADDITIONAL INDICATORS OF PERFORMANCE

Additional Indicators of Performance

Additional Indicators of Performance