

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

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 state of Idaho and the Idaho Department of Labor will continue to utilize state merit staff to implement required services, including labor exchange services, under the Wagner-Peyser Act.

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

IDOL is committed to investment in professional development activities for ES staff. The central office team that supports the ES program recently hired a new ES Program Specialist to focus on best practices in ES program design, and develop training to assure consistent, high-quality services around the state. The ES Program Specialist is working with a team of local office supervisors to improve onboarding processes and identify gaps in training as well as identify priorities and resources for ongoing professional development. With the multitude of webinars, resources and toolkits available through Workforce GPS, IDOL seeks to leverage these and other online tools to standardize ES staff training using quality sources, and supplement with classroom training, peer-learning and regional program meetings. IDOL hopes to be able to offer a statewide ES conference in the next year or two to bring new and seasoned staff together for professional development and reinvigorate the networking and personal connections that have faded due to travel limitations and staff turnover during the pandemic.

Additional Ongoing Professional Development for ES Staff

- Idaho's One-Stop core partners are responsible for appropriate training to ensure all staff physically present at the One-Stop can correctly provide information to customers about the programs, services and activities available through partner programs and make appropriate referrals.
- Staff training for all ES and select One-Stop partner staff on effective employer outreach techniques and coordination of business outreach among One-Stop partners.
- Training on work-based learning opportunities that can assist employers in meeting skilled-workforce needs, particularly registered apprenticeship models, and One-Stop partner programs that support work-based learning.
- In-depth analysis of regional/local labor market data, including 'real-time' labor market data provided by IDOL's Regional Economists
- One-Stop partner staff meetings to develop knowledge of partner program offerings and activities, and maintain working connections and effective referral processes.

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

As the state government agency tasked with administering the unemployment insurance program for collection of taxes from employers and disbursement of benefits to claimants, IDOL provides periodic training and general information to American Job Center staff, including ES and WIOA staff, regarding general eligibility guidelines.

Strategies to support training and awareness of UI across core programs include:

- UI Program staff provide training to all ES and WIOA staff on identification of UI eligibility issues and how to refer issues to UI staff for adjudication.
- ES staff provide RESEA services in Idaho, and they receive annual training from UI program staff specific to the requirements of the RESEA program
- Fully trained unemployment insurance staff are available by phone and via online chat, during business hours, to answer any questions from staff or claimants regarding UI issues
- UI Navigators are stationed within seven AJCs located throughout the state to provide UI claimants with in-person help such as filing UI claims, resolving basic non-monetary issues, and helping them with other unemployment insurance functions.

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

Idaho's unemployment insurance application process is available online. Idaho's iUS web-based system and staffing model is designed to provide meaningful and personalized assistance in filing a claim for unemployment compensation at Idaho's American Job Centers, as well as at partner locations, in the following ways:

- When applying online, the iUS system provides simple, written instructions in English and Spanish to assist claimants through the application process
- Each American Job Center provides several lobby computer stations to provide self-service access for filing an application for unemployment compensation or to access other online One-Stop services. Each workstation has been updated to improve data processing times, and include larger monitors to reduce user scrolling
- In addition, IDOL's mobile service delivery brings ES staff and laptops for customer use to rural communities on a scheduled basis to increase access to UI and other One-Stop programs in places far from an AJC.
- Each American Job Center also provides access to centralized, fully trained UI staff who answer questions, and assist with UI application or weekly claim filing. Centralized staff are available by phone or via online chat technology on the public access lobby computers.
- iUS user guides and real-time communications support is available for ES, WIOA, and other One-Stop Partner frontline staff from the centralized UI section to support staff provision of information.

c. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

Reemployment assistance is available to anyone in Idaho through the ES program, including UI claimants, unemployed individuals, and employed individuals. All job seekers who register in IdahoWorks receive an email to welcome them to the system and inform them of services available to assist with reemployment. All UI claimants receive information by email after filing their claim that directs them to register in IdahoWorks, informs them of assistance available through the AJCs,

and provides links to the IDOL website where they can find information on available assistance and contact information for the AJC or mobile location nearest them.

A large number of UI customers first come to use staff- assisted ES services through the RESEA program. ES staff provide an orientation to all RESEA claimants on available AJC services. They work with each claimant one-on-one, conducting a thorough assessment of the claimant's current skills, abilities and identifying any barriers to reemployment. They also provide customized labor market information to each claimant based on their specific situation. Working together with the claimant they complete an individualized employment plan for each claimant, which may include additional follow up activities and services to assist the claimant in returning to work as soon as possible, including referrals to community services and training services as appropriate. The RESEA program focuses on UCX claimants and those profiled as most likely to exhaust their benefits. RESEA services are provided for each claimant at an average of two and a half hours.

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:

1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

All in-state UI claimants are required to register for work in the IdahoWorks system upon filing a claim. After filing a claim for UI, the iUS web-based system provides a link to IdahoWorks, offering immediate access to work registration and the array of labor exchange services available, including links to current employment opportunities for self-referral. Wagner-Peyser funded staff provide services to UI claimants every day as a regular part of their duties, and IDOL has placed additional emphasis on ES services to unemployed Idahoans as a strategy to address business needs as the state experiences historic low UI rates.

2. Registration of UI claimants with the State's employment service if required by State law;

Department program policy, not state law, requires registration with ES.

3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

IDOL Wagner Peyser staff are familiar with UI eligibility requirements and do eligibility assessments and referral to adjudication as required and appropriate for RESEA participants. In 2021 a more rigorous work test process was implemented where most RESEA participants are given a job referral and follow up is done with the employer to verify the application was made and determine hire status when possible. Issues detected through RESEA interviews, work test, or other interactions with UI claimants are referred to adjudication.

4. Provision of referrals to and application assistance for training and education programs and resources.

Idaho's WIOA Title IB programs (Adult, Dislocated Worker and Youth) reflect high service levels for UI claimants. IDOL's ES staff are co-located with WIOA Title IB staff, and they also participate in One-Stop partner and community meetings on a regular basis to remain up to date on training, education and resources. ES staff are often the first point of contact for new job seekers coming into

the AJCs, whether in person or virtually, and one of their primary functions is to assess basic needs and eligibility and provide services and/or refer appropriately to WIOA Title IB or other One-Stop and community partner training programs and resources.

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.

In 2020, there were an estimated 24,000 Idaho farms producing 185 commodities. Idaho's crop farming is integrating technology and automation as labor force shortages have been a reality in agriculture for decades. Round-up ready sugar beet seeds have freed up hand hoeing and thinning. Precision agriculture has improved and sped up the drilling/planting of seeds utilizing the Global Positioning System to keep rows straight and alleviate human error. Precision agriculture also refers to tracking the amount of water in the soil to enhance efficiency in irrigation. Programmable pivots have reduced some of the labor needed to move irrigation lines.

Idaho's top five labor-intensive crops are potatoes, sugar beets, hay/grain, onions, and corn, primarily because many workers are still needed for irrigation and harvest. In addition to these, there is large production of peas and lentils in north-central Idaho, and hops production has increased dramatically across the U.S. and Idaho, driven by the popular craft beer industry. Since 2000, hops acreage under production across the U.S. increased by 62% (Source: NASS) while Idaho's acres under production tripled. The northern and southwestern regions of the state have witnessed growth in hops that require hand-stringing, mowing, and pruning.

Nursery operations are another important agricultural activity, mainly the production of ornamental trees in north Idaho. Nursery and landscape flowers and shrubs are raised in greenhouses across southern Idaho requiring hand labor for planting during months not normally reserved for agriculture.

The dairy industry, concentrated in south central Idaho, has skyrocketed since the 1980's when California enacted environmental laws causing dairy operators to relocate operations to states with less onerous oversight. Many large dairy operations produce their own hay and forage needing both seasonal workers for irrigation, equipment operation and harvest but also year-round milking and feeding operations. The dairies milk three times a day requiring relief milkers to ensure reliability.

In 2020, Idaho led the nation in the production of potatoes, barley, food-size trout, and peppermint. Idaho's sugar beets and hops were ranked second nationally while alfalfa hay, cheese and milk were ranked third. Onions, spring wheat and lentils were ranked fourth nationally.

Idaho's need for an agricultural labor force has remained steady and has been a high-demand industry for decades but lacks supply due to its seasonality, hard physicality of the job requiring overtime during growing season, lower wages and dismal benefit packages. The projections

provided by the Idaho Department of Labor's (IDOL) Research & Analysis Bureau show the need for agricultural workers is approximately 62,600 during the peak of the agricultural season.

2. An assessment of the agricultural activity in the State means: 1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

Agricultural employers primarily hire foreign workers for the use of hand labor utilizing the H2A Visa program which reported 6,757 visas approved for Idaho in 2021. Producers are heavily dependent on foreign labor due to its reliance on guaranteed labor as crops must be planted, irrigated and harvested in a timely manner.

In Northern Idaho, the predominant crops are hay, barley, grain, hops, peas, beans (lentils, garbanzos, and chickpeas) wheat and grass seed. The earliest activity involves hops, stringing from April to May and training from May through June. The harvest season for hay begins in May and lasts through September. Harvest for the other groups lasts from August through Mid-September. The estimated number of farmworkers in Northern Idaho was almost 2,500 for 2020 and slightly over that amount in 2021.

In Southeastern and Eastern Idaho, the predominant crops are barley, beans, grain, hay, potatoes, and sugar beets. The hiring season begins in April for irrigation activities. The harvest for potatoes and sugar beets is in October and November, respectively, occurring later in the fall due to the later start of the growing season in the spring. In addition to farmworkers, there is a requirement for truck drivers, equipment operators from May to November, along with sorters and testers during harvest. In 2020, Southeastern Idaho had about 9,200 farmworkers and Eastern Idaho had approximately 7,000. 2021 saw the same amount of agricultural employment for both regions.

Southwestern Idaho has greater diversity of significant crop activity: seeds, barley, beans, corn, fruits (cherries, apples, and peaches primarily), grain, hay, hops, mint, oats, onions, potatoes, sugar beets, and wheat. Workers are needed for irrigation, hoeing, topping, and harvest in the months of heavy activity. Apples and other fruits require pruning and thinning from January to March. The first cutting of hay occurs in April and can end as late as October. The number of farmworkers in Southwestern Idaho was 14,446 in 2020 and 14,698 in 2021.

The traditional South-Central Idaho crops are barley, beans, corn, grain, hay, potatoes, sugar beets, forage crops, and wheat. There is also high demand for farm equipment operators and truck drivers. Greenhouse and nursery workers are needed for seedling and plant cultivation. South central Idaho pulls shepherders from Peru with the caveat that the Department of Homeland Security approves countries for H2A visas with a new list for each year. South Central Idaho had 15,987 farmworkers in 2020 and 15,983 in 2021.

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

The characteristics of the MSFW population indicate a large percentage of MSFWs are Hispanic and predominantly Spanish speaking. Most migrant and seasonal farmworkers in or coming to Idaho originate from either southern parts of the United States (e.g., Texas, Arizona) or Mexico. The popularity of the H2A visa program has replaced the diminishing pool of domestic migrant seasonal farmworkers, many of which found jobs in construction or agricultural jobs closer to home. In 2021, the number of certified H2A visas rose to 6,757. The number of MFWs range from a low of 3,600 in the winter months to the peak of 18,200 in October. Much of the work is seasonal reflecting on the workforce for this industry.

Due to the difficulty in estimating farm employment on a monthly basis, IDOL staff utilize data from a variety of sources to establish MSFW population projections for the state. These include the U.S. Department of Agriculture's Census of Agriculture, U.S. Census Bureau and the Idaho Department of Labor's Quarterly Census of Employment and Wages (QCEW) data. The need for agricultural workers is projected to remain at slightly more than 62,600 during the peak of the agricultural season, which is the month of October when most of the crops are harvested statewide.

4. Outreach Activities -The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

In an effort to address the unique regional challenges that the system faces in our state, primarily with service accessibility in rural and remote areas and reductions in federal funds, in the summer of 2019 the Idaho Department of Labor implemented new service delivery model. Face-to-face service can now be found in approximately 47 communities around the state, an increase of more than 100 percent from the agency's previous brick and mortar offerings. The new model modernizes how the department delivers services, focusing on increasing IDOL's presence while decreasing its physical footprint. It is more adaptable to fluctuations in the economy and empowers staff to be more responsive to community needs.

Bureau of Labor Statistics' farmworker estimates are significant for the three southern regions of the State. However, IDOL will provide appropriate outreach from its AJCs in the following communities located in these agricultural regions throughout the state:

- **Caldwell AJC** - Located in city of Caldwell, provides services to Canyon County
- **Burley AJC** - Located in the city of Burley, provides services to Minidoka and Cassia counties
- **Pocatello AJC** - Provides services to Bingham, Power, Franklin, Caribou, Bear Lake, Oneida and Bannock counties

In addition, during the months of high agricultural activity, the department will provide or coordinate activities to reach MSFWs in the following communities although the department may no longer have an AJC located there:

- **Sandpoint AJC/Bonnars Ferry Mobile Service Delivery** -Provides services to Boundary County

- **Twin Falls AJC** - Provides services to Twin Falls, Jerome, Gooding, and Lincoln counties
- **Caldwell AJC/Mountain Home Mobile Service Delivery** - Provides services to Elmore and Owyhee counties
- **Caldwell AJC/Payette Home Mobile Service Delivery**- Provides services to Washington and Payette counties
- **Idaho Falls AJC/ Rexburg Mobile Service Delivery** - Provides services to Jefferson, Butte and Bonneville counties and Clark, Fremont, Madison, and Teton counties, respectively.

Migrant and/or Seasonal Farmworker (MSFW) outreach staff are located in the American Job Centers listed above to best serve the state’s high agricultural areas. The department will ensure bi-lingual English/Spanish capability of staff assigned to outreach and ensures multi-lingual access through the use of language line tools to the state’s one stop system. All AJC staff participating in the outreach effort will receive training on the use of language line tools, including mobile location staff who may assist in the effort where there may be no AJC located in a specific community and may resort to use language line tools to assist in communication efforts.

During each year of this four-year plan, the department’s Wagner-Peyser (W-P) staff, in collaboration with its partner organizations also serving MSFWs throughout the state, will plan to reach 10% of the estimated migrant/seasonal farmworker population during the peak of the agricultural season in the counties served by outreach offices. As noted by USDOL, these numerical goals are in reference only to the proposed outreach activities and are not negotiated performance targets. The offices noted in italics below serve as the principal locations within their respective regions with the responsibility for not only ensuring appropriate MSFW outreach but service provision as well.

AJC REGIONS - Community Locations	Estimated Farmworker Population*	Outreach Goals W-P Staff	Outreach Goals in Conjunction with Other Agencies
NORTH IDAHO – PLANNED <i>STAFFING: .15FTE/ year W-P</i>			
<i>Sandpoint/Bonnors Ferry</i>	650	39	26
SOUTHWEST IDAHO – PLANNED <i>STAFFING: 1 FTE/year W-P; .03/year Cooperating Agency</i>			
<i>Payette</i>	2,558	153	102
<i>Caldwell</i>	5,668	340	226
<i>Mountain Home</i>	2,735	164	109
SOUTH-CENTRAL IDAHO – PLANNED <i>STAFFING: 1 FTE/year W-P; .06/year Cooperating Agency</i>			
<i>Twin Falls**</i>	10,045	297	203
<i>Burley</i>	5,297	317	206
SOUTHEAST IDAHO – PLANNED <i>STAFFING: 1.5 FTE/year W-P; .06/year Cooperating Agency</i>			
<i>Idaho Falls/Rexburg</i>	5,744	344	229
<i>Pocatello/Blackfoot</i>	9,004	540	360
Total	41,701	2,194	1,461

Idaho Department of Labor: Estimated Agricultural Employment-December 2021

*Farmworker population based on counties which make up the AJC regions & service locations. **Twin Falls - 5% outreach; adjusted due to high dairy count

A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

Designated MSFW outreach staff are creative in seeking out opportunities to contact farmworkers who may not be reached through the normal intake activities conducted at the AJCs, especially with the impact created from the COVID-19 pandemic. However, outreach staff have resumed their efforts as much as possible and are adjusting their approach as needed based on the pandemic's current status.

ES staff target Idaho farmworkers through different types of media outlets, such as the multitude of radio stations in the state with Spanish programming that regularly air public service announcements from the Idaho Department of Labor. These announcements provide notice of the workforce development system's services and are used to inform and educate farmworkers and their families about the services and protection available in the state of Idaho.

Individual MSFW outreach staff also make direct appeals and other announcements via their local radio stations. Special presentations are made to English as a Second Language groups, Hispanic high school students and other groups of farm workers to encourage use of the *IdahoWorks* system and the state's One-Stop system services.

In addition, MSFWs and Idahoans across the state will see, hear and read about accessing Idaho Department of Labor services in the service delivery model described earlier. "Let's Talk Work" is a bilingual (English and Spanish) outreach campaign designed to help job seeker and employer customers find their nearest IDOL location via radio, print ads, billboards and social media. The overarching message - "Help is Closer than You Think" - reinforces the fact that help with finding a job, filing for unemployment insurance or improving one's skills is just a phone call away.

The Idaho Department of Labor prints bilingual brochures, posters and flyers for dissemination at and beyond the AJCs. One example is an easy-to-carry bilingual rack card, which outlines the state's complaints process which provides MSFWs guidance on how to file a complaint or wage claim.

Assigned outreach staff contact MSFWs at their work sites, labor camps, living areas, and other places frequented by the migrant and seasonal farmworkers. Outreach staff also attend community events on evenings and weekends where migrant and seasonal farmworkers are in attendance.

Outreach workers encourage MSFWs to come into the local AJC one-stop or mobile location for more in-depth assessment and to register for available services. For those who choose not to or cannot visit their local AJC, the outreach worker provides on-site assistance for services that may be available, such as prepare and accept complaints or apparent violations, provide information on local labor markets and training opportunities or referral to other service providers.

Outreach workers in Idaho have not limited themselves to pounding the pavement to contact MSFWs. Since 2013, an outreach worker in Southcentral Idaho has hosted a local radio show periodically as a means of offering MSFWs information about the services available through the department. Topics ranged from recruitment efforts for the WIOA Youth Program which targets out-of-school youth, to discussions regarding Idaho and federal labor laws impacting agricultural employment. Radio as an outreach tool has also been used by outreach workers from the Caldwell, Twin Falls and Idaho Falls AJCs during the last year.

The AJCs with outreach staff have permanent and/or temporary staff who are bilingual in Spanish to conduct outreach. During the area's peak agricultural season, if resources permit, additional temporary bilingual staff will be used to support MSFW activities.

B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

A primary resource available to all outreach workers is the MSFW page in the department's internal employee website, "EPIC", which provides all the information needed for all department staff who work with MSFWs. It includes Spanish language materials addressing One-Stop services, local contacts for groups serving MSFWs, as well as basic material outlining the rights MSFW are entitled to.

The State Monitor Advocate assists the department by providing training and technical assistance to One Stop Staff, especially dedicated MSFW outreach personnel, concerning the MSFW special service requirements and best practices, much of it on a one-on-one basis. The topics presented during trainings include outreach practices, labor law updates, H-2A/Foreign Labor Certification, the Employment Service Complaint System, and labor market information. During PY20, the Monitor Advocate conducted two statewide MSFW services trainings and one complaint system training via virtual means to AJC staff throughout Idaho.

The State Monitor Advocate also provides training and technical assistance to AJC staff during the review visits to significant offices, and as needed and/or requested by office managers. Due to the pandemic, this was not possible during the last PY. However, the Monitor Advocate has prioritized providing one-on-one training and technical assistance to newly hired outreach personnel. The Monitor Advocate has continued to make this practice a priority during subsequent years and will resume with the onboarding of new outreach staff. As new outreach staff onboard, individualized technical assistance continues as a program mainstay, especially in these times plagued by the pandemic. As COVID subsides, in-person training and technical assistance presentations may resume as necessary

To bolster the one-on-one training and technical assistance, the State Monitor Advocate has also organized an annual, statewide MSFW/H2A training conference over the years. In addition to IDOL staff, a significant number of staff from the state's National Farmworker Jobs Program (NFJP), the Community Council of Idaho, also participate in the training. Multiple Idaho state Department of Education staff, along with local school district employees, and other community service programs, such as Idaho Legal Aid, have also attended this two-day event over the last several years. However, because of the COVID pandemic, this event did not take place in the spring of 2021. It is hoped that the event may resume once the impact of the Corona virus has subsided.

These conferences, usually held in March, have been considered very successful. Participant feedback has shown that these conferences are an efficient tool for training staff, allowing for the sharing of new techniques and approaches on providing MSFW services, and strengthening partnerships with other state and federal agencies and local organizations serving farmworkers.

Past presenters have included district directors from each of USDOL's Wage & Hour and EEOC divisions, an agricultural economist from the University of Idaho, as well as state program staff addressing services and systems such as the complaints process.

C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues

MSFW outreach workers are merit staff for Wagner-Peyser Employment Services and receive an overview of the Unemployment Insurance process. As part of the one-stop system, the outreach workers are also responsible for providing information regarding ES services, farmworker rights, Unemployment Insurance, the complaint system, WIOA Title I-B employment and training services for Adults, Dislocated Workers and Youth, WIOA Title II Adult Education services, WIOA Title IV Vocational Rehabilitation services, SNAP and TANF benefits, along with other community services that may be available.

The MSFW page in the department's internal website, EPIC, keeps updated program information available for outreach workers. Not only are outreach workers aware of the WIOA core program services, but they are also active collaborators in advocating for and recruiting participants. Over the last four PYs, Governor's Reserve/state funds have been set aside to provide additional assistance to MSFW youth at the behest of outreach staff. American Job Center staff, including outreach workers, continue to work together to find eligible individuals in the MSFW communities to connect them to Title IB services. During the end of PY20, the department implemented a media outreach campaign targeting MSFW and Hispanic youth to encourage their enrollment in the Title I-B youth program. AJCs all along the Snake River plain have seen an increase in these youth expressing an interest in the program.

For the past several years, the state has spearheaded an effort to increase WIOA Title I-B Youth program enrollment of MSFW and Hispanic youth through an infusion of Governor's Reserve funds under the requirement to provide additional assistance to local areas with high concentrations of eligible youth. For PY20, a portion of these funds flowed to areas of the state with agricultural activity to target this population in an enhanced recruitment effort.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

As merit staff for Wagner-Peyser Employment Services, MSFW outreach workers receive regular professional development activities described in (a)(2) of the Wagner-Peyser section of this plan.

The State maintains training programs for local service delivery staff, which includes MSFW outreach staff. Instruction is provided as needed. Training is also periodically open to One-Stop partner staff as well. Management development has also been a focus for delivering quality customer service over the long term.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

With a cooperative agreement with the Community Council of Idaho (CCI- Idaho's Sec. 167 grantee) and other partner agencies, the Idaho Department of Labor serves as the lead organization in coordinating outreach efforts at both the state and local levels. All partners are dedicated to increasing MSFW customers' awareness and access to education, training and other services. CCI,

as Idaho's NFJP grantee, is not a subrecipient conducting outreach, but rather actively collaborates in the effort.

At a minimum, the following collaborative activities will occur during the upcoming agricultural seasons:

- The memorandum of understanding/cooperative agreements for coordination of services between the Idaho Department of Labor and the Community Council of Idaho is in the process of being reviewed and renewed.
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system
- Partners are collaborating on developing and sharing outreach materials among all entities
- Coordination of community information and staffing efforts at the local level to enhance outreach
- The administrative entities have reached data sharing agreements, facilitating reporting and data analysis which improves partnership and service delivery, along with opportunity assessment and process enhancement to streamline co-enrollment

To leverage resources, staff coordinate outreach activities with local partner organizations, targeting large events to contact a greater number of farmworkers. The State Monitor Advocate and outreach workers continue to make use of appropriate media, especially public service announcements using the multitude of radio stations throughout the state with Spanish programming.

Program service information is presented verbally and/or in writing in both English and Spanish. In many instances, these efforts are coordinated with other agencies, such as Idaho Legal Aid, the Community Council of Idaho, and others in order to provide MSFWs with a comprehensive look at the services available to them.

In order to protect Idaho's agricultural labor force from exposure to the COVID virus, the state Monitor Advocate coordinated efforts with St. Luke's Hospital allowed for the distribution of guidance, posters and other information to agricultural employers and workers across the state. Various health providers in the state aided these efforts by creating awareness and by volunteering during immunization clinics that were organized specifically for Idaho farmworkers. Outreach workers in the areas where these events took place were made aware of these events so they could relay the information to the MSFWs they came across.

In addition, during PY2020, the Monitor Advocate donated more than 400 protective masks and received a donation of more than 3,000 masks that were distributed to farmworkers across the state during the pandemic. This effort also included the creation and maintenance of a Facebook page to reach out to monolingual, Spanish speakers farmworkers with the purpose of providing reliable information on verified resources *Trabajadores Agrícolas de Idaho* | Facebook

5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

- A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:*

- i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers*
- ii. How the State serves agricultural employers and how it intends to improve such services*

Providing career and training services to MSFWs

The Idaho Department of Labor, its AJCs, and mobile locations provide the full range of ES benefits and protections, including the full range of job counseling, testing, and job and training referral services to MSFWs. The agency continues to expand services to agricultural workers and employers by coordinating basic labor exchange services, outreach, information dissemination, and training workshops with other One Stop partner agencies, organizations and the employer community. Working relationships exist with the Community Council of Idaho, Idaho Legal Aid Services, Inc., and various agricultural producer organizations to provide services and information. AJC and mobile office staff are fully informed of the services available to farmworkers in their areas, including short-term training programs, ESL classes, etc. Once in an AJC or mobile location, staff thoroughly assess the skills, strengths, and needs of farmworkers who register with the system, and make appropriate referrals to jobs and training opportunities. With this information, farmworkers may make informed employment decisions and have meaningful access to all the services that are available through the state's One Stop network.

With the recent transition of WIOA service providers, the state looks to maintain a sustained level of service to MSFWs visiting AJCs across Idaho in search of appropriate workforce services. Aware of this change, state outreach workers make active referrals to the new provider, Equus Workforce Solutions, which has ensured the state and the Workforce Development Council that it has the capacity to serve all those in need of service, regardless of any potential language limitation a visitor, including MSFWs, may have.

Services Provided to Farmworkers and Agricultural Employers

Agricultural-related job listings have increased over the years, primarily due to the rapidly increasing demand for foreign workers through the Foreign Labor Certification programs, initiated through the Agricultural Clearance Order process. As noted earlier, this activity has increased significantly in the state over the past several years. Many of the employers utilizing this program are members of the Snake River Farmers' Association (SRFA), Western Range Association (WRA) and Mountain Plains Agricultural Services (MPAS), which act as a recruitment agency for Idaho agricultural employers. The state's H-2A activity for FY 2020 shows a slight decrease in applications over the previous year, with 699 applications recorded for the recent FY, and 715 in PY19. However there were more than 4,664 positions listed in FY20, a 4.2 increase over the previous year. The program is currently on track to match or exceed the previous year's activity. As more H-2A applications are submitted, and more positions requested to be filled by foreign labor, the placement of domestic agricultural workers has unfortunately declined over time.

Basic labor exchange services are provided to the agricultural employer community through the automated process of matching job seekers to job orders received as well as recruitment and direct referral from staff. IDOL continues to provide information about ES services and assist agricultural employers through direct employer visits and outreach to grower organizations, county extension offices, and through special presentations and seminars to agricultural employers, farm labor contractors, and local employer committees. Information may be provided through radio and TV, or other media in conjunction with other agencies and organizations involved with the agricultural

employer community. These efforts are coordinated with other outreach efforts that are developed as part of the respective area's One Stop system.

To identify agricultural employers in labor needs, the department reviews prior year job orders and request input from grower organizations and local employer committees. Direct outreach activities, specialized surveys and other labor market information available through IDOL and One Stop system will also be used to identify agricultural employer needs. Information from other agencies or organizations that represent or serve the agricultural community will also be solicited to identify areas of needed services.

IDOL will continue to expand services to agricultural workers and employers by coordinating basic labor exchange services, outreach, information dissemination, and training workshops with other One Stop partner agencies, organizations and the employer community. As noted earlier, IDOL's extensive working relationships help to ensure an information exchange on available services. To reduce the impact on domestic workers, the department continues its coordination with the NFJP grantee and other partners to identify pools of available and eligible workers who may take advantage of the agricultural listings throughout the state.

The state's approach to enhanced business services takes a regional focus to serving employers, targeting activities such as outreach, one-on-one meetings with select employers to learn their workforce needs, office team discussions and strategy session on how best to respond to identified employer needs. Enhanced collaboration is channeled through the state's AJCs and mobile locations, which direct the coordination of workforce needs with education, economic development and workforce partners across the state. All of which leads to a streamlined service delivery which is logged through the state's *IdahoWorks* management information system, which provides automated business services tracking and information management to all AJCs and mobile locations.

B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups

The state has multiple resources available to provide information regarding the complaint system. Outreach workers and one stop partners encourage MSFWs to come to their local AJC or mobile location to register for all available services. For those who choose not to or cannot visit the AJC, the outreach worker provides on-site assistance for services including the preparation and acceptance of complaints or apparent violations.

Information about the complaint system is not only provided via outreach orientation of the services available through IDOL's various locations, but also through various documents available in the AJCs and the Idaho Department of Labor's website. This allows One-Stop partners' access to those same documents to distribute to their customers. Public Service Announcements (PSAs) are also used to notify MSFW customers of available services, including the complaint system. The PSAs, distributed to Spanish-speaking radio stations across the state, are used to inform and educate farmworkers and their families about services and protection available in the state of Idaho. Ongoing efforts continue to improve outreach to inform MSFWs and the rest of the public about the state's ES complaint system.

Over the last several years, a Spanish radio station in the city of Burley collaborated with its local AJC to reach out to the Spanish-speaking community. When originally aired, the employment-related segments generated more calls than usually received during the previously scheduled

broadcast for that hour timeslot. Because of its popularity, the radio station established a regular Friday morning, hour-long show that continues to provide information to the public on a multitude of issues revolving around the area of employment. Since it began in 2013, the segments addressing the complaints system and worker's compensation that have been periodically presented are likely to elicit more calls from the listening audience.

The efforts to inform Wagner-Peyser program users of these services found some success, as the Idaho Department of Labor processed 478 Employment Services complaints, four of which were MSFW complaints, accompanied by two apparent violations. Wages remain the number one issue cited by program customers, as the state's Wage and Hour Section addressed 52 MSFW wage claims, which is an overall increase from PY19. During that period, 440 complaints were processed, none from MSFWs however, there were three apparent violations. Thirty-nine farmworker wage claims were also reviewed by the Wage and Hour Section.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

Agricultural jobs, both temporary and permanent, continue to be important to local economies throughout the state. The increased interest by agricultural employers in having a reliable workforce at the "right" time is gaining in importance compared to other considerations such as costs. This situation presents a phenomenal opportunity for the Idaho Department of Labor and the One-Stop System to demonstrate to employers, workers and the public that AJCs and their partners can be the First Stop and the Only Stop in helping agricultural workers find jobs with agricultural employers find a suitable workforce through utilization of the ARS.

IDOL is working to provide agricultural employers with information on ALL programs and resources available to help them with their labor needs. By emphasizing that the ARS is simpler to use, costs less, and does not require another federal agency's involvement, employers will be encouraged to consider ARS as an integral part of their effort to locate qualified citizen/legal resident domestic workers in other parts of the state/country.

Information about the ARS continues to be shared and distributed to agricultural employer groups and associations and statewide publications including the Idaho Employment Newsletter, Idaho Farm Bureau and other major publications. MSFW outreach staff and regional business services staff also provide information about the ARS as they reach out to employers to orient them about One-Stop services for businesses.

6. Other Requirements

A. Collaboration - Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

As mentioned before, IDOL maintains several agreements and partnerships with other WIOA Core programs and partners throughout the state, each which have a significant impact on MSFWs across the state. For example, The Community Council of Idaho is represented on the One-Stop Committee of the state Workforce Development Council, Idaho's WIOA State Board. The state's monitor advocate and the Community Council have also entered into an agreement outlining the

services that the SWA and NFJP grantee will both provide their efforts to reach out and increase services to MSFWs across the state.

In addition, the Idaho Department of Labor has agreements with several universities' High School Equivalency Program (HEP) and College Assistance Migrant Program (CAMP) programs across the state to work in conjunction with both to offer the most effective and best possible services to MSFWs participating in those programs. Another strong collaborative effort the agency has maintained over the years is with U.S. DOL's Wage and Hour Division regional office. A Memorandum of Understanding between the two entities is designed to maximize and improve the enforcement of laws administered by both agencies through greater coordination. This MOU has been helpful to both agencies in their efforts to seek remedy for MSFWs impacted by those who sought to take advantage of them.

Also, the statewide training conferences, coordinated in partnership with the state monitor advocate, the College of Idaho, the Community Council of Idaho, the state's HEP/CAMP programs, have included AJC and NFJP staff, as well as other partner staff. And will continue to do so in the future. As in previous years, attendees also included state education agency and local school district representatives, along with Boise State University's HEP and CAMP programs. Training highlights include the state's complaint system, and the challenges and obligations faced by Idaho's agricultural employers relating to immigration. Plans for future trainings are already underway. A consortium comprised of the State Monitor Advocate, NFJP grantee staff and representatives from colleges and universities across the state meet periodically to expand informational offerings to not only MSFW service providers, but the public as a whole to provide them awareness of MSFWs across the state. However, because of the COVID pandemic, this event did not take place in the spring of 2021. It is hoped that the event may resume once the impact of the Corona virus has subsided.

At a minimum, the following collaborative activities will occur during the upcoming agricultural seasons:

- Review/renewal of cooperative agreements for coordination of services between the Idaho Department of Labor and the Community Council of Idaho
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system
- Collaboration on development and sharing outreach materials among all entities
- Coordination of community information and staffing efforts at the local level to enhance outreach
- Sharing data for reporting and data analyses to improve partnership service delivery
- Assessment of opportunities and enhancement of processes to streamline co-enrollment

In order to leverage resources, staff will coordinate, where possible, outreach activities with partner organizations in their area, targeting large events where a greater number of farmworkers may be contacted. The State Monitor Advocate and outreach workers will continue to make use of appropriate media, especially public service announcements using the multitude of radio stations throughout the state with Spanish programming.

The existing core and One-Stop partners form the state level WIOA Advisory Group, which meets regularly to discuss the continued improvement of the state's robust one-stop service delivery

design. This collaboration is also engaged at the service delivery area level to ensure that their specific program services are integrated into the local one-stop delivery system. As part of the continuous improvement and design of the One-Stop service delivery, new partners are actively recruited.

Supplementing the cooperative agreements noted earlier, the required One-Stop Memorandum of Understanding addresses the service delivery integration and collaboration of the partners in providing services to MSFWs. Each memorandum of understanding will be reviewed within the required three-year timeline to ensure that the collaborations are still productive and make adjustments as necessary to ensure service delivery alignment.

B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The State Monitor Advocate reviewed this plan and provided direct contributions in drafting this agricultural plan, with consideration given to the annual summary developed under 20 CFR 653.108(g)(4).

Electronic copies of this plan have been provided to Idaho's WIOA 167 grantee- National Farmworker Jobs Program, Community Council of Idaho, with a request for written comments by February 25, 2022. A draft of this 2020-2023 Agricultural Outreach Plan-PY22 Modification, and a request for comments have also been sent out the same day to the following agencies/service providers with instructions to provide comments:

Erik Johnson, Director Migrant Unit Idaho Legal Aid Erik.johnson@idaholegalaid.org

Jane Donnellan, Administrator Idaho Division of Vocational Rehabilitation
jane.donnellan@vr.idaho.gov

Michelle Kelley, HEP/CAMP Recruiter Boise State University mkelley@boisestate.edu

Sarah Seamount, Migrant Coordinator Migrant Education Programs Idaho Department of Education sseamount@sde.idaho.gov

Irma Morin, Executive Director Council of Idaho imorin@ccimail.org

Korene González, Director Employment and Training Community Council of Idaho
KGonzalez@ccimail.org

Roy Vargas, Farm Foreman Former FLC rvargas1276@gmail.com

Sonia Martínez, Diversity Outreach Coordinator Idaho State University orstem@isu.edu

Sam Byrd, Director Centro de Comunidad y Justicia sbyrd@comunidadyjusticia.org

Margie Gonzalez, Executive Director Idaho Commission on Hispanic Affairs
Margie.gonzalez@icha.idaho.gov

Brian S. Bean, Lava Lake Land and Livestock brian@lavalake.net

A draft of this plan was incorporated as part of Idaho's WIOA Combined State Plan-PY22 Modification, which also underwent a public comment period ending February 25, 2022. Two stakeholders commented during the 30-day comment period regarding the state's AOP. One of the comments targeted the collaboration and coordination of outreach efforts between state Migrant Education program staff and ES outreach staff to maximize both programs' ability to find and serve MSFWs needing services. The other comment presented that the closure of offices across the state during the pandemic adversely impacted many MSFW and Hispanic families lacked internet access. The comment also noted that Spanish speakers struggle with the state's unemployment insurance system. Both of these items have been directed to the appropriate area within the agency.

C. Data Assessment

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

The following data regarding Idaho's performance versus actual attainment of minimum service levels was provided by the department of Labor's *IdahoWorks* MIS system and the department's electronic outreach log records.

Prior to the full implementation of WIOA, the state struggled to achieve *Attained* status for all three of the MSFW Compliance Indicators. Since then, the state has seen improvement with few measures lacking. However, this may be attributed to several issues, mostly due to the reporting requirements under WIOA. Many of these measures are based on wage-related data. The lag time in reporting wages, which relies on automated reporting from employers, can cause a delay. In addition, because of WIOA's requirements, an individual that is considered active in any of the partner programs, despite obtaining employment, is not considered as exited from a program and therefore not immediately counted in the measures. As a result of both of these reporting issues, some placements may not be counted if one continues their active status in a program such as Wagner-Peyser (Labor Exchange).

With regards to the MSFW Equity Indicators, IDOL notes that a comparison of these over the years shows that the state is consistently meeting the majority of these numbers. Unfortunately, the overall number of applications has decreased which subsequently affects the indicators. The pandemic played a significant role in the establishment of these annual universes, as noted with the decrease in the number of non-MSFWs during each PY.

The Idaho Department of Labor also notes that the Compliance Indicators goals were established by USDOL in the 1970's, and strongly recommends a review of these fixed outcomes. Updating the static measures to something more equitable and reasonable would be more in line with the philosophy behind WIOA to consider current, up-to-date data which reflects economic and labor conditions, as well as the technology applies more relevance to these measures relevant.

Corrective Action - Wagner-Peyser management and outreach staff will assess data collection options to increase documentation of placements on job orders listed with AJCs. Connections with agricultural employers will increase as outreach staff continue to connect with the department's employer service efforts implemented under WIOA. One-Stop partners have also been encouraged to refer MSFWs to the AJCs to assist them in fully accessing the state's labor exchange system. Future staff presentations will include an emphasis to ensure that MSFWs receive a full complement of services when present in an AJC or mobile office location, including referrals to WIOA Title I-B as necessary.

PY 2017 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	89	100%	13,555	100%	
Referred to Employment	36	40.45%	3,272	24.14%	Yes
Received Staff Assisted Services	87	97.75%	12,563	92.68%	Yes
Referred to Support Service	0	0.00%	0	0.00%	Yes
Career Guidance	18	20.22%	3,501	25.83%	No
Job Development Contact	49	55.06%	7,898	58.27%	No
Compliance Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Compliance
Placed in Job	84	94.38%	11,569	85.35%	Yes
Placed \$.50 above min Wage	0	0.00%	2	0.01%	No
Placed in Long Term non-ag Job	84	94.38%	11,569	85.35%	Yes
2018 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	240	100%	16,308	100%	
Referred to Employment	67	27.92%	2,607	15.99%	Yes
Received Staff Assisted Services	228	95.00%	15,399	94.43%	Yes
Referred to Support Service	0	0.00%	0	0.00%	Yes
Career Guidance	41	17.08%	3,139	19.25%	No
Job Development Contact	136	56.67%	9,461	58.01%	No
Compliance Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Compliance
Placed in Job	144	60.00%	9,019	55.30%	Yes
Placed \$.50 above min Wage	0	0.00%	0	0.00%	Yes
Placed in Long Term non-ag Job	144	60.00%	9,019	55.30%	Yes
PY 2019 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	219	100%	17,006	100%	Yes
Referred to Employment	49	22.37%	1,918	11.28%	Yes
Received Staff Assisted Services	215	98.17%	9,916	58.31%	Yes
Referred to Support Service	0	0.00%	0	0.00%	Yes
Career Guidance	33	15.07%	2,371	13.94%	Yes
Job Development Contact	146	66.67%	10,210	60.04%	Yes
Compliance Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Compliance

Placed in Job	150	75.76%	9,049	69.50%	Yes
Placed \$.50 above min Wage	NA	NA	NA	NA	NA
Placed in Long Term non-ag Job	98	86.73%	6,947	88.54%	No
PY 2020 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	109	100%	13,173	100%	Yes
Referred to Employment	9	8.26%	759	5.76%	Yes
Received Staff Assisted Services	109	100%	13,116	99.57%	Yes
Referred to Support Service	0	0.00%	0	0.00%	Yes
Career Guidance	12	11.01%	1,247	9.47%	Yes
Job Development Contact	68	62.39%	7,733	58.70%	Yes
Compliance Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Compliance
Placed in Job	130	71.04%	9,066	64.28	Yes
Placed \$.50 above min Wage	NA	NA	NA	NA	NA
Placed in Long Term non-ag Job	107	85.60%	8,321	86.77%	No

D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Year after year, the state continually exceeds its overall planned outreach objectives for the season, achieving its outreach-contact goal of contacting 10% of MSFWs throughout the state, For PY20, state outreach workers contacted 6,633 MSFWs across Idaho, providing them information about the multiple services cited earlier. The state will strive to reach its goals of exceeding its planned outcomes for the year.

As noted earlier, the number of actual MSFW applications for the state has decreased significantly, which coincides with the period during which the department has implemented its automated IdahoWorks system as a member of the AJLA consortium. This, in combination with the changes in WIOA's reporting requirements, have likely led to the reduction in overall MSFW applications. However, recent changes to how the Idaho Works system poses questions to users to allow them to identify themselves more easily as MSFWs, should lead to an increase in the state's MSFW applications. The state will review MSFW registration numbers periodically throughout the year to ensure MSFW applicants are being coded correctly so they can be served and included in reporting.

E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The State Monitor Advocate, funded by Wagner-Peyser, is the department's lead representative to ensure that ES services are coordinated with other MSFW service providers, to identify overall changes in agricultural employment, MSFW trends, employment rights, and to recommend new program approaches. The Monitor Advocate Unit will continue to conduct ongoing monitoring of the service provided to Migrant and Seasonal Farmworkers. Reviews will be conducted in each of

the significant offices to identify the needs and concerns that affect the provision of services for farmworkers and provide technical assistance as appropriate. The issues identified will be brought to the attention of the Administrative and Executive personnel when necessary.

On February 1, 2022, the state Monitor Advocate approved the state’s final draft of its Agricultural Outreach Plan, after offering suggestions and commentary to ensure the state is able to appropriately meet the needs of MSFWs across Idaho. The AOP has been included as part of the overall WIOA Combined State Plan and was made available for public comment. Comments were incorporated earlier in the AOP in Section 6.B.

Wagner-Peyser Assurances

The State Plan must include assurances that:

<i>The State Plan must include</i>	<i>Include</i>
<i>1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));</i>	<i>Yes</i>
<i>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;</i>	<i>Yes</i>
<i>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</i>	<i>Yes</i>
<i>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.</i>	<i>Yes</i>

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as

baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	64.0	65.7	64.0	65.7
Employment (Fourth Quarter After Exit)	65.0	66.2	65.0	66.2
Median Earnings (Second Quarter After Exit)	5900.0	\$6,175	5900.0	\$6,175
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.