

IDAHO PYS 2020-2023

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## OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

## OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) <sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.

- The **Operational Planning Elements** section identifies the State’s efforts to support the State’s strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances,
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

**Paperwork Reduction Act:** The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

## I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

### A. WIOA STATE PLAN TYPE

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs. Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

**Unified State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

**Combined State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a combined plan

#### COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

No

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

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

Yes

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

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

Yes

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

## B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

No narrative included for this optional element.

## II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

### A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

#### 1. ECONOMIC AND WORKFORCE ANALYSIS

##### A. ECONOMIC ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

##### I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which there is existing demand.

##### II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which demand is emerging.

##### III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

#### ***(i) Existing Demand Industry Sectors and Occupations***

This section analyzes Idaho's high-demand industries and provides an overview of Idaho's Target Sectors. It also covers Idaho's high-demand occupations, including an analysis of Idaho's "Hot Jobs" list.

#### **High-Demand Industries**

High demand industries can be defined in several ways. Most commonly they are industries with the largest number of workers. However, for the purpose of analyzing Idaho's industrial make-up to determine what industries might be the best to target, that industry's employment as a percentage of nonfarm employment and its rate of job growth over a period of time will also be part of the equation, employment in the government sectors, excepting education, will



not be included in the discussion of job growth and target industries. Government employment is important but its jobs are not actively created and most often support efforts in private industry. There are industries that cross multiple sectors and are not considered formal industries in the North American Industrial Classification System, commonly known as NAICS. Two of these often referred to are tourism and high tech. These hybrid industries do have an impact on Idaho's economy but are a combination of several industrial sectors. Just as these two industries are made up of smaller industrial classifications, specific occupations can be found in many industries. That is why it is important that the analysis of demand industries is not limited just to those with the highest number of workers.

Idaho Department of Labor 2020 data shows Idaho had a monthly average of 755,100 nonfarm payroll jobs. Total nonfarm employment is further classified in seven industry supersectors. Table 1 (Data Appendix Table 1 – for detailed Nonfarm Jobs) shows the seven highest-demand supersectors, based on both the number of jobs. The top three – education and health services, trade, transportation and utilities, and construction – accounted for more than 50 percent of growth between 2010 and 2020. These other four high-demand supersectors are professional and business services; leisure and hospitality; manufacturing; and financial activities. The number of jobs in these seven supersectors range from 111,500 to 37,500.

Employment growth and trends since 2010 illustrate the recovery since the 2007 recession. Since 2010, each of the supersectors has shown significant growth. The recession caused a dramatic loss of 51,500 jobs between 2007 and 2010. After that, Idaho's economy created 151,900 new jobs. Education and health services added the most jobs—28,400, while information decrease by 2,200. Construction, like manufacturing, experienced devastating job losses during the recession but grew significantly after 2010. However, construction has relatively increased the most between 2010 and 2020, by 79 percent, in part due to the rapid growth in Idaho.

**Table 1: Employment in Idaho Private Supersectors Adding the Most Jobs, 2010-2020**

Supersectors	2007	2010	2020	2010-20, Difference
Education and health services	73,600	83,100	111,500	28,400
Trade, transportation, and utilities	131,400	119,900	146,400	26,500
Construction	52,000	31,200	55,800	24,600
Professional and business services	84,200	75,700	99,000	23,300
Leisure and hospitality	63,300	58,000	75,800	17,800
Manufacturing	66,400	53,300	68,200	14,900
Financial activities	32,400	29,200	37,500	8,300
<b>Idaho Nonfarm Payroll Jobs</b>	<b>654,700</b>	<b>603,200</b>	<b>755,100</b>	<b>151,900</b>

Another way to determine demand is by the percent increase in the number of jobs. Following the recession, jobs in four supersectors grew more than 30 percent, while total nonfarm jobs grew 25.2 percent between 2010 and 2020. They were construction (79 percent); education and health services (34 percent); professional, scientific and technical services (31 percent);

leisure and hospitality (31 percent). Jobs in professional and business services more than tripled between 2007 and 2020. Table 2 provides information on both the numeric and percentage growth of those supersectors.

**Table 2: Employment in Idaho's Seven Fastest-Growing Private Supersectors, 2010-2020**

Supersectors	2007	2010	2020	2007-19, Numeric Change	2010-20, Numeric Change	2007-20, Percent Change	2010-20, Percent Change
Construction	52,000	31,200	55,800	3,800	24,600	7%	79%
Education and health services	73,600	83,100	111,500	37,900	28,400	51%	34%
Professional and business services	31,800	75,700	99,000	67,200	23,300	211%	31%
Leisure and hospitality	63,300	58,000	75,800	12,500	17,800	20%	31%
Financial activities	32,400	29,200	37,500	5,100	8,300	16%	28%
Manufacturing	66,400	53,300	68,200	1,800	14,900	3%	28%
Trade, transportation, and utilities	131,400	119,900	146,400	15,000	26,500	11%	22%
<b>Idaho Nonfarm Payroll Jobs</b>	<b>654,700</b>	<b>603,200</b>	<b>755,100</b>	<b>100,400</b>	<b>151,900</b>	<b>15.3%</b>	<b>25.2%</b>

### Idaho Target Sectors

In recent years, the Idaho Department of Labor staff along with the Workforce Development Council leadership began discussing potential target industries for the state. The group analyzed the number of current jobs and gross domestic product (GDP) in each supersector. Table 3 ranks the supersectors by employment and gross domestic product. While education and health care, retail trade and professional and business services ranked highest in employment; the share of GDP for finance/insurance/real estate tops all supersectors leaving manufacturing and professional and business services the next top contributors. In the industry makeup of the state retail trade is a large supersector and while many of its jobs are entry-level and low-skill this supersector is prime as a springboard for workforce development and skill enhancement.

Jobs in education are primarily found in the government sector and as such are typically low in both employment and contributions to GDP but is vital for the state for it provides educational opportunities and skill development for current and future work force.

**Table 3: Ranking of Private Supersectors by Employment and GDP: 2020**

Industry Supersector	Employment	Rank	GDP	Rank
Private industries	630,800		\$65,183	

Industry Supersector	Employment	Rank	GDP	Rank
Educational services, health care, and social assistance	111,500	1	\$6,546	4
Professional and business services	99,000	2	\$8,050	3
Retail trade	88,300	3	\$5,998	5
Manufacturing	68,200	4	\$8,846	2
Construction	55,800	5	\$4,327	7
Wholesale trade	31,200	6	\$4,680	6
Finance, insurance, real estate, rental, and leasing	28,100	7	\$12,646	1
Transportation and warehousing	26,900	8	\$1,762	9
Arts, entertainment, recreation, accommodation, and food services	11,700	9	\$2,155	8
Information	7,400	10	\$1,735	10
Mining	3,700	11	\$225	12
Utilities	3,000	12	\$1,310	11

\*2020 Nonfarm Annual Average

Employment projections, wages paid and the multiplier impact of supersectors on Idaho's economy are also important areas to look at. Staffing patterns of the potential supersectors were analyzed by high demand, hot jobs and wages. The Research and Analysis Bureau presents economic updates on a quarterly basis regarding Idaho's target supersectors to the Workforce Development Council. These updates and data are discussed at the Council level to monitor the continued relevance of these clusters in real time and measure their impact on Idaho's economy and workforce.

Table 4 shows the top five supersectors projected to grow significantly during the next 10 years. Growth also will occur in other supersectors including public administration, educational services, wholesale trade as well as transportation and warehousing.

**Table 4: Private Supersector Ranked by Projected Employment Growth, 2020-2030**

Supersector	2020 Jobs	2030 Jobs	Growth in Numbers	% Change	% Rank
<b>Total Employment</b>	<b>806,943</b>	<b>933,563</b>	<b>126,620</b>	<b>15.7%</b>	
Health Care and Social Assistance	109,395	132,551	23,156	21.2%	4
Construction	54,337	75,469	21,132	38.9%	1
Leisure and Hospitality	76,748	91,946	15,198	19.8%	5
Professional and Business Services	97,874	110,711	12,837	13.1%	12
Manufacturing	67,681	80,328	12,647	18.7%	7

Together, these five supersectors provide more than 50 percent of Idaho jobs. The largest is health care and social assistance currently providing 13 percent of all jobs and projected to increase to 14 percent over ten years. The smallest is manufacturing at just over 8 percent. Table 4 shows that each of the target supersectors will continue to grow and provide job opportunities for Idaho's work force.

- **Health Care and Social Services** comprises ambulatory medical care, hospitals, nursing, residential care, child care, vocational rehabilitation services and mental health services. Many of the services provided by this sector are delivered by trained professionals. All establishments have labor inputs of health practitioners or social workers with the necessary expertise. This supersector, which includes public and private employment, provides 13.5 percent of Idaho's jobs. Although this sector includes only four major industry categories, it includes more than 150 occupations.
- **Construction** comprises nine industries, ranging from residential and highway construction to special trade contractors such as electricians and plumbers. Construction employment as a percent fell to a low of 4.8 percent in 2011-2012 as a result of the recession, but has since increased in the percent of jobs each year, reaching 6.7 percent by 2020.
- **Leisure and Hospitality** comprises five industries – including accommodation, amusement, performing arts, sports and food services. This industry comprises nearly 10 percent of Idaho's non-farm jobs.
- **Professional, Scientific and Technical Services** comprises nine industries including: legal services; accounting and tax preparation; architectural and engineering; computer systems design; consulting; scientific research; and advertising. There are nearly 200 occupations in this supersector, which provides slightly more than 12 percent of Idaho's nonfarm jobs and some of the highest paid occupations.
- **Manufacturing** includes a wide range of activities—from food processing and wood processing to making computer and electronic products and transportation equipment. Food processing and transportation equipment are the fastest growing manufacturing sectors. Many of Idaho's high tech jobs are in the manufacturing supersector. The amount of nonfarm jobs in manufacturing contributed to 8.4 percent of Idaho's jobs.

## High-Demand Occupations

Occupations generally cross industries. Some will be more prominent in specific industries but can be found to a lesser degree in others. For example, although most nurses work in health care, some work in manufacturing, retail, education and other supersectors. Similarly, food service workers mostly work at restaurants and related businesses, but some work at school cafeterias, retail stores, hospitals, and nursing homes.

Occupations are considered high-demand if they have at least 100 openings annually. Average annual opening reflect churn in the labor force. Openings includes those individuals that left that particular occupation for some reason, those individuals that transferred out of a particular occupation to another one and then openings that are new due to growth in that particular occupation. Table 5 lists the top ten high-demand occupations, ranked by the number of annual openings –which include transfers, exits and new jobs. Table 6 lists the top ten high-demand occupations, ranked by the number of new jobs.

**Table 5: Top 10 High-Demand Occupations Ranked by Annual Openings**

Occupation Title	2020 - 2030 Projected Growth	2020 - 2030 Growth Rate	Annual Exits	Annual Transfers	New Jobs	Total Annual Openings	Hourly Median Wage	Education Level**
Carpenters	5,460	45%	877	1,309	546	2,733	\$18.59	HSDE
Construction Laborers	3,054	28%	801	1,172	305	2,278	\$16.54	LHS
General and Operations Managers	2,179	15%	822	1,132	218	2,172	\$33.49	BD
Miscellaneous Assemblers and Fabricators	2,092	26%	582	929	209	1,721	\$14.77	HSDE
Registered Nurses	3,050	20%	351	809	305	1,465	\$34.27	BD
Farmers, Ranchers, and Other Agricultural Managers	1,143	13%	280	888	114	1,282	\$31.17	HSDE
Light Truck or Delivery Services Drivers	1,635	27%	415	700	164	1,279	\$15.63	HSDE
Sales Representatives, Wholesale and Manufacturing	1,075	15%	467	695	108	1,270	\$27.27	HSDE
Electricians	1,629	31%	421	591	163	1,175	\$24.79	HSDE
First-Line Supervisors of Construction Trades	1,755	39%	326	477	176	978	\$29.11	HSDE

\*Annual Openings include openings due to exits, transfers and projected growth (New Jobs)

\*\*Education Level-See Data Appendix Table 7

**Table 6: Top 10 High-Demand Occupations Ranked by Number of New Jobs**

Title	2020 - 2030 Projected Growth	2020 - 2030 Projected Growth Rate	Annual Change	Hourly Median Wage	Education Level**
Carpenters	5,460	44.70%	546	\$18.59	HSDE
Construction Laborers	3,054	27.60%	305	\$16.54	LHS
Registered Nurses	3,050	19.90%	305	\$34.27	BD
General and Operations Managers	2,179	15.40%	218	\$33.49	BD
Miscellaneous Assemblers and Fabricators	2,092	25.60%	209	\$14.77	HSDE
First-Line Supervisors of Construction Trades	1,755	39.00%	176	\$29.11	HSDE

Title	2020 - 2030 Projected Growth	2020 - 2030 Projected Growth Rate	Annual Change	Hourly Median Wage	Education Level**
Light Truck or Delivery Services Drivers	1,635	26.70%	164	\$15.63	HSDE
Electricians	1,629	31.40%	163	\$24.79	HSDE
Farmers, Ranchers, and Other Agricultural Managers	1,143	12.90%	114	\$31.17	HSDE
Passenger Vehicle Drivers, Except Bus Drivers, Transit and Intercity	1,086	27.40%	109	\$14.32	LHS

\*\*Education Level-See Data Appendix Table 7

Although the occupation “Carpenters” ranks number one on both tables, the addition of registered nurses, general operation managers and passenger vehicle drivers provides a unique perspective of high demand jobs. Churn should always be considered but the number of new job opportunities should be a priority. A complete list of the high-demand occupations is in Data Appendix Tables 4 and 5, High Demand Occupations and High Demand New Jobs.

The Idaho Department of Labor defines Idaho’s hot jobs — as the jobs that generally require some training, pay a better wage and are predicted to be in high demand. Specifically, the criteria used to determine which jobs are included on the hot jobs list include (1) the number of annual openings, (2) median wage, and (3) projected growth. Some hot jobs have fewer than 100 openings a year but make the list due to their high wages and projected growth. For example, the occupation of “environmental engineers” has only 78 annual openings, but the median wage and growth rate are remarkably high. The top 20 hot jobs are listed below. A complete list of all 50 of Idaho’s Hot Jobs is included in Data Appendix X Table 10 - Idaho Hot Jobs.

**Table 7: Top 20 Hot Jobs by Ranking**

Hot Job Rank	Title	2020 – 2030 Projected Growth	2020 – 2030 Projected Growth Rate	New Jobs	Total Annual Openings*	Hourly Median Wage	Typical Education Level**
1	Construction Managers	943	35.4%	94	418	\$36.43	BD
2	First-Line Supervisors of Construction Trades	1,755	39.0%	176	978	\$29.11	HSDE
3	Hazardous Materials Removal Workers	327	46.8%	33	191	\$34.05	HSDE
4	Dental Hygienists	561	27.4%	56	243	\$36.68	AD
5	Cost Estimators	476	34.7%	48	272	\$29.73	BD
6	Electricians	1,629	31.4%	163	1,175	\$24.79	HSDE
7	Registered Nurses	3,050	19.9%	305	1,465	\$34.27	BD

Hot Job Rank	Title	2020 – 2030 Projected Growth	2020 – 2030 Projected Growth Rate	New Jobs	Total Annual Openings*	Hourly Median Wage	Typical Education Level**
8	Environmental Engineers	174	34.7%	17	78	\$51.28	BD
9	Physical Therapists	427	24.1%	43	153	\$39.83	DPD
10	Sales Engineers	99	35.5%	10	65	\$49.69	BD
11	Plumbers, Pipefitters, and Steamfitters	628	30.3%	63	449	\$23.92	HSDE
12	Medical and Health Services Managers	416	17.5%	42	333	\$43.99	BD
13	Industrial Engineers	226	21.6%	23	134	\$44.67	BD
13	Carpenters	5,460	44.7%	546	2,733	\$18.59	HSDE
15	Physician Assistants	195	22.8%	20	104	\$53.79	MD
16	Software Developers and Software Quality Assurance Analysts and Testers	669	15.9%	67	559	\$44.03	BD
17	Cement Masons and Concrete Finishers	966	36.1%	97	564	\$20.60	LHS
18	Family Medicine Physicians	257	21.3%	26	76	\$99.26	DPD
18	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	1,022	30.9%	102	651	\$20.73	PDNA
20	Civil Engineers	424	17.3%	42	346	\$38.04	BD

\*Annual Openings include openings due to exits, transfers and projected growth (New Jobs) \*\*Education Level-See Data Appendix Table

7 SOURCE: Idaho Department of Labor Occupational Projections, 2020-2030

The list below shows major occupational groups and how many of Idaho's 50 hot jobs are included and the projected annual openings from those occupations.

- **Architecture and Engineering** – Seven occupations requiring an associate's or bachelor's degree, 1029 openings
- **Business and Finance** - One occupation requiring a bachelor's degree, 272 openings
- **Community and Social Service** - One occupation requiring a bachelor's degree, 328 openings
- **Computer and Mathematical** - One occupation requiring a bachelor's degree, 559 openings
- **Construction and Extractions** - Eleven occupations requiring either a high school diploma or equivalent or no formal educational credential, 9,746 openings

- **Education, Training and Library** - Two occupations requiring a bachelor's degree or a master's degree, 245 openings
- **Healthcare Practitioners and Technical** - Ten occupations requiring education ranging from an associate degree to a doctoral or professional degree — 2,442 openings
- **Healthcare Support** - One occupation requiring an associate-s degree, 105 openings
- **Installation, Maintenance and Repair** - Three occupations requiring either a high school diploma or equivalent or postsecondary non-degree award, 933 openings
- **Management** - Seven occupations with one requiring a high school diploma or equivalent and all others requiring a bachelor's degree, 4,892 openings
- **Personal Care and Service** - One occupation requiring high school diploma or equivalent, 708 openings
- **Production** – Two occupations requiring a high school diploma or equivalent, 1,445 openings
- **Sales and Related** - Two occupations—one requiring a high school diploma or equivalent and one requiring a bachelor's degree, 1,335 openings

Of the 50 hot jobs, 33 require some type of training beyond high school, including seven of the top 10. Projected growth of these occupations, coupled with education data and direct input from representatives of Idaho industries, lend strong support to the state's goal to increase educational attainment beyond high school. It is vital that Idaho's labor force seek educational opportunities to qualify for the hot jobs projected over the next 10 years.

The Research and Analysis Bureau in the Idaho Department of Labor publishes a monthly job listing report. The report provides current data on the number of job openings in Idaho for each month and the average number of new openings. The jobs are ranked by the monthly average listings. "New listings" are those listed for the first time that month. The number of listings open 90 days or more are considered hard-to-fill. The wages are presented as the median annual wage rather than the median hourly rate because that is what is published monthly. Many of the top 20 job listings are also on the high demand occupations based on occupational employment projections. Most of those occupations show up at the top of the job listings every month due to high demand. The top 20 job listings for 2019 are listed below.

**Table 8: Average Monthly Job Listings, 2019**

Rank	Occupational Title	2019 Average Job Listings	2019 Average New Job Listings	Median Annual Wage (OES)	Education Level*
	<b>Total, All Occupations</b>	<b>15,832</b>	<b>5,993</b>	<b>\$35,360</b>	
1	Registered Nurses	652	253	\$69,320	BD
2	Customer Service Representatives	496	197	\$32,020	HSDE
3	Retail Salespersons	448	175	\$25,220	LHS
4	Sales Representatives, Wholesale and Manufacturing,	445	168	\$54,950	HSDE



Rank	Occupational Title	2019 Average Job Listings	2019 Average New Job Listings	Median Annual Wage (OES)	Education Level*
	Except Technical and Scientific Products				
5	Heavy and Tractor-Trailer Truck Drivers	372	133	\$41,780	PNDA
6	First-Line Supervisors of Retail Sales Workers	320	124	\$39,720	HSDE
7	Laborers and Freight, Stock, and Material Movers, Hand	288	113	\$28,950	HSDE
8	Managers, All Other	255	97	*	HSDE
9	Combined Food Preparation and Serving Workers, Including Fast Food	236	93	*	HSDE
10	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	228	89	\$24,930	LHS
11	Computer Occupations, All Other	227	84	*	BD
12	Software Developers, Applications	225	80	*	BD
13	Maintenance and Repair Workers, General	207	78	\$35,320	HSDE
14	Nursing Assistants	189	70	*	PNDA
15	Medical and Health Services Managers	185	71	\$88,160	BD
16	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	167	66	\$33,520	HSDE
17	Personal Care Aides	165	65	*	HSDE
18	Cooks, Restaurant	160	56	\$24,830	LHS
19	Driver/Sales Workers	152	57	\$24,480	HSDE
20	Maids and Housekeeping Cleaners	147	58	\$22,440	LHS

\*Education Level-See Data Appendix Table 7

NOTE: Median Annual Wage is from the 2020 Occupational Employment & Wage Survey released in May 2020

SOURCE: Idaho Department of Labor - Communications & Research Division & the Conference Board's Help Wanted Online

## ***(ii) Emerging Demand Industry Sectors and Occupations & (iii) Employers' Employment Needs***

This section analyzes emerging demand industry sectors and occupations by way of examining high growth industries and occupations. In several cases, industries and occupations that have previously been discussed as high demand are also high growth. For example: construction is a high growth industrial sector and many construction occupations are in current high demand.

However, there are some occupations that are not currently high demand but are growing—such as electronics engineers or nuclear technicians. Additionally, subsectors within a high-growth industry may be emerging. For example, more than one-half of the growth in the health care field is projected to occur in ambulatory health care services, which include doctor's offices, outpatient care centers, home health care and laboratories. These and other trends are discussed in greater depth under "Growth Industries" and "Growth Occupations."

### **Growth Industries**

This section examines Idaho's industries in terms of projected employment growth. The industrial supersectors projected to have the largest net job growth between 2020 and 2030 are:

- Health Care and Social Assistance – 46,313
- Construction – 42,262
- Manufacturing – 25,296
- Accommodation and Food Services – 22,728
- Educational Services (include private and government jobs) – 19,895
- Wholesale Trade – 10,501

The graphs in Figures 1 and 2 present data on both the net growth and relative growth of the industries listed above, as well as several other industries. Specific information for these and other high-growth industries is provided the following graphs.

## Idaho's Industries by Relative Growth 2020 - 2030 Projections

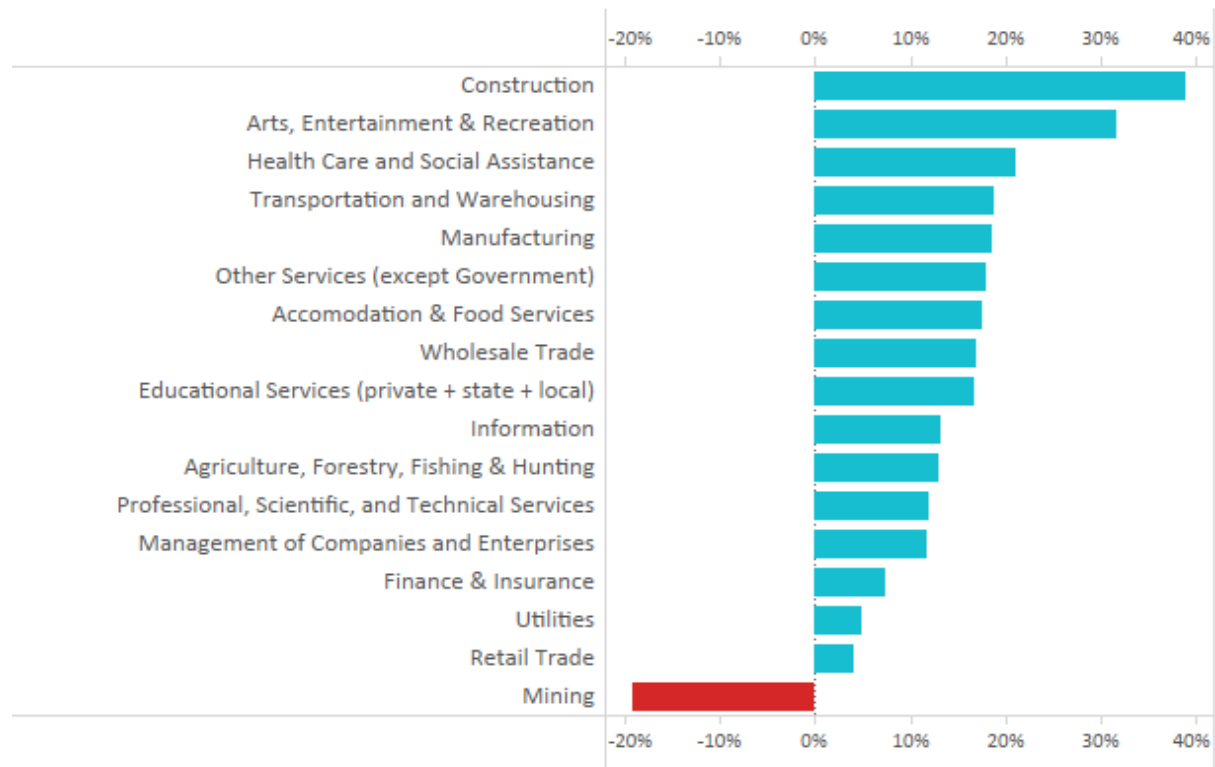


Figure 2. Idaho's industries growth projections from 2020 - 2030.

## Statewide Industry Projection 2020 - 2030 Industry Employment

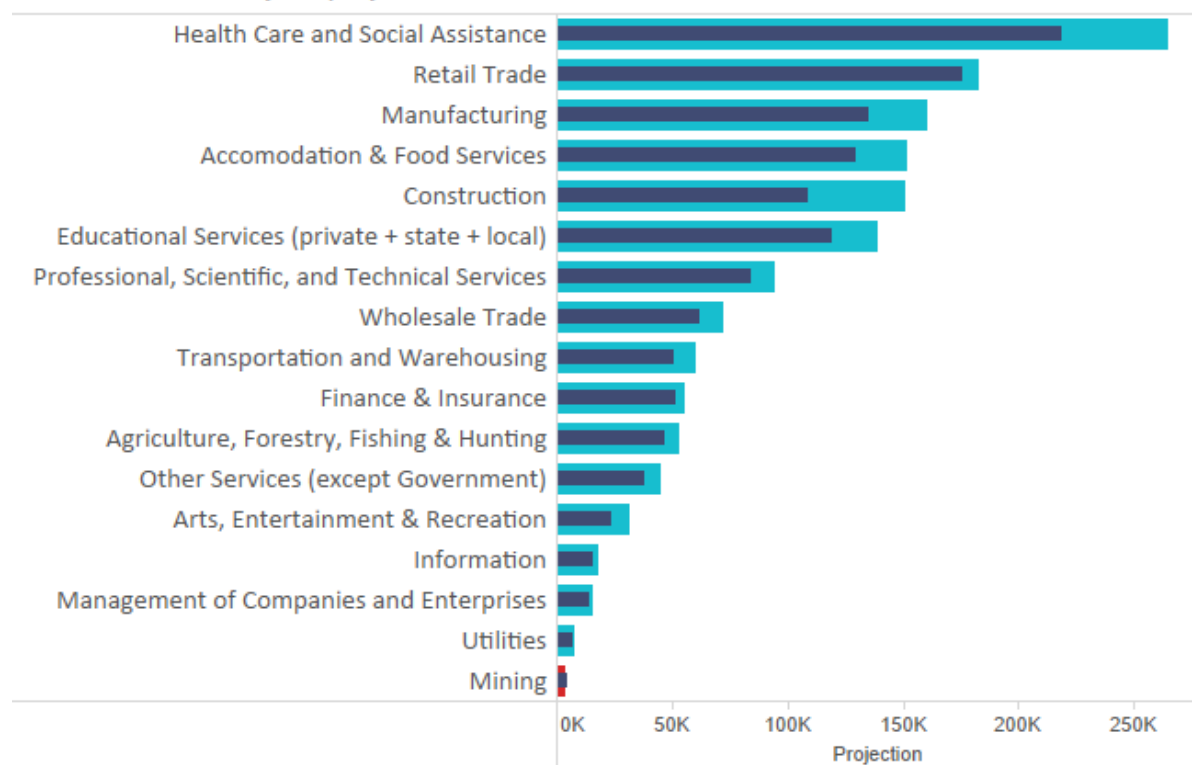


Figure 1. Statewide industry employment projections from 2020 base employment (dark blue) through 2030 projections (light blue).

Most of these industries are already among Idaho's largest. However, the new emerging and revitalized industries could be identified as: arts, entertainment and recreation, and transportation and warehousing. Each of these emerging industries are projected to add more than 5,000 jobs to its work force by 2030. An analysis of the growth in each industry sector follows.

**Construction:** Construction employment is projected to have the largest percentage growth at 39 percent, resulting in the addition of 42,262 new jobs. More than half of the new jobs will be in specialty trades including painting, electrician, and plumbing businesses. Heavy and civil engineering construction will have the smallest uptick at 2,100 jobs. With the high demand for new homes rapid growth in the state, jobs in both nonresidential and residential building construction are predicted to increase by over 16,911. Construction employment in 2030 is projected to be 150,936. Sixteen construction occupations are in the top 100 high demand. First-line supervisors of construction trades and extraction workers is the top 2<sup>nd</sup> in-demand occupation. Carpenters and electricians are in the top 50. Another five construction occupations are in the top 20.

**Arts, Entertainment & Recreation:** Employment in the Arts, Entertainment & Recreation industry ranked as having the second highest projected percent growth by 2030 at 32 percent. Employment in this industry is projected to add 7,666 new jobs over the next nine years. This industry includes amusement, gambling, recreation, performing arts, spectator sports, and museums/historical sites. More than two-thirds of the growth is projected to occur within occupations including amusement parks, fitness trainers, bartending, and waiters/waitresses. Performing arts and spectator sports are projected to add another 1,556 new jobs by 2030.

**Health Care and Social Assistance:** Over the long-term, the health care and social assistance sector is projected to add the most new jobs at 46,313. However, it ranks third in percentage growth at 21 percent. The aging workforce and in-migration of retirees will continue to drive significant growth in this sector. Ambulatory health care services, which include doctor's offices, outpatient care centers, home health care and laboratories is projected to grow by nearly 27 percent, adding more than 24,000 jobs over the next 10 years. Hospitals – including general, surgical, psychiatric and substance abuse facilities – are projected to grow by 20 percent. Nursing homes and residential care facilities will add 2,800 jobs by 2030. Social assistance is projected to add nearly 5,200 jobs, growing 16 percent, as more individuals and families are seeking counseling, services for the elderly and disabled, assistance with retraining, emergency food and shelter, and day care services. The growth and aging of Idaho's population will foster this industry's growth. Idaho's health care will grow about 21 percent between 2020 and 2030. Its rapid growth has led to shortages in many health care occupations. Over 20 percent of the high demand jobs are in the health care industry with the education ranging from an associate degree to a professional degree.

**Transportation and Warehousing:** Transportation and warehousing— a component of the trade, transportation and utilities sector—makes up about 17 percent of the sector's employment. Transportation and warehousing ranks fourth in percentage growth at 19 percent but ninth in numeric growth, projected to add just over 9,500 jobs. Most of the growth will come from the transit and ground passenger transport. Passenger vehicle drivers is ranked as the 80<sup>th</sup> top in-demand job.

**Manufacturing:** Manufacturing struggled the first few years of the decade following the recession but rebounded after 2011. By 2030 employment is projected to reach over 160,000, an increase of just over 25,000 jobs, ranking it fifth in percentage growth. Food processing will

account for 18 percent of the growth, while the computer industry's employment is projected to increase by 21 percent.

**Accommodation and Food Services:** Accommodation and food services industries, the largest part of the leisure and hospitality sector, is projected to add more than 22,000 jobs between 2020 and 2030. Jobs in the food services industry will account for 80 percent of this growth. It is estimated 18,700 job openings will include waiters and waitresses, food preparation and serving workers, counter attendants, dishwashers and cooks. Only restaurant cooks require more than short-term training. Most of these jobs require interaction with the public so good people skills are of relevant importance. Growth in Idaho's population and increased tourism activity will contribute to the employment increase.

**Wholesale Trade:** Jobs in wholesale trade will expand by more than 10,000 over the next 10 years, a projected increase of 17 percent by 2030. New jobs in merchant wholesalers – which include motor vehicle parts and suppliers, professional equipment, and machinery – projected to bring 11,500 new jobs by 2030. Wholesale electronic markets and merchant wholesalers of non-durable goods are both projected to experience a decline in projected jobs.

**Education Services:** Education services are forecast to add nearly 20,000 jobs, 17 percent increase, by 2030, in both public and private schools from kindergarten through postsecondary. Education accounts for more than half of government jobs. As Idaho's population continues to grow, student populations will rise. Although Idaho's economy is growing, schools continue to experience budget constraints. Some school districts have passed bond and levy elections to help ease local budgets and upgrade facilities and equipment, however, local school districts in many rural areas of Idaho continue to struggle with their budgets. Inadequate public school facilities and overcrowding – which is expensive to address and can become a barrier to attracting new residents to an area. The current budget pressures on public education will have a direct effect on the structure of Idaho's economy.

## Growth Occupations

This section examines Idaho's occupations both in terms of net growth (number) and relative growth (percentage). An occupation with large relative growth may not necessarily add a large number of jobs. Sixty-five of Idaho's top 100 in-demand occupations are projected to experience very high relative growth between 2020 and 2030, defined as an increase of 20 percent or more in total number of jobs. However, the majority of these high-growth occupations have less than 500 annual openings. Openings do not just come from the addition of new jobs but also from the need to replace workers that are exiting the occupation or leaving the labor force. Of the sixty-five fastest growing in-demand occupations with a projected growth of 20 percent or more, only five have at least 1,000 annual openings. Table 9 shows the top 20 fastest growing in-demand occupations. Of the 20 occupations listed below, four have more than 100 new job openings and ten require more than a high school education. Table 6 in Data Appendix provides a list of the relative growth of occupations with at least 200 openings.

**Table 9: Idaho Demand Occupations by Projected Relative Growth (Percent Change)**

Hot Job Rank	Occupation	2020 Jobs	2030 Jobs	Net Change	Growth Percent	New jobs	Annual Openings	Education Level
97	Photographers	631	980	349	55.3%	35	145	BD

<b>Hot Job Rank</b>	<b>Occupation</b>	<b>2020 Jobs</b>	<b>2030 Jobs</b>	<b>Net Change</b>	<b>Growth Percent</b>	<b>New jobs</b>	<b>Annual Openings</b>	<b>Education Level</b>
3	Hazardous Materials Removal Workers	698	1,025	327	46.8%	33	191	HSDE
31	Structural Iron and Steel Workers	359	520	161	44.8%	16	92	BD
13	Carpenters	12,228	17,688	5,460	44.7%	546	2,733	LHS
2	First-Line Supervisors of Construction Trades and Extraction Workers	4,499	6,254	1,755	39.0%	176	978	PNDA
27	Drywall and Ceiling Tile Installers	1,641	2,270	629	38.3%	63	330	BD
86	Carpet Installers	567	775	208	36.7%	21	114	LHS
17	Cement Masons and Concrete Finishers	2,679	3,645	966	36.1%	97	564	BD
53	Brickmasons and Blockmasons	409	556	147	35.9%	15	85	HSDE
64	Cargo and Freight Agents	323	438	115	35.6%	12	62	BD
10	Sales Engineers	279	378	99	35.5%	10	65	BD
1	Construction Managers	2,665	3,608	943	35.4%	94	418	BD
71	Cabinetmakers and Bench Carpenters	1,243	1,681	438	35.2%	44	242	BD
8	Environmental Engineers	501	675	174	34.7%	17	78	HSDE
5	Cost Estimators	1,372	1,848	476	34.7%	48	272	MD
98	Electrical, Electronic, and Electromechanical Assemblers	1,157	1,549	392	33.9%	39	246	
90	Refuse and Recyclable Material Collectors	430	575	145	33.7%	15	113	HSDE
36	Roofers	1,220	1,612	392	32.1%	39	255	HSDE
6	Electricians	5,181	6,810	1,629	31.4%	163	1,175	LHS
18	HVAC and Refrigeration Mechanics and Installers	3,306	4,328	1,022	30.9%	102	651	HSDE

\*Annual Openings include openings due to exits, transfers and projected growth (New Jobs) \*\*Education Level-See Data Appendix Table

## B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

### I. EMPLOYMENT AND UNEMPLOYMENT

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

### II. LABOR MARKET TRENDS

Provide an analysis of key labor market trends, including across existing industries and occupations.

### III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Provide an analysis of the educational and skill levels of the workforce.

### IV. SKILL GAPS

Describe apparent 'skill gaps'.

#### (i) Employment and Unemployment Trends

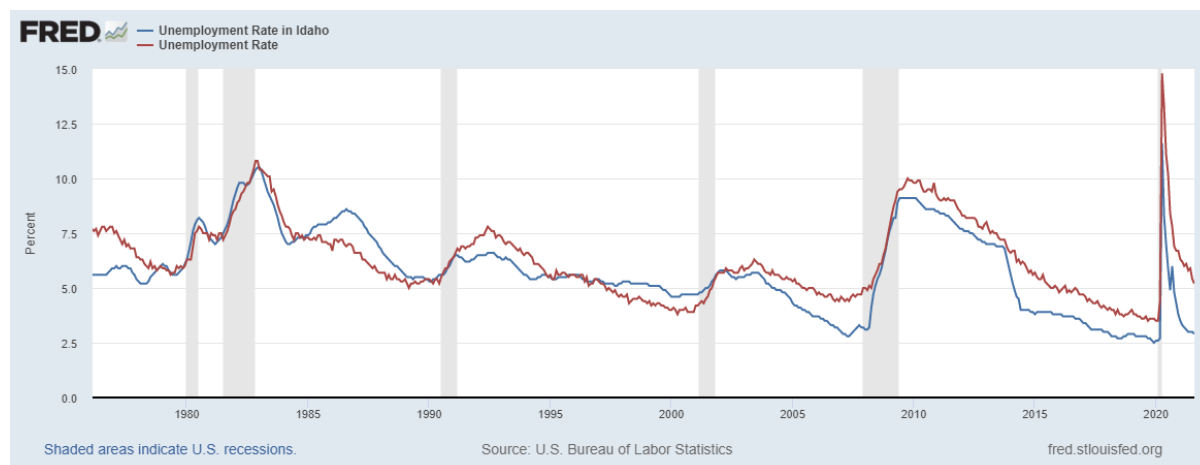
##### **General Employment Trends**

In Idaho, jobs grew at a healthy pace from 2003 through 2006. By mid-2007, the growth began to slow and ended in August when the number of people employed began to decline and continued to decline through mid-2009. The seasonally adjusted unemployment rate increased from a low of 2.9 percent in March 2007 to 9.6 percent in June 2009. However, following this sharp incline in unemployment rate, Idaho's economy began to recover and the unemployment rate steadily declined over the next several years to a record low of 2.5 percent in late-2019.

Following the emergence in COVID-19 in early 2020 and the Idaho Governor's Stay-at-Home order in response, Idaho experienced a sharp spike in unemployment, reaching a record high of 11.6 percent unemployment in April 2020. By the end of 2020, Idaho's economy showed signs of recovery, with unemployment rates declining to 3.8 percent by December. Idaho's unemployment rate has continued to remain below the national average since 2001. Figure 3

(below) shows the comparison of Idaho's seasonally adjusted unemployment rate to the national average.

**Figure 3.** Comparison of Idaho's Seasonally Adjusted Unemployment rate to the U.S. Average



Prior to COVID-19, Idaho's economy had been exhibiting strong healthy growth. The year-over-year number of employed workers increased and the year-over-year number of unemployed workers decreased each month since the recession ended in July 2009, with a few minor upticks early on in the recovery.

In March of 2020, when Idaho's Governor enacted a Stay-at-Home order in response to COVID-19, Idaho's initial unemployment claims spiked from a typical level of 1,031 to nearly 33,000 within two weeks. Idaho's continued claims reached a peak 71,794 claimants filing in early May of 2020. The industries most affected include accommodation and food service, health care and social assistance, and retail trade, together accounting for more than half of initial claims at the peak. One year later – in March of 2021 – initial claims in those three industries returned to near pre-pandemic levels, each having more than an 80 percent reduction.

Retail trade and health care account for the top two industries by projected employment in 2030. Since 2010, employment in health care and social assistance has increased 37 percent from 72,800 to 99,800; retail trade was reported at 93,200 in January of 2021, up more than 24 percent from 75,000 in 2010. While retail trade is projected to account for the second-most employment in the state, relative growth is projected to slow down to under 10 percent, less than half the relative growth from 2010 – 2020.

Top occupations held by unemployment claimants include construction and extraction – accounting for 15 percent – building cleaning and maintenance, and transportation and material moving. Compared to the prior year, claimants in those occupations have increased by more than 10 percent.

Some characteristics of the unemployed are: 62 percent are male, 16 percent are Hispanic (by ethnicity), 53 percent are white and 59 percent are between the ages of 25 and 54. (Detail data is in Data Appendix Table 17 – UI-Claimant Characteristics).



## Overall Labor Force Participation

The labor force consists of individuals who are in the workforce employed or looking for work. Idaho's civilian labor force participation rate—percentage of civilians 16 years and over who are employed or looking for work—in 2019 was 63.2 percent, down from Idaho's highest participation rate of 70.0 percent in 2005. Idaho's labor force participation rates have consistently been above the national rates since 2010. In 2005 the state's participation rate was 70.0 percent compared to the national rate of 66.0 percent. Idaho's participation rate has been around 64.0 since 2013 except for 2014 when it was 63.1 percent. The national rate has hovered around 62.9 during the same period.

The labor force participation rate varies by age group and gender. In the 1-Year American Community Survey 2019 estimates (2020 data was not released due to COVID-19), ages 25-54 had the highest labor participation rate at 81.3 percent. The next highest was ages 16-24 at 67.4 percent. Men had a participation rate of 68.2 percent and women 58.5 percent. Table 10 shows the labor participation rate by age and gender.

**Table 10: 2019 Labor Force Participation Rates by Age and Gender (Population in Thousands)**

	2019 Civilian Population	2019 Civilian Population Labor Force	2019 Labor Force Participation Rate
Population 16 and Over	1,386	877	63.2%
16-24	215	145	67.4%
25-54	664	540	81.3%
55-64	219	141	64.3%
65 and older	288	51	17.7%
Population 20 to 64 Years	1,002	778	77.6%
Men	692	472	68.2%
Women	694	406	58.5%

Source: Census.gov, American Community Survey

## Employment Trends by Population

The table below provides employment information for Idaho's labor force by age, race, and gender, taken from the American Community Survey (ACS) five-year estimates for 2015-2019. information provides insight into whether specific groups may face barriers to employment. Specific trends are discussed following Table 11.

The American Community Survey (ACS) five-year data is the only source for detailed information on unemployment rate by age, race and ethnicity.

**Table 11: Idaho Labor Force by Age, Race and Gender**

Population Subgroups	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
Total Population, aged 16 Yrs & Older	1,327,132	828,116	792,237	35,879	4.5%
<b>Age</b>					
16 to 19 years	96,966	45,373	38,548	6,825	15.0%
20 to 24 years	114,610	34,896	31,530	3,366	9.6%
25 to 29 years	114,370	54,603	51,155	3,448	6.3%
30 to 34 years	110,604	89,932	85,322	4,610	5.1%
35 to 44 years	214,214	86,876	84,043	2,833	3.3%
45 to 54 years	200,024	17,4713	169,469	5,244	3.0%
55 to 59 years	107,070	16,2304	157,956	4,348	2.7%
60 to 64 years	104,385	77,870	75,672	2,198	2.8%
65 to 74 years	160,197	27,050	26,205	845	3.1%
75 years and over	104,692	29,942	29,066	876	2.9%
<b>Race and Hispanic or Latino Origin</b>					
White Alone	1,205,357	747,756	716,611	31,145	4.2%
Black Alone	8,317	5,252	4,804	448	8.5%
American Indian & Alaska Native Alone	17,859	10,435	9,475	960	9.2%
Asian Alone	20,022	12,421	12,042	379	3.1%
Native Hawaiian & Other Pacific Islander Alone	2,114	1,331	1,178	153	11.5%
Some Other Race Alone	43,399	31,271	29,979	1,292	4.1%
Two or More Races	30,064	19,650	18,148	1,502	7.6%
Hispanic or Latino Origin of any race	143,364	100,856	95,712	5,144	5.1%
White Alone, not Hispanic or Latino	1,115,497	684,818	657,137	27,681	4.0%
<b>Gender (Civilian Labor Force)</b>					
Male	660,777	448,460	428,611	19,849	4.4%
Female	666,355	379,656	363,626	16,030	4.2%

As Table 11 shows, the largest age cohort for Idaho workers is those 45 to 54 years old. The age group experiencing the highest unemployment rate is teens 16 to 19 years old, while the group with the lowest unemployment rate are 55 to 59 years old.

It is important to note that the youth listed in this table are those who are part of the workforce and actively looking for work. The state is implementing several strategies designed to increase employment, education and skill attainment opportunities for this youth demographic.

During the five-year period (2015-2019) more than 90 percent of Idaho's labor force is White alone, and this group has an unemployment rate of 4.2 percent—the third lowest among racial and ethnic groups. The lowest unemployment rate was among Asian alone at 3.1 percent. Native Hawaiian and Other Pacific Islander alone make up the smallest portion of Idaho's labor force at 0.1 percent and have an 11.5 percent unemployment rate – the highest of all racial groups. American Indian and Alaska Native alone as well as Black experienced the next highest unemployment rates, at 9.2 and 8.5 percent, respectively.

People of Hispanic or Latino origin—a designation which crosses multiple racial groups—represent 12 percent of Idaho's workforce and had an unemployment rate of 5.1 percent.

Men in the workforce were unemployed at a rate of 4.4 percent compared to 4.2 percent for women.

Veterans, another important demographic group in Idaho, totaled 116,157 according to the American Community Survey 2015-2019 data. Nearly 95 percent of Idaho's veterans are White and males account for 92 percent while 36 percent are between the ages of 35 and 64. This group is well educated with nearly 30 percent having a bachelor's degree or higher. The unemployment rate for veterans was 4.4 percent, more than 50 percent higher than the state's average unemployment rate in 2019. Additional information is found in Data Appendix Table 19 - Idaho's Veterans.

Idaho is home to five Indian reservations - the Coeur d'Alene and the Kootenai (both in northern Idaho), the Nez Perce (north central Idaho), the Shoshone-Paiute (Duck Valley on the Idaho-Nevada border) and the Shoshone-Bannock (Fort Hall in southeastern Idaho). Total statewide reservation population is 33,377 and includes a variety of races outside of Native American. The largest race is White at 21,950, or 66 percent of the total reservation population. The American Indian and Alaska Native population is second with 8,933, or 27 percent. Most of the workers are in management, business, science and arts occupations. Education services, health care and social assistance provide the largest number of jobs at 2,758. Arts, entertainment and recreation, and accommodations and food services have the second largest number of jobs with over 1,661. Four other industry groups—agriculture, forestry, fishing, hunting and mining; manufacturing; retail trade; and public administration (government) employ more than 1,000 workers. One-third of the reservations' population 25 years and over has a high school diploma or equivalency. Over 68 percent have some college or more. Data Appendix Tables 18a and 18b - Idaho Indian Reservations detail further information specific to reservations.

### **Idahoans with Disabilities**

The Workforce Innovation and Opportunity Act calls for enhanced services and opportunities for individuals with disabilities in the workforce system. As a result, this population has been analyzed in greater detail in Idaho's Combined State Plan. The information below provides a deeper look at Idaho's population of people with disabilities and the employment trends

therein. Data is sourced from the American Community Survey estimates unless otherwise noted.

The number of people with disabilities in Idaho is growing. The American Community Survey one-year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 241,391 in 2019, representing an increase of 17 percent over five years. This indicates Idaho's population of people with disabilities is increasing at a rate faster than growth in the general population.

According to data from the 2019 American Community Survey, 12.7 percent of Idaho civilians living in the community report having a disability, including 10.5 percent of residents of working age (18-64). The prevalence of disability in Idaho roughly corresponds to that of the United States, with estimates all within one-percentage point each of the past eight-years, with the exception of 2015.

**Table 12: Civilians Living in the Community by Age and Disability Status**

Civilian Population	Total	Population With Disability	Percent	Population Without Disability	Percent
US Population	323,120,678	41,089,958	12.7%	282,030,720	87.3%
Idaho Population	1,764,911	241,391	13.7%	1,523,520	86.3%
Under 5 Years	115,837	1,063	0.9%	114,774	99.1%
5 to 17 Years	332,592	20,065	6.0%	312,527	94.0%
18 to 34 Years	393,026	35,011	8.9%	358,015	91.1%
35 to 64 Years	639,586	86,897	13.6%	552,689	86.4%
65 to 74 Years	172,552	42,440	24.6%	130,112	75.4%
75 Years and Over	111,318	55,915	50.2%	55,403	49.8%

SOURCE: American Community Survey 1-Year Estimates: 2019 (Table S18101)

The table above demonstrates that the percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to a number of factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. This trend is illustrated in Table 12 above, with only 6.0 percent of individuals aged 5 to 17 experiencing disability compared to 13.6 percent for those aged 35 to 64 and 34.6 percent for those aged 65 or older. Because the 35 to 64 age group is quite large, the variance within that group is large as well: around half as many individuals age 18 to 34 experienced a disability.

When conducting its research, the American Community Survey includes questions related to six disability categories. Residents are asked if they have difficulty in any of the following areas:

- Hearing: deaf or having serious difficulty hearing.
- Vision: blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive: difficulty remembering, concentrating, or making decisions due to physical, mental, or emotional problem.

- Ambulatory: serious difficulty walking or climbing stairs.
- Self-care: difficulty bathing or dressing.
- Independent living: difficulty doing errands alone such as visiting a doctor's office or shopping due to physical, mental, or emotional problem.

Table 13 provides information about the prevalence of these various disability types in Idaho. Self-report of disability category can include responses in multiple categories and therefore exceed 100 percent. The presence of co-occurring disabilities has a negative relationship with competitive, integrated employment.

**Table 13: Civilians Aged 18 to 64, Living in the Community by Disability Type**

Disability Category	Number of Idahoans Reporting a Disability*	Percent of Idaho's Total Population (18-64)	Percent with a Disability Reporting a Disability within a Category
Hearing	27,334	2.6%	2.4%
Vision	22,142	2.1%	18.2%
Cognitive	56,065	5.4%	45.9%
Ambulatory	51,911	5.0%	42.5%
Self-Care	16,493	1.6%	13.5%
Independent Living	38,429	3.7%	31.5%

SOURCE: American Community Survey 1-Year Estimates: 2019 (Table B18120)

**Table 14: Civilians Aged 18 to 64, Living in the Community by Disability Type**

Disability Type	Total Population*	Number Employed	Number Unemployed	Unemployment Rate for those in Labor Force	Number Not in Labor Force	Percent Not in Labor Force
Cognitive	56,065	19,977	2,066	10.3%	34,022	60.6%
Hearing	27,334	16,445	822	4.9%	10,067	36.8%
Self-care	16,493	2,783	218	7.8%	13,492	81.8%
Vision	22,142	11,302	218	1.9%	10,622	48.0%
Ambulatory	51,911	16,026	1,455	9.1%	34,430	66.3%
Independent living	38,429	9,189	1,069	11.6%	28,171	73.3%
All Disabilities	121,908	54,417	4,007	7.3%	63,484	52.1%
No disability	910,704	727,649	22,429	3.1%	160,626	17.6%

SOURCE: American Community Survey 1-Year Estimates: 2019 (Table B18120)

Table 14 shows the employment status of Idahoans by self-reported disability type. Variation in employment between disability categories is substantial. For example, those individuals with hearing impairments participate in the labor force at a rate of 63 percent, and of those only 4.9 percent are unemployed. Whereas those with a cognitive disability participate in the labor force at a rate of 39 percent, and 10.3 percent are unemployed. When taken as a group, Idahoans with disabilities participated in the labor force at a rate of 48 percent, compared to 82 percent for people without disabilities, and the unemployment rate for Idahoans with disabilities was 7.3 percent, on average, compared to 3.1 percent for those without disabilities.

Disability is also strongly associated with poverty: 24.7 percent of Idahoans below age 65 having a disability fall below the poverty threshold (ACS, 2019 1-year estimates).

Finally, it is worth noting that a significant percent of Idaho's growth can be attributed to people moving to the state. Further analysis of population trends by age across time suggest a significant portion of Idaho's population growth can be attributed to people age 65 and over moving to the state to enjoy a comparatively cheaper cost of living during retirement. These individuals, due to their age, are more likely to report experiencing a disability, and are less likely to be seeking employment than Idaho's population on average. This trend is illustrated by a significantly reduced poverty rate for Idahoans with disabilities in retirement age, (8.8 percent for ages 65-74 and 8.3 percent for ages 75 years and over). Compared to the 2014 1-Year ACS estimates, both age groups have seen reductions in poverty rate from 13.8 and 9.9 percent, respectively. Those Idahoans with disabilities between 18-65 experience far higher rates of poverty, with all working age cohorts' poverty rates ranging between 23 and 32 percent.

## **(ii) Labor Market Trends**

This part of Section (II)(a)(1)(B) discusses general trends regarding Idaho's population and workforce, a discussion of in-migration to our state, as well as trends and changes in Idaho's population demographics. It also examines wage and income information, and finally, trends relating to Idaho's job market.

### **General Population Trends**

Idaho's economy and workforce have historically been, and continue to be, impacted by the state's geography and population distribution. Idaho is a large, sparsely populated state with a 2020 census population of 1.839 million spread across more than 82,000 square miles. Idaho's average population density is 21.9 persons per square mile, though the population tends to cluster within the six urban counties, Ada, Canyon, Kootenai, Bonneville, Bannock and Twin Falls. The density in these counties is over 140 persons per square mile while density in the rest of the state is only 7.9 people per square mile. Ada County has the highest density at 424 persons per square mile. Camas County, one of Idaho's smaller counties, has the smallest density at 6 persons per 10 square miles. The rural areas, often separated by large distances, mountain ranges and rivers from the nearest urban hubs, pose a challenge for service access and require special consideration in creating any statewide system.

The steady shift of Idaho's population from rural counties to urban counties continues. From 1920 until 1972, the population in rural Idaho exceeded that of urban counties. However, from the 1970s on a new demographic era began as people increasingly moved from more rural to less rural areas resulting in increased concentrations in what today are Idaho's six most populous counties. The population of those six counties account for nearly two-third of the state's total population while one third is distributed among the other 38 counties.

The six urban counties had a combined population of 1,198,462 in 2020, accounting for more than 75 percent of the growth in the state's population since 2010 and 65 percent of overall population. Idaho's largest county, Ada, is located in Southwest Idaho. It is the only county with a population over 400,000.

Idaho had four counties with a population of 10,000 or more that ranked nationally in the top 100 counties for percentage growth between years 2010 – 2020. These include Madison (41 percent), Ada (26 percent), Kootenai (23 percent) and Canyon (22 percent).

Idaho's population and economy are expected to see continued growth. The forces that drove Idaho's expansion prior to the recession still exist as they did in the 1990s. Population has grown primarily through in-migration of people attracted by Idaho's quality of life—despite wage and income levels that rank near the bottom of the states. Many of those coming to Idaho are retirees over the age of 65. Increasing population—and an aging population—create more demand for goods and services, which has led to the predominance of the service sector. Our aging population has also increased demand for occupations in the health care industry.

Idaho's population has grown 44 percent since the turn of the century. The 2020 decennial census, showed the continuation of Idaho's strong growth with a 2.9 percent increase, making it one the fastest-growing states in the US. Its growth was much faster than the national growth rate of 1.0 percentage points. It was similar to the state's peak growth rate in the 2000-2010, occurring in 2006 just before the recession, and more than four times the growth rate in the recession decade of the 1980s. Idaho's population increased by 52,041 in 2020 to 1,839,106. Idaho ranks 38<sup>th</sup> among the states in overall population, up two compared to the 40<sup>th</sup> most populous ranking in 2010.

### **In-Migration**

Idaho's net migration during 2020 was 30,961 or 82 percent of the population growth while the rest of the population growth was due to the difference between births and deaths. This much growth from immigration sets the state as the one of the fastest recipient of population from the surrounding states and California.

In 2020 more people moved into 40 of Idaho counties than moved out. The increase from net migration ranged from 12,519 in Ada County to just 7 in Power County. Four counties—Caribou, Custer, Lemhi, Lewis — experienced negative migration – in total, 70 more people left than moved in. The 14 counties that make up Idaho's metropolitan areas accounted for 87 percent of the state's net migration.

In-migration is expected to increase as Idaho's economy continues its growth as the state attracts new businesses and local companies expand. With the creation of additional jobs, more local job seekers stay in Idaho, reducing out-migration. At present, there is a shortage of workers and a need for an influx of skilled workforce into the state.

The table below shows in-migration between 2010 and 2020. The recession caused the drop in net migration from 2009 to 2010. Domestic in-migration and out-migration consist of moves where both the origin and destination are within the United States. International migration accounts for any change of residence across the borders of the United States and Puerto Rico. Net international migration is estimated in four parts: foreign born, between the United States and Puerto Rico, of natives to and from the United States and movement of the Armed Forces population between the United States and overseas. The largest component, net international migration of the foreign born, includes lawful permanent residents (immigrants), temporary migrants (such as students), humanitarian migrants (such as refugees) and people illegally

present in the United States. After 2011 net migration increased primarily due to the international portion. However, since 2012 net migration increases are largely due to the domestic portion; international migration has since declined significantly following 2017.

**Table 15: Idaho Net Migration, July 2010 through Jun 2020**

Time Period	Net Migration	Domestic	International
July 2010	-194	-381	187
July 2011	2337	524	1813
July 2012	1035	-721	1756
July 2013	5574	3535	2039
July 2014	10059	8470	1589
July 2015	10065	6771	3294
July 2016	22168	18550	3618
July 2017	26857	25035	1822
July 2018	24864	24401	463
July 2019	29224	28466	758
July 2020	30961	30283	678

SOURCE: Annual Population Estimates, U.S. Census Bureau

International migration could be the reason that 10.8 percent of the population over the age of 5 speaks a language other than English – with the predominant language being Spanish. Of those who speak a language other than English, nearly 45 percent were foreign-born, 17 percent have incomes below the poverty level and 30 percent have less than a high school education.

### Demographic Trends

According to EMSI, Idaho’s population is expected to grow by 18 percent from 2020 to 2030 (Table 16a). In the same period, Hispanics, the state’s largest minority, will grow much faster at 33 percent (Table 16b).

Over the next decade however, the major demographic impact in Idaho will come from the aging of the population. Although Idaho has a higher percentage of workers aged 24 and younger than the nation as a whole, the state will not be immune from an aging labor force as workers age 55 and older leave the workplace. This will encourage employers to provide a work environment that entices experienced and highly skilled workers to remain on the job and in the state.

The overall composition of the population is also changing. Projections indicate that Idahoans aged 60 to 64 years will decrease by 1 percent while age groups 65 and older will all increase by 15 percent or more. The age group 55 to 59 will have the smallest growth at only 2 percent. The second and third smallest growth rates will be in the 10 to 14-year-old at 3 percent, and 15 to 19-year-old at 8 percent. Over time, this may mean fewer workers aging into the labor force to replace those aging out. While this trend was somewhat evident between 2000 and 2010, it will become much more pronounced as the youngest in the baby boomer generation pass the threshold of 65 in the present decade. Even with an expanding cadre of older workers, Idaho has a relatively large number of young people entering or soon to enter the labor force.



**Table 16(a): Projected Population by Age for Idaho, 2020-2030**

	2020	2030	Percent Change
<b>Total Population</b>	<b>1,826,913</b>	<b>2,148,168</b>	<b>18%</b>
Age			
Under 5 years	113,848	137,818	21%
5 to 9 years	125,055	139,107	11%
10 to 14 years	132,772	136,595	3%
15 to 19 years	127,139	137,227	8%
20 to 24 years	119,974	134,146	12%
25 to 29 years	122,723	135,302	10%
30 to 34 years	118,855	137,615	16%
35 to 39 years	120,252	144,479	20%
40 to 44 years	113,978	139,533	22%
45 to 49 years	104,222	134,175	29%
50 to 54 years	101,277	121,866	20%
55 to 59 years	109,050	111,586	2%
60 to 64 years	111,774	110,442	(1%)
65 to 69 years	102,392	117,943	15%
70 to 74 years	83,550	112,655	35%
75 to 79 years	55,797	90,659	62%
80 to 84 years	33,841	61,806	83%
85 years and over	30,414	45,214	49%

SOURCE: Economic Modeling Specialist, Inc. (EMSI)

**Table 16(b): Projected Population by Age for Idaho, 2020-2030**

	2020	2030	Percent Change
<b>Total</b>	<b>1,826,913</b>	<b>2,148,168</b>	<b>18%</b>
White, Non-Hispanic	1,487,564	1,692,466	14%
White, Hispanic	209,735	279,053	33%
Two or More Races, Non-Hispanic	38,476	53,161	38%
Asian, Non-Hispanic	27,095	38,617	43%
American Indian or Alaskan Native, Non-Hispanic	19,438	22,246	14%

	2020	2030	Percent Change
Black, Non-Hispanic	13,793	19,841	44%
American Indian or Alaskan Native, Hispanic	12,398	14,366	16%
Two or More Races, Hispanic	9,137	13,345	46%
Native Hawaiian or Pacific Islander, Non-Hispanic	3,275	5,213	59%
Black, Hispanic	2,978	4,618	55%
Asian, Hispanic	2,187	3,579	64%
Native Hawaiian or Pacific Islander, Hispanic	837	1,662	99%

SOURCE: Economic Modeling Specialist, Inc. (EMSI)

### GDP and Personal Income

Another major economic factor in Idaho is wages and income. Although Idaho has a low unemployment rate, the state also tends to have lower average wages compared to the rest of the nation. Low wages may be attractive from the perspective of operating a business, but they also make it difficult to attract highly skilled workers. Idaho's low average wages can be attributed in large part to the relatively high share of jobs in the food service and retail sectors, where pay is typically low.

Personal income and gross product are indicators for measuring the business activity in a state and a broad measure of the state's economic wealth. As indicated in Table 17, personal income and gross state product rebounded in 2010 with consistent annual increases. In 2020, Idaho's gross domestic product experienced the smallest increase since 2010, at 1.7 percent. However, total personal income for 2020 increased by 9.2 percent, the highest year-over-year change in the past decade.

**Table 17: Idaho Gross Product and Personal Income 2008-2020 (in thousands)**

Year	Gross Domestic Product	Percent Change from Previous Year	Total Personal Income	Percent Change from Previous Year
2008	\$55,546		\$50,205	
2009	\$53,775	-3.2%	\$48,477	-3.4%
2010	\$55,171	2.6%	\$50,197	3.5%
2011	\$56,488	2.4%	\$53,083	5.7%
2012	\$57,764	2.3%	\$56,140	5.8%
2013	\$61,018	5.6%	\$58,338	3.9%
2014	\$63,522	4.1%	\$61,827	6.0%
2015	\$66,004	3.9%	\$65,825	6.5%

Year	Gross Domestic Product	Percent Change from Previous Year	Total Personal Income	Percent Change from Previous Year
2016	\$69,029	4.6%	\$68,445	4.0%
2017	\$72,723	5.4%	\$72,355	5.7%
2018	\$77,052	6.0%	\$77,012	6.4%
2019	\$82,420	6.9%	\$81,565	5.9%
2020	\$83,822	1.7%	\$89,078	9.2%

SOURCE: Bureau of Economic Analysis

## Job Market Trends

Idaho's industrial make-up shifted since the 2007 recession. The jobs losses between 2007 and 2010 primarily came from construction and manufacturing, while many of the jobs gains between 2010 and 2020 came from health services and social services (25,200). This was followed by a rebound in construction (24,400) and manufacturing (14,800). Other industry sectors that have recorded job growth in excess of 10,000 are accommodation and food services (14,800), retail trade (13,500), and professional and technical services (13,200).

The bulk of the available jobs in 2020 were registered nurses, additionally impacted by COVID-19 pandemic and the high demand for healthcare workers. Following this were low-wage low-skill jobs in the customer-service and retail industry. However, although current economic projections rank healthcare and social assistance and retail trade as holding the bulk of jobs in 2030, retail trade is projected to have the slowest growth of all industries from 2020 – 2030 at just under 5 percent. This is a significant shift from earlier years that projected large growth in retail trade, with the model conceivably now factoring in the current retail shift to online sales. The state workforce agency has provided an increasing number of rapid response services in response to a large trend of national, regional and local retail closures.

Despite the retail closures, a review of Idaho's real-time labor market information from Help Wanted Online for 2020 shows continued demand for retail workers. There was an average of 640 job openings for first-line supervisors of retail sales workers and 896 openings for retail salespersons, with an average time of fill of 36 and 33 days, respectively.

Although manufacturing jobs have increased, the types of jobs available within the industry are projected to grow at different rates. Between 2020 and 2030, computer and electronic manufacturing is projected to grow by more than 20 percent. While food manufacturing represents the largest share of job in the industry, it is projected to grow by 12 percent.

Health care has continued to grow irrespective of economic conditions. There has been a continuous need for occupations at all skill levels, from certified nursing assistants to primary care physicians. According to Help Wanted Online, registered nurse is the hardest job to fill in Idaho - with an average of 1,784 openings in 2020 with an average time to fill of 39 days. After registered nurses, customer service representatives had an average of 993 openings, about 25 percent less than registered nurses. However, they ranked fifth in hard to fill with an average of 327 monthly openings.

Retail salesperson were high on both the monthly listings and hard-to-fill lists. Additionally, truck drivers are consistently in the top ten jobs listing.

Unlike health care, the construction industry is highly affected by the economy. The recession had a devastating effect on this sector - dropping from nine percent of all jobs in 2006 to five percent in 2010. Although construction jobs account for only seven percent of total nonfarm jobs in 2020, the number of jobs has increased 78 percent since 2010, including 24 percent in the past three years alone.

### **(iii) Education and Skill Levels of the Workforce**

This part of Section (II)(a)(1)(B) outlines trends in Educational Attainment for Idaho's general population, as well as for specific populations with barriers, where data is available. All data is obtained from the American Community Survey 5-year 2015-2019 data.

#### **Educational Attainment - General Population**

In Idaho, a sizable portion of the population completes high school education. About 87 percent of the 18-24 age group and 91 percent of 25 and older have at least a high school diploma. However, as discussed further in the following sections, the trend towards high school graduation does not necessarily apply to specific populations with barriers to employment.

While high school participation is generally high, participation drops off at the post-secondary level. About 44 percent of the 18-24 age group have some college or an associate degree, and 6.9 percent have a bachelor's degree or higher. For those age 25 and over, 26 percent have some college but no degree, 9.8 percent have an associate degree, and 27.6 percent have a bachelors or higher. In other words, the majority of Idaho's youth graduate from high school, while just over half (51 percent) of young adults age 18-24 participate in post-secondary education. And a little more than one third (39 percent) of Idaho's adults have an associate degree or higher.

#### **Educational Attainment - By Race**

The American Community Survey Data provides educational attainment by race for the groups listed below. While races other than white, in combination, make up only 8 percent of the state's population over the age of 25, these groups do have significant variances in Educational Attainment that are worth noting. For example, within the group of Asians, 43 percent hold a bachelor's degree, compared to the next highest group at 28 percent (White alone). Among those who self-identify as "Some other race," 44 percent have less than a high school diploma.

Educational attainment data is also available for Hispanics, which includes all races. The data shows that like "Some other Race" about 35 percent have less than a high school education

**Table 18: Educational Attainment by Race**

Racial Group	Race Population	% of State Population	% of Race with Less than High School Diploma	% of Race with High School Diploma or Higher	% of Race with Bachelor's or higher
Total State Population 25 and Over	1,115,556	100%	9%	91%	27%
White alone	1,023,717	92%	8%	92%	28%
Black or African American alone	5,476	1%	9%	91%	26%

Racial Group	Race Population	% of State Population	% of Race with Less than High School Diploma	% of Race with High School Diploma or Higher	% of Race with Bachelor's or higher
American Indian and Alaska Native alone	14,686	1%	15%	85%	13%
Asian alone	16,561	2%	12%	88%	43%
Native Hawaiian and Other Pacific Islander alone	1,663	0.1%	7%	93%	23%
Some other race alone	32,365	3%	44%	56%	6%
Two or more races:	21,088	2%	11%	89%	28%
Hispanic or Latino (All Races)	106,974	10%	35%	65%	10%

SOURCE: American Community Survey 1-Year Estimates – 2019

### Educational Attainment - Individuals Age 55 and Over

According to data from the American Community Survey 2019 1- year estimates, individuals 55-64 participate in Idaho's workforce at a rate of 64 percent, and this age group makes up nearly 16 percent of Idaho's total workforce. Individuals aged 65 and older participate in the workforce at a much lower rate of 17 percent, but they make up 5 percent of the overall labor force in the state. When combined, these two groups make up nearly 21 percent of Idaho's total workforce; a depiction of an aging labor force.

While older individuals participate in the workforce at a lower rate than their younger counterparts, they have a relatively comparable mix of educational attainment. The education levels of older individuals in Idaho are generally comparable with those of other age groups. The primary area of difference is that individuals over the age of 65 are less likely to have an associate degree at 9 percent; the lowest of the age groups (25+) from Table 19a.

Younger age groups have a higher proportion of bachelor's degree, have more than one-fifth of the population 25 – 44 achieving the degree, an increase of more than 5 percentage points compared to those 65 and older. This larger ratio of higher educational attainment perhaps is a depiction of the greater educational demands of the most modern times.

**Table 19a: Educational Attainment by Age Group by Percent of Total**

	18 to 24 Years	25 to 34 Years	35 to 44 Years	45 to 64 Years	65+
<b>Total</b>	<b>166,713</b>	<b>234,800</b>	<b>225,804</b>	<b>421,776</b>	<b>288,617</b>
Less than 9th grade	2%	2%	3%	3%	3%

	18 to 24 Years	25 to 34 Years	35 to 44 Years	45 to 64 Years	65+
9th to 12th grade, no diploma	10%	5%	5%	6%	6%
High school graduate (includes equivalency)	38%	29%	23%	25%	28%
Some college, no degree	37%	26%	24%	26%	27%
Associate's degree	6%	10%	11%	12%	9%
Bachelor's degree	7%	21%	22%	17%	16%
Graduate or professional degree	1%	6%	11%	10%	12%

SOURCE: American Community Survey 1-Year Estimates - 2019

By gender, educational attainment varies by age group, while younger males exhibit higher rates of high school graduation; females are the ones with larger proportions of higher educational attainment. The same holds true for everyone else from the 25 to the 64 age groups. The 65 and older cohort shows a different kind of educational attainment trend where males hold larger educational accomplishments (Table 19b).

**Table 19a: Educational Attainment by Age Group by Percent of Total**

	Male, 18-24	Female, 18-24	Male, 25-34	Female, 25-34	Male, 35-44	Female, 35-44	Male, 45-64	Female, 45-64	Male, 65 +	Female, 65 +
Less than 9th grade	1%	2%	2%	3%	3%	3%	4%	3%	3%	3%
9th to 12th grade, no diploma	12%	9%	6%	4%	7%	4%	7%	5%	5%	7%
High school graduate (inc equivalency)	41%	34%	32%	25%	27%	19%	27%	23%	27%	29%
Some college, no degree	36%	37%	25%	28%	23%	25%	25%	28%	25%	28%
Associate's degree	5%	8%	9%	11%	10%	13%	11%	12%	9%	9%
Bachelor's degree	5%	9%	19%	24%	20%	23%	16%	19%	18%	15%
Graduate or professional degree	0%	1%	6%	6%	11%	12%	11%	10%	15%	9%

SOURCE: American Community Survey 1-Year Estimates - 2019

## Educational Attainment - Low-Income Individuals

About nine percent of the population age 25 and older have income levels below poverty, with 21 percent of those having attained less than high school falling into this category, more than five times the rate of those holding bachelor's degrees. This data (Table 20), reinforces this assumption that obtaining a high school credential is an important first step towards escaping poverty, while continuing on to post-secondary education provides important additional opportunities to improve quality of life and well-being. More than 90 percent of people holding a high school credential or higher remain out of poverty status.

**Table 20: Educational Attainment by Poverty Status**

Income Level	Less than High School	High School Graduate	Some College or Associate	Bachelor's or Higher	Total
Number Below Poverty	20,090	30,577	35,925	12,594	99,186
Percent Below Poverty	21%	10%	8%	4%	9%
Number at or Above Poverty	77,621	266,981	388,604	322,797	1,056,003
Percent at or Above Poverty	79%	90%	92%	96%	91%

SOURCE: American Community Survey 1-Year Estimates - 2019

### **Educational Attainment - English Language Barriers**

Of those in Idaho's workforce, approximately 12 percent speak a language other than English at the home, however, this group with language barriers participate in the workforce at in larger proportion than their English-only speaking counterparts.

The most significant difference between these two populations, in terms of educational attainment, is with regard to high school graduation. For those in the workforce who speak only English in the home, just 4 percent have less than a high school diploma compared to those in the workforce who speak another language at home, 30 percent have less than a high school diploma.

When the data is broken down further by specific languages (including Asian/Pacific Island, Indo-European, Spanish, and Other), an even greater discrepancy emerges. Specifically, for those in the workforce who speak Spanish in the home, 36 percent have less than a high school diploma. This is especially significant in that Spanish speakers represent the largest minority and at the same time hold the largest majority (73 percent) of Idaho's non-English workforce population.

When taken in combination, these data indicate a significant skills gap for non-English speakers in the workforce, especially for those who speak Spanish in the home.

**Table 21: Educational Attainment by Language Spoken at Home for those in the Workforce**

Language Spoken	Less than High School	High School Graduate	Some College or Associate	Bachelor's or Higher	Total
Speaks Only English (Number)	29,129	160,391	252,169	209,071	650,760
Speaks Only English (Percent of Total)	4%	25%	39%	32%	100%
Speaks Other Language* (Number)	27,363	23,232	21,906	20,198	92,699
Speaks Other Language* (Percent of Total)	30%	25%	24%	22%	100%

SOURCE: American Community Survey 1-Year Estimates - 2019 \*Includes native English speakers who also speak another language at home, and other bilingual speakers.

#### **(iv) Skills Gaps**

Idaho's workforce development system seeks to prioritize its efforts around those industries and occupations that balance good wages with existing or projected demand for workers, as well as those industries which can have a larger overall weight on Idaho's economy. Such industries and occupations have been identified in Idaho's Target Sectors and Occupations-In Demand.

However, as described in Section (II)(a)(1)(A) of this plan, nearly 20 percent of Idaho's jobs in 2020 were in the combined industries of accommodation food services and retail trade. Many of these jobs pay relatively low wages, require relatively little training or education, and lack a significant multiplier effect on Idaho's economy. As a result, many of Idaho's workers are in jobs which may not sufficiently prepare them to move into the types of careers that require additional skills and pay better wages. As such, these workers will need to access training and education outside of their current workplace if they want to advance their skills or careers.

With that being said, there are jobs within these two industries that require training beyond a high school education. Cooks, managers, maintenance workers just to name a few. Individuals in these industries that want to move up the career ladder need to have the opportunity for career ladder advancement

The analysis in Section (II)(a)(1)(A), coupled with education data and direct input from industry lend strong support to the state's goals to increase educational attainment beyond high school. It is vital that Idaho's labor force seek educational opportunities or training to qualify for the jobs that will be available over the next 10 years. Of the top 50 hot jobs, 26 require a typical education of four-year degree or higher. Within the top 10, the following seven require some post-secondary education or training while three require a minimum of high school or equivalent (First-line Supervisors of Construction Workers, Hazmat Removal Workers, and Electricians).

- Construction Managers - Bachelor's Degree
- Dental Hygienists - Associates Degree
- Cost Estimators – Bachelor's Degree
- Registered Nurses – Bachelor's Degree



- Environmental Engineers – Bachelor’s Degree
- Physical Therapists - Doctoral or Professional Degree
- Sales Engineers - Bachelor’s Degree

In the most recent list of Idaho’s In-Demand Occupations (2020), there has been a shift to construction-related positions now reflecting a larger share of the top 10 occupations, more than the 2018 estimates. This is likely in-response to the rapid growth Idaho has been experience in recent years and difficulty contractors have recruiting workers.

Not only is there difficulty in adequate availability for training programs, cost is one of the biggest challenges for Idaho workers in obtaining the training and education they need to meet the skill demands of the evolving job market.

Idaho workers’ educational credentials will need to increase in order to obtain higher-paying jobs. And yet, pervasive low wages can make it difficult for Idaho workers to access the training and education needed to upgrade their skills without the availability of external financial resources. Addressing the affordability of college education, expanding the “learn while you earn” model and expanding registered apprenticeships may help address this opportunity gap, especially for populations with significant barriers to employment and education.

In 2019, the Research Bureau collaborated with the Idaho Department of Transportation, Federal Highway Administration, Workforce Development Council and Associated General Contractors to conduct a highway construction skills gap report and compiled what survey respondents felt were the missing skills in job applicants. Most of the skills or soft skills were generalized and included math, reading, safety awareness, good work ethic, showing up on time, and communication and problem solving.

An enhanced focus on career pathways and stackable credentials may also help address this gap. Many jobs on the hot jobs list can be part of a career ladder and lend themselves to stackable credentials in education. A nurse could start as a certified nursing assistant or licensed practitioner nurse. A construction manager could gain skills while working as a first-line supervisor. A dental hygienist could work while going to school to be a dentist and have inside knowledge of the job. Idaho’s work on career ladders and stackable credentials is addressed in Section (II)(c)(1).

Finally, the analysis in Section (II)(B)(i) shows that youth ages 16-24 have a much higher unemployment rate than other age groups. As teens and young adults are finding it harder to get jobs in the current labor market, fewer are learning the basics of how to hold on to a job or getting the opportunity to learn about various occupations and industries by working or interning in them. The strategies identified above may also be appropriate to address this cohort of workers.

## 2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

### A. THE STATE’S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required <sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), 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 Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

## B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

## C. STATE WORKFORCE DEVELOPMENT CAPACITY

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

### ***(A) The State's Workforce Development Activities***

To provide a thorough overview of the current workforce development activities and delivery models taking place in Idaho, we have provided a program-by-program summary of core WIOA programs as well as for those programs who will be submitting as part of the Combined State Plan. Where possible, we have also solicited information from our One-Stop partners who are not submitting as part of the Combined State Plan and have included this information as well. A comprehensive discussion of strengths, weaknesses, and capacity will be covered in the subsequent sections (B) and (C).

### **Title I - Adult, Dislocated, and Youth Programs (Idaho Department of Labor)**

Funded by the U.S. Department of Labor (USDOL), WIOA Title I-B offers programs for Youth, Adult and Dislocated Workers in Idaho. These programs help eligible individuals get good jobs and stay employed and help employers by improving the skills of Idaho's workforce.

Idaho's WIOA Title I-B Youth program serves out-of-school youth ages 16 to 24. Eligible young people work closely with a career planner to support them in achieving the education and skills necessary to enter the workforce. Services may include work experience through job shadowing and internships, work skills training such as vocational classes or on-the-job training, and supportive services to help with the costs of transportation and other necessities.

The Idaho Department of Labor also administers a State-Operated Job Corps Demonstration Project in Nampa, Idaho, located in southwestern Idaho. Like the youth program, it also serves youth from 16-24, and is intended to increase access to and enrollment in education and work-based learning for out-of-school and at-risk Idaho youth by leveraging existing resources and

programs to better serve Idaho youth in getting the education and training they need in high-demand fields.

The Adult and Dislocated Worker programs provide access to the same array of service categories: career, training, and supportive services. Services are provided at the level needed to launch the adult or restore the dislocated worker to self-sufficient employment.

For the Adult program, individuals lacking basic skills or receiving public assistance may be eligible. For the Dislocated Worker program, those who have lost their job through no fault of their own may be eligible. Dislocated Worker funds also support the Rapid Response program that provides immediate assistance to employers and workers for business closings and other mass layoff events.

Idaho Department of Labor staff provide Adult, Dislocated Worker, and Youth program services in the state's 11 American Job Centers and mobile locations, providing access in 50 communities across the state. North Idaho College in Coeur d'Alene and Magic Valley Youth and Adult Services in Twin Falls provide additional Adult program services.

## **Title II - Adult Education and Family Literacy (AEFLA) (Idaho Career & Technical Education)**

The Adult Education program supports efforts to improve the quality of life for adults with academic skill levels below the 12<sup>th</sup> grade, and/or adults who need English language skills to succeed in their communities. Literacy, numeracy, and English language skills are fundamental for workforce success and personal and social well-being. Services provided under the Adult Education program are intended to lead to further education, training opportunities, and work.

The Adult Education program plays an integral role in the workforce development system by providing access to educational and training services for adult learners. The program seeks to increase opportunity in the educational and workforce development of adults as workers, parents, and citizens. While playing a critical role in adult attainment of a secondary school diploma, the program also aims to assist in the transition to postsecondary education and training.

Currently, the program is carried out locally, on a regional basis, via the state's technical and community colleges, universities, as well as the State Department of Correction. Each local provider is responsible for offering Adult Education services, either through direct instruction or through distance learning models. Local programs conduct intake and assessment, ensure appropriate class placement, provide goal-setting and education planning guidance, and follow up.

## **Title III - Wagner-Peyser/Employment Services (Idaho Department of Labor)**

Employment services are designed to help connect job seekers and employers. Self-service is available at [idahoworks.gov](http://idahoworks.gov), an online labor exchange system where job seekers can register for work, search for job openings, and access a variety of job search resources. Additionally, employers can list jobs, search resumes, and link to labor market information and other resources.

Staff are available to assist job seekers with job search consulting and workshops; aptitude, interest, and proficiency tests; career guidance; and referrals to other workforce development services. Specialized services are available for veterans, migrant seasonal farm workers, and individuals with disabilities.

Employment services to employers include referring job candidates, promoting job openings, providing space at the American Job Centers for employers to conduct customized recruitment and hiring events; recruiting or matching applicants from local, state, and national labor pools; and organizing area job fairs.

#### **Title IV - Vocational Rehabilitation Services (Idaho Division of Vocational Rehabilitation and Idaho Commission for the Blind and Visually Impaired)**

Vocational Rehabilitation services in Idaho are provided through two agencies: the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (the Commission). Both agencies serve individuals with disabilities that constitute or result in substantial barriers to employment. IDVR works with a diverse array of disabilities to include, but not limited to individuals with mental health disorders, learning disabilities, developmental disabilities, diabetes, deafness, amputation, mobility impairments, and traumatic brain injury. The Commission specifically serves individuals whose primary disability is blindness or visual impairments, including those who may experience co-occurring disabilities. Where co-occurring disabilities are present, the Commission partners with IDVR to the extent practicable.

IDVR and the Commission provide services which include counseling and guidance, assessment, vocational training, post-secondary education, transportation, personal assistance services, and job supports and placement. Through customer informed choice and in partnership with their VR counselor, individuals with disabilities are able to create an individualized plan for employment, maximize their potential, and reach the goal of competitive integrated employment. Services unique to the Commission include an Assessment and Training Center, Low Vision Clinic Services, and regional Rehabilitation Teachers who provide low vision and blind skills training to individuals in all communities in the state.

Both programs provide services to students and youth with disabilities to ensure they have meaningful opportunities to receive training and other services necessary to achieve employment. Pre-employment transition services for students and similar services for youth include job exploration counseling, work-based learning experiences (paid or unpaid), counseling on post-secondary enrollment opportunities, workplace readiness training, and instruction in self-advocacy. Students are supported by a VR counselor to determine which combination of pre-employment transition services may best meet their individual needs. Pre-employment transition services are designed to help students with disabilities begin to identify career interests that may be further explored through additional VR services. Students must be receiving transition services through an Individualized Education Program (IEP) or are eligible for a section 504 accommodation to receive these services under the banner of Pre-ETS. Similar services are available and are afforded to out-of-school youth under the age of 25.

While the services provided by these two agencies to their specific customer base are similar, the delivery systems differ slightly. IDVR provides services through eight regional offices and a series of sub-offices. Through cooperative agreements, IDVR has numerous staff collocated in several state program offices, such as the Idaho Division of Behavioral Health and the Idaho Department of Correction. Additionally, numerous counselors are collocated in school districts to provide direct services to students with disabilities. The Commission provides services through a central office in Boise, ID and five regional offices.

#### **Combined Plan Partner - Jobs for Veterans State Grant Program (Idaho Department of Labor)**

Veterans receive priority service for all U.S. Department of Labor workforce programs. In addition, Idaho Department of Labor has dedicated staff located in select American Job Centers throughout the state to provide targeted support for veterans.

Local Veterans Employment Representatives (LVER) program staff conduct outreach to employers on behalf of veteran customers. The LVER works with employers to develop job opportunities for veterans and promote the value of hiring veterans within the larger workforce.

The Disabled Veterans Outreach Program (DVOP) staff serves veterans most in need of intensive employment and training assistance. These staff focus on veterans with barriers to employment and other special workforce needs. DVOPs offer a wide range of workforce services to veterans and other eligible persons coordinated through a case management approach.

#### **Combined Plan Partner - OAA Title V - Senior Community Service Employment Program (Idaho Commission on Aging)**

The Senior Community Service Employment Program (SCSEP) is funded by the USDOL and administered by the Idaho Commission on Aging (ICOA). Easterseals-Goodwill is the sub-recipient and serves seniors 55 and older, that are unemployed and have an income at 125% or less of the Federal Poverty Level. Services include paid employment training at community service assignments, employment training counselors to provide job skill training, computer skills training, paid supportive services to help overcome barriers to employment, development of an individual employment plan, and financial assistance with annual physical exams.

Enrollment priority is given to veterans and qualified spouses, then to individuals who are over 65, have a disability, have low literacy skills or limited English proficiency, reside in a rural area, are homeless or at risk of homelessness, have low employment prospects, or have failed to find employment after using services through the American Job Center system. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment.

SCSEP participants are placed in non-profit or government agencies called, "Host Agencies". Host Agencies include senior centers, community action centers, and health clinics. These agencies agree to provide employment training through community service activities that provide the education identified in the participant's individual employment plan. The program provides minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining unsubsidized employment.

Employment Training Counselors (ETC's) assist seniors to develop Individual Employment Plans and teach job seeking skills such as; interviewing, job searches, setting goals, and resume building. Currently, the emphasis is to provide technology training that will assist seniors to build marketable skills that are essential to the present workforce. A participant can be in the program 48 months; however, 12-month extension waivers are allowed for specific groups.

The ICOA and Easterseals-Goodwill provide compliance, monitoring, statewide goal-setting, federal reporting, and program reimbursement.

#### **Combined Plan Partner - Trade Adjustment Program (Idaho Department of Labor)**

The Idaho Department of Labor administers the state's Trade Adjustment Assistance (TAA) Program, designed to assist U.S. workers who have lost or may lose their jobs because of foreign

trade. This program seeks to provide affected workers with opportunities to obtain skills, credentials, resources, and support necessary to become re-employed.

Eligible workers are identified when a petition is filed with the US Department of Labor, which investigates and determines whether the layoff meets program eligibility criteria. The petition identifies a specific worker group that may access TAA services.

Services of the Trade program include: employment and case management services; skills assessments; individual employment plans; classroom training, on-the-job training, and apprenticeships; income support; job search cost allowance; and relocation allowance.

The Trade Adjustment Assistance Program, like WIOA Title I-B, is delivered by the Idaho Department of Labor in the American Job Centers and Idaho Department of Labor mobile locations. The integration of both programs allows for seamless service delivery to individuals already receiving services from programs such as the Dislocated Worker program.

### **Combined Plan Partner - Unemployment Insurance (Idaho Department of Labor)**

The Idaho Department of Labor administers the state's Unemployment Insurance (UI) program, which provides temporary cash assistance to individuals experiencing hardship during periods of involuntary unemployment.

Workers may file and check the status of UI claims through the Idaho Department of Labor's website. Direct in-person staff assistance is available at each of the state's comprehensive centers, including those AJCs soon to receive that designation. Claimants can also find help through the web portal's "click to chat" feature or directly by telephone.

### **One-Stop Partner - TANF & SNAP (Idaho Department of Health and Welfare)**

Both the Supplemental Nutrition Assistance Program (SNAP) and the Temporary Assistance for Needy Families (TANF) Programs are administered by the Idaho Department of Health and Welfare. Each program is discussed separately below.

#### **Supplemental Nutrition Assistance Program**

The Supplemental Nutrition Assistance Program (SNAP), also known as the Food Stamp Program, helps low-income families maintain good health and nutrition. SNAP benefits are federally funded, but the state shares the cost of administering the program with the federal government. Benefits are provided through an Electronic Benefits Transfer (EBT) card, which works like a debit card.

In order to receive SNAP benefits, Idahoans must meet certain eligibility requirements. For more information visit <https://healthandwelfare.idaho.gov>:

- Be an Idaho resident who is either a U.S. citizen or meets specific lawful residency criteria;
- Provide proof of identity;
- Meet income eligibility limits of 130% of poverty or less for family size;
- Possess assets of less than \$5,000;
- Meet stricter eligibility requirements if applicant is a student, legal immigrant or convicted felon; and
- Participate in a Job Search Assistance Program, unless exempt.

All eligibility requirements are verified through electronic interfaces or documentation provided by the family. Once approved for SNAP benefits, a family must participate in a semi-annual or annual reevaluation of their household circumstances. In the re-evaluation process, all elements of eligibility are re-verified using these same methods.

SNAP recipients, unless exempt, must either be employed 30 hours per week or participate in job search activities that will help them find or improve employment opportunities to continue receiving benefits. The primary focus of the work program is to help SNAP recipients get a job, keep a job, or find a better job.

The amount a participant receives depends on the number of people in the household, income, and other factors. Generally, larger household sizes or lower incomes result in higher benefit amounts. In July 2021, the average SNAP allotment per person in Idaho was \$136, or approximately \$1.51 per meal.

SNAP enrollment expands during recessions and contracts during improved economic times. In 2021, additional flexibilities were implemented in response to the COVID-19 pandemic, providing a temporary boost in benefit payments to assist recipients manage food costs. This boost came in addition to an additional \$95 provided to recipients to bring SNAP payments to the maximum benefit amount.

### **Temporary Assistance for Needy Families**

The *Temporary Assistance for Needy Families* (TANF), or as known in Idaho *Temporary Assistance for Families in Idaho* (TAFI) program provides temporary cash assistance and work preparation services for families with children. The program served an average of nearly 1,900 households and 2,700 individuals in 2020.

TAFI beneficiaries receive a maximum of \$309 per month, regardless of family size. These funds help pay for food, shelter, clothing, and other essentials. Idaho has a lifetime limit of 24 months of TAFI cash assistance for adults.

Approximately 96 percent of households are relatives taking care of a family member's child, with the remaining six percent being single- or two-parent households.

In order to receive TAFI benefits, Idahoans must meet the following eligibility requirements:

- Be an Idaho resident who is either a U.S. citizen or meets specific lawful residency criteria;
- Provide proof of identity;
- Meets income eligibility limits for family size;
- Meets personal asset limits;
- Cooperates with Child Support enforcement;
- Participates in a drug and alcohol abuse screening and, if determined to be in need of treatment, must comply with a treatment plan; and
- Participate in the Enhanced Work Services program and meet strict participation requirements.

All eligibility requirements are verified through electronic interfaces or through documentation provided by the family.

Ongoing, intense job coaching and case management ensures that the state always has the most up-to-date status on the family to determine ongoing eligibility. Idaho's TAFI cash assistance program requires participation in work preparation activities that build or enhance the skills needed to increase their income and become self-sufficient. Participants in this program are required to participate from 20 - 40 hours per week (depending on family composition) in approved activities including, but not limited to, job search, education directly related to employment, work experience opportunities, and substance abuse treatment. Failure to meet these required activities results in cessation of the TAFI assistance, with an additional penalty period during which the family is ineligible to receive TAFI cash.

***(B) The Strengths and Weaknesses of Workplace Development Activities***

As part of the State Planning process, public listening sessions were conducted throughout the state in the following locations:

- Hailey
- Twin Falls
- Pocatello
- Fort Hall
- Caldwell
- Payette
- Boise
- Salmon
- St. Anthony
- Preston
- Coeur d'Alene
- Bonners Ferry
- Plummer
- Lewiston
- Cottonwood
- McCall

Participants were asked the following questions:

- Are the numbers (*referring to the brief labor market presentation that was delivered at the beginning of the session*) telling the story that employers and job seekers are living?
- How well are local education and training programs preparing people for local jobs? Is there alignment?
- What support would businesses like in connecting to job seekers?
- What methods/channels of communication should we be using to reach the citizens that need support?



- What are the common barriers/gaps to accessing services and employment? (i.e. for those that are unemployed, what's preventing them from getting jobs?)
- Describe the top 3 things that are not working well.
- Describe the top 3 things that are working well.

In addition, participating core and partner programs were asked to identify strengths and weaknesses of their programs, as well as for the workforce development system as a whole. Several themes emerged from that discussion. These themes, which are common across all (or most) programs, are discussed below. Several of the specific strengths and weaknesses of individual programs are discussed in more detail in subsequent sections of this plan.

### **Strengths**

The primary strengths identified in our activities analysis were program administration, alignment, and partnership. Currently, all the WIOA Title I-B programs, as well as the UI, Trade Adjustment, and Veterans' Outreach programs are administered by the Idaho Department of Labor. The Carl D. Perkins, postsecondary workforce training, and WIOA Title II (Adult Education) programs are administered by Idaho Career & Technical Education (ICTE). Both ICTE and the Idaho Division of Vocational Rehabilitation are under the administrative umbrella of the State Board of Education. Idaho's State Board of Education also offers a unique advantage as one of two states in the nation with K-20 governance under a single board. ICBVI and the Workforce Development Council are under the Office of the Governor.

Having the core WIOA programs—as well as several of the optional partners—clustered within a few agencies makes it easier to streamline planning and policy alignment and promote robust referral processes at the State level. Additionally, the Idaho Department of Labor, Idaho Career & Technical Education, and state Vocational Rehabilitation programs enjoy strong, positive, and constructive working relationships, which have contributed and will continue to contribute to the State Planning process.

All of these agencies are represented, by their senior leaders, on the Idaho Workforce Development Council. In addition, partner agencies such as Idaho Health and Welfare, the Idaho Department of Commerce, and the State Board of Education hold seats on the Council.

The successful establishment of data sharing agreements, specifically on wage matching, between Idaho's core partners are due in large part to the strong relationships they have amongst themselves, each playing a significant role as Idaho signed on to the federal State Wage Interchange System to allow for the data sharing to take place. The Workforce Data Quality Initiative grant awarded to the state will do much to improve this effort as it enhances the state's ability to automate data exchange processes within Idaho's workforce development system. The grant seeks to build upon the existing State Longitudinal Data System (SLDS) to build a secure, web-based interface, which ties together individual program participant information from workforce, education, and unique program data sets from Idaho's WIOA Core Partners, the Idaho State Board of Education, and the Idaho Workforce Development Council.

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 recently implemented new service delivery model. Face-to-face service can now be found in more than 50 communities around the state, a more than 100 percent increase from the agency's previous brick and mortar offerings. The new model modernizes how the department delivers services, with a focus on increasing IDOL

staff presence across the state while decreasing costs associated with its physical footprint. It is more adaptable to fluctuations in the economy and empowers staff to be more responsive to community needs.

Core and One-Stop partners offer regional training and quarterly collaboration for all One-Stop/AJC staff, ensuring participating staff gain awareness of the services and activities each partner makes available to residents in need across the state. As part of this effort, the state provided select partner staff training and deployment of ADA physical and programmatic assessments to ensure One-Stops and AJCs comply with WIOA requirements.

### **Weaknesses/Challenges**

We have identified three major weaknesses/challenges for Idaho's Workforce Development System. The first is in regard to staffing, the second is in regard to serving rural communities, which the state has sought to address by implementing the change in the Idaho Department of Labor's service delivery model (see above) as a means of improving rural access to services, and the third is in regard to connecting programs with employers.

Several of our core and partner programs identified staff turnover, staff training, and staff retention as issues—especially those programs which provide direct services like education and counseling. Attracting, training, and retaining high quality, qualified staff can be difficult in a stagnant funding environment, as well as in a state like Idaho where wages are lower on average. For example, Vocational Rehabilitation Counselors are required to have Master's degrees, but the pay is not always commensurate with the education and training requirements. The State's career and technical education programs have also experienced difficulty filling vacancies, as teachers are required to have both pedagogical and technical expertise and may have to take a pay-cut when moving from a career in industry to a career in teaching.

Attracting and retaining quality staff can be especially difficult in rural communities. The pool of local applicants is limited, with many qualified candidates seeking employment elsewhere. The pay is often low, and insufficient to bring in qualified labor from outside the community.

In fact, rural communities present a number of challenges for our workforce programs. A great deal of research links rural communities with higher instances of poverty and unemployment, lower education levels, and a generally higher need for services. In Idaho, these communities face the additional challenge of isolation, and are often separated by geographical barriers such as mountain ranges or large distances with few transportation options. As a result, bringing services to these communities can cost more, while at the same time serving fewer people. The majority of programs cited rural service provision as a significant challenge. Additional challenges in rural and remote communities for our participants include access to education, affordable housing, and public transportation.

Through the listening sessions introduced earlier, it was noted that Idaho's workforce and education system has a difficult time coordinating with employers at both the state and local level. In addition, Idaho's employers could benefit from additional support in connecting with underserved populations such as older workers, Veterans, persons with disabilities, and those exiting the corrections system. With an increased focus on employer engagement, employer satisfaction, and employment outcomes for participants, it is vital that all the WIOA core programs, as well as partner programs, have the opportunity to develop meaningful relationships with employers. Idaho's Workforce Development Council was reorganized in late 2017 to increase the presence of and partnership with employers and industry associations. The reorganization was implemented in direct response to this weakness in Idaho's workforce development system, as identified by an independent, industry-led task force appointed by the

Governor in January 2017. Included in the state goals section of this plan are specific steps to increase coordination of business services.

***(C) State Workforce Development Capacity***

The following table provides a summary of the funding and service levels of the programs previously described in Part (A) (where available). The service levels in Table 22 reflect the number of individuals served by each program. It is likely that many Idahoans participate in multiple workforce programs at any one time. However, Idaho is currently unable to produce an unduplicated count of the total unique individuals served across programs in the workforce development system. The figures below provide a sense of the service levels and capacity of individual programs as they exist today.

Funding amounts included in the table are as reported by each program and include both administrative costs and program costs. Federal Funding includes, but is not limited to WIOA authorized funds. The table does not include local funding, employer contributions, user fees, or entitlement payments such as Social Security reimbursements.

**Table 22: Workforce Program Capacity - Funding Levels and Participants Served by Program**

*Numbers are based on most recent annual-reporting data available for Program Year 2018 (July 1, 2018 through June 30, 2019). Those programs noted by an \* show data by federal Fiscal Year 2019 (September 2018 through October 2019).*

Program	Federal Funding	State Funding	Number Served
Title I – Youth	\$2,470,966	\$0	627
Title I – Adult	\$2,303,210	\$0	596
Title I – Dislocated Worker	\$1,975,683	\$0	466
Title II – Adult Education	\$2,364,311	\$1,090,900	5,113
Title III – Wagner-Peyser	\$6,028,187	\$0	13,896 (job-seekers) 8,142 (employers)
Title IV – Vocational Rehabilitation (IDVR)	\$14,504,074	\$4,155,895	10,059
Title IV – Idaho Commission for Blind and Visually Impaired (ICBVI)	\$2,353,608	\$714,410	524
OAA Title V - Senior Community Service Employment Program (SCSEP)	\$421,835	\$0	53

Program	Federal Funding	State Funding	Number Served
Trade Adjustment Assistance (TAA)*	\$1,797,478	\$0	161
Veterans Outreach and Employment*	\$827,933	\$0	450
Community Development Block Grant	Not Applicable	Not Applicable	Not Applicable
Carl D. Perkins	\$7,597,090 (includes both Secondary & Post-Secondary programs)	\$379,854	5,933 (Secondary programs)  5,031 (Post-secondary programs)
Temporary Assistance for Needy Families (TANF/TAFI) / Supplemental Nutrition Assistance Program (SNAP)	TAFI - \$7,499,850  TANF (Work Services) \$3,127,411 (Federal/state variable split)  SNAP - \$193,499,850  SNAP (Work Services) \$991,380 (50% Federal/50% State)	See previous column	SNAP -149,537 monthly avg.  TANF - 3,127 monthly avg.
Unemployment Insurance	\$15,276,403	\$0	44,397

## B. STATE STRATEGIC VISION AND GOALS

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

### 1. VISION

Describe the State's strategic vision for its workforce development system.

### 2. GOALS

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>

(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

### 3. PERFORMANCE GOALS

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

### 4. ASSESSMENT

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

#### **1. Vision**

Idaho's Workforce Development System will: improve access to education, economic opportunity, and employment for all of Idaho's job seekers—especially those with significant barriers to employment; develop a skilled and competitive workforce that meets the needs of Idaho's employers; stimulate the vitality of our local communities; and promote a strong state economy.

#### **2. Goals**

***A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>[8]</sup> and other populations.<sup>[9]</sup>***

***(B) Goals for meeting the skilled workforce needs of employers.***

In July 2019, the Idaho Workforce Development Council, which serves as Idaho's WIOA State Board, finalized a strategic planning process in which it developed strategies and objectives for the three goals set by the Governor. The Council developed this plan over a six-month time period with significant input from partners, employers, and industry associations.

The three goals mandated by the Governor for the State's workforce system are outlined below. Under each of these goals, the Council identified several strategies that relate more specifically to the populations, services, policies, and priorities within the workforce development system.

**Goal 1** – Increase public awareness of and access to career education and training opportunities.

*Strategy* – Identify, develop, connect, and activate a diverse network of influencers throughout the state that can distribute information and resources in a way appropriate to their locale.

- Utilize personal contact, digital, and traditional media to communicate with our target audiences and those who influence and support them.
- Develop and implement an outreach strategy for the one-stop system.
- Implement an outreach strategy to increase awareness and perception of apprenticeships as a pathway to careers for students, parents, teachers, and counselors.
- Collaborate with partners to maximize effectiveness of all outreach efforts; enhance and expand Idahoan's perceptions of, access to, and persistence in pathways to careers.

**Goal 2** – Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.

*Strategy* – Create, align, and sustain partnerships with stakeholders to implement workforce development programs.

*Strategy* – Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.

*Strategy* – Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.

*Strategy* – Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

*Strategy* – Champion public policy initiatives that enable dynamic response to evolving industry needs.

**Goal 3** – Provide for the most efficient use of federal, state, and local workforce development resources.

*Strategy* – Be objective, data driven, and accountable.

*Strategy* – Build trust in decision-making based on an understanding of the resources available and projected outcomes.

*Strategy* – Identify gaps and opportunities in the workforce system and initiate or support policy and/or allocate resources to meet them.

The economic and activities analysis conducted in Section (II) of this plan identified the following priority focus areas that are of special concern for the purposes of improving Idaho's workforce system under WIOA. These focus areas, listed below, inform the strategies used to meet the goals listed above. These focus areas will also guide the structure of this State Plan, and serve as a continuing theme that unites our goals, strategies, and operational elements.

- **Improving Public Awareness and Access to the Workforce System** – The sixteen public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both jobseekers and employers, including veterans. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. Specific goals for implementation during this state plan period include:

1. Identify gaps and opportunities – conduct a customer flow exercise across the partners.
  2. Develop a consistent referral process across programs.
  3. Implement a communications strategy that is segmented to specific audiences.
  4. Explore technology solutions to increase efficiencies in referrals and intake.
- **Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions** – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. Specific goals for implementation during this state plan period include:
    1. Develop value statements for services offered by the partners.
    2. Implement targeted, coordinated business visits through regional teams.
    3. Launch a comprehensive virtual one-stop source of information for employers.
  - **Serving Rural and Remote Communities** - In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. Specific goals for implementation during this state plan period include:
    1. Analyze the effectiveness of the distributed service delivery model.
    2. Implement best practices among the partners.
  - **Career Pathways/Sector Partnerships** - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as *manufacturing, construction, health care, and professional, scientific, and technical services*. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. Specific goals for implementation during this state plan period include:
    1. Support implementation of the Talent Pipeline Management (TPM) initiative led by the Idaho Association of Commerce & Industry.
    2. Define high-quality industry credentials.
    3. Revisit career pathways in light of the TPM initiative to ensure system alignment.

Specific high-level strategies, by partner, for addressing each of these areas are discussed in Section (III)(a)(2)(A) and (B) State Strategy Implementation.

### **(3) Performance Goals**

Please refer to Appendix 1 for Idaho's expected levels of performance *relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.*

Subregulatory guidance addressing the four-year submission requirements for WIOA Combined State Plans for PY 2020-2023 addresses the ongoing 'phase-in' of negotiated targets for various programs.

#### **(4) Assessment**

The State uses the indicators of performance outlined in Section 116 of WIOA to measure and evaluate the effectiveness of individual programs and the State's workforce development system. These indicators are well aligned with the goals indicated above, and will allow our programs to measure how well they are serving participants and employers in both the short and long term. Progress toward these indicators will initially be evaluated against the performance targets negotiated by each program with their applicable federal agencies. As the collected baseline data becomes available, the state will have the capacity to measure the progress of the entire workforce development system through combined performance reporting.

Section 116 indicators for measurable skill gains will inform Idaho's workforce providers how well participants are progressing while participating in the workforce development system, as well as their likelihood of success after exit. This information will help the state measure effectiveness against Goal 2 in part II.b.2: *Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.* Specifically, indicators regarding measurable skill gains will be used to measure literacy skills improvement as well as technical and workplace skills development. Where applicable, these measures will help programs make real-time adjustments to ensure specific participants are making progress. They will also be used to guide program improvement efforts by providing more general information about how participants' skills progress overall while enrolled in a program. In turn, this data will help the State evaluate the overall effectiveness of the workforce system in developing a highly-skilled workforce.

Section 116 indicators regarding employment after exit, enrollment in training or post-secondary programs, and credential attainment will help the State's workforce development system determine whether individual programs have adequately prepared participants for the demands of the workplace and/or continued education. These indicators will help programs measure the relevance and quality of their services in the context of the larger workforce system, which will help the State measure the system's effectiveness against Goal 3: *Provide for the most efficient use of federal, state, and local workforce development resources.*

Finally, the Section 116 indicator regarding employer satisfaction will help the State measure the relevance and usefulness of our workforce development system to employers. This will help the state measure its effectiveness in meeting one of the state's objective's with an employer focus: *Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions.*

These indicators will be used to measure and evaluate the effectiveness of individual programs, as well as for the workforce development system as a whole. By comparing performance between core programs, we can potentially identify ongoing gaps in service, as well as opportunities. For example, if one core program has consistently high outcomes in a certain area, while other core programs struggle, this may help the State identify areas for improvement while also helping to identify promising practices and strategies from those



programs that are performing well. By evaluating individual programs in the context of the overall workforce system, the State will gain valuable information about how and where to improve both programs and the system as a whole. Additionally, as longitudinal performance data emerges for programs across the nation, Idaho's workforce development system can compare performance to states with similar economic and demographic characteristics. These benchmarks will also provide opportunities to identify potential innovative approaches to incorporate in Idaho's workforce system.

The results of these assessments and reports will be used to evaluate the effectiveness of Idaho's workforce development system and guide program improvement efforts. To the extent that identified gaps and areas of improvement result from insufficient alignment between agencies and policies at the state level, such improvement efforts will be undertaken by state staff representing core programs, with guidance by the Council and the WIOA Advisory Group (identified in part II.c.2 of this plan). These efforts will include as appropriate revising existing policies, and issuing clarified guidance to the field about policies, partnerships, and best practices.

Program improvement at the local level will be overseen by the agencies responsible for administering those programs. These efforts will include, as appropriate and authorized by each Title, on-site monitoring and evaluation, targeted technical assistance, professional development, and corrective action plans. The consequences for continued poor performance will be determined by each agency, as authorized under each Title and outlined within the respective State Plans for each program.

When available, the results of such local and statewide improvement efforts will be recorded and reported as part of the State's annual report to the Workforce Development Council.

### C. STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. DESCRIBE THE STRATEGIES THE STATE WILL IMPLEMENT, INCLUDING INDUSTRY OR SECTOR PARTNERSHIPS RELATED TO IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AND CAREER PATHWAYS, AS REQUIRED BY WIOA SECTION 101(D)(3)(B), (D). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7) AND INCLUDES REGISTERED APPRENTICESHIP. "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23)

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO 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 TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2)

In Section (II)(b)(2) (State Goals) the Council's new strategic vision and goals are described. Each goal includes strategies specific strategies to strengthen the State's workforce system.

Additionally, the Economic and Activities analyses conducted in Section (II)(a)(1) of this plan also identified four areas of focus that are priorities for the WIOA Combined State Plan:

- Improving public awareness of and access to the workforce system.
- Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions.
- Serving rural and remote communities.
- Career pathways/Sector partnerships.

With these priorities in mind, Idaho has identified a variety of strategies, which are outlined in the following sections as per the State Plan Information Collection Request.

### **1. Sector Strategies and Career Pathways**

Idaho continues to refine its sector strategies to meet the needs of the individuals who face barriers to employment in an economic climate where unemployment rates have been below 3% for nearly two years. Our economic analysis revealed that much of Idaho's current job demand and job growth are in health care, retail trade, manufacturing, accommodation & food service, construction, and professional, scientific & technical services. While jobs in retail trade and accommodation & food service lean towards lower wages, they play an important role in the development of workplace skills for Idahoans with the highest barriers to employment. In addition, these two industries are important in our rural communities where options for full-time, year-round jobs with benefits are few. Providing career pathways into the higher skilled jobs in these industries, or leveraging entry-level employment in these industries to develop workplace skills, are necessary for Idaho's sector strategies and career pathways. Additionally, jobs in education are increasingly appearing on state and regional "in-demand" occupation lists signifying the need to invest in strategies that grow the talent needed to train the workforce of the future.

#### **Sector Strategies**

The Idaho Workforce Development Council, in partnership with the Idaho Association of Commerce & Industry, are launching the US Chamber of Commerce Foundation's Talent Pipeline Management Initiative (TPM) in 2020. State workforce development training funds have been awarded to train an initial cohort of 30 individuals in the methodology. These individuals will then work with local industry cohorts and education providers (K-career) to align the talent pipeline through the following steps:

1. Organize Employer Collaboratives
2. Engage in Demand Planning
3. Communicate Competency and Credential Requirements
4. Analyze Talent Flows
5. Build Talent Supply Chains
6. Continuous Improvement

Training on the TPM model will be completed by September 30, 2020.

Discussions of the Council have evolved from focusing on specific industries (as detailed in the 2016-2020 WIOA State Plan), to in-demand occupations, to the specific skills needed for

multiple occupations. The Council continues to use data-informed decision making to refine its investment priorities – from eligible training providers to award of state workforce training resources.

### **Career Pathways**

Through the State's work-based learning initiative, Idaho LEADER (Learn.Do.Earn), all of the core partners, along with the State Board of Education, State Department of Education, Department of Commerce, Department of Health & Welfare, STEM Action Center, Department of Corrections, Department of Juvenile Corrections, and Idaho Public Television are working to increase the line of sight between our youth, transitioning adults and career opportunities. The group has adopted a work-based learning continuum that categorizes opportunities for employers to engage with education and the workforce system under Learning About Work, Learning Through Work, and Learning At Work. Scaling apprenticeship is a high priority under LEADER and the investments made through the State Apprenticeship Expansion and American Apprenticeship Initiative grants in *ApprenticeshipIdaho* have moved the state forward significantly. The LEADER group has the following priorities over the next 12-18 months in support of career pathways:

- Implement and scale a youth apprenticeship initiative. South Carolina and Colorado's models are being explored for replication in Idaho. An industry association, Idaho Business for Education, has expressed interest in serving as the industry intermediary.
- Develop a list of high-quality degree and non-degree credentials. Processes used by Education Strategy Group, Texas CTE and Ohio's TechCred programs are informing our approach.
- Launch a more robust Next Steps website to include college and career information for high school students, transitioning adults and influencers (i.e. parents, teachers, counselors, one-stop partners, etc.)
- Develop career pathways specific to rural Idaho to be housed in the Next Steps website.

Idaho Career & Technical Education (which houses both Adult Education and Carl D. Perkins programs) continues to be the lead in researching and developing career pathways. ICTE oversees 700 secondary career-and-technical education programs in Idaho's high schools, and the technical colleges housed within Idaho's public higher education institutions. ICTE is near completion of an initiative to create statewide alignment between secondary and postsecondary CTE programs of study. In the past, each secondary program maintained an individual articulation agreement with one of Idaho's post-secondary institutions. This effort first aligns program learning outcomes across postsecondary institutions, and then aligns the secondary programs to those learning outcomes. Once the process is complete, a statewide articulation is put in place, allowing secondary students to articulate seamlessly into any Idaho institution that offers their program of study. Thus far, ICTE has aligned 37 of its 49 programs of study.

To support the statewide articulation framework, ICTE developed Idaho SkillStack - a micro certification/badging platform that communicates the competencies/skills Idaho high school and postsecondary students can demonstrate. The micro certifications/badges are stacked towards the award of postsecondary credit (i.e. once a student earns predefined badges, by demonstrating competency, they are eligible to convert the badges to credit), preparation for industry certifications and the common skills required by Idaho employers for job openings. These badges provide visual progress towards an individual's career goals.

Taking this effort to the next level, ICTE developed career ladders for the most in-demand jobs in Idaho (where secondary and post-secondary career and technical programs are also available). The career ladders begin with core transferrable skills that students are learning through their program. Students then move from the entry level positions up through the career pathway showing what skills need to be added to move to the next level and where an individual can learn those skills. Currently, career ladders are available for the following:

#### *Skilled and Technical Sciences*

- Advanced Manufacturing
- Engineering Drafters and Technicians
- Transportation Equipment Repair
- Installation, Maintenance and Repair

#### *Health care*

- Dentistry
- Therapeutic Services
- Nursing
- Pharmacy
- Health Informatics

#### *Business and Marketing*

- Administrative Services (showing Finance & Accounting, Human Resources & Administrative Support and Production and Manufacturing)
- Sales and Marketing (showing Marketing and Advertising, Licensed Sales and Retail/Specialty Sales)

#### *Information and Technology*

- IT Support and Administration
- IT Design and Development

These career ladders are integrated into the SkillStack and Career Information Systems websites to provide an interactive solution for students, parents, teachers, and counselors. The technology platform will allow the State to add additional pathways as they are mapped and to continuously update the data so that the tool stays relevant. The career ladders have their own website: <http://careeratlas.idaho.gov>.

## **2. Program Alignment and Addressing Gaps**

This section addresses strategies in place to ensure alignment between core programs, Combined Plan partners, and One-Stop partners to achieve fully integrated customer services consistent with the State Plan vision and goals. It also describes strategies to strengthen the workforce development system in regard to the gaps identified in analysis in Section (II)(a).

### **Program Alignment**

Many aspects of the WIOA core and partner programs in Idaho are already aligned as a result of being clustered within a few State agencies. For example, all of the Title I-B, Trade, Veterans, and Unemployment Insurance programs are housed with the Idaho Department of Labor and thus have a single intake and cross-enrollment process. To ensure ongoing alignment and to guide implementation of the Combined State Plan, the Workforce Development Council coordinates a One-Stop Committee and a WIOA Advisory Group. The One-Stop Committee consists of the senior leadership level of core programs, combined plan partners and additional entities involved in Idaho's workforce development system. The One-Stop Committee is expected to develop policies for consideration by the Council, fulfill certain responsibilities of state and local workforce boards (i.e. AJC Certification), and ensure continuous improvement of the system. The WIOA Advisory Group takes a more hands-on role in drafting policies and plans as its members work more closely with the customers of the workforce system. The WIOA Advisory Group consists of:

- Staff from the Idaho Workforce Development Council.
- Staff from the Idaho Department of Labor to represent the service delivery roles of Title I-B and Title III programs, as well as Combined State Plan programs administered by the Department.
- Staff from the Idaho Department of Labor to represent the administrative entity and fiscal agent.
- Staff from Adult Education to represent Title II programs.
- Staff from the Division of Vocational Rehabilitation to represent Title IV programs.
- Staff from the Idaho Commission for the Blind and Visually Impaired to represent Title IV programs.
- Staff from the Idaho Commission on Aging to represent SCECP, a combined plan partner program.
- Program staff from other partner programs as necessary and appropriate.

This group ensures ongoing alignment between programs, coordinates statewide reporting, and will also serve (as appropriate) on the Data System Alignment working group identified in Section (III)(b)(6). The WIOA Advisory Group has been instrumental in supporting efforts to develop co-enrollment and eligible training provider performance data.

Many members of the WIOA Advisory Group also serve on the leadership team for Idaho's Workforce Data Quality Initiative which seeks to build upon the existing State Longitudinal Data System (SLDS), managed by the Idaho Office of the State Board of Education (OSBE), to build a secure, web-based interface, which ties together individual program participant information from workforce, education, and unique program data sets. This interface will enable partners to 1) merge multiple data sets to fulfill WIOA joint performance reporting requirements; 2) link workforce and ETP data to strengthen workforce program data outcomes; and 3) enhance the ability to evaluate both workforce and education programs across the state, including laying the foundation to incorporate additional Idaho-based WIOA partner programs via automated, electronic means.

The Council also identified the following strategies that support program alignment and the goals of the Idaho's Combined State Plan:

- Improving Public Awareness and Access to the Workforce System – The sixteen public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both jobseekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need.
- Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners.
- Serving Rural and Remote Communities - In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate.
- Career Pathways/Sector Partnerships - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, construction, health care, technology and tourism. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education.

Specific goals for implementation during this State Plan period are included in II(b)(2) and each partner's description of how they will implement the strategies follow in III(a)(2).

### ***Addressing Gaps***

In addition to implementing the state's strategies (described above and in II(b)(2)), the needs of specific populations were identified as areas of concern in the Workforce Analysis:

- Older workers
- Youth
- Veterans
- Formerly incarcerated individuals
- Individuals with disabilities

These populations are intertwined with all of the strategies, but additional efforts are described below.

- Older Workers - As noted in the economic and workforce analyses, Idaho's population and economy are expected to see continued growth and many of those moving to the state are over 65. The workforce participation rate of this group is just 16%, providing an opportunity for employers to leverage these individuals for unfilled jobs. However,

employers may need to modify their work environments or address cultural issues to retain older workers. Idaho's workforce system can help by educating employers on the benefits of hiring older workers and the workplace practices that would be desirable to older workers.

- Youth - The economic and workforce analyses revealed that youth ages 16-24 in the workforce are more likely to be unemployed than other age groups. "*Youth ages 16-24 who are in the workforce*" includes all persons ages 16-24 who are actively employed or seeking employment. This is a broad group which includes, but is not limited to, specific populations with barriers to employment. This group also includes students who are engaged in secondary education (ages 16-21), and youth who are engaged in post-secondary education (through age 24), who are employed or seeking employment. Implementing and scaling a youth apprenticeship initiative in the state will support connecting these youth to careers before they leave high school. The initiative is envisioned to encompass both traditional and non-traditional apprenticeship opportunities. Some could have postsecondary components that lead to industry credentials, others could lead to a bachelors or advanced degree. In addition to the postsecondary credential, the initiative is designed to reduce youth unemployment.
- Veterans – Those who have served our country deserve additional support from the state's workforce system. Efforts are underway to build relationships and opportunities under the Department of Defense's SkillBridge program. In addition, the state's Division of Veteran Services has been a key partner in aligning with the *ApprenticeshipIdaho* initiative to ensure that Veterans can access their benefits when participating in a registered apprenticeship program. There are also initial efforts to attract separating service members to the state for unfilled jobs. A small campaign using social media is under development through a partnership between the Workforce Development Council and the Division of Veterans Services. Finally, the State Board of Education has leveraged a Lumina Foundation grant to create a crosswalk between military training and college credit so that there is consistency statewide in how Veterans receive credit for prior learning when enrolling in the state's public postsecondary institutions.
- Formerly Incarcerated Individuals – Given Idaho's low unemployment rate, those individuals with a criminal background also offer an opportunity for unfilled jobs. The Idaho Department of Corrections applied for, and received, a grant from the Lumina Foundation to create better pathways for those who have a criminal background – starting behind the gate in providing postsecondary training programs that are aligned to in-demand occupations. The Workforce Development Council and Idaho Career & Technical Education are partners in the grant.
- Persons with Disabilities - Idaho's population of persons with disabilities is increasing at a rate faster than growth in the general populations. Idahoans with disabilities participated in the labor force at a rate of 48 percent, compared to 80 percent for people without disabilities, and the unemployment rate for Idahoans with disabilities was 12.2 percent, on average, compared to 3.3 percent for those without disabilities. Through the delivery of the Idaho Division of Vocational Rehabilitation and Idaho Commission for the Blind and Visually Impaired's Pre-Employment Transition Services (Pre-ETS) for students with disabilities, opportunities have been afforded to students in the areas of counseling on postsecondary education, instruction in self advocacy, job exploration counseling, work-based learning and work readiness. Business engagement services delivered throughout the state address the needs of local businesses in the areas of

technical assistance and training specific to disability related accommodations for employees on the job and disability etiquette, connecting businesses with an untapped and diverse labor pool, and education on job modification and retention of employees. Agency staff are improving their use of regional labor market information and the various pathways to careers to better inform individuals with disabilities of the emerging high-demand, high growth industry sectors and occupations.

### III. OPERATIONAL PLANNING ELEMENTS

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

#### A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

##### 1. STATE BOARD FUNCTIONS

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

In January 2017, Governor C.L. "Butch" Otter appointed a seventeen-member Workforce Development Task Force to "examine ways to improve Idaho's funding and delivery of training programs to meet our state's growing demand for skilled workers." The Task Force concluded that Idaho needed an entity in the state to better focus and direct workforce development efforts, and empowering a more business-driven Workforce Development Council was the right way to do it. Of the nine recommendations delivered by the Task Force in July 2017, the highest priority was placed on implementing an organizational model that meets the following expectations:

- a. Is industry-driven;
- b. Can hire/direct dedicated staff;
- c. Can effectively coordinate industry-driven workforce development efforts among state agencies and educational institutions; and
- d. Is actionable and accountable.

In response to the Task Force recommendations, Governor C.L. "Butch" Otter updated his Executive Order concerning the Council adding industry members, moving the Council under the Executive Office of the Governor and appointing an Executive Director in late 2017. Visit the Council's website to view the full report - <https://wdc.idaho.gov/> - under "Task Force Recommendations".

#### **State Board Responsibilities**

In Executive Order No. 2019-08, Governor Brad Little reauthorized the Idaho Workforce Development Council as the state board under the Workforce Innovation and Opportunity Act.



As outlined in the executive order, the council is specifically responsible for advising the Governor, Legislature and appropriate executive agencies on matters related to developing and implementing a comprehensive workforce development strategy for Idaho that:

- a. Increases public awareness of and access to career education and training opportunities;
- b. Improves the effectiveness, quality and coordination of programs and services designed to maintain a highly skilled workforce; and,
- c. Helps provide for the most efficient use of federal, state and local workforce development resources.

The Workforce Development Council is also responsible for the development and oversight of procedures, criteria, performance measures and expenditures for the Workforce Development Training Fund, a state-funded mechanism to support workforce education and training.

### **Implementation of State Board Functions**

As described in the introduction to this section, a significant shift in the composition and responsibilities of the Idaho Workforce Development Council was made in late 2017. The Workforce Development Council now meets the membership requirements for the WIOA State Board. In addition to serving as the state board, under a waiver granted by USDOL, the Council also serves as the local board.

The majority of the work carried out by the Workforce Development Council is through a committee structure. Quarterly meetings of the full Council are scheduled a year in advance and committees have standing monthly meetings. Notice of meetings and materials are posted on the Workforce Development Council's website. Council meetings are typically well attended by the public with approximately 40-50 attendees from education and workforce agencies participating in each quarterly meeting.

The Workforce Development Council also empanels ad hoc committees, appointed by the chair when needed. All committees may include members from the general public who have special knowledge and qualifications to be of assistance to the council.

Currently, there are six standing committees, the Executive Committee, the Apprenticeship Committee, the Workforce Development Policy Committee, the Grant Review Committee, the One-Stop Committee and the Outreach Committee. As defined in the bylaws, the Executive Committee consists of five private sector members and one representative of a labor union, appointed by the Governor. The primary function of the Executive Committee is to ensure that the Governor's directive to develop and implement a comprehensive workforce development strategy for Idaho is carried out. The Executive Committee is also empowered to conduct business in the interim between meetings and may act on behalf of the entire council.

The remaining committees are briefly described below:

#### **Workforce Development Policy Committee**

The Workforce Development Policy Committee is responsible for developing most of the policies that govern council actions in carrying out its responsibilities. The committee is specifically responsible for the Workforce Development Training Fund policies and the Eligible Training Provider policies. The committee is also charged with developing an annual projection of needs for state investment into workforce development activities.

#### **One-Stop Committee**

The One-Stop Committee ensures that the Workforce Development Council assists the Governor in fulfilling the requirements of the State Workforce Investment Board as set forth in the Workforce Innovation and Opportunity Act - with an emphasis on continuous improvement, alignment and coordination. The committee develops policies as needed for WIOA and supports the coordination of procurement activities for the one-stop system.

A WIOA Advisory Group, consisting of programmatic leaders of the core and optional partners (referenced in Section II.c.2 Program Alignment, Section III.a.2.A Implementation of State Strategy, Assessment and Section III.b.4 Evaluation of Programs and One-Stop Program Partners), supports the One-Stop Committee on WIOA implementation and assisting the Workforce Development Council to fulfill its responsibilities under WIOA section 101(d) and WIOA section 107 (d).

The WIOA Advisory Group recommends actions to implement the WIOA State Plan and other provisions/requirements of WIOA. These recommendations are presented to the One-Stop Committee, where the executive leaders of the partner agencies can ensure proper resourcing and implementation needs are addressed. The One-Stop Committee then recommends measures for adoption by the full council.

#### Apprenticeship Committee

The Apprenticeship Committee leads the development of replicable and sustainable work-based learning opportunities. The initial focus of the committee has been on registered apprenticeship; however, the committee is considering how it can also support internship, cooperative education, pre-apprenticeship and on-the-job training. The committee is exploring whether Idaho should consider creating a State Apprenticeship Agency and will make a recommendation to the Council.

#### Grant Review Committee

The Workforce Development Council is responsible for approving expenditures (i.e. awards) of the state-funded Workforce Development Training Fund. This was previously the responsibility of the Directors of the Departments of Commerce and Labor in consultation with the Governor's office. To maintain a separation of duties between setting the policy for the Workforce Development Training Fund and awarding grants, a Grant Review Committee reviews applications and make recommendations to the Council. The Grant Review Committee is chaired by a member of the Executive Committee.

#### Outreach Committee

The Workforce Development Task Force recommendations and subsequent Executive Order from the Governor added "increase public awareness of and access to career education and training opportunities" to the responsibilities of the Council. The Outreach Committee drives the coordination across state agencies, education and the private sector to fulfill this important responsibility.

#### **State Board Decision Making Process**

The Council has authority to make decisions regarding its functions as both the state board and the local board under WIOA. Recommendations from committees are placed on the agenda for consideration by the full Council at its quarterly meetings. The Executive Committee, who meets monthly, can take action on items requiring more expeditious review. The Executive Committee is then required to report on its actions at the next full Council meeting.

At the quarterly meetings, the full Council reviews pertinent decision items, including supporting documentation and presentations by staff, as appropriate. The Council will deliberate if necessary, and the recommendation is either approved, or amended in a motion from a council member. A separate council member must second the motion. After being seconded, the full Council votes to approve or reject the recommendation. If the vote is unclear, a roll call vote is taken. In order for a decision to be binding, a quorum of members must be present at the time the vote takes place. Recommendations which are rejected by the council are returned to the appropriate committee for further work or revision.

## 2. IMPLEMENTATION OF STATE STRATEGY

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of—

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

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

In addition to the specific activities described in Table 23, the core and partner programs will also participate on the WIOA Advisory Group, and to the extent appropriate, participate in joint training and planning activities coordinated across programs as outlined in Section (II)(c)(2).

Where appropriate, each core and partner program specifically address the various activities they fund which are listed in the table that follows. Activities are organized under the appropriate strategy they address. However, the Idaho Department of Labor is the lead state agency for administering all Title I-B programs, Title III programs, as well as the Combined State Plan partner programs of Trade Adjustment Assistance, Veterans Employment and Training Services, and Unemployment Insurance. As a result, the activities funded by this agency apply across multiple programs and are addressed concurrently. Therefore, this section is organized as follows:

#### Idaho Department of Labor Programs

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan partner programs: Trade Adjustment Assistance, Veterans Employment and Training Services, and Unemployment Insurance. It funds the activities listed in the table below as a means of implementing the State's strategies across its programs.

#### Title II Programs - Adult Education

The agency responsible for administering Title II programs is the Idaho Career & Technical Education (ICTE). ICTE, as well as local Adult Education programs, will invest in the activities listed in the table.

#### Title IV Programs - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as "The Division") and the Idaho Commission for the Blind and

Visually Impaired (referred to below as “The Commission.”). This section highlights the efforts of both agencies.

### Combined Partner Program - OAA Title V - Senior Community Service Employment Program

The following activities are funded by the Idaho SCSEP to implement the state strategies and support unemployed individuals 55+.

**Table 23: Core Program Activities Aligned with Strategy Implementation**

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
<b>Idaho Department of Labor- WP, WIOA Title I-B, TAA, VETS, &amp; UI</b>	<ul style="list-style-type: none"> <li>·Provide AJC staff training on business outreach techniques.</li> <li>·Monitor real-time activity, trends &amp; needs at local, regional &amp; state levels.</li> <li>·Enhanced business services: Outreach; 1 on 1 meetings w/targeted employers; office strategy sessions on how to best respond to employer needs.</li> </ul>	<ul style="list-style-type: none"> <li>·Develop a messaging campaign to make Idaho residents aware of the agency's new service delivery model which allows a greater number of customers access to services in more communities.</li> <li>· Encourage Title I-B participants, especially dislocated workers, to participate in work-based learning opportunities, including registered apprenticeships, on-the-job training (OJT), internships and others.</li> </ul>	<ul style="list-style-type: none"> <li>·Coordinates employer outreach among local one-stop partners as One-Stop Operator.</li> <li>·Work with State Board of Education to ensure WIOA Eligible Training provides offer high quality education experiences.</li> <li>·Prioritize work-based learning for all programs.</li> </ul>	<ul style="list-style-type: none"> <li>·Maintain a presence in rural communities, through the mobile service delivery model, ensuring that One-Stop services are be available across the state in over 50 communities to serve job seekers and employers in both urban and rural areas.</li> <li>·Refer to the agency's new service delivery model which now offers service to more than 50 communities across the state, more than doubling previous efforts.</li> </ul>	<ul style="list-style-type: none"> <li>·Implement state's WIOA ETP policy developed to ensure training for occupations within the established career pathways available and prioritized</li> <li>·Actively work with employers to develop registered apprenticeships for their in-demand occupations.</li> </ul>
<b>Idaho Career &amp; Technical Education-Adult Education</b>	<ul style="list-style-type: none"> <li>· Provide technical assistance to WIOA Title II funded program sites to develop/</li> </ul>	<ul style="list-style-type: none"> <li>· Coordinate WIOA Title II and WIOA Title I intake</li> </ul>	<ul style="list-style-type: none"> <li>· Enhance WIOA Title II curriculum to meet employer needs.</li> </ul>	<ul style="list-style-type: none"> <li>· Fund research, training &amp; implementation of</li> </ul>	<ul style="list-style-type: none"> <li>· Fund research, training &amp; implementation of</li> </ul>

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
	<p>refine career pathways focused curriculum in key sectors.</p> <p>•Focus on sector priorities established by the Workforce Development Council aligned with regional labor needs.</p> <p>•Develop and maintain a regional matrix of labor needs to be shared with WIOA Title II program sites.</p>	<p>processes.</p> <p>•Partner with Workforce Development programs at Community College sites to align adult education with workforce needs.</p>	<p>•Collaborate with WIOA providers and WDC to communicate the value add of adult education programs to ensure coordinated messaging.</p> <p>•Coordinate with ICTE Administrator to communicate statewide Adult Education overview to the WDC.</p>	<p>effective distance learning models for adult students, including partner program collaboration to identify promising models or utilize existing resources.</p> <p>•Encourage local providers to strengthen partnerships &amp; supports in rural areas, funding coordination efforts as appropriate.</p>	<p>contextualized instruction which incorporates workplace preparation &amp; occupational skills into literacy, math and English language instruction, &amp; is aligned with the career pathways being developed by the state.</p>
<b>Vocational Rehabilitation Programs- Idaho Division of Vocational Rehabilitation &amp; Idaho Commission of the Blind and Visually Impaired</b>	<p>•Contribute to the sector approach established by the WDC.</p> <p>•Explore the development of similar tools for pathways common to quality VR outcomes.</p> <p>•Continue to focus on and train staff to use IDOL or other sources of local area LMI (e.g. Career Index Plus, CIS) to better inform customers' employment goal selection using a career pathways strategy in concert with regional LMI to identify in-demand quality jobs, including</p>	<p>• Improve program visibility including improved marketing tools for both employers and people with disabilities with core Programs, including materials for coordinating business services.</p> <p>•Continue to work with one-stop partners to provide guidance on programmatic and physical</p>	<p>•Track business services provided/delivered by staff and reporting this information to WDC on a monthly basis.</p> <p>•Participate in business service teams comprised of membership of all core programs to meet on a quarterly basis.</p>	<p>•Collaborate with One-Stop partners, including libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence.</p>	<p>•Train staff and expand utilization of the career pathways established by ICTE, including the Career Atlas tool.</p>

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high- quality solutions	*Serving Rural communities	*Career Pathways
	use of DOLs hot jobs list, that are a match for the customer.	<p>accessibility to increase quality of services for people with disabilities.</p> <p>•Market services to targeted populations with the “Live Better Idaho” local community resource portal.</p> <p>•Coordinate activities with One- Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. Maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations, especially Community</p>			

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
		Rehabilitation Partners.			
Idaho Commission on Aging - SCSEP		·Partner with One-Stop partners on outreach campaigns to increase visibility for participants 55+ /years old.	·Provide paid employment training, job skills & computer skills training. · Offer supportive services, such as annual physical exams, to overcome barriers to employment	·Continue to support new and existing participants 55+ /yrs. old in attaining employment. Offer additional assistance, i.e., On-the-Job Experience (OJE) and other paid training opportunities to those experiencing barriers to employment such as those who live in rural and remote settings across the state.	

## B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The information in this section is organized parallel to Part (A) above and listed in Table 24, which follows on the next page:

- Idaho Department of Labor Programs - includes WIOA Title I-B and Title III, and Combined Partner programs of Trade Adjustment Assistance, Veterans Training & Employment Programs, and Unemployment Insurance
- Title II - Adult Education
- Title IV - Vocational Rehabilitation Programs

- Combined State Plan Partner - OAA Title V - Senior Community Service Employment Programs

All workforce system partners use a statewide resource for service coordination: *Live Better Idaho* (LBI) located at <https://www.livebetteridaho.org>, an online platform developed and supported by one-stop partner Idaho Department of Health & Welfare. The custom-designed platform is ‘agency agnostic’ and available to public and private providers of services. It connects Idahoans in need to relevant services by matching individuals with programs they may qualify for. The tool is localized and customized, connecting users to services that are relevant and available in their local areas.

LBI was developed specifically to implement many of the state’s strategies, such as serving rural communities, coordinating staff training, and connecting to youth populations. It is the product of intensive research in customer-centered services and translating the results to an electronic platform. All one-stop partners are required to link their services to LBI, but not simply as an information source. Customers are able to take the next actionable step toward receiving services, such as completing an application or identifying needed eligibility documentation.

LBI provides customers in remote locations access to services, even from a mobile device. The customers do not have to make a long drive to a one-stop center. Customers choosing to visit a local library can receive additional direction from library staff. Even staff at American Job Centers rely on LBI as the most up-to-date resource on services in the local area. Where the tool is designed to empower customers to serve themselves, it is also an invaluable training resource for AJC staff on partner programs.

All one-stop partner staff have been trained on LBI and can use it with customers to explore other complimentary programs which may offer specific funding in areas of need, reducing direct program expenditures, and service redundancy while increasing overall collaboration with partners external to WIOA.

**Table 24: Core Program Activities Aligned with Strategy Implementation**

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
<b>Idaho Department of Labor-WP, WIOA Title I-B, TAA, VETS, UI,</b>	·The sector strategy initiative is supported by the Idaho Department of Labor’s Research and Analysis	·The agency’s Communications division is assisting in the development of an outreach campaign to inform the public of the Idaho	·The Research & Analysis Bureau provides labor market information to core	·In order to provide One-Stop services across the state, IDOL is leading the discussions with the One-Stop partners to share resources, including co-location. It is	·The career pathways initiative is led by Idaho Career & Technical Education, the administrator of the Carl D.



Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
	<p>Bureau. This bureau is responsible for developing and publishing data for Bureau of Labor Statistics programs and other labor market information. Industry scans for the targeted sectors are published periodically to update policymakers, industry leaders, and those working in economic and workforce development. These industry scans are important for informing and training all workforce partners about the targeted industries and</p>	<p>Department of Labor's new service delivery model. In addition, Communications also assists the Workforce Development Council in the development/lay out of some of its reports to the Governor and legislature which outline the multitude of workforce activities taking place across the state.</p> <p>•The agency's Idaho Job Corps initiative is creating better opportunities for Idaho's youth to benefit from the Job Corps program.</p>	<p>and One-Stop partners to assure that employers across the state receive program information and services designed to improve their labor force.</p> <p>•The Research &amp; Analysis Bureau assists the Workforce Development Council in developing and issuing metrics to determine criteria for awarding Workforce Development Training Fund grants.</p>	<p>rare that partners duplicate each other's work. The communities are so small that each partner is intimately aware of what the other is doing and they most often collaborate; however, there is room for improvement as leases expire and new service delivery models are implemented.</p>	<p>Perkins programs. The initiative is well informed by many of the partners - Adult Education, WIOA Title I-B programs, and Employment Services staff. The effort is overseen by the Workforce Development Council with input from industry leaders and all levels of educators.</p> <p>•The Idaho Job Corps program is partnering with the community colleges in the state in a new pilot designed to promote more flexibility to the program in aligning to in-demand</p>

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
	the high-demand occupations within them.				career pathways. The pilot is in place at one community college and will expand to the others in PY21.
<b>Idaho Career &amp; Technical Education-Adult Education</b>		·ICTE also administers the GED program for the State and will ensure that the policies and processes guiding GED testing in Idaho align with the Combined State Plan strategies. For example, the Division has implemented new policies for opening GED testing centers in underserved and rural communities. ICTE also coordinates training around the GED for local Adult Education providers.	·Training initiatives for local program staff around workforce development, One-Stops, and program partnerships will be coordinated through the WIOA Advisory Group and Workforce Development Council to maximize cross training opportunities and reduce	*See Improving Public Awareness/Access	Career pathways, contextualized literacy instruction, and college transition programs for Adult Education will be developed in coordination with ICTE and the State Board of Education, as well as local colleges. This will help ensure alignment with technical programs funded by Carl D. Perkins at both the secondary and

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
			uplicated efforts		post-secondary levels, and reduce duplication and redundancies in remedial education programs.
<b>Vocational Rehabilitation Programs- Idaho Division of Vocational Rehabilitation &amp; Idaho Commission of the Blind and Visually Impaired</b>	•Focus training and improvement efforts around Comprehensive Assessments to require the utilization of career pathways model in addition to LMI, when applicable, and enhanced discovery activities to align with interests, abilities, capabilities, strengths, and limitations of the individual.	•VR programs are working to improve program visibility including improved marketing tools for both employers and people with disabilities.  •VR programs have re-engineered our 'success stories' process with a focus on the creation of quality products showcasing beneficial outcomes for business and customers who utilize VR.	•Business outreach team for each region has been established by IDVR and ICBVI to strategize and coordinate regional services and to participate in WIOA regional employment teams.  •Developing employer related training for staff to use with	•Continue to encourage and support vendors offering service provision in smaller communities to offset the impact of long distances, while exploring other service delivery models to expand options in rural/remote communities. •Continue to monitor rural need and continue to support travel by Community Rehabilitation Programs serving Idaho's remote & underserved areas.  •Extend rural outreach to all school districts.	• See Target key industries/Sector Approach

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
		<ul style="list-style-type: none"> <li>•DVR has developed an updated website, and ICBVI will be updating their website soon to provide better resources to complement the professionalization of marketing efforts.</li> <li>•Title IV programs continue to work with Idaho school districts and LEAs to promote early involvement of students in the VR process and Pre-employment Transition Services.</li> </ul>	<p>employers.</p> <ul style="list-style-type: none"> <li>•Strategic planning efforts will better inform a business outreach for Title IV programs, due to occur in March 2020.</li> </ul>	Transition coordinator to develop, evaluate & modify innovative transition services tailored to the needs of local areas/ communities as they align with the combined state strategy and activities of workforce partners.	
<b>Idaho Commission on Aging - SCSEP</b>		<ul style="list-style-type: none"> <li>•Provide referral information to outside organizations that provide information and assistance, such as, Centers for Independent Living and the</li> </ul>			

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
		Area Agencies on Aging.			

### C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

This section describes how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B).

The primary purpose of WIOA is to “increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for employment, education, training, and support services they need to succeed in the labor market.” (WIOA Sec (2)(1)). While Idaho’s workforce programs can and do address the need for supportive services, education and training, we must also serve as advocates for the populations we serve, especially with employers.

To that end, in addition to the agency-specific activities outlined below in this section, the Combined State Plan programs, via the WIOA Advisory Group, acknowledge the need for coordinated outreach to employers regarding the benefits of hiring employees from groups who have barriers to employment. One such option will be to integrate this outreach into the “single point of contact” model discussed in Part (D) of this section.

The remaining information in this section is organized by program, similar to Parts (A) and (B) above, without the table format:

#### Idaho Department of Labor Programs

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four of the core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan partner programs: Trade Adjustment Assistance (TAA), Veterans Employment and Training Services (VETS), and Unemployment Insurance (UI). The

department's primary delivery model for these services is via the One-Stop system in American Job Centers.

The One-Stop system is the ideal way to provide customer-centered services to a wide variety of individuals. A robust system of referrals and cross-training provides a seamless experience for customers. Each American Job Center has a resource list of community supportive services as well as personal connections with suppliers of supportive services in their area.

Idaho's web-based Unemployment Insurance program (iUS) uniquely coordinates activities and resources to ensure delivery of necessary services to unemployed individuals. With information, services and resources accessible virtually anywhere, Idaho's One Stop Centers, affiliate sites and all partner locations offer full access. UI program staff, the majority of whom are located at the central Department of Labor office, provide immediate customer service through "click to chat" from the website or by phone. Direct, in-person assistance is also available in the state's comprehensive centers.

Robust cross-training of One-Stop system staff includes training regarding general eligibility guidelines and user training for iUS, which strengthen linkages between the One-Stop system and the UI program, and increases awareness of UI issues across core programs.

The long-term unemployed have been an area of special focus at the American Job Centers. The Wagner-Peyser employment service workforce consultants have had great success in engaging those participating in the Reemployment Services and Eligibility Assessments (RESEA) program and other long-term unemployed individuals. Those that need special assistance with skills upgrading are referred to a WIOA career planner. Those with substantial cultural barriers, such as refugees resettled in Idaho, are often One-Stop center customers. The One-Stop centers in Boise and Twin Falls have strong relationships with the Center for Refugees and provide targeted services to those populations.

The WIOA/TAA career planners specifically work with a variety of special populations such as displaced homemakers, low-income individuals, trade-affected workers, veterans, and ex-offenders. WIOA Youth career planners prioritize serving youth with disabilities or those who have aged out of foster care. These customers are served not only by WIOA/TAA career planners, but are often co-enrolled in appropriate programs for which they are eligible. They are also referred or provided education, workforce development or supportive services as needed. Career planners work in conjunction with Incarcerated Veterans Transition Program staff to help ensure that homeless and formerly incarcerated veterans enrolled in the program receive the services they need to help spur them towards self-sustaining employment.

The Department of Labor is currently winding down its Disability Employment Initiative grant, which has facilitated in-depth training to staff on how to provide employment services to individuals with disabilities. All American Job Centers are Americans with Disabilities Act compliant.

In July 2019, the U.S. Department of Labor awarded the Idaho Department of Labor a three-year grant for a State-Operated Job Corps Demonstration Project, transferring operational control of the Centennial Job Corps Civilian Conservation Center (Nampa, Idaho) from the U.S. Forest Service. The project provides flexibility to the state to develop and implement a customized, state-based, approach to serving Idaho Job Corps students. As the first state to take over a Job Corps site, the Idaho Department of Labor is directly responsible for project outreach, recruitment, work-based learning, and employment related services. Known as Idaho JOBCorps, the model is intended to increase access to and enrollment in education and work-based learning for out-of-school and at-risk Idaho youth by leveraging existing resources and

programs to better serve Idaho youth in getting the education and training they need in high-demand fields.

#### Title II - Adult Education

Services to individuals under Title II are carried out locally by eligible providers. The lead agency administering Title II programs (Idaho Career & Technical Education) ensures policy alignment with other partner programs at the state level through participation on the WIOA Advisory Group. ICTE will require that local providers coordinate services at the local level and will provide guidance and technical assistance to support such efforts. Local providers are required to demonstrate capacity for and history of (1) local coordination and (2) provision of quality services to individuals, as part of the competitive application process. Effective partnerships are pivotal to maximize resources and align services; the following examples reflect current initiatives to meet this goal:

- Adult Education staff at the College of Eastern Idaho (CEI) and Lewis-Clark State College (LCSC) are colocated at the comprehensive AJC, and participate in cross training to refer students to services provided by other WIOA core and one-stop partners.
- College of Western Idaho (CWI) staff participate in Quarterly WIOA Workgroup meetings to share program resources, referrals and updates. The adult education programs partner with the Title I WIOA Youth and Adult programs to leverage resources for maximum benefit to an individual through education, support services, and employment, and training placement.
- CWI Adult Education instructors collaborate with WIOA Youth staff to support Canyon County Juvenile Detention and Idaho JOBCorps youth with their educational goals and connections to training and employment opportunities.

#### Title IV - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as “The Division”) and the Idaho Commission for the Blind and Visually Impaired (referred to below as “The Commission.”). This section addresses each agency separately.

##### *Idaho Division of Vocational Rehabilitation*

Coordination of service provision will take place at the local area level. Local agreements are established among One-Stop partners that promote communication and include arrangements for cost sharing to enable the full utilization of external funding sources. The Division supports informational training on programs. The Division continues to support coordination and co-location with external plan agencies such as the Division of Behavioral Health, the Idaho Department of Correction and our school to work transition partners.

##### *Idaho Commission for the Blind and Visually Impaired*

The coordination efforts of the Commission generally reflects those described above for the Division. In addition, the Commission will:

- Begin to work with youth at the start of high school to foster the development of ongoing transition planning and services specifically connecting School Districts throughout the State.
- Conduct assistive technology assessments with clients.

- Increase training availability, effectiveness and access for clients, including minority, and the underserved in rural communities.

#### Combined Partner Plan - OAA Title V - Senior Community Service Employment Program

The Idaho Commission on Aging coordinates activities with one stop partners by utilizing local Employment Training Coordinators to connect participants to local one stop programs. The Commission's SCSEP Program Manager provides One-Stop partner information to the SCSEP local regional offices to ensure participation at the local level. Participation with the One-Stop programs is reviewed through annual monitoring reviews. The Employment Training Coordinators assess participants and utilize program and community resources to meet identified supportive service needs.

Quality of service delivery will be measured by participant annual surveys. Annual survey results are assessed and shared with the local SCSEP offices. Strategies are developed and implemented to address survey concerns.

#### D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

This section describes how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs. The activities described shall conform to the statutory requirements of each program.

In addition to the agency-specific activities outlined later in this section, the Combined State Plan programs, via the WIOA Advisory Group, will develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach at the local and regional level. Such a model will ensure more coordinated, less disruptive or duplicated outreach to employers. It will also build on existing relationships. This approach provides business assistance that streamlines communication and leverages resources to assist with workforce development.

The statewide one-stop operator is charged with coordinating the employer outreach among the local one-stop partner programs. This approach also helps the core programs and agencies coordinate outreach to employers in regard to the benefits of hiring people with barriers to employment. For example, about 15% of refugees living in Idaho are highly educated in their home country, but are often overlooked as a source of skilled labor because of their language barriers. Additionally, individuals with disabilities make skilled and loyal employees when matched with a meaningful job that fits their skill sets.

Both individuals and employers benefit when an employee with the right skills is matched in the right job with the right employer, regardless of age, disability status, language, income, race, or other barriers. Idaho's workforce development programs can help employers make the most of these potential employees by providing the services and support to help employers and employees succeed.



The information below describes how individual programs and/or agencies will coordinate services to employers. This section is organized similar to Part (C) above:

### Idaho Department of Labor Programs

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four of the core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan and One-Stop partner programs: Trade Adjustment Assistance, Veterans Employment and Training Services and Unemployment Insurance. The Department's primary method for coordinating with employers is via the One-Stop system.

Employers are valued and important customers of the One-Stop system. The Workforce Development Council's goals and strategies include a detailed description of the sector strategy approach offered through the American Job Centers as the state's overarching guidance for One-Stop services to businesses.

One-Stop centers serve the business community and are routinely engaged in a variety of local activities. Staff are driven by the philosophy that quality business services ultimately facilitate connections to employment opportunities for job seekers and enhance economic growth. Such services include recruitment and labor exchange support, coordination of customized hiring events, business-related workshops, and providing connectivity to workforce training resources, tax credits, and other business resources available through the organizations such as the Idaho Department of Commerce and Small Business Development Centers.

The Idaho Department of Labor leverages WIOA Title I-B and Wagner-Peyser Employment Services program funds with other federal program funds, discretionary grants, National Dislocated Worker Grants, and state funds from the Workforce Development Training Fund to expand and enhance employer participation in the statewide workforce investment system in a variety of ways:

- Extensive staff training for business consulting techniques and connecting employers to system resources, particularly WIOA work-based learning opportunities, such as On-the-Job Training, Internships, Work Experiences, and Apprenticeships.
- Development of career pathways as described in Section (II)(c) to guide workforce, economic and education development professionals to meet the needs of employers.
- The use of the state's Workforce Development Training Fund, which is administered by the Workforce Development Council, to build the skills of workers in new and expanding business.
- Joint partnerships with employers and education for events such as the annual Hard Hats, Hammers & Hot Dogs event in north Idaho or the Youth Career Fair in southeast Idaho.
- Extensive enhancements to and use of technology including social media and virtual job fairs to connect employers and job seekers.
- Special surveys to identify needs and impressions of employers and inform the department of successful initiatives or areas of needed improvement.
- Development of industry-driven microsites for increasing employment opportunities and workforce development within the sector strategy approach.

- Customized recruitment for employers with high-skill and high-demand occupations
- Specialized workforce studies to identify skills gaps and partnerships.
- Local Veteran's Employer Representatives (LVER) are assigned duties that promote the advantages of hiring veterans to employers, employer associations, and business groups. When employer outreach is primarily accomplished by a "business services team" or like entity within a region or service delivery area, the LVER is included as an active member of that team. The LVER advocates for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities.
- Providing a professional setting in One-Stop facilities for employers to conduct customized recruitment and hiring events, collaborative efforts and events conducted with workforce, economic, and community partners.

As noted above, employer services are offered in tandem via the TAA, ES, WIOA Title I-B, and other programs through the state's AJC centers. By aligning activities such as Rapid Response, trade, dislocated worker, sector strategies, career pathways, and more, the state works towards the development, improvement, and expansion of its business engagement activities. These include but are not limited to:

- Providing customized training options as a means of layoff aversion;
- Offering Assistance in filing a TAA petition;
- Delivering Rapid Response services to impacted employees to maintain morale and productivity at the worksite prior to an impending layoff; or
- Securing lists of trade-affected workers to ensure they become aware of the services available to them.

### Title II Programs - Adult Education

Title II programs are administered by Idaho Career & Technical Education, which employs a Communications Manager. This position coordinates major initiatives with the public and with Idaho employers on behalf of ICTE. The ICTE administrator also sits on the Workforce Development Council, which facilitates major statewide employer outreach initiatives.

The State Coordinator attends Council meetings and collaborates with ICTE and Department of Labor staff to identify and understand the high-level needs of employers across the state. The State Coordinator, in conjunction with ICTE, uses this information, including current economic indicators provided by the Idaho Department of Labor, to prioritize services authorized under Title II. ICTE issues policies and guidance that ensure comprehensive, high-quality services are built into and encouraged of our local service providers, in alignment with core and one-stop partner programs.

The role of local providers is to make connections with individual employers and design quality services in response to the needs of local industries. This may include job-site classes, contextualized vocabulary, connections with occupational training, enhanced transition programs, and other models that help build the foundational skills of students while preparing them for successful employment in the regional economy.

Historically, Title II programs in Idaho have operated on a regional basis and have been administered by the community college, technical college, or university serving each region.

Many local programs have established connections with local employers through their institution, as well as convening advisory boards, establishing community partnerships, and connections with other workforce agencies.

#### Title IV Programs - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as “The Division”) and the Idaho Commission for the Blind and Visually Impaired (referred to below as “The Commission.”). This section addresses each agency separately.

##### *Idaho Division of Vocational Rehabilitation*

The Division has hired a business relations liaison with the sole commitment to engage businesses in the hiring of people with disabilities across Idaho. This liaison is required to coordinate with other workforce business specialists to ensure maximization of effort and single point of contact to both meet the needs of Idaho’s businesses and reduce the burden on employers. The Division took advantage of the Job-Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC) to inform competencies for the business liaison position and to inform activities for the position. The business liaison is responsible for participating in business driven disability initiatives to increase diversity in the workforce, and coordinating the delivery of technical assistance on employer requested disability specific business needs. The Division partner with the Workforce Development Council in implementing the Talent Pipeline Management initiative, led by the State’s Chamber of Commerce. The Division will explore the potential development of tailored training programs to help bridge the gap between employer needs and qualified talent.

##### *Idaho Commission for the Blind and Visually Impaired*

The Commission will partner with the Division of Vocational Rehabilitation on activities described above as appropriate and necessary. In addition, if an employer requests an Assistive Technology Assessments in order to hire a person with a visual impairment, the Commission will work with the employer on that accommodation. This assessment may include website and network software accessibility as well as job site accommodations.

#### Combined State Plan Partner Program - OAA Title V - Senior Community Service Employment Program

Local SCSEP offices will provide government and non-profit employers with subsidized staff to work at their agency while they receive training. The host agency works with the individual and evaluate if the person can transition to a paid employment position. Employers have access to Employment Training Counselors to develop and implement employment training plans and communicate potential supportive service needs.

Quality of Service Delivery is measured by employer annual surveys. Annual survey results will be assessed by ICOA program staff and shared with the local SCSEP offices. Strategies will be developed and implemented to address survey concerns.

#### E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Describe how the State’s Strategies will engage the State’s community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

Idaho's workforce development system engages the State's six technical colleges (located at Idaho's four Community Colleges, Lewis Clark State College, and Idaho State University) and secondary career and technical programs as partners in the workforce development system to create a job-driven education and training system. At the strategic level, this engagement will be carried out by three main entities: Idaho's Workforce Development Council, Idaho Career & Technical Education, and the Office of the State Board of Education. The specific efforts of these three entities are provided in more detail below.

Idaho's STEM Action Center also plays an important role in engaging Idaho's schools with science and technology through teacher professional development, connecting schools and students with grants and scholarships, and hosting educational camps and events.

#### Idaho Workforce Development Council

Several of Idaho's workforce development strategies—as specified in the State Workforce Development Council's Strategic Plan—are focused on education and training. Their goals include:

- Increase public awareness of and access to career education and training opportunities.
- Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.
- Provide for the most efficient use of federal, state, and local workforce development resources.

It is no coincidence that the state's workforce development goals target education and training. As the WIOA State Board, Idaho's Workforce Development Council includes a representative of the State Board of Education, the Administrator of Career & Technical Education, a community college representative, two representatives of registered apprenticeship programs, and a representative of a community-based organization for out-of-school youth. In addition, the Governor has appointed the Executive Director of the Idaho STEM Action Center as his designee to the Council (the STEM Action Center is located within the Executive Office of the Governor). These Council members provide a direct connection to job-driven education.

The Workforce Development Council has also directed the creation of Industry Sector Grants and Innovation Grants using state Workforce Development Training Funds. These grants support job-driven training for in-demand occupations by requiring the collaboration of employers and education to meet employer-identified gaps in the workforce. The Industry Sector Grants are awarded to industry partnerships consisting of education providers and at least three employers within the industry providing a cash and/or in-kind match. These grants are used to develop training programs at educational institutions to provide industry with the skilled workforce it needs. The Innovation Grants are awarded to community-based teams representing employers, education and other community partners to provide training for specific in-demand skills in the local area.

#### Idaho Career & Technical Education

Idaho Career & Technical Education (ICTE), which administers both the WIOA Title II and Carl D. Perkins programs, is essential in connecting workforce programs with career and technical education, engaging the State's technical colleges, and guiding the development of meaningful career pathways. ICTE also coordinates the state Workforce Training Network, which includes the directors of the Workforce Training Centers located at Idaho six technical colleges. The

Workforce Training Network leverages best practices and develops statewide solutions to meet the talent needs of Idaho's employers.

ICTE supports the career and technical programs at Idaho's technical colleges through both state and federal funds. For the past four years, ICTE has used in-demand occupations to drive its postsecondary budget request to the State legislature. To guide this request, technical colleges identified programs where all graduates were being placed in in-demand, high-wage occupations and where extensive student waiting lists existed to access these programs. Based on this request, the Idaho State legislature provided \$5.1 million for adult education during FY20.

At the secondary level, ICTE is working to expand an incentive program driven by program quality metrics and alignment to industry needs. Within the efforts to improve program quality is an emphasis on technical advisory committees (TACs). All CTE programs (secondary and postsecondary) are required to have technical advisory committees; however, the effectiveness of these committees varies. ICTE is providing professional development for CTE faculty on creating high-impact TACs and has created a mechanism to allow for state-level review of the activities of local TACs to inform its strategic planning.

#### The Idaho Office of the State Board of Education

The Idaho Office of the State Board of Education plays an important role in ensuring that workforce training programs at Idaho's colleges are eligible for Title I-B individual training accounts, and to serve as Eligible Training Providers (ETPs). A group of education stakeholders from the board's jurisdiction representing ICTE, private and proprietary schools, and the Workforce Training Network collaborated to develop WIOA ETP transition policies and data reporting requirements.

The postsecondary institutions expressed interest in continuing to provide occupational skills training under WIOA, but faced challenges in implementing the Act's more stringent performance reporting requirements for ETPs. In particular, the workforce training programs, preferred by employers, did not collect the level of student information required for WIOA reporting. The stakeholder group met for over a year to write policy and develop technical solutions. Most importantly, this group generated buy-in for the much resisted data collection required.

State education staff worked to ensure that all programs within the state's designated career pathways were included on the Eligible Training Provider List. The Office of the State Board of Education leveraged Statewide Longitudinal Data Systems grant funds to assist the schools in developing data collection systems for WIOA reporting.

The stakeholder group provided input for the final ETP Criteria, which was developed by the Workforce Development Policy Committee of the Council. This criteria, implemented since July 2018, serves to ensure that providers are WIOA compliant to meet the needs of Idaho residents seeking training through Title I-B services.

#### **F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS**

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

Almost 90% of the state's WIOA eligible training provider programs are from Idaho's community colleges and technical education schools. As noted earlier, these programs are well integrated into the workforce development system.

The Idaho Department of Labor and the Office of the State Board of Education work with other providers, such as proprietary schools and non-public training programs, to provide technical assistance as part of implementing WIOA reporting requirements for eligible training providers. These schools have agreed to provide participant and program information for their programs in a manner that is consistent with the public institutions. The result will be a comprehensive, comparable list of program outcomes across all programs in the workforce development system.

The WIOA State Plan partners have a strong relationship with the apprenticeship programs in the state. The union-based apprenticeship programs are available on the WIOA Title IB Eligible Training Provider list. In addition, the state's U.S. Department of Labor-funded apprenticeship effort, *ApprenticeshipIdaho*, involves employers, unions and many other stakeholders, including traditional and nontraditional training providers, including online training opportunities. The AFL-CIO's president is represented on the Workforce Development Council and the apprenticeship coordinator is an active participant in all state workforce development initiatives, including the performance reporting initiative for the eligible training providers.

One-Stop partner Idaho Department of Health and Welfare encourages partners to leverage its SNAP 50-50 matching funds for training opportunities, having developed relationships with many community based organizations that provide training with non-federal funds.

The Idaho Commission for Libraries has been an active facilitator for promoting and expanding the One-Stop system across the state. Particularly in rural areas, libraries are the main resource for citizen seeking public information. Under the Idaho Department of Labor's new service delivery model, 14 libraries in smaller cities and towns across the state serve as remote locations for the various services offered by the agency. In addition to providing access to information on workforce development programs, the libraries have free training resources available to the general public. The LiLI system (Libraries Linking Idaho) provides access to the LearningExpress Library, which even includes occupational test preparation.

#### G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

Idaho's State Plan strategies are well positioned to leverage the state's Workforce Development Training Fund. This fund is supported by 3% of the unemployment insurance taxes collected in Idaho. From this fund, the Workforce Development Council approves industry sector and innovation grants to increase the pipeline for a variety of in-demand occupations. Many of the funds have directly fortified the post-secondary education opportunities in the state. Some examples include, doubling the capacity of the computer science program at Boise State University, providing state of the art medical equipment to Idaho State University, and training incumbent workers with technical skills to receive a license in log scaling and badges in programmable logic control.

Additionally, the state's strategy to develop and align career pathways with our target sectors has encouraged additional support from employers and the private sector in the form of investments in Idaho's post-secondary institutions and technical schools. Through the state's

apprenticeship efforts, many sector employers have demonstrated their interest in establishing their own means of training new employees. And the state's strategy to improve rural service delivery has also helped to leverage existing resources and innovations in the private sector, such as with apprenticeship—especially regarding remote delivery—which our post-secondary institutions can adapt for educational purposes.

Research and implementation of promising delivery models for distance education and remote service delivery has been shared among workforce development partner programs to improve knowledge of, and access to, alternative learning modalities. For example, the Legislature, through Idaho Career & Technical Education, continues to invest in CTE Digital through, online career-and-technical education courses to serve rural students who don't have access to live CTE programs.

#### H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

The four strategies described in Section (II)(c)(1) and (II)(c)(2) of this plan directly enhance access to post-secondary education and credentials: (1) develop career pathways aligned with target sector industries, (2) improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce, (3) increase public awareness of and access to career education and training opportunities and (4) expand options for service delivery in rural areas.

Items one, two, and three in the above paragraph are closely related, in that a complete and effective career pathway includes multiple entry-points, including Registered Apprenticeship opportunities and certificates, for students of all skill levels, promoting a "no wrong door" approach to education and training. Item three above assists post-secondary institutions improve access to their programs and classes, including those supporting Registered Apprenticeships, in rural communities to reach historically underserved populations there by promoting models such as the "CTE Digital" model mentioned in Part (G) above.

As outlined in Section (II)(c)(1), the State's strategy for implementing well-aligned career pathways relies heavily on efforts already underway at the Idaho of Career & Technical Education (ICTE). These efforts include alignment of articulation between secondary and post-secondary technical programs across the state, including pre-apprenticeship and Registered Apprenticeship training opportunities, as well as the development of SkillStack®, ICTE's micro-certification platform. Information about these projects is reiterated below, for ease of reference:

ICTE oversees approximately 701 secondary career-and-technical education programs in Idaho's high schools, and the technical colleges housed within Idaho's public higher education institutions. Currently, each secondary program maintains an individual articulation agreement with one of Idaho's post-secondary institutions. ICTE spearheaded an effort to first align program learning outcomes across postsecondary institutions, and then align the secondary programs to those learning outcomes. A statewide articulation is in place for over 70 percent of programs with a projected completion for all programs in FY21, allowing secondary students to articulate seamlessly into any Idaho institution that offers their program of study.

To support the statewide articulation framework, ICTE developed Idaho SkillStack® - a micro certification/badging platform that communicates the competencies/skills that Idaho high school and postsecondary students demonstrate. The micro certifications/badges are stacked towards the award of postsecondary credit (i.e. once a student earns predefined badges, by demonstrating competency, they are eligible to convert the badges to credit), industry certifications and common skills required by Idaho employers for job openings. These badges provide visual progress towards an individual's career goals."

UI claimants have the opportunity to receive postsecondary credentials while attending WIOA Title I-B or TAA training programs. UI claimants retain eligibility for UI benefits when attending these approved training programs as verified by an AJC career planner.

#### I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

The Idaho Workforce Development Council includes as members the director of the Department of Commerce and many others who serve on regional economic development boards. In particular, the economic development agency East-Central Idaho Planning and Development Association, also known as The Development Company, is an integral partner with the Workforce Development Council as it officially represents the eastern Idaho local area.

##### **Strategy: Target key industries using a sector strategy**

The aforementioned Workforce Development Training Fund has been revamped to connect employers, education, and economic development. Grants are available in four categories:

- Direct grants to employers – these grants help Idaho employers (along with companies starting or expanding in Idaho) to train new and incumbent employees to meet specific economic opportunities and industrial expansion efforts, and may serve as a beneficial layoff aversion tool.
- Industry sector grants - these sector-partnership based grants are designed to increase the talent pipeline for in-demand occupations. A minimum of three employers and an educational or training entity may apply for grant funds for specific occupational training.
- Innovation grants – targeted to rural communities, these grants provide significant flexibility for educational institutions, community-based organizations, economic development organizations, local government entities, and/or employers to increase employment and wages of the community's workforce.
- Outreach projects - provides funding for proposals that provide public information and outreach on career education and workforce training opportunities, including existing education and training programs and services not funded by the Workforce Development Training Fund.

##### **Strategy: Improving Public Awareness and Access to the Workforce System/ Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions**

As core and One-Stop partner programs work to develop and improve outreach efforts, the Department of Commerce and regional economic development organizations, are engaged in semi-annual workforce summits, hosted by the Workforce Development Council. These



summits provide an opportunity to disseminate information and share best practices. The first summit was held in October 2019 and attended by over 50 economic development professionals from throughout the state. The Council provides funding for the travel costs for the most rural individuals to ensure they can attend.

In addition, the Talent Pipeline Management initiative will engage a number of economic development professionals as facilitators. We anticipate training a representative from the Idaho Department of Commerce as a trainer in the TPM methodology so that we can continue to leverage their expertise for the effort.

### **Strategy: Serving rural communities**

Business retention and expansion specialists from the Department of Commerce, along with their network of local economic development professionals, play an important role in educating rural community partners, and businesses, about the workforce system. As mentioned in the previous paragraph, special attention is paid to engaging the economic development professionals in the workforce summits by paying for their travel costs.

## **B. STATE OPERATING SYSTEMS AND POLICIES**

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section **II Strategic Elements**. This includes—

This section of the State Plan includes a description of the State operating systems and policies that will support the implementation of the State strategy described in **Section II Strategic Elements**.

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

#### **A. STATE OPERATING SYSTEMS THAT SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE-MANAGEMENT SYSTEMS, JOB BANKS, ETC.)**

WIOA emphasizes the importance of labor market and system performance information in driving strategic and operational decision-making within a state's workforce development system. Idaho subscribes to this approach as it confirms data plays a key role in its strategic development and oversight processes.

### **System of Communication**

To ensure ongoing alignment of WIOA programs and the system's workforce development system, and to guide implementation of the Combined State Plan strategies and goals, Idaho's Workforce Development Council utilizes numerous subcommittees and working groups, meeting regularly with a variety of groups to discuss state plan goals and priorities. Several of these groups, such as its standing One-Stop Committee and the WIOA Advisory Group, report to the WDC to assist in advancing the goals of the WDC. A brief description of each group follows:

- The One-Stop Committee consists of the senior leadership level of core programs, combined plan partners and other stakeholders in Idaho's workforce development system. The Committee, which develops policies for consideration by the WDC, communicates guidance and expectations on policy development and state strategies to Idaho's American Job Centers and WIOA program staff across the state as well as engaging in discourse with the WDC on goal progress and decisions within their charter.

- The WIOA Advisory Group is a hybrid working group with representation from all WIOA core programs, WDC staff, other combined plan partner programs, and stakeholders. This group consists of principal contributors towards the development of Idaho's Combined State Plan, and works to identify and align policy and planning with the WDC's goals, all while meeting the regulatory requirements of WIOA. Additionally, Advisory group members help to promote the alignment of these programs with the overall goals and strategies found in the Common Elements portion of Idaho's WIOA Combined State Plan, communicating decisions and strategies with program leadership.

The WDC's Executive Director serves as a member of these groups, acting as a primary liaison between the WDC and the working groups. Members of both the WIOA Advisory Group and the One-Stop Committee participated in a state plan strategic planning session and also participated in multiple public listening sessions held across the state.

## **Data Systems**

Idaho maintains a federated statewide longitudinal data system (SLDS) with several participating state agencies housing primarily educational data, and incorporating a limited scope of workforce data by way of participant wage matching. These systems are currently designed to assist agencies in meeting their individual state and federal reporting requirements for program participants and allow analysis of individual wage outcomes. Idaho's federated model was adopted to align with the state's data sharing culture and to address issues such as a state prohibition on permanently establishing a linkage between certain data. Under Idaho's federated SLDS, each agency retains control of the personal information in its records and safeguards the data according to its own needs and requirements.

Through its Workforce Data Quality Initiative (WDQI) grant, the state has engaged its core WIOA programs to coalesce data sets for the purposes of program evaluations, outcomes reporting, and predictive analysis. Building upon the existing State Longitudinal Data System (SLDS), WDQI allows for data exchange between disparate MISs while maintaining appropriate data security and compliance requirements. Core program partners have come together to establish a shared data validation policy which incorporates procedures unique to each agency's program design. The project works on two fronts –interagency policy development and technical development – to assist Idaho's core partners under WIOA in the exchange of data via a web-based portal for multiple federal reporting purposes. With core partners working together, Idaho leverages resources towards improved federal reporting, timely communication of achievements and enhanced performance outcomes.

IDOL's IdahoWorks houses multiple workforce programs' longitudinal datasets, including case management data for multiple programs (WIOA Titles I, III [Wagner-Peyser, Employment Services (ES)], and Trade Adjustment Assistance (TAA)), and employment and wage records (inclusive of Unemployment Insurance (UI) wage and benefits data). IdahoWorks is a web-based, all-in-one labor exchange, reporting and case management solution; a data warehouse and multi-program management information system that collects program participants' data.

The Office of the State Board of Education (OSBE) houses all K-20 data in the SLDS, with case management systems maintained at the WIOA agency level, for example, the Idaho Division of Vocational Rehabilitation (IDVR) utilizes one proprietary system (AWARE) and its sister agency, the Idaho Commission for the Blind and Visually Impaired (ICBVI) utilizes their own customized case management system (ORION). Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Career & Technical Education (ICTE), and IDVR.

Idaho's segmented approach to data sharing allows each agency to retain control over the sensitive personal information in its records and safeguard data according to its own needs and requirements. Idaho WIOA partners maintain separate data systems because each partner has invested significant funds, time, training, and other resources into each of their existing programmatic management information systems, built to meet agency/program designs consistent with WIOA reporting elements. The state's approach with the WDQI project incorporates these concerns, working within the federated system rather than against it, ensuring a better fit for Idaho.

This effort will do much to improve the state's ability to automate data exchange processes within Idaho's workforce development system. Additionally, this data will feed into IDOL's Labor Market Information (LMI) tool known as JobScape. JobScape is an easy-to-use, mobile-friendly career and educational training search tool that provides occupation descriptions, wages, worker demand, current employment, and the number of certificates and degrees awarded from Idaho's public postsecondary for-credit programs. Users, Idaho students, and job seekers, can search by keywords, occupation/job titles, military occupation titles or codes, or commonly used job title acronyms. JobScape enhancements would include non-credit program and aggregate ETP participant rates of wages, employment, graduation/program completion, and credential attainment. With this easily accessible data, customers can make more informed career and educational training decisions.

Currently, the core programs under WIOA use several different Management Information Systems (MISs) to collect and report data for program management, case management, and federal reporting purposes, eventually feeding into its WDQI project. These systems, and the applicable agencies and programs that use them, are:

MIS	Agency (WIOA Title)	Function
<i>AWARE</i> – Alliance Enterprise Incorporated	Idaho Division of Vocational Rehabilitation (Title IV)	Primary case and information management system
<i>ORION</i>	Idaho Commission for the Blind and Visually Impaired (Title IV)	Primary case and information management system
<i>IMAS</i> – Benchmark Integrated Technology Services	Adult Education, via Idaho Division of Career-Technical Education (Title II)	Information management system
<i>IdahoWorks</i> – America's Job Link Alliance  <i>iUS</i> - Internet Unemployment System	Idaho Department of Labor (Title I-B, Title III & Unemployment Insurance-Combined Plan Partner)	Primary case and information management system for Titles I-B & III; MIS for Veterans' and TAA programs. Labor exchange system for job seekers and employers.  Used by unemployment insurance claimants to determine eligibility and file claims, and by staff to process and track claims.

MIS	Agency (WIOA Title)	Function
<i>SPARQ &amp; Web Data Collection System (WDCS)</i>	Idaho Senior Community Service Employment Program – Combined Plan Partner	Primary case and information management system

As specified in Section (III)(b)(6) of this State Combined Plan, Idaho will continue to use these existing systems as the core infrastructure for our data collection and reporting processes under WIOA. Please refer to that section for more information regarding our plans for linking and integrating these systems.

#### B. DATA-COLLECTION AND REPORTING PROCESSES USED FOR ALL PROGRAMS AND ACTIVITIES, INCLUDING THOSE PRESENT IN ONE-STOP CENTERS

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

This portion of the State Combined Plan primarily addresses the data collection and reporting processes for core WIOA programs as well as the optional programs currently administered by the Idaho Department of Labor (Jobs for Veterans, Trade Adjustment Assistance, and UI). These constitute the core framework for Idaho’s current workforce development system and American Job Centers.

The state has continued to develop its comprehensive One-Stop system under WIOA, gaining a better understanding of how partners most effectively intersect with the One-Stop system. Part of updating our One-Stop system involved targeted research of partner programs to better understand their data collection processes and needs as they relate to the state’s One-Stop system and the Workforce Development System. This will allow for the identification of common data elements and opportunities for streamlining.

The data collection and reporting processes for the core WIOA programs are addressed across four main topics as listed below:

- The physical process of collecting information from participants
- An overview of the information being collected
- An overview of who uses the system and for what purposes
- Reporting processes

Each topic comprises applicable overviews of each of the core programs.

##### Physical Data Collection Processes

Below is a brief overview for each program describing the physical process of collecting information from participants and entering it into each data system. The specific data systems used for each program are discussed in previously in Section (III)(b)(1)(A).

**Programs Administered by Idaho Department of Labor:** These programs use *IdahoWorks* as the initial portal through which participants register for and enroll in programs and services. In most cases, information is populated into the system by participants who fill out an online

application. However, department staff also have the option to manually input data into the system.

- **Title I-B Programs (Adult, Youth, Dislocated Worker)** - Job seekers initially enter their information into the *IdahoWorks* system by completing a web-based registration. For enrollment into a WIOA program, a career planner will locate the existing registration, verify the information, and collect any additional required documentation as needed.
- **Title III (Wagner-Peyser)** - Job seekers initially enter their information into the *IdahoWorks* system by completing a web-based registration. After they have created an account, users have access to job listings and job search functions within *IdahoWorks*. Employers may also create accounts to post jobs and review resumes.
- **Jobs for Veterans, Trade Adjustment Assistance-** (One-Stop Partners) -Participants in these programs also use the *IdahoWorks* system as their portal for online registration and enrollment.
- **Unemployment Insurance** - (One-Stop Partner) - UI claimants file claims use using iUS, an online portal where they provide information to determine their eligibility. Assistance is also available over the telephone to collect information from those unable to use the online portal. Career planners who provide RESEA re-employment services collect the participant's interview information into an Excel template, which is sent immediately to UI staff for processing.

**Adult Education:** Students initially attend a general orientation session (either in person or online), followed by an assessment which measures their Educational Functioning Level. Once the student has completed the assessment, a staff person or teacher will conduct an in-person intake interview. This information is then manually entered into the statewide Adult Education MIS (IMAS).

**Vocational Rehabilitation Programs** - Programs under Title IV of WIOA are administered by both the Idaho Division of Vocational Rehabilitation (IDVR), as well as the Idaho Commission for the Blind and Visually Impaired (ICBVI). The intake process for both agencies is similar. The intake process typically begins with a referral, in which the applicant may be asked to fill out an application form. The applicant then meets for a face-to-face interview with a counselor. The individual may also need to complete additional assessments to determine eligibility (such as medical evaluations). Data collected during the application process is entered into each agency's respective MIS (Aware for IDVR and Orion for ICBVI). Supporting documentation is also collected during this time and may be scanned into the system or filed as appropriate.

**Senior Community Service Employment Program** - SCSEP uses a comprehensive system called SPARQ for standard data entry and reporting of quality data about participants and services. Employment training specialists from Easterseals-Goodwill input participant information through the SPARQ system and Web Data Collection System (WDCS). Information regarding host agencies, assignments, and employers can also be accessed and edited.

#### Information Collected

The information collected by the core WIOA programs during intake has many common elements, as well as elements which are unique to each program. Common elements include demographics (race, age), identifying information (name, date of birth, SSN), employment status, educational attainment, disability status (self-reported and/or verified), and referral

information. Unique elements are generally used to determine eligibility for each program and to guide participant placement. These include:

- **Title I-B, III, and other IDOL Administered programs** - Eligibility to work, desired occupation, migrant seasonal farmworker information, veteran's information, UI claimant status, selection for RESEA
- **Adult Education (Title II)** - Educational Functioning Level, detailed educational background, educational goals
- **Vocational Rehabilitation (Title IV)** - Disability type and medical background/records (where applicable)
- **Senior Community Service Employment Program** - Grantee information, participation levels, community service assignments, participant characteristics, and core performance measures. Management reports contain specific information on applicants (pending, eligible, and/or ineligible), participants, host agencies, employers, and follow ups/actions.

#### Uses and Users of Data Management Systems

The data systems used by Idaho's core WIOA programs are generally used by staff across all levels of each program from field staff, to local program managers, to state administrators.

Additionally, portions of the *IdahoWorks* system used by the Idaho Department of Labor can also be accessed by job seekers and employers.

The information collected by the various programs is used for a number of purposes such as determining eligibility, program placement, measuring participant progress, evaluating program effectiveness, case management, aiding in program planning, and federal reporting.

#### Reporting Processes

Reporting processes for core WIOA programs are dictated by Section 116, as well as individual titles and federal guidance. Please refer to Section (III)(b)(6)(A)(ii) of this Combined State Plan.

Additionally, core WIOA program partners are working together as part of a Workforce Data Quality Initiative (WDQI) award to develop web-based, secure data exchange tools as well as a combined, repository for joint performance analysis and reporting of WIOA outcomes. Please refer to Section (III)(b)(6)(A) of this Combined State Plan for more detailed descriptions of shared reporting goals for core WIOA programs

## 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

### **General Policy Process**

Most policies that support the implementation of the State's strategies in the Combined State Plan are currently determined at the agency or provider level based on the statutory requirements for each Title (for example, program intake and assessment policies). Although the statute changed several years ago, the state agencies responsible for the various programs continue to review their existing policies to ensure compliance with WIOA, ensure alignment

with the strategies identified in this Combined Plan, and identify potential logistical complications across programs. State agencies are expected to communicate these policies to local programs, provide applicable training so that program staff have a full understanding of the most current policies, and establish methods to monitor local compliance. It is important that any such policies should be developed with full input from local providers, as applicable, to ensure that policies are reasonable, necessary, and provide adequate flexibility for local and regional implementation.

Idaho has several co-enrollment policies in place, primarily for programs housed with the Idaho Department of Labor (Title I-B, Title III, TAA, VETS). For example, the Department requires co-enrollment of Trade Adjustment Assistance recipients with WIOA Title I-B Dislocated Worker whenever they are eligible to receive assistance or services from WIOA staff. The Department utilizes a single management information system (MIS) for both fiscal and case management for WIOA Title I-B and III programs, as well as Trade and VETS programs. Unemployment Insurance has a policy that job-seeking UI claimants must enroll in the Wagner-Peyser labor exchange.

### **One-Stop Policy Process**

Guidelines for the one-stop system in Idaho are developed by the One-Stop Committee of the Workforce Development Council, comprised of decision-makers for the state administrative entities for the core partners and one-stop partners. This committee provides active oversight for the state's One-Stop delivery system and makes policy recommendation to the Workforce Development Council. The committee developed the following policies, approved by the Council, to facilitate WIOA implementation across the state.

- Executed a statewide one-stop MOU that outlines the expected policies and standards for service delivery <https://www.labor.idaho.gov/wioa1/policies/Executed-Idaho-AJC-Network-MOU.pdf>
- Developed a template for local service delivery areas to develop MOUs <https://www.labor.idaho.gov/wioa1/onestop/091217/Trans1.pdf>
- Provided additional one-stop infrastructure funding guidelines <https://www.labor.idaho.gov/wioa1/policies/Infrastructure-Funding-Agreement-Guidance.pdf>
- Recommended criteria for one-stop certification and assessments <https://wdc.idaho.gov/wp-content/uploads/sites/62/2019/11/AJC-Certification-Policy-approved-4-5-18-1.pdf>
- Developed a policy for selecting service providers under WIOA Title I-B, including the One-Stop Operator <https://wdc.idaho.gov/wp-content/uploads/sites/62/2019/11/WIOA-Service-Provider-Selection-Policy-approved-on-4-11-19.pdf>
- Implementing the state's one-stop branding requirement <https://www.labor.idaho.gov/wioa1/policies/AJC-Branding-Policy.pdf>
- Developed a policy for the state's Eligible Training Provider List <https://wdc.idaho.gov/wp-content/uploads/sites/62/2019/11/ETP-Policy-approved-on-7-18-18.pdf>

### 3. STATE PROGRAM AND STATE BOARD OVERVIEW

#### A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

This section describes the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

In Idaho, many of the WIOA core and Combined Plan programs are consolidated into a few core agencies. Below is a list of the agencies and the applicable programs which they oversee:

- ***Idaho Department of Labor***
  - WIOA Title I-B - Youth, Adult, Dislocated Workers
  - WIOA Title III - Wagner-Peyser Employment Services
  - Combined Partner - Trade Adjustment Assistance
  - Combined Partner - Veterans Outreach and Employment
  - Combined Partner - Unemployment Insurance
- ***Idaho Division of Career & Technical Education***
  - WIOA Title II - Adult Education
  - One-Stop Partner - Carl D. Perkins
  - Other - Workforce Training programs
- ***Idaho Division of Vocational Rehabilitation***
  - WIOA Title IV - Vocational Rehabilitation (except for the blind)
- ***Idaho Commission for the Blind and Visually Impaired***
  - WIOA Title IV - Vocational Rehabilitation for the Blind and Visually Impaired
- ***Idaho Commission on Aging***
  - Combined Partner - OAA Title V - Senior Community Service Employment Program

The agencies listed above report to a number of entities, including their cognizant federal agencies, the governor, and commissions or boards as appropriate.

Program services for the WIOA Core and Combined partner programs are provided locally through a variety of delivery systems. These systems are described in detail for each program under Section (II)(a)(2) State Workforce Development Activities. A high-level summary of these delivery systems is included below:

**Title I-B, III, Trade, Veterans, and UI:** The majority of Idaho Department of Labor's services are provided through the American Job Centers. Although Unemployment Insurance is centralized at the State office via an online application system, in-person staff assistance is available in the state's comprehensive offices, while online staff assistance is available



throughout the state. The Department of Labor also uses the *IdahoWorks* system to provide online services such as job-search and streamlined applications.

**Title II - Adult Education:** Title II programs are carried out locally through Idaho's Technical College system as well as the Idaho Department of Corrections. Colleges and the Department of Corrections provide classes and other instructional services on their main campuses as well as more than 40 outreach sites throughout the state.

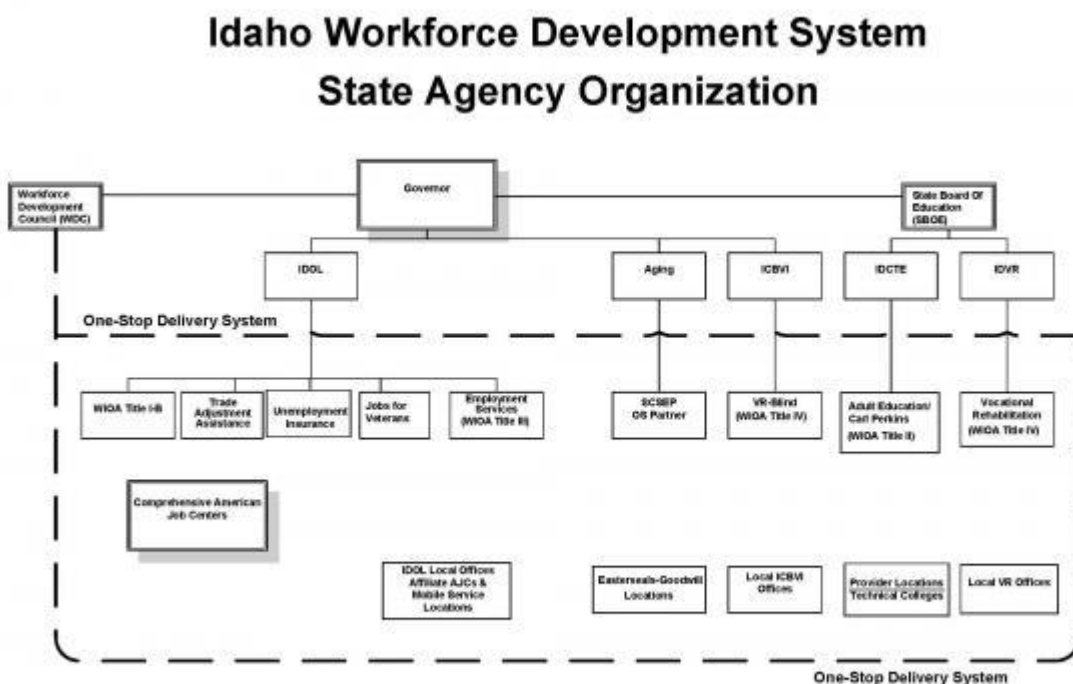
**Title IV - Vocational Rehabilitation:** Counseling services and programs are carried out locally by the Idaho Division of Vocational Rehabilitation (IDVR) and the Idaho Commission for the Blind and Visually Impaired (ICBVI). The IDVR provides services through eight regional offices and a series of sub-offices. Through cooperative agreements, IDVR has numerous staff collocated in several state program offices including the Idaho Division of Behavioral Health and the Idaho Department of Correction. Additionally, numerous counselors are collocated in school districts to provide direct services to students with disabilities. The Commission provides services through a central office in Boise, ID and five regional offices.

**OAA Title V - Senior Community Service Employment Program:** Counselors are available via the Commission on Aging's local offices. Seniors are also placed at non-profit host agencies throughout the state to obtain job training.

An organizational chart of Idaho's Workforce Development System as a whole follows.

**Figure 4: Org Chart for Idaho Workforce Development System - All programs**

#### IDAHO WORKFORCE DEVELOPMENT SYSTEM - STATE AGENCY ORGANIZATION



## B. STATE BOARD

Provide a description of the State Board, including—

This section describes the State Board Membership Roster and State Board.

### I. MEMBERSHIP ROSTER

Provide a membership roster for the State Board, including members' organizational affiliations.

Idaho's Workforce Development Council serves as the State Workforce Board under section 101(a). The Council's membership brings together a well-integrated mix of business and industry, education, labor, community and government representatives to establish the vision and plan for Idaho's workforce development system.

Executive Order No 2019-08 provides for council membership as follows:

- 17 positions appointed by the Governor representing industry and nominated by statewide and regional business organizations;
- Seven positions appointed by the Governor representing the workforce, including two labor union representatives, two registered apprenticeship program representatives, one representative of a community-based organization for veterans, one representative of a community-based organization for individuals with disabilities, and one representative of a community-based organization for out-of-school youth;
- Ten positions appointed by the Governor representing government, including representatives from the Department of Labor, State Board of Education, State Department of Education, Division of Career-Technical Education, Division of Vocational Rehabilitation, Department of Health and Welfare, Department of Commerce, an elected city official, an elected county official, and a community college representative.
- One member from each chamber of the Idaho Legislature, including a member of the Senate appointed by the Senate President Pro Tem, and a member of the House of Representatives appointed by the House Speaker;
- The Governor or his designee.

Further, the order requires that the chair, vice chair and executive committee be from the private sector, with the exception of one position representing a labor union.

The Council's membership brings together a well-integrated mix of business and industry, education, labor, community and government representatives to establish the vision and plan for Idaho's workforce development system. A roster of the Workforce Development Council membership and their affiliations is listed below. This roster may also be found on the Council's Website at: <https://wdc.idaho.gov/council-members/>.

### IDAHO WORKFORCE DEVELOPMENT COUNCIL MEMBERSHIP

#### Representing the Governor

Angela	Hemingway	STEM Action Center	Boise	Region 3	Governor's Rep
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#### Representing the State Legislature

Michelle	Stennet	Idaho State Legislature	Ketchum	Region 4	Legislature
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Scott	Syme	Idaho State Legislature	Caldwell	Region 3	Legislature
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**Members appointed by the Governor, representing Business**

Trent	Clark	Customalting LLC	Soda Springs	Region 5	Industry
B.J.	Swanson	Principal Analytics	Troy	Region 2	Industry
Shelli	Bardsley	Idaho Central Credit Union	Pocatello	Region 5	Industry
Elli	Brown	Idaho National Laboratory	Idaho Falls	Region 3	Industry
Brian	Cox	Kochava	Sandpoint	Region 1	Industry
Audrey	Fletcher	Consultant	Idaho Falls	Region 5	Industry
Jeff	Greene	Saint Alphonsus	Boise	Region 3	Industry
Dave	Hannah	G-Zero	Meridian	Region 3	Industry
Deni	Hoehne	Higher Resources, LLC	Eagle	Region 3	Industry
Kelly	Kolb	Vista Outdoor	Lewiston	Region 2	Industry
Kate	Lenz	Kount	Boise	Region 3	Industry
Jeff	McCray	McCain Foods	Burley	Region 4	Industry
Jan	Nielsen	Basic American Foods	Rexburg	Region 6	Industry
Matt	Van Vleet	Van Vleet and Associates	Lewiston	Region 2	Industry
John	Young	Young Construction	Coeur d'Alene	Region 1	Industry
2 Vacancies		Private Sector/Business Representatives			Industry

**Members appointed by the Governor, representing Workforce**

Donna	Butler	Dawn Enterprises	Blackfoot	Region 5	Workforce serving individuals with disabilities
Oscar	Evans	Veterans Representative	Homedale	Region 3	Workforce serving Veterans
Marie	Hattaway	Idaho Out-of-School Network	Boise	Region 3	Workforce serving out-of-school youth
Joe	Maloney	Idaho State AFL-CIO	Boise	Region 3	Workforce - labor organization
Tom	Schultz	Idaho Forest Group	Boise	Region 3	Workforce - registered apprenticeships
Travis	Woolsey	Ironworkers Local 732	Pocatello	Region 5	Workforce - labor organization registered apprenticeship program
Vacant		Union Representative			Workforce - labor organization

**Representatives of Government**

Linda	Clark	Idaho State Board of Education	Boise	Region 3	Government - higher education
Jane	Donnellan	Idaho Division of Vocational Rehabilitation	Boise	Region 3	Government - WIOA Title IV
Tom	Kealey	Idaho Department of Commerce	Boise	Region 3	Government - economic development
Clay	Long	Idaho Career & Technical Education	Boise	Region 3	Government - WIOA Title II
Jani	Revier	Idaho Department of Labor	Boise	Region 3	Government - WIOA Titles I and III
Todd	Schwarz	College of Southern Idaho	Twin Falls	Region 4	Government - community colleges
John	Smith	Commissioner - Clearwater County	Orofino	Region 2	Government - elected official
Marilyn	Whitney	State Department of Education	Boise	Region 3	Government - K-12 education
Steve	Widmyer	Mayor - City of Coeur d'Alene	Coeur d'Alene	Region 1	Government - elected official
Lori	Wolff	Idaho Department of Health and Welfare	Boise	Region 3	Government - TANF & SNAP

The WDC members affiliated with the core programs are:

- WIOA Title I-B & Title III (Wagner-Peyser) – Jani Revier, Director of Idaho Department of Labor
- WIOA Title II (Adult Education) – Clay Long, Administrator, Idaho Career & Technical Education,
- WIOA Title IV (Vocational Rehabilitation) - Jane Donnellan, Administrator, Idaho Division of Vocational Rehabilitation

## II. BOARD ACTIVITIES

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

### (ii) State Board Activities

The WIOA Advisory Group supports the Workforce Development Council and its One-Stop Committee by bringing forth issues, sharing vital information about policy changes and making recommendations to the council.

The council receives, via quarterly meetings, regular updates about the activities taking place in the workforce development system around the state. When setting the agenda for Council meetings, the executive committee makes a concerted effort to include all workforce

development activities, including those not funded under WIOA. This ensures that efforts with the state's limited resources are not duplicated and work in tandem to further the state's goals.

Committees, described in Section III(a)(1), work to ensure that all of the board's functions are met. The committee members attend to functional details, provide recommendations, and ensure action taken by the full council is well informed.

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

##### A. ASSESSMENT OF CORE PROGRAMS

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The State will use the indicators of performance outlined in Section 116 of WIOA to measure and evaluate program effectiveness at both the local and state level. Please refer to Section (II)(b)(4) of this plan (Assessment), for an overview of how WIOA Section 116 performance data will generally be used to evaluate program and system effectiveness. This section deals more specifically with how programs will be assessed based on performance targets and projected levels of performance submitted with this plan.

**Establishing Performance Levels** - The agency administering each core program will be expected to negotiate performance targets with its federal office per applicable guidelines for each core program. The One-Stop Committee identified in Section (II)(c) will establish a process to review proposed performance levels across the core programs and establish statewide annual performance levels. The WIOA Advisory Group will be responsible for coordinating with the appropriate federal office to negotiate and report statewide performance levels as required by WIOA and applicable regulations.

**Local Provider Assessment** - Each agency administering a core program will be responsible for establishing a system for collecting, reviewing, and evaluating performance from local providers' data pursuant to the applicable WIOA Title and Regulations, and in alignment with the strategies and processes outlined in this Combined State Plan—including data alignment strategies outlined in Section (III)(b)(6). Each agency will also be responsible for: establishing or negotiating local performance levels or targets as appropriate; ensuring local compliance; and guiding local improvement efforts related to the evaluation of local data.

**Core Program Assessment** - Each agency administering a core program will be responsible for compiling statewide performance data for that program according to applicable WIOA Title and Regulations and will be responsible for submitting applicable program reports to the appropriate federal office. Each agency will also be expected to establish and implement statewide improvement plans for its applicable programs based on the evaluation of performance data.

**Statewide Workforce Development Assessment** - Until such time as the state has an integrated data system for its core WIOA programs, the WIOA Advisory Group will collect the Section 116 performance data from each agency and will compile that data into a single Statewide Annual Report to be submitted to the appropriate Federal office, pursuant to regulation, as well as to Idaho's Workforce Development Council. The Statewide Annual Report will be used by core programs and the Workforce Development Council to evaluate the workforce system as a whole. This report may include additional information to help the Council assess program performance, such as labor force participation rates for various

populations, changes in labor market data, and other program demographics that provide additional context for interpreting performance outcomes and guiding program improvement.

#### B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

One-Stop Partners and other Combined Plan partners that are not authorized under WIOA will be assessed against their statutory performance and reporting requirements through the process established by the appropriate federal office. Idaho's workforce system will request that such reports and assessments be made available to other One-Stop partners, the Workforce Development Council, the WIOA Advisory Group, and other stakeholders as appropriate.

Idaho functions as a single statewide planning region and as such the State Workforce Development Council serves as both the State Board and the Local Board. Although performance goals are reported only at the state level, the performance of different local areas is regularly monitored to ensure they are contributing to the overall statewide/regional goals.

To ensure local input into planning processes the State has conducted several planning sessions in each service delivery area. These ongoing planning sessions were used to establish the service delivery design that are outlined in the One-Stop Memorandums of Understanding (MOUs) and may provide additional goals as determined by the service delivery area stakeholders.

Partner programs will also be assessed against their agreed-upon One-Stop contributions as outlined in their Memorandums of Understanding (MOUs). For example, is the partner program providing the services they agreed to provide at the locations and levels they agreed to provide them? The extent to which such assessments are carried out and by whom, and with what consequences will be outlined in the One-Stop MOUs.

#### C. PREVIOUS ASSESSMENT RESULTS

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

The following assessment results reflect the actual performance of Idaho's workforce programs at the program level. The performance of each program is directly affected by, and thus reflects, the opportunities, barriers, strengths, and weaknesses identified in the analysis in Section (II) of this plan. As a result, these strategies are based on the factors that currently affect program performance. Therefore, implementing the strategies identified in Section (II) should inherently lead to improved performance outcomes.

For example, attracting and retaining qualified program staff should lead to higher levels of participation, retention, and outcomes for participants. Expanding services to rural communities may initially decrease certain aspects of program performance, as individuals in these communities have a higher likelihood of facing multiple barriers to employment and education. However, over the long-term, this strategy should improve outcomes as these communities build the capacity to support their residents through continued economic growth.

For Program Year (PY) 2016-2019 plans, certain primary indicators of performance were designated as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. As a result, “baseline” indicators were not used to adjust year-end of performance levels nor were they used to determine failure to meet performance levels. The federal agencies 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.

The Primary Indicators of Performance for all programs under the Workforce Innovation and Opportunity Act are:

1. Percentage of program participants who are in unsubsidized employment (and/or education or training, for Title I-B Youth) during the second quarter after exit. (**Employment Rate – ER Q2**)
2. Percentage of program participants who are in unsubsidized employment (and/or education or training, for Title I-B Youth) during the fourth quarter after exit. (**Employment Rate – ER Q4**)
3. Median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program. (**Median Earnings - ME Q2**)
4. Percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program. (**Credential Attainment Rate – CAR**)
5. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment. (**Measurable Skill Gain – MSG**)

#### Title I-B - Youth, Adult, Dislocated Worker

The performance reports for the previous three program years for each of the youth, adult and dislocated worker programs are included in the three tables that follow.

*Youth Program* - The WIOA Youth program transitioned to 100% out-of-school youth in PY2015, which is a much harder population to serve. As a result, its performance results have dropped from its WIA period of performance. Idaho hopes to recalibrate the baseline for serving youth under WIOA.

**Table 25: Previous Assessment Results for WIOA Title I-B Youth**

WIOA Indicator/Measure	PY16 Negotiated	PY16 Actual	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	73.10%	NA	75.10%	74.90%	69.50%	80.34%
ER Q4	73.10%	NA	75.10%	77.1%0	50.00%	79.75%
ME Q2	Baseline	NA	Baseline	NA	Baseline	\$3,912
CAR	72.20%	NA-	72.20%	43.00%	52.00%	51.04%
MSG	Baseline	NA	Baseline	46.40%	Baseline	40.22%

**Table 26: Previous Assessment Results for Title I-B Adult Programs**

WIOA Indicator/Measure	PY16 Negotiated	PY16 Actual	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	81.50%	NA	83.50%	80.80%	77.00%	85.75%
ER Q4	68.30%	NA	70.30%	82.90%	46.00%	80.98%
ME Q2	\$5,225	NA	\$5,425	NA	\$6,000	\$7,202
CAR	68.90%	NA	70.90%	40.30%	50.00%	63.67%
MSG	Baseline	NA	Baseline	40.90%	Baseline	47.23%

**Table 27 - Previous Assessment Results for Title I-B Dislocated Worker**

WIOA Indicator/Measure	PY16 Negotiated	PY16 Actual	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	81.80%	NA	83.80%	82.40%	85.90%	83.46%
ER Q4	71.90%	NA	73.90%	83.30%	49.00%	83.47%
ME Q2	\$6,433	NA	\$6,633	NA	\$7,241	\$8,016
CAR	68.00%	NA	70.00%	51.10%	45.00%	69.08%
MSG	Baseline	NA	Baseline	44.10%	Baseline	46.29%

## **Title II - Adult Education and Family Literacy**

The Agency administering Title II Program (Idaho Career & Technical Education) is required to negotiate performance targets with the Office of Career, Technical, and Adult Education at the US Department of Education each year. The table below shows the target and actual performance for Program Year PY16 (July 1, 2016 - June 30, 2017), PY17 and PY18.

**Table 28: Previous Assessment Results for Title II, Adult Education Programs**

Educational Functioning Level	PY16 Target	PY16 Actual	PY17 Target	PY17 Actual	PY18 Target	PY18 Actual
<b>ABE Level 1</b>	51%	36%	36%	44%	41%	36%
<b>ABE Level 2</b>	50%	39%	39%	46%	44%	38%
<b>ABE Level 3</b>	44%	39%	39%	41%	44%	38%
<b>ABE Level 4</b>	40%	39%	39%	43%	45%	42%
<b>ABE Level 5</b>	33%	44%	44%	46%	49%	44%
<b>ABE Level 6</b>	NA	15%	15%	19%	20%	15%
<b>ESL Level 1</b>	48%	40%	40%	43%	45%	39%
<b>ESL Level 2</b>	55%	47%	47%	42%	53%	46%
<b>ESL Level 3</b>	55%	45%	45%	34%	51%	33%
<b>ESL Level 4</b>	45%	37%	37%	27%	42%	25%
<b>ESL Level 5</b>	34%	34%	34%	32%	39%	25%



Educational Functioning Level	PY16 Target	PY16 Actual	PY17 Target	PY17 Actual	PY18 Target	PY18 Actual
<b>ESL Level 6</b>	20%	17%	17%	13%	20%	20%

#### *Measurable Skill Gain Assessment*

The overall skill gain rate for Idaho's CTE programs was 36% for PY18, compared to 38.59% in PY17. Despite not meeting the PY18 Educational Functioning Level (EFL) performance goals, Idaho's Adult Education programs have identified trends and performance improvement solutions to address the MSG rate. The overall rate for measurable skill gain varied from 32% to 45% among local programs in PY18.

Three related trends emerged in the PY18 Annual Reports which may help identify some causes of low MSG performance:

- The continued low unemployment rate in Idaho continues to be a challenge for retaining adult education students. Idaho just marked two years of an unemployment rate below three percent. Additionally, Adult Education students are balancing classes, childcare, personal, and professional responsibilities. The opportunity cost of attending classes is particularly challenging for many adult education students, as students have significant financial burdens of providing for their families' immediate needs.
- The challenge of adapting to a new assessment was a significant factor for many of the program sites. Program sites are continuing to refine curriculum to better align with the TABE assessment.
- The limitations of our current statewide database (Idaho Management & Accountability System) has meant program sites are unable to investigate their data in a meaningful way to determine underlying reasons behind the MSG drop. It is challenging for sites to be able to make data-informed programming decisions and changes due to the database's limitations and low data quality.

For those programs whose performance was unusually low (compared to prior years), the State required a Program Improvement Plan, which was implemented in the winter 2016-2017.

#### *Post-Exit Outcomes*

The post exit targets were *not included in* Idaho's PY17 and PY18 reporting requirements, as the data submitted will be used as a baseline for future negotiations. Title II actual performance for PY17 and PY18 post-exit outcomes are described in the following table.

**Table 29: Previous Post-Exit Outcomes for WIOA Title II Adult Education**

WIOA Indicator/Measure	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	NA	55.69%	NA	60%
ER Q4	NA	57.43%	NA	39%
ME Q2	NA	\$4,219	NA	\$4,656
CAR	NA	37%	NA	.22%
MSG	45%	38.59%	44%	35.44%

#### Title III - Wagner-Peyser

The performance reports for the previous program years for the Wagner-Peyser program are included below. Under the Workforce Investment Act, Title III programs are considered to have met the performance goals if the actual results are within 80% of the negotiated goal. Idaho's performance results indicate a very high quality Wagner-Peyser program. Wagner-Peyser is currently not required to include CAR and MSG as active program measures.

**Table 30: Previous Assessment Results for WIOA Title III, Wagner Peyser Program**

WIOA Indicator/Measure	PY16 Negotiated	PY16 Actual	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	58.1%	NA	60.1%	73.10%	65.60%	72.90%
ER Q4	67.6%	NA	69.6%	73.40%	49.00%	72.90%
ME Q2	\$4,545	NA	\$4,745	\$5,592	\$4,859	\$5,743

#### Title IV - Vocational Rehabilitation

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provided guidance on the requirements for these indicators for PYs 2018 and 2019, noting that the same required levels of performance for PYs 2016 and 2017 be used. The level of performance for PYs 2016 and 2017 were baseline therefore baseline levels of performance will continue to be collected for PYs 2018 and 2019 to be used in establishing initial levels of performance for future negotiation. As a result, not all results are being reported for the Primary Indicators of Performance listed: Data on Measurable Skill Gains are now coming online, and this preliminary baseline is reported in table 31 below Title IV programs anticipate negotiation of the MSG target for the first time next year, with other 116 primary performance indicators coming online before the next state plan. Title IV programs have provided emerging results for ER Q2 and ME Q2.

**Table 31: Previous Assessment Results for WIOA Title IV VR Programs**

WIOA Indicator/Measure	PY16 Negotiated	PY16 Actual	PY17 Negotiated	PY17 Actual	PY18 Negotiated	PY18 Actual
ER Q2	NA	NA	NA	NA	NA	53.6%
ER Q4	NA	NA	NA	NA	NA	NA
ME Q2	NA	NA	NA	NA	NA	\$3,734
CAR	NA	NA	NA	NA	NA	NA
MSG	NA	NA	NA	NA	NA	35.3%

#### OAA Title V - Senior Community Service Employment Program (SCSEP)

Performance level goals for each core indicator are agreed upon by USDOL and the grantee before the start of each program year (PY). USDOL evaluates the goals and performance of each grantee annually, making both available for public review. Prior to 2018, SCSEP was previously measured by six core performance measures, subject to goal setting and corrective action. These performance measures, along with a description of each, are listed below.

- **Community Service:** The total number of hours of community service provided by participants divided by the number of hours of community service funded by the grant.

- **Entered Employment:** The number of participants who are employed divided by the number of participants who exit.
- **Employment Retention:** The number of participants who are employed divided by the number of participants who exit.
- **Average Earnings:** Total earnings in the second and third quarters after exit; divided by the number of employed participants who exited.
- **Service Level:** Total number of participants served divided by a grantee's authorized number of positions.
- **Service Most in Need:** Average number of employment barriers per participant. Barriers include having a severe disability; frail; age 75 or older; meet the eligibility requirements related to age for, but do not receive, benefits under title II of the Social Security Act (42 U.S.C. 401 et seq.); live in an area with persistent unemployment; have limited English proficiency; have low literacy skills; reside in a rural area; veteran; have low employment prospects; have failed to find employment after using services through the American Job Center system; or are homeless or at risk for homelessness.

**Table 32: Previous Assessment Results for the SCSEP Program**

Performance Measure	PY 16 Goal	PY 16 Actual	PY 16 % Met	PY 17 Goal	PY 17 Actual	PY 17 % Met
Community Service	80.0 %	N/A	N/A	80.0%	79.3%	99.1%
Entered Employment	46.1%	39.1%	84.8%	46.2%	5.6%	12.1%
Employment Retention	73.0%	36.4%	49.9	72.1%	50.0%	69.3%
Average Earnings	7597	10001	131.6%	8711	3965	45.5%
Service Level	175.0%	N/A	N/A	175.0%	137.2%	78.4%
Service Most in Need	2.80	2.74	97.9%	2.75	2.71	98.5%

The Department of Labor's Employment and Training Administration adopted as a final rule, without change, the interim final rule (IFR) published by the Department in the December 1, 2017 Federal Register. The IFR revised performance accountability measures for the Senior Community Service Employment Program (SCSEP). The Older Americans Act (OAA) Reauthorization Act of 2016 amended the measures of performance for the SCSEP program in large part to align them with the performance measures mandated for programs under WIOA (listed earlier) and required implementation, including through regulation by December 31, 2017. Below are the core performance measures for PY18 with the newly revised performance measures:

**Table 33: Previous Assessment Results for SCSEP Program –WIOA Basis**

Performance Measure	PY 18 Goal	PY 18 Actual	PY 18 % Met
Service Level	150.0%	123.3%	82.2%
Community Service	75.9%	76.9%	101.3%
Service to Most in Need	2.90	3.11	107.2%

Performance Measure	PY 18 Goal	PY 18 Actual	PY 18 % Met
ER Q2	33.5%	19.0%	56.7%
ER Q4	32.1%	13.0%	40.5%
ME Q2	\$2792	\$2080	74.5%
Employer, Participant, & Host Agency Effectiveness			
Employers	85.8%	N/A	N/A
Participants	79.5%	N/A	N/A
Host Agencies	79.7%	N/A	N/A

#### *SCSEP Strategies to Improve Performance Measures*

**Community service and Service Level:** The U.S. Department of Labor determines every year how many positions will be available for the SCSEP on a national and state level. After negotiations and or funding changes, sometimes positions will get modified. The assessment results above show that the modified positions were changed in the middle of the third quarter of PY 2016 to reflect the awards made to national grantees by the 2016 competition and changes to Equitable Distribution based on the latest Census data. Fields in the Quarterly Performance Reports cannot be accurately reported for the third and fourth quarters of PY 2016 or for the final end-of-year QPR for PY 2016.

The **employment rate** (after 2<sup>nd</sup> and 4<sup>th</sup> quarters) measure did not meet project goals (56.7% and 40.5%, respectively). ICOA is working on making program improvements with a new subrecipient, Easterseals-Goodwill, in order to ensure that employment rate goals are met.

The **employment retention** measure increased from 36.4% to 50% under the previous subrecipient. With the new subrecipient and newly revised core performance measures in place, consistent follow up with exited participants will be emphasized in order to ensure that employment retention goals are met. The individual employment plan (IEP) of every participant that Easterseals-Goodwill is tailored to ensure that employment after SCSEP is plausible and aligned with the participants' long term goals.

The **average earnings** goal for PY 17 were not met at 45.5%. With the new performance measure of median earnings for PY 18, the goal was not met at 74.5%. The new subrecipient, Easterseals-Goodwill, will work with participants in searching for and securing employment that compensates adequately to maintain this goal.

The **most in need** performance measure increased from 2.71% to 3.11% average employment barriers per participant. As positions open Easterseals-Goodwill will prioritize participants with barriers to employment first. Easterseals-Goodwill will also ensure that priority of service is given to veterans and ensure positions are filled in rural areas where employment opportunities are limited.

**SCSEP Customer Satisfaction Surveys – American Customer Satisfaction Index (ACSI) for employers, participants, and host agencies:** Customer satisfaction surveys for the SCSEP are distributed to all parties involved in SCSEP efforts (i.e., employers, participants, and host agencies). Easterseals-Goodwill and ICOA are communicating the purpose of the survey to respondents and ensuring that they are being completed appropriately and mailed back on time.

### Trade Adjustment Assistance

The Trade Adjustment Assistance (TAA) program does not have state negotiated performance measures. The Trade Adjustment Assistance program previously reported two sets of measures - those defined by the Trade Adjustment Assistance Act (aligned with WIOA under TAARA 2015) and Common Measures. USDOL only established TAA program goals under Common Measures and not, however, for the TAA measures. The program now reports solely under the first three WIOA primary indicators of performance listed at the beginning of this section.

For FY18, Idaho well exceeded the national results for entered employment rates, which was slightly lower in the previous fiscal year. TAA performance measure period is based on federal fiscal year (FY), which ranges from October through September. FY17 measures October 1, 2016 through September 30, 2017, while FY18 would measure the same period the following year.

**Table 34: Previous Assessment Results for TAA Program**

Measure	FY17	FY17	FY18	FY18
	Idaho Results	National Results	Idaho Results	National Results
ER Q2	74.8%	74.8%	84.6%	76.6%
ER Q4	49.3%	74.0%	83.5%	75.2%
ME Q2	\$7,022	\$8,039	\$7,827	\$8,892

It should be noted when comparing Idaho's wages to the nation's there is a significant difference between the wage markets. The annual mean wage in the United States for all occupations (May 2018 - U.S. Bureau of Labor Statistics) is \$51,960 while the wage in Idaho for the same period is \$43,480. Increasing wages for the Idaho workforce is definitely a priority and directly corresponds to expanding services to rural communities.

### Veterans' Employment

As noted in the State's PY2018 Modification, USDOL did not require performance measures for states implementing Veterans' Employment and Training Service (VETS) programs. It was estimated new program performance measures would be in place for PY 2018. USDOL resumed quarterly reporting for the program, with the first reports to be submitted in November of 2018. Previously, the program had had established thirteen performance measures, (similar to those under WIA) which focus on the effectiveness of the services delivered to veterans, noting the two distinct sets of services: the Local Veterans Employment Representatives (LVERs) and Disabled Veterans Outreach Program specialists (DVOPs). However, like many other programs, VETS now only requires states to address the first three primary indicators of performance under WIOA. Because of the implementation of this recent change and lack of data, the state has only last year's data to present.

**Table 35: Previous Assessment Results for VETS Program**

Measure	PY18	PY18	PY19	PY19
	Goals	ID Results	Goals	ID Results (Q1)
ER Q2	63.0%	65.9%	64.0%	66.7%
ER Q4	61.0%	56.2%	62.0%	58.1%

Measure	PY18	PY18	PY19	PY19
	Goals	ID Results	Goals	ID Results (Q1)
ME Q2	\$5,400	\$6,067	\$6,500	\$5,963

#### Unemployment Insurance

The Unemployment Insurance program has approximately 30 reports that reflect various aspects of the program performance. However in the context of the One-Stop service delivery system, the Unemployment Insurance program will be assessed by evaluating its performance in service delivery to claimants. The cores measure for services to claimants in the UI program are: "All First Payments 14/21-day Timeliness" and "Nonmonetary Determinations 21-day Timeliness." These performance measures reveal the timeliness of processing and paying UI claimants' claims.

The standard for first unemployment insurance payments made within 14 days is 87%. Idaho not only exceeds the standard, but ranks among the highest in the nation in its percent.

A second core measure is the timeliness of nonmonetary determinations. A nonmonetary determination is a written notice to the worker and other interested parties which advises of the worker's eligibility with respect to acts or circumstances which are potentially disqualifying. The standard for these decisions to be made is 80% within 21 days. Idaho does not currently meet the standard of 80% but continues to work on methods to improve non-mon timeliness including training, monitoring individual performance and process improvement.

**Table 36: Previous Assessment Results for Unemployment Insurance-First Payments within 14 Days**

Fiscal Year	First Payments within 14 days	Rank
FY 2013	90.5%	9 <sup>th</sup>
FY 2014	87.2%	24 <sup>th</sup>
FY 2015	96.5%	2 <sup>nd</sup>
FY 2016	96.5%	1 <sup>st</sup>
FY 2017	97.1%	2 <sup>nd</sup>
FY 2018	96.9%	2 <sup>nd</sup>
FY 2019	97.1%	3 <sup>rd</sup>

**Table 37: Previous Assessment Results for Unemployment Insurance-Nonmonetary Determinations within 21 Days**

Fiscal Year	Determinations within 21 days	Rank
FY 2013	69.8%	28 <sup>th</sup>
FY 2014	68.5%	35 <sup>th</sup>
FY 2015	75.4%	35 <sup>th</sup>
FY 2016	79.4%	28 <sup>th</sup>

<b>Fiscal Year</b>	<b>Determinations within 21 days</b>	<b>Rank</b>
FY 2017	80.6%	24th
FY 2018	79.7%	30 <sup>th</sup>
FY 2019	78.7%	33rd

Approximately six years ago, the state modified its unemployment insurance program service delivery strategy. Piloting a change in FY 2014, Idaho centralized its unemployment insurance processing. The results of this change showed cost savings, but also resulted in the standardization of procedures, improved individual performance and policy consistency. The cost savings has been invested in technology towards the development and modification of a new unemployment insurance system.

The centralization strategy also produced improved staff outcomes through consistent training, leading to higher quality levels of service to claimants throughout the state, including those in rural areas. While most customers file online claims, claims are also taken over the phone for those that request it. There are also six UI navigators located in the Comprehensive One Stop Centers.

#### D. EVALUATION

Describe how the State will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Under the direction of Idaho's Workforce Development Council, the One-Stop Committee will develop evaluation strategies and processes as required by Section 116(e) of WIOA. These strategies and processes will establish, implement, and utilize methods for continuously improving core programs in order to achieve high-level performance within, and high-level outcomes from, the workforce development system.

The evaluations will be designed with input from the Workforce Development Council and in conjunction with the state agencies responsible for the administration of the core programs. They may include, for example, an analysis of the new service delivery model for rural and remote Idaho, or customer feedback and outcome measures, incorporating data from the performance indicators collected under Section 116 of WIOA. The frequency, scope, and content of such evaluations may be determined by several factors, including but not limited to: performance gaps identified in program assessments, compliance with federal regulations, and the feasibility of such evaluations based on resources and funding.

All partners in the one-stop system will work with their federal oversight agencies to participate in evaluation projects as requested.

#### 5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

##### A. FOR TITLE I PROGRAMS

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

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

### i. Youth activities in accordance with WIOA section 128(b)(2) or (b)(3).

All Youth program funds will be allocated using the three required factors of substantial unemployment, excess unemployment, and economically disadvantaged individuals.

- 1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher unemployment)
- 1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)
- 1/3 of the funds allocated on the number of economically disadvantaged youths

The hold-harmless provisions defined under WIOA are applied to the Youth program allocations. Hold-harmless levels are based on 90% of an area's average relative share of the previous two years of funding.

The state Workforce Development Council has updated the policy for "Distribution of WIOA Title IB Formula Funds, Recapture and Reallocation". It was approved by the Council's One-Stop Committee on March 10, 2020, and is scheduled for final approval on April 7, 2020. The policy ensures that the state's fund distribution model first allocates funding to the state's two local areas. Within the largest local area, funds will be further distributed among the five service delivery areas. The policy directs the state to follow WIOA fund distribution requirements at WIOA Sec. 128(b) and Sec. 133(b) and can be found on the Council's website at :

<https://wdc.idaho.gov/workforce-innovation-opportunity-act/>

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

### (ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3).

All Adult program funds will be allocated using the three required factors of substantial unemployment, excess unemployment, and economically disadvantaged individuals.

- 1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher)
- 1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)
- 1/3 of the funds allocated on the number of economically disadvantaged adults

The hold-harmless provisions defined under WIOA are applied to the Adult program allocations. Hold-harmless levels are based on 90% of an area's average relative share of the previous two years of funding.

The state Workforce Development Council has updated the policy for "Distribution of WIOA Title IB Formula Funds, Recapture and Reallocation". It was approved by the Council's One-Stop Committee on March 10, 2020, and is scheduled for final approval on April 7, 2020. The policy ensures that the state's fund distribution model first allocates funding to the state's two local



areas. Within the largest local area, funds will be further distributed among the five service delivery areas. The policy directs the state to follow WIOA fund distribution requirements at WIOA Sec. 128(b) and Sec. 133(b) and can be found on the Council's website at :

<https://wdc.idaho.gov/workforce-innovation-opportunity-act/>

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

#### (iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

As authorized by WIOA, up to 25% of the state's Dislocated Worker budget will include a set-aside for "Rapid Response" funds. These funds are used to assist local areas with supplemental funds to support services for layoffs that occur throughout the program year.

The state allocates the remaining Dislocated Worker funding to the service delivery areas based upon information that will include insured unemployment data, unemployment concentrations, plant closing and mass layoff data, declining industries data, farmer/rancher economic hardship data and long-term unemployment data. Given that plant closure and mass layoff data is no longer produced by the U.S. Bureau of Labor Statistics, the state will use the sub-state data set of the number of employers with 50 or more initial unemployment insurance claims in their stead. No other informational factors will be used. The data used and weight factors are:

- 0.320 Average number unemployed
- 0.320 Average number unemployed over the state's rate
- 0.320 Number of Unemployment Insurance (UI) claimants with 15 weeks claimed
- 0.020 Number of employers with 50 or more initial unemployment insurance claims
- 0.010 Industry employment declines by annual average monthly employment
- 0.010 Number of USDA Farm Loan borrowers who are bankrupt or delinquent
- 1.000 Total

To mitigate significant shifts in funding for service delivery areas, the Governor defined hold-harmless levels for the WIOA Dislocated Worker funds. Hold-harmless levels are based on 90% of an area's relative share of the previous two years of funding.

The state Workforce Development Council has updated the policy for "Distribution of WIOA Title IB Formula Funds, Recapture and Reallocation". It was approved by the Council's One-Stop Committee on March 10, 2020, and is scheduled for final approval on April 7, 2020. The policy ensures that the state's fund distribution model first allocates funding to the state's two local areas. Within the largest local area, funds will be further distributed among the five service delivery areas. The policy directs the state to follow WIOA fund distribution requirements at WIOA Sec. 128(b) and Sec. 133(b) and can be found on the Council's website at :

<https://wdc.idaho.gov/workforce-innovation-opportunity-act/>

## 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

(i) Awarding Multi-Year Grants

The Eligible Agency administering Title II programs is Idaho Career & Technical Education. Title II funds are awarded on a competitive basis as multi-year grants to eligible providers, as described below. These competitions adhere to the provisions set forth in WIOA Title II, Section 203(5) - Eligible Providers, and Section 231 - Grants and Contract for Eligible Providers.

The application packet for Title II funds for Sections 231 (Adult Education and Literacy, English Language Acquisition Activities, and Integrated Education and Training), 225 (Corrections Education and the Education for Other Institutionalized Individual), and 243 (Integrated English Literacy and Civics Education) will be released in the spring of 2021. ICTE will provide technical assistance after the release of the application packet through in-person meetings and online webinars (to ensure statewide accessibility). All applications will be reviewed by a committee using a rubric, the scores to be used as a major consideration in awarding the final contracts, in addition to the review and input of the State Workforce Development Council (serving as Idaho's local board).

Applicants will be notified of the ICTE's decision, and awarded funds on July 1, 2021. Initial grants are awarded for a period of two years. Following this two-year period, grantees receiving funds under the initial competition are required to submit annual renewal plans and negotiate budgets and performance targets each year.

Because of Idaho's large size, small population, and relatively low funding levels, the State provides grants for activities defined in Section 231 (Adult Education and Literacy, English Language Acquisition Activities, and Integrated Education and Training), on a regional basis, with one eligible provider per each of the State's six service regions. A single applicant may apply for grants in multiple regions, but must submit separate applications for each, and each regional application will be reviewed and considered separately. The amount of available funds for each region is determined in advance, and is based on census data regarding low-skilled populations in each region, historical service levels of each region, and historical funding levels for each region.

Corrections education programs, as defined in Section 225 use the same application as defined above, but are exempt from the regional service provision, and may apply to serve larger or smaller geographic areas. The Section 225 funding amounts are based on historic service and funding levels of incarcerated programs, and shall not exceed statutory limitations, defined as 20% of funds available for local grants in the state.

The Integrated English Language and Civics programs funded under section 243 are exempt from the regional service provision. Section 243 grants may be awarded to multiple providers serving larger or smaller geographical areas than any of the six regions. The amount of funding available for activities under Section 243 for each state is determined at the national level by the US Department of Education.

All applicants may submit for grants under any or all sections 231, 225, and 243.

All applicants (or members of an applying consortium) must meet the requirements of an "eligible provider" defined in section 203(5) of Title II and which includes: a local educational agency; a community-based organization or faith-based organization; a volunteer literacy

organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit institution that is not listed in this paragraph but which has the ability to provide adult education and literacy activities to eligible individuals; or a consortium of or coalition of the eligible providers listed here.

Eligible providers must provide evidence of demonstrated effectiveness in providing services to improve the literacy of eligible individuals, skills in order to be considered in the grant application process.

## 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

### (ii) Ensuring Equitable Access

The Eligible Agency administering Title II programs in Idaho is Idaho Career & Technical Education. ICTE oversees all outreach and notification processes, as well as submission and review processes to ensure consistency and fairness. The announcement, due dates, application submission procedure, and review process is the same for all applicants and across all regions. The same process will be used for reviewing applications. The same application form and rubric is used for all applicants seeking to provide services under Section 231 and Section 225, as described in part (i) above.

A separate, but substantially similar, application form and rubric is used for all applicants seeking funds under Section 243. This application only differs in that it solicits additional information regarding the Civics and Integrated Education and Training components to ensure compliance with the requirements set forth in Section 243 and related regulations.

ICTE issued a Notice of Grant Availability (NGA) in each of the major newspapers serving Idaho. This NGA contains general information about the grant and directed interested parties to ICTE for further information and application materials. Information about the grant was posted on the Division's website and distributed to other core WIOA programs and partners, One-Stop providers, regional planning groups, other state and local stakeholders, as well as groups representing other types of eligible providers such as non-profit and library associations.

Promotional materials directed entities wishing to apply for funding to contact ICTE for a complete grant application packet or packets, including an electronic copy of the application in Word or other format to be completed by the applicant.

## C. VOCATIONAL REHABILITATION PROGRAM

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

Activities authorized under Title IV of WIOA are carried out by two agencies in Idaho. The first is the Division of Vocational Rehabilitation (IDVR) and the second is the Idaho Commission for the Blind and Visually Impaired (ICBVI). The Rehabilitation Services Administration (RSA) distributes funds directly to each VR agency in Idaho.

A Memorandum of Agreement (MOA) between the two agencies determines the percentage to be distributed to each agency from RSA, upon which separate awards are made to each agency. The current distribution is as follows:

**Table 38: Funding Distribution for Idaho Vocational Rehabilitation Agencies**

<b>Funds</b>	<b>Portion to IDVR</b>	<b>Portion to ICBVI</b>
General VR Program	86.5%	13.5%
Supported Employment	100%	0%
Independent Living	70% (All funds are reallocated to Centers for Independent Living (CILs) and the State Independent Living Council (SILC)	30% (decreases 3% annually for next 3 years)

Both Title IV programs must reserve 15% of the total General VR grant awarded to the State of Idaho for the delivery of pre-employment transition services.

Additionally, 50% of the Supported Employment funds are reserved for youth with the most significant disabilities.

## 6. PROGRAM DATA

### A. DATA ALIGNMENT AND INTEGRATION

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

#### I. DESCRIBE THE STATE'S PLANS TO MAKE THE MANAGEMENT INFORMATION SYSTEMS FOR THE CORE PROGRAMS INTEROPERABLE TO MAXIMIZE THE EFFICIENT EXCHANGE OF COMMON DATA ELEMENTS TO SUPPORT ASSESSMENT AND EVALUATION

Idaho maintains a federated data systems approach with core WIOA programs, consistent with the development of Idaho's statewide longitudinal data system housing primarily educational data and incorporating a limited scope of workforce data by way of participant wage matching. These systems are currently designed to assist agencies in meeting their individual state and federal reporting requirements for program participants and allow analysis of individual wage outcomes through a manual process.

Idaho was recently awarded a Workforce Data Quality Initiative grant, engaging core WIOA programs to coalesce data sets, based upon the WIOA Joint Performance Report template, for the purposes of program evaluations, outcomes reporting, and predictive analysis. Building upon the existing State Longitudinal Data System (SLDS), the grant will allow for data exchange between disparate MISs while maintaining appropriate data security and compliance requirements.

With the implementation of WIOA, Idaho's core WIOA programs have been working to update data elements within each agency's MIS, consistent with the WIOA Joint Performance Report Template and corresponding PIRL elements. Core program partners have come together to

establish a shared data validation policy which incorporates procedures unique to each agency's program design.

IDOL's *IdahoWorks* houses multiple workforce programs longitudinal datasets, including case management data for multiple programs (WIOA Titles I, III [Wagner-Peyser, Employment Services (ES)], and Trade Adjustment Assistance (TAA)), and employment and wage records (inclusive of Unemployment Insurance (UI) wage and benefits data). Developed and administered by America's Job Link Alliance (AJLA), *IdahoWorks* is a web-based, all-in-one labor exchange, reporting and case management solution - a data warehouse and multi-program management information system that collects program participants' data.

The Office of the State Board of Education (OSBE) houses all K-20 data in the SLDS, with case management systems maintained at the agency level, for example, the Idaho Division of Vocational Rehabilitation (IDVR) and its sister agency, the Idaho Commission for the Blind and Visually Impaired (ICBVI). Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Career & Technical Education (ICTE), and IDVR. Under Idaho's federated SLDS, each agency retains control of the personal information in its records and safeguards the data according to its own needs and requirements.

While the SLDS is a significant accomplishment, the ability to collect and combine certain Participant Individual Record Level (PIRL) elements to meet joint federal reporting requirements between WIOA Title programs has been missing. Additionally, the reporting tools capable of automatically coalescing the state data and preparing it for direct upload into the federal Workforce Integrated Performance System (WIPS) does not currently exist in Idaho.

Embedded in the WDQI project's design to meet federal reporting objectives is the access to comprehensive Eligible Training Provider data, another federal reporting requirement of WIOA. The plan of the WDQI project's proposed platform extends the automation of data exchange and reporting to address both public and private providers, which contrasts with the state's current SLDS limitation to public postsecondary providers, lacking a means of reliably calculating performance of proprietary schools or training programs. A thorough assessment of the state's training providers to ascertain their impact on Idaho's workforce and economy includes all public and private, educational and training sources.

## II. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN

Upon passage of the Workforce Innovation and Opportunity Act, the Idaho Department of Labor implemented a new MIS for its WIOA Title IB, Wagner-Peyser, Trade Adjustment Assistance, and discretionary grant programs. Provided by America's Job Link Alliance, this system integrates labor exchange, case management, and reporting functions. The system also provides a common exit for individuals in the WIOA Title I-B and III programs.

The core and partner programs have invested considerable funds, time, training, and other resources into each of their existing programmatic management information systems, consistent with WIOA reporting elements. Core partners are currently working together to create a secure web-based portal for existing agency datasets to collect common WIOA joint performance report data elements, aggregate them and assist in generating required federal reports for Idaho agencies receiving WIOA funds under Title I, II, III, IV and Trade. The following Idaho state agencies and entities are working collaboratively to fulfill these goals:

IDOL, IDVR, ICTE, ICBVI, OSBE and the Workforce Development Council (WDC). Current inter-agency policies and procedures will be reviewed, modified and/or developed to reflect this data exchange platform, as differs from Idaho's Data Management Council's (DMC) policies and procedures intended for research. The web-based platform will be designed to accommodate additional WIOA-required partners as they engage in Idaho's One-Stop Network. Secondary outcomes of these activities include:

- Identification and reporting of WIOA co-enrollments, leveraging opportunities for savings
- Integration of datasets to facilitate evaluation, research and decision-making
- Access to merged public/private education and wage data for automated ETP reporting
- Predictive analysis to better determine potential outcomes and expose risk
- Individual and combined outcomes of project partners for:
  - dashboard development
  - JobScape data inputs for consumer choice

This plan has allowed programs to update their data collection processes and individual MIS systems to become WIOA-compliant as soon as possible, while taking steps toward fuller integration over the long term. Each program continues collecting data via different systems, using an ad-hoc data sharing process for exporting, sharing, matching, and importing data. This revised data sharing process, however, along with several other agreements allow core programs to report required elements under WIOA.

In an effort to update data collection processes, the state's core program partners conducted an analysis of the each programs' MISs as well as the data collection and reporting needs of individual programs and the workforce system as a whole. This has led core programs to continue to fine tune their individual data systems to ensure alignment with WIOA requirements.

The WIOA Advisory Group, applicable optional partners, and other affected stakeholders will convene a working group for data integration. This group will consist of program staff, IT staff, and vendors for existing systems. Their plan going forward is to conduct an analysis of applicable intake processes across the system and identify areas of duplication, or opportunities for integration and work towards creating a framework for how a system will connect individual MISs and what that might look like.

Joining this effort with the WDQI grant awarded to the Idaho Department of Labor, will do much to improve the state's ability to automate data exchange processes within Idaho's workforce development system. Additionally, this data will feed into IDOL's Labor Market Information (LMI) tool known as JobScape. JobScape is an easy-to-use, mobile-friendly career and educational training search tool that provides occupation descriptions, wages, worker demand, current employment, and the number of certificates and degrees awarded from Idaho's public postsecondary for-credit programs. Users, Idaho students and job seekers, can search by keywords, occupation/job titles, military occupation titles or codes, or commonly used job title acronyms. JobScape enhancements would include non-credit program and aggregate ETP participant rates of wages, employment, graduation/program completion, and credential attainment. With this easily accessible data, customers can make more informed career and educational training decisions.

III. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING  
TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER PROGRAMS  
(INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.)  
AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS,  
INCLUDING UNEMPLOYED INDIVIDUALS

The Workforce Development Council, appointed by the Governor, will provide leadership for data integration efforts through its One Stop Committee. Agency leaders from WIOA core and optional partners participate in the One Stop Committee and have the ability to identify resources and expertise to support efforts brought forth by the WIOA Advisory Group.

Previous efforts to implement common intake and a technology solution that could overlay the individual partner's systems have stalled and a new course of action is set in place in Section II(b)(2) under the focus area of Improving Public Awareness and Access to the Workforce System. Prior to looking at data integration, the questions of how many individuals would be impacted and whether it would improve service delivery need to be answered. Since referrals across programs are low, processes need to be developed and implemented before data integration efforts are launched.

The state's Workforce Data Quality Initiative grant (WDQI - referenced earlier in Section III.b.6.A.i.) will assist the Workforce Development Council in this effort, providing the data necessary to help improve system alignment in Idaho. Guided by the Workforce Development Council and based on the data generated by WDQI, Core and One-Stop partners can focus on the development of potentially new service delivery models to improve participant outcomes throughout the state's workforce development system.

IV. DESCRIBE THE STATE'S PLANS TO DEVELOP AND PRODUCE THE REPORTS REQUIRED  
UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2))

As per Section 116 of WIOA, as well as applicable federal regulations, the State will be on the cusp of submitting a single annual report covering all programs before the expiration of this four-year plan. This is in addition to the reports already submitted by individual programs to their respective federal agencies if required.

The core program partners, working together with the WDQI processes in development and using SLDS database processes to address the requirements under the Family Educational Rights and Privacy Act (FERPA), plan to incorporate education and state wage data with WIOA cases management data into the current PIRL file schema to exchange, merge and report on behalf of all Idaho WIOA Title IB, II, III and IV grantees.

To fully incorporate the use of unemployment insurance data for performance reporting, the combined plan partners have executed the state's SWIS data sharing MoU which allows core program partners additional options for the collection, exchange and reporting of required data. We anticipate that the process will involve individual programs sending their performance information to a single entity (likely the Idaho Department of Labor) who will compile and submit the State Annual Report to the US Department of Labor. As noted earlier, the WDQI grant will help to facilitate partner's abilities to meet WIOA quarterly and year-end reporting requirements through its automated data exchange process. The core partners required to report under Section 116 will issue a Memorandum of Understanding that identifies who this entity will be, the responsibility of that entity for submitting on behalf of the core programs, and the process for submitting program performance data to this entity.

The eligible agencies administering core programs will be responsible for submitting program-specific reports in accordance with applicable Titles under WIOA, federal guidance from their respective Departments, and other statutes to which they are accountable (for example, the Rehabilitation Services Administration and The Rehabilitation Act for Title IV programs). In addition, activities generated under this plan will lay the foundation to incorporate additional Idaho-based WIOA partner program reporting via automated, electronic means.

#### B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

Idaho's workforce system will primarily measure participant progress using the indicators defined in WIOA Section 116 and subsequent guidance. Many of the data elements required to track participant progress in employment and post-secondary education are already collected in some fashion by at least one of the lead State agencies administering a core program. These performance indicators track participants' post-program employment in the second quarter and fourth quarter after exit, as well as credential attainment up to one year after program exit.

For example, The Idaho Department of Labor houses all of the WIOA Title I-B programs, as well as Wagner-Peyser, and the Unemployment Insurance program. As a result, they are able to provide other core partners with wage, and employment records. Both Title II (Adult Education) and Title IV (Vocational Rehabilitation - IDVR) programs are housed in separate divisions of the State Board of Education, allowing them access to post-secondary enrollment data via the National Student Clearing House, as well as the State's Longitudinal Data System for Education.

Currently, the existing data sharing agreements established continue to allow core programs to share and report progress measures for WIOA participants. Data sharing agreements negotiated under WIOA follow a similar structure as before. For example, the Adult Education program presents its Employment cohort lists to the Department of Labor to determine employment status of students after exit. As noted earlier, these processes will continue.

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

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

As mentioned in the previous section (III)(b)(6)(B), Assessment of Participants' Post-Program Success, the Idaho Department of Labor currently houses both WIOA Title I-B and Title III programs, as well as the Unemployment Insurance program for Idaho. All of the core partners have a current MOU with the Unemployment Insurance program via the Idaho Department of Labor to use wage records from the UI system for WIOA performance reporting and evaluations. These records are used to determine the employment status of program participants after exit from their respective WIOA programs. The results then guide program improvement and system alignment, as well as federal reporting purposes under Section 116.

The Department of Labor's Communication and Research Division utilizes Idaho's UI data to conduct a labor market information analysis, which supports the findings under Section (II)(a) of this Plan - Economic, Workforce, and Workforce Development Activities Analysis.



## D. PRIVACY SAFEGUARDS

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

Currently, each of the core programs under WIOA maintains its own management information system (MIS), and adheres to the standards and laws which are applicable to the population being served and the data being collected therein. Participants (or their legal guardians where applicable for those under 18 years of age) are asked to sign release of information waivers, as appropriate, and are advised of their right to decline to share their information outside of the program to which they are applying. Provision of information is voluntary except where such information is necessary to determine program eligibility.

Additionally, data-sharing agreements between core and optional partners will provide specific and explicit instructions as to which data can and cannot be shared between programs, and under which circumstances.

With respect to privacy safeguards related to the General Education Provisions Act and other applicable Federal laws, the Idaho Data Management Council (DMC) is a council that was established to make recommendation on the oversight and development of Idaho's Educational Analytics System (EASI) and oversees the creation, maintenance and usage of said system, including safeguards for student data and privacy concerns.

The Idaho Department of Labor cooperates with the EASI through the Statewide Longitudinal Data System (SLDS) agreement, following Council and agency policies and procedures for secure data sharing.

The purpose of the EASI is to allow longitudinal tracking of students from preschool through all levels of the public education system (elementary, middle and high schools, college and graduate school) and into the workforce. To reflect this scope, the EASI is referred to as a P-20W system. This system will collect data from a variety of disparate source systems, including the K-12 system developed by the State Department of Education, the systems in use at the various postsecondary institutions, the State Department of Labor, the National Student Clearinghouse, and others, and will transform that data into a single, coherent structure on which longitudinal reporting and analysis can be performed.

The privacy of all student level data that is collected by the EASI is protected. A list of all data fields (but not the data within the field) collected by the EASI is publicly available. Only student identifiable data that is required by law is shared with the federal government.

### **Roles and Responsibilities**

In order to advise and make recommendation to OSBE on the implementation of the EASI, the DMC will report to OSBE through the Planning, Policy and Governmental Affairs Committee. The scope of responsibilities of the DMC includes the following:

1. Data Standards and Quality
  - Ensure that all data elements within the EASI are clearly and unambiguously defined and used consistently throughout the system.
  - Ensure that the data within the EASI is as complete and accurate as possible and complies with the agreed upon definitions.

1. Access and Security

- Establish parameters for security and encryption of data uploads, data storage, user roles and access, privacy protection, and appropriate use of data.
- Review and approve mechanisms (technical and procedural) for implementing the required security and access rights.
- Establish guidelines for responding to requests for data access by various stakeholders, including school, district and college/university staff, education researchers, and the public.

1. Change Management and Prioritization

- Propose enhancements to the EASI , review enhancements proposed by other groups, and set priorities for the development of those enhancements.
- Review and approve or deny any proposed changes to existing functionality, data definitions, access and security policies, etc.

1. Training and Communication

- Establish guidelines for training of EASI users, and review and approve specific training plans.
- Ensure adequate communication concerning the EASI. In each of these areas, the DMC shall develop policies and procedures for OSBE approval as appropriate.

Members of the Data Management Council include the Office of the State Board of Education, Idaho Department of Labor, Idaho State University, Idaho Division of Career & Technical Education, North Idaho College, University of Idaho, and the Idaho Department of Education.

## 7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

As outlined in Section (II)(a)(2) State Workforce Development Activities, the Jobs for Veterans State Grant program is operated by the Idaho Department of Labor (IDOL), which also administers all Title I-B and Title III programs, as well as Unemployment Insurance and Trade Adjustment Assistance programs. More information about the specific activities and services available through these programs are outlined in the Activities Analysis. Because these programs are administered by the same agency, the department has policies in place that ensure consistency in providing appropriate priority of service for veterans across all of these programs. This also ensures effective referrals and co-enrollment where appropriate. A copy of the department's Priority of Service Policy can be found as an appendix to the state's 2020 Draft Plan on the Council's website at <https://wdc.idaho.gov/wp-content/uploads/sites/62/2020/03/ID-PY20-23-WIOA-Combined-State-Plan-Appendices.pdf>.

Wagner-Peyser and Veteran State Plans both outline veterans' priority of service and are also highlighted in the WIOA Title I-B Eligibility Technical Assistance Guide (TAG) for career planning staff throughout the state. Updates to the Wagner-Peyser and Veteran State Plans are included in this Combined State Plan under "Program Specific Requirements."

The Idaho Department of Labor requires all American Job Center (AJC) managers attend the annual state veterans' training where a significant amount of time is spent discussing priority of service for veterans and eligible spouses. Additionally, in an effort to ensure all program staff understand veterans' priority of service, the state developed an online training module for department staff. All Idaho AJC staff are required to view this training module. Since 2014, this module has been included in the department's New Employee Orientation, to include most administrative staff in addition to AJC staff.

### **Implementation and monitoring of the state's Priority of Service Policy**

American Job Center staff are frequently reminded that Priority of Service (POS) for covered persons is mandated for any services funded entirely, or in part, by the USDOL. The most basic Priority of Service measure is extended to covered persons by notifying them that they are entitled to priority of service. Signage in Idaho's AJCs informs covered persons that they have Priority of Service before non-covered persons and encourages them to identify themselves as veterans in the automated system and to office staff. This is also noted on the covered person's registration. AJCs have incorporated a questionnaire into the front desk duties. This questionnaire is given to covered persons and helps the consultant determine the appropriate service and service provider. (See bulleted list below).

Managers and career planners conduct team "staffings" to determine how to best utilize available funding and select those appropriate for training under the WIOA Title I-B programs and other programs that have eligibility criteria. Historically, Idaho has not encountered any issues with providing priority to covered persons in these programs. However, if resources become scarce and more competitive, covered persons will be accepted before qualified non-veterans as noted earlier in this WIOA State Plan which states:

...in a few programs such as the WIOA-funded Adult and Youth programs, veterans priority will compete with existing statutory priorities that favor certain population groups and must be taken into account when applying the priority. A covered person (veterans are considered covered persons) is entitled to and will be given priority over non-covered persons for the receipt of employment, training and placement services if the person otherwise meets the eligibility requirements.

Joint AJC office reviews, conducted by the state VETS coordinator and USDOL/VETS staff, provide quality control and ensure that Priority of Service processes and procedures are implemented. VET staff review the entire AJC office veterans' operations, analyzing data on services and outcomes for veterans and interviewing AJC staff. The team provides a written report that evaluates the office's strengths and weaknesses and its implementation of priority of service measures.

Monthly veteran program meetings with local management and veteran staff are conducted on a statewide basis to review processes and identify necessary improvements in which Priority of Service is discussed. If necessary, process improvement or corrective action plans are developed.

Additionally, the state's Recently Registered Veterans report is reviewed. When an eligible person is identified the DVOP sends an introductory email listing IDOL's services, and the eligible person is encouraged to contact the DVOP for additional services. Otherwise, an ES staff member would contact them. The covered persons receive various informational handouts,

resume assistance, job search strategies, and information on community resources. They are also provided a review of the veteran section of the IDOL web page showing a list of veterans' services offered by IDOL. If a covered person does not qualify for DVOP services, an Employment Services staff member will review the covered person's IdahoWorks registration.

In addition to the items listed on the previous page, the state has taken these additional steps to ensure priority of service for covered persons:

- Idaho has designated Local Veteran Employment Representatives (LVERs) to provide Priority of Service training in their local American Job Centers as often as needed. LVERs will also provide training to smaller offices that do not have a Jobs for Veterans State Grant (JMSG)-funded staff member.
- Signage is posted in all American Job Centers asking veterans to identify themselves to any local office staff.
- Front desk staff are instructed to ask the covered person to complete an intake form that lists all the Significant Barriers to Employment (SBEs) recognized by USDOL VETS. Completion of this form helps to determine eligibility for DVOP services or if a referral to an Employment Services consultant is appropriate.
- All American Job Centers have pamphlets outlining the department's promise to covered persons, including Priority of Service, how the state administers this preference, and other useful information.
- WIOA Quarterly Continuous Improvement Reports assess the number of veterans served in the WIOA Title IB Programs.
- Recently separated veterans are the first priority in the referral of UI claimants for the RESEA program.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

In order to fully address the various components of accessibility, this section is broken into four main topics:

- Internal policies and procedures that ensure compliance, accessibility, and effectiveness
- Training and professional development available to program staff and One-Stop staff
- Accommodations available to individuals with disabilities to ensure accessibility
- One-Stop Certification Policy

#### **Policies and Procedures**

All core and combined plan partners, in conjunction with the state's equal opportunity (EO) officer, work to maintain a Non-Discrimination Plan that provides a comprehensive set of actions to ensure that the American Job Centers in Idaho address the needs of customers with disabilities, to include the full array of available services. All of the state's One-Stop centers comply with ADA Amendments Act (ADAAA) legislation to ensure access for persons with disabilities, providing for the most integrated setting practicable. The state's facilities procurement process incorporates ADAAA guidelines to ensure access to new or renovated One-Stop center facilities.

The state's EO officer works with the Idaho Department of Labor EO officer, who acts as the liaison with other units of the department such as the Disability Determinations Service and the Human Rights Commission, as well as external disability support organizations such as the Vocational Rehabilitation programs and the Council on Developmental Disabilities, to ensure policies are communicated and to foster these groups as resources for customers with disabilities.

American Job Center program service delivery staff provide individuals with disabilities special consideration for labor exchange services. WIOA Title IB program policies consider an individual with disability as having a verifiable impediment to employment. The programs treat individuals with disabilities as a family of one in determining income for program eligibility, giving them an additional opportunity for participation in intensive and training services. Youth with disabilities are given the highest priority service within Idaho's youth programs.

### **Disability Training for Program Staff**

With the assistance of a Disability Employment Initiative (DEI) grant, the Idaho Department of Labor facilitated the development of training to One-Stop staff across the state and laid a foundation of resources for continuous improvement of services to and employment outcomes of individuals with disabilities. Through information and materials gathered from expert local and national sources, the grant efforts are being sustained through publications such as the comprehensive job search handbook, *Willing and Able: A Job Hunting Guide for Idahoans with Disabilities* ([https://www.labor.idaho.gov/publications/Willing\\_and\\_Able.pdf](https://www.labor.idaho.gov/publications/Willing_and_Able.pdf)), and its subsequent companion handbook, *Willing and Able: A Job Hunting Guide for Idaho Veterans with Disabilities*. Disability etiquette guides, local resource flyers, referral information and other materials disseminated via the DEI grant remain available on staff SharePoint portals for use by all American Job Center staff.

A statewide training was conducted after the development of training materials to ensure the tools and information created through the grant's period of performance were sustainable. Despite the DEI grant's end, the knowledge imparted through the training and tools developed as a result of the grant continues to be the cornerstone of services to individuals with disabilities throughout the One-Stop system. All of which have resulted in improved coordination with, and referral to partner services and community resources, enhanced understanding of the needs of those with disabilities and improved ability to develop employment opportunities. As prescribed by Wagner-Peyser Section 8(b), each One-Stop center maintains at least one staff member who is well equipped to provide the unique level of support needed by individuals with disabilities seeking entry or re-entry into the workforce.

Idaho's Vocational Rehabilitation programs also provide technical assistance where needed, and can provide or connect other core WIOA and partner programs to additional training available through national resources. A brief list of additional resources compiled by the Idaho Division of Vocational Rehabilitation is available [below](#):

- National Clearinghouse of Rehabilitation Training Materials provides resources on accessibility to meet requirements of Section 508 (accessible electronic and information technology for federal agencies) of the Rehabilitation Act of 1973. [neweditions.net/projects/descriptions/national-clearinghouse-rehabilitation-training-materialsand-webinar-support](http://neweditions.net/projects/descriptions/national-clearinghouse-rehabilitation-training-materialsand-webinar-support)
- Disability.gov is the federal government website for comprehensive information about disability-related programs, services, policies, laws, and regulations. The site links to thousands of resources from many different federal government agencies, as well as state and local governments and nonprofit organizations across the country. [www.disability.gov](http://www.disability.gov)
- The ADA National Network Centers made up off ADA professionals and experts charged with assisting businesses, state and local governments, and people with disabilities as they manage the process of changing our culture to be user friendly to disability and the effect the variety of health conditions can have on society. Training on all aspects of the ADA is one of the major tasks of the Northwest ADA Center. [nwadacenter.org](http://nwadacenter.org)
- The Idaho affiliate of the Northwest ADA Center-Idaho is formerly known as the Idaho Task Force on the ADA. There are four partners in the ADA coalition composed of the three Idaho Centers for Independent Living (CIL) and a state coordinator.
- The Job Accommodation Network (JAN) is the leading source of free, expert, and confidential guidance on workplace accommodations and disability employment issues. Working toward practical solutions that benefit both employer and employee, JAN helps people with disabilities enhance their employability, and shows employers how to capitalize on the value and talent that people with disabilities add to the workplace. [askjan.org](http://askjan.org)

## **Accessibility and Accommodations**

All of Idaho's 11 comprehensive and affiliate American Job Centers are equipped with accessible computers built primarily with accessible peripherals and software to accommodate a variety of disabilities. Customers with disabilities can come to the centers during office hours and access center programs and information sources. And, with the Idaho Department of Labor's transition to its new service delivery model, any customers with specific accommodations who finds that an advertised location, for some reason, does not meet their need, can rest assured that remote staff will meet them in a location that does. In addition, State policy requires all partner programs that provide services at the One-Stop centers do so in a manner that meets requirements of Section 188 affording programmatic and physical access to services.

Partner-provided services are also available to meet specific One-Stop customer needs. The One-Stop staff collaborate with ICBVI and/or the Deaf and Hard of Hearing to obtain information for customers in Braille, tape or large print versions or access to the qualified Sign Language Interpreter directory.

As core partners, both ICBVI and IDVR's goal is to provide all individuals, regardless of disability, with equal access to its program. Individuals who have complaints or wish to provide input on accessibility issues associated with ICBVI may contact the Administrator or the Rehabilitation Services Chief. Furthermore, if customers wish to report an issue related to the accessibility of the IDVR program, they may do so by submitting a complaint to the Division's Section 504 Coordinator via e-mail or written correspondence. Contact information is posted on the Division's website. Complaints may also be sent to the Office of Civil Rights. Contact

information is available at [www.ed.gov/ocr](http://www.ed.gov/ocr). The Division conducts programmatic and physical accessibility evaluations of all regional offices for Section 188 compliance and is working to make its website accessible.

And through the Ticket to Work program, formerly a component of the DEI grant project, the department has a certified Work Incentives Benefits Practitioner to offer benefits counseling to participant ticketholders on how employment affects Social Security benefits.

The Idaho Department of Labor website and *IdahoWorks* (the online workforce programs' electronic registration system) include taglines to ensure clear communications regardless of the process utilized by the customer. The EO officer coordinates with the Communications Bureau of the department to ensure taglines and other appropriate information are included and effective on publications.

### **One-Stop Certification Policy**

Part of the State Workforce Development Council's One-Stop certification policy includes annual physical and programmatic accessibility for individuals with disabilities. The certification criteria references the ADA Checklist for Existing Facilities as recommended by the Northwest ADA Center. The full checklist is located here:

<https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>. The state's EO office developed a checklist for programmatic accessibility along with an EO Survey. All WIOA funded programs are required to report annually to the state EO Officer the results of their physical and programmatic assessments.

Training was provided to agency staff on conducting physical and programmatic assessments in September 2018 and December 2018, respectively. The state EO Officer sends a delegate to the Council's One-Stop Committee meetings to ensure that accessibility is top of mind.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The state workforce system provides a variety of services to those with limited English proficiency (LEP). Staff at Idaho American Job Centers have two primary means of providing language assistance: oral interpretation, either in person or via a telephone interpretation service such as the *LanguageLink*, or written translation. One-Stop staff receive training on how to use the *LanguageLink* as part of their initial staff training. At a minimum, LEP customers will be offered oral interpretation services to help them access and understand recipient programs. This service ranges from onsite interpreters for critical services provided to a high volume of LEP customers, to accessing assistance through commercially available telephonic interpretation services. Written translation, which is provided as necessary, can range from translation of an entire document to translation of a short description of the document.

The Idaho Department of Labor is the service provider and location manager of all comprehensive and affiliate American Job Center locations in Idaho. The Idaho Department of Labor maintains a comprehensive policy clarifying the Department's responsibility for providing persons with limited English proficiency meaningful access to agency programs and services as required by Executive Order 13166, Title VI of the Civil Rights Act of 1964 and Section 188 of the Workforce Innovation and Opportunity Act. This policy not only includes

instructions on reasonable steps to provide meaningful access, it describes potential discriminatory practices, staff training and processes for monitoring and complaints.

Alongside the agency's policy for Serving Limited English Proficient Customers are training materials and resources available for AJC staff. The resources include instructions and tips for using the *LanguageLink* service for interpretation services and process for agency translation requests. WIOA Title II providers also use the *LanguageLink* service to support limited English proficient students when needed. Alongside this service, staff members participate in professional development training on serving limited English proficient students.

In addition, with advance notice, core partners ICBVI and IDVR provide interpreter services for their clients and customers, in the customer's preferred language, to meet their needs as they seek services. Both agencies utilize state contract providers for these services. In addition, IDVR also uses CTS Language Link, or Linguistica International to assist with real-time interpretation when advance notice is not provided. ICBVI has a staff member who is fluent in Spanish and provides assistance, when needed, to all regions of the state.

#### IV. COORDINATION WITH STATE PLAN PROGRAMS

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

##### **Description of the State Plan Development Process**

The WIOA State Plan partners (known as the WIOA Advisory Group) developed the WIOA 2020 -2024 Combined State Plan between July 2019 and February 2020. The Workforce Development Council's executive director Wendi Secrist led the plan development process through a series of public meetings. This includes 16 listening sessions that were held in:

- Hailey
- Twin Falls
- Pocatello
- Fort Hall
- Caldwell
- Payette
- Boise
- Salmon
- St. Anthony
- Preston
- Coeur d'Alene
- Bonners Ferry
- Plummer
- Lewiston



- Cottonwood
- McCall

All listening session invitations were sent to local media, local elected officials, chambers and other business organizations, and workforce system partners for distribution. Nearly 250 individuals attended the listening sessions.

Following the listening sessions, an all-day strategy session was held on November 12, 2019 to develop the goals and strategies for the WIOA State Plan under the umbrella of the Council's strategic plan which was approved on July 18, 2019. Over 25 representatives of the workforce system partners attended and contributed. Through a technical assistance grant, USDOL provided facilitators for the session.

Meetings of the WIOA Advisory group were posted, in accordance with Idaho Open Meetings Law, on the WIOA State Plan section of the Council's website, with a banner linking directly to the page from the home page. These agenda identified specific sections of the Combined State Plan to develop/review. Following the meeting, the modified sections with tracked changes were posted on the State Plan website.

The following individuals, representing the partners participating in the WIOA Combined State Plan contributed and were responsible for its program-specific content.

- **Idaho Workforce Development Council** – Wendi Secrist, Executive Director, Matthew Thomsen, Business Partnership Manager, Caty Solace, Outreach & Communications Manager, Amanda Ames, Finance and Grant Manager. Council staff represented the State Workforce Board. Paige Nielebeck, Management Assistant ensured that plan development complied with Idaho's Open Meetings Law.
- **Idaho Commission on Aging** – Admir Selimovic, SCSEP Program Specialist. Admir represented the Combined Partner program of Senior Community Service Employment Program.
- **Idaho Commission for the Blind and Visually Impaired** - Mike Walsh, Rehabilitation Services Chief. Mike represented Title IV programs administered by the Commission.
- **Idaho Department of Labor** – Kristyn Carr, Workforce Administration Program Operations Manager, Rico Barrera, Senior Planner, Janell Hyer, Research Analyst Supervisor, and Laurel McMahon, Workforce Services Program Operations Manager. Michael Johnson, Deputy Director, Unemployment Insurance administrator. Kristyn and Rico represented all core and partner programs (except for Unemployment Insurance) administered by the Department, including Title I-B, Title III, Veterans Employment, and Trade Adjustment Assistance as the administrative entity and fiscal agent. Laurel McMahon represented the Title I-B programs as a service provider. Janell Hyer provided all of the updated labor market information in the economic and workforce analysis section of the plan. Michael Johnson represented input from the Unemployment Insurance program.
- **Idaho Career & Technical Education (ICTE)** – Molly Valceschini, State Coordinator for Adult Education and GED Administrator. Molly served as the State Plan Lead, represented Title II programs, and also provided a link to Carl D. Perkins programs via the Division (the Perkins program did not participate in the Plan, but is a close partner in the workforce development system).

- **Idaho Division of Vocational Rehabilitation** - Teresa Pitt, Planning and Evaluation Manager; and Matt Markve, Program Evaluation Analyst. Teresa and Matt represented the Title IV general VR program administered by the Idaho Division of Vocational Rehabilitation.

Other WIOA partners, while not participating in the combined plan, contributed to the development of the state's strategies and goals. They include:

- the Idaho Department of Health and Welfare representing TANF and SNAP Employment & Training,
- the Idaho Division of Career & Technical Education representing Perkins,
- the Idaho Commission for Libraries,
- North Idaho College as a WIOA Title I-B service provider,
- Easterseals-Goodwill and ExperienceWorks as state and federal service providers, respectively, for the Senior Community Service Employment Program, and
- East Central Idaho Planning and Development Association as a local workforce development board.

Additionally, input from the public and other stakeholders was solicited as part of Idaho's Public Comment Process. The comment period for the plan was available from March 2, 2020 through March 23, 2020. The plan was housed on the state's Workforce Development Council's website, with core and One-Stop partners with links to the plan from their own websites. The information was also shared statewide through both the Idaho Association of Counties and the Idaho Association of Cities and their respective membership.

## V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering 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	Yes

The State Plan must include	Include
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;	
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 administrative requirements under WIOA section 184(a)(3);	Yes
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

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

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

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

#### A. GENERAL REQUIREMENTS

##### 1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

A. IDENTIFY THE REGIONS AND THE LOCAL WORKFORCE DEVELOPMENT AREAS  
DESIGNATED IN THE STATE

Idaho is identified as a single statewide planning region, consisting of the two former WIA local areas –

1. Balance of State and
2. East-Central District.

B. DESCRIBE THE PROCESS USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES  
FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR “PERFORMED  
SUCCESSFULLY” AND “SUSTAINED FISCAL INTEGRITY” IN ACCORDANCE WITH 106(B)(2) AND  
(3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING  
REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW  
THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN  
IDENTIFYING THE REGIONS

Draft policy criteria for local area designation and appointment of local board members were posted and presented to the Workforce Development Council at the July 2015 public meeting in Idaho Falls. The criteria were modified and approved by the Governor and then posted for public comment on the Idaho Department of Labor website for 30 days from August through early September 2015. Local public officials were notified via the Idaho Association of Cities to ensure that all Idaho mayors and county clerks received direct notice of the policies and opportunity to comment. *No comments were received.*

At the October 19, 2015 public meeting, the Workforce Development Council adopted the WIOA local area designation policy and policy for appointment of local board members. Both local areas met the policy criteria for “performed successfully” and “sustained fiscal integrity” as described below.

Performed Successfully - Met or exceeded the negotiated levels of performance for the last two consecutive program years.

Sustained Fiscal Integrity - The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination

After the initial designation of the local areas, a policy for identification of region(s) was developed. Again, the policy was posted for public comment on the Idaho Department of Labor website for a minimum of 30 days December 2015 through January 2016 and the Idaho Association of Cities was informed to ensure that all Idaho mayors and county clerks received direct notice of the policy and opportunity to comment. *No comments were received.*

Since that time, the Council has reviewed and updated these policies. It received guidance USDOL that the Region Identification Policy was no longer required, which it subsequently archived. It also revised the Local Area Designation and Policy, and placed it alongside the state's Combined State Plan for public comment. The Council will vote to adopt these policies during its meeting held in April 2020.

The state's Local Area Designation and Policy can be found at  
- <https://wdc.idaho.gov/workforce-innovation-opportunity-act/>

C. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS

**Denial of Local Area Designation**

A unit of general local government that requests but is not granted designation as a local Workforce Investment area under section 106 (b) (2) or (3) may submit an appeal to the State Workforce Development Council.

The existing designated workforce areas will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

**(i) Appeal to the State Workforce Development Council**

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor's designee. The appeal must include all factual and legal arguments as to why the appeal should be granted. The appeal shall be filed with the Executive Director of the Workforce Development Council, 317 West Main Street, Boise, Idaho 83735. The Executive Director shall promptly acknowledge receipt of the appeal.

The appeal shall be deemed timely filed if it is received by the Executive Director of the Workforce Development Council within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U. S. Postal Service shall be deemed to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than forty-five (45) days after the appeal was filed. With the consent of the appealing party, the hearing may be held after the 45-day period, but in no case shall the hearing be conducted more than sixty (60) days after the appeal was filed.

The hearing officer shall inform the appellant of the date, time and place of the hearing by written notice mailed at least ten (10) calendar days in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIOA funds cannot be used for remuneration.

An appellant must establish that it is entitled to designation as a local area according to this policy and WIOA.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Executive Director of the Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition, if there are at least 14 calendar days remaining prior to the meeting; however, if no Council meeting is scheduled within forty-five (45) days of the date the decision was issued, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the

appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations and rationale of the hearing officer.

## **(ii) Appeal to USDOL**

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty-days (30) after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Innovation and Opportunity Act. The Secretary, after receiving a request for review and upon determining that the entity has met the burden of establishing that it was not accorded procedural rights under the appeal process established in the state plan, or that the area meets the requirements of Section 106(b) paragraph (2) or (3) and 20 CFR 679.250, as appropriate, may require that the area be designated as a local area. As part of this determination, the Secretary may consider comments submitted by the Council in response to the appeal.

Appeals made to the Secretary must be filed no later than 30 days after receipt of written notification of the denial from the Council, and must be submitted by certified mail, return receipt requested, to:

Secretary U.S. Department of  
Labor  
ASET  
200 Constitution Ave  
NW  
20210,

Attention:

Washington, DC

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development  
Council  
Main  
Street  
Idaho 83735

317 West

Boise,

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision.

### **D. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING**

The appeal must be made in writing to the Idaho Workforce Development Council within ten (10) business days of the Governor's determination. The appeal will be heard at the next Workforce Development Council meeting, provided there are at least 14 days before the next meeting. If the Council's regularly scheduled meeting is sooner than 14 days from the appeal submission, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within a 30-day period to accept or reject the appeal. The partner program entity shall have the opportunity to submit written and verbal information to the Workforce Development Council. The Council will issue a decision within 14 days of the Council appeal hearing. Its decision will be final.

Each partner may only appeal once per program year.

## **2. STATEWIDE ACTIVITIES**

**A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE  
DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT  
ACTIVITIES**

The Idaho Workforce Development Council, functioning as both Idaho's State and Local board, continually updates statewide policy to for use by all WIOA service providers. All statewide policies for Governance, WIOA Title IB, and One-Stop System reside on the Council's website - <https://www.labor.idaho.gov/dnn/WIOA/Law-and-Policies>

The general statewide service policies are provided below and linked here - <https://www.labor.idaho.gov/wioa1/policies/Statewide-Service.pdf>.

**Statewide Service Policies for WIOA Title IB Service Provision**

***(i) Residency***

WIOA adult, youth and dislocated worker career and training services will be limited to residents of the state of Idaho. Residents of other states who wish to receive WIOA career and training services will first be referred to the One Stop/American Job Center in their home state to obtain resources for services. First priority will be given to Idaho residents who are eligible for career and training services. In instances where a home state denies services to an out-of-state resident, the Idaho One Stop/American Job Center may consider enrollment of the individual if it is in the best interest of the state of Idaho and no qualifying Idaho residents are denied access to services as a result.

***(ii) Priority***

In the provision of WIOA services, veterans' priority will be followed in accordance with 38 USC Chapter 41, 20 CFR 1001.100 and PL 107-288. Priority will also be given to low-income individuals with barriers to employment. Additionally, priority for individualized and training services in the adult program will be provided to individuals who are basic skills deficient, which may include referral to Title II programs.

***(iii) Participant follow-up***

The Workforce Innovation and Opportunity Act requires that Title I Youth, Adult and Dislocated Worker participants receive follow-up services for not less than 12 months. For the duration of the 12-month follow-up period, a minimum of one contact with each exiter who received career or training services from a WIOA program (adult, dislocated worker or youth) is required per quarter. Appropriate supportive services are allowable for youth during the follow-up period.

***(iv) Work Experience Activity***

The participation hours for this activity are limited to ensure participants are engaged in learning basic work maturity skills such as attendance, following directions and wearing appropriate attire as opposed to receiving occupational skill training. Work Experience activities take place in a public, private for-profit or non-profit workplace for a limited period, generally not exceeding 520 hours. All participants enrolled in the Work Experience activity may receive a wage equivalent to the Federal Minimum wage, or an hourly wage similar to that offered at the work site to individuals with comparable experience, not to exceed \$11/hour. Participants are provided with Federal Insurance Contributions Act (FICA) and workers compensation coverage while participating in this activity.

***(v) Internship Activity***

All participants enrolled in the Internship activity are to receive an hourly wage at least equivalent to the state or federal minimum wage, whichever is higher. The wage may be higher depending on the participant's prior training/work experience and the hourly wage offered at the worksite to individuals with comparable training/work experience. (250-hour limitation)

***(vi) Out of Area Job Search Activity Limitations***

This service is designed to assist adults and dislocated workers in seeking employment in areas outside of their normal commuting distance. Career planners may authorize multiple job searches for a single client.

Out of Area Job Search - Each out of area job search is limited to 90 percent of allowable and actual costs up to \$600.

Out of Area Job Search Cash Advance - A job search cash advance is limited to 50 percent of estimated costs not to exceed \$300.

***(vii) Relocation Assistance Activity Limitations***

Relocation assistance is designed to enable participants to receive financial assistance toward the cost of relocating themselves and their family to a labor market outside of their normal commuting distance.

Relocation - Relocation assistance is limited to 90 percent of allowable and actual costs not to exceed \$4,000.

Relocation Cash Advance - A cash advance for relocation is limited to 50 percent of the estimated costs for the trip, or \$750, whichever is lower.

***(viii) Individual Training Account (ITA)***

The ITA is established on behalf of an adult, dislocated worker or youth participant when purchasing any occupational training services (tuition and books), from an eligible training provider selected in consultation with the career planner from the State-maintained WIOA Eligible Training Provider list. No monetary limitations on ITAs as staff will ensure that each ITA cost is reasonable and necessary. Career planners will continue to adhere to the WIOA requirement to document coordination of financial assistance with training providers, including Free Application for Federal Student Aid (FAFSA) and scholarships where applicable. The Workforce Development Council will be updating its ETP policy to include further direction on ITAs in PY2020.

***(ix) Needs-Related Payments***

Needs-related payments are payments that are necessary to enable an individual to participate in training services for adults and dislocated workers. However, because of limited WIOA funding, the needs-related payment option has been eliminated.

***(x) Incentives and Bonuses***

A stand-alone youth policy since 7/13/2017

- <https://www.labor.idaho.gov/wioa1/policies/youth-program-incentives.pdf> The Workforce Development Council will be reviewing this policy and updating it in PY2020 if needed.

***(xi) Policy on Self-sufficiency***

An employed adult shall be considered self-sufficient if the family income exceeds 155 percent of the U.S. Department of Labor's Lower Living Standard Income Level (LLSIL) guidelines. A



reemployed dislocated worker shall be considered self-sufficient if he/she is employed in a permanent position that pays at least 90 percent of the qualifying layoff wage.

***(xii) Dislocated Worker Eligibility***

**(aa) Timeline** - Three years will be established as the timeframe from which the layoff, termination or ending of self-employment occurred for dislocated worker eligibility purposes.

**(bb) Unlikely to Return** - Four weeks of unemployed time shall be used to substantiate “unlikely to return” to the previous industry or occupation. The four weeks of unemployed time can be waived if the career planner can verify/document that the registrant is unlikely to return to a previous industry or occupation.

**(cc) Duration Sufficient to Demonstrate Attachment to the Workforce** - Applicants must provide evidence that they have been employed full-time (30 hours or more per week) in the same or similar occupation for at least one year out of the last three years immediately prior to registration, or they must otherwise demonstrate that they have had substantial attachment to the same or similar occupation for at least one year. The term “substantial” is based on calculating the fulltime equivalency of work history. “Fulltime” is defined as 30 hours per week at a minimum, which calculates to 1,560 hours worked per year. This definition of full-time employment is also applicable to Trade Adjustment Assistance (TAA) and Re-Employment Trade Adjustment Assistance (RTAA) programs, which ensures consistency among state administered workforce programs.

**(dd) Substantial Layoff** - The state uses the following definition from the Worker Adjustment and Retraining Notification (WARN) Act of 1988:

Any reduction in force which is not the result of a plant closing and which results in an employment loss at a single site of employment during any 30 day period of: a) at least 500 employees (excluding employees regularly working less than 20 hours per week) or b) at least 50 employees (excluding employees regularly working less than 20 hours per week) and at least 33 percent of the regular full-time workforce (excluding employees regularly working less than 20 hours per week).

**(ee) Terminated/Laid off** - “Terminated/laid-off” refers only to involuntary discharge not for cause, and precludes enrollment of those individuals who were discharged for cause. Individuals may qualify as having been “laid off or terminated” when the cognizant Unemployment Insurance (UI) entity has adjudicated the case and determined that the decision to quit the job was warranted. In those instances where the applicant receives formal notification of monetary ineligibility for UI, the career planner may apply the rationale of “discharge not for cause” using information received from the employer regarding the individual’s separation.

**(ff) General Announcement** - A verifiable form of communication from the employer, authorized representative or designee, informing the public or the employees of the business closure or substantial layoff, which includes a planned closure date for the facility, is required.

**(gg) Self-Employed** - An individual who was self-employed (including but not limited to employment as a farmer, a rancher or a fisherman) or was a contributing family member in a self-employment endeavor, but is unemployed due to business downturn or failure which occurred as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

**(ii) Governor's Group** - Individuals laid off or terminated due to natural disaster or severe economic downturn, as defined and approved by the Governor or his designated representative.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

WIOA Title IB funds reserved for state level activities will be used to support the following:

- Rapid Response activities for dislocated workers;
- Disseminating by various means:
  - The State list of eligible providers of training for adults, dislocated workers and youth, including performance, tuition/fees and attendance cost information;
  - Information identifying eligible providers of work-based training opportunities;
  - Information on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
  - Information of physical/programmatic accessibility for individuals with disabilities;
- Conducting evaluations;
- Providing technical assistance to local areas in carrying out state plan activities, including coordination and alignment of data systems in support of this Act;
- Assisting various entities provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities.
- Assisting local areas for carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;
- Providing technical assistance to local areas that fail to meet performance accountability measure;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system.
- Supporting the state board as it implements workforce activities across the state.

#### Dissemination of Information

The State invests significant funds to meet this statutory requirement, which includes: eligible providers, outreach, service delivery strategies, accessibility and workforce information. The

state's eligible training provider performance reporting system will continue to receive investments to support eligible training providers and comply with increased regulations.

#### Assisting in the Operation of the One Stop System

The State invests a significant amount of state funds to assist in the support and operation of the One Stop system. This also includes staff development and technical assistance. To ensure more local funds are dedicated to service delivery, state funds are used to supplement the local planning process and other administrative and program activities.

#### High-Concentration of Eligible Youth

The State reserved \$30,000 to be used to serve high concentrations of eligible youth needing assistance throughout the state. For PY18 & PY19, the state directed efforts to target enrollment of Hispanic and migrant and seasonal farmworker youth across the state. Funds are distributed based on areas demonstrating a need for additional monies.

#### Fiscal and Program Management

The State invests significant funds to pay for the costs of state administration and program functions such as monitoring, data validation and program assessments. This includes maintaining a fiscal reporting system as well as the annual subscription to America's Job Link for supporting the shared statewide MIS system and assisting with federal reports.

#### Rapid Response Activities

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker/TAA services within the department and other state and local community resources. The department's Rapid Response activities involve and are closely coordinated with the Workforce Services Division, Benefits Bureau, Research and Analysis Bureau, and American Job Center (AJC) locations. The department offers a comprehensive array of services including Title I-B, Wagner-Peyser, unemployment insurance, Trade Adjustment Assistance and veterans' services.

Rapid Response interventions, implemented by the department's Workforce Administration Division and coordinated with the local AJC locations, incorporate all these entities to ensure workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop activities. The department also coordinates with labor organizations in arranging services for dislocations involving organized labor. The East-Central Idaho Planning and Development Association in the eastern Idaho also plays a significant role coordinating that area's local resources to meet the workforce needs of impacted workers. These and other program representatives constitute the state's Rapid Response Team.

Local AJC management staff is responsible for coordinating local workforce investment activities in conjunction with the state's Rapid Response efforts, including making WIOA Title I-B resources available to dislocated workers. The staff assists the state in promoting rapid response, early interventions services, and helps to develop response plans to worker dislocations. AJC staff also assists in coordinating services with local economic development efforts and the appropriate local elected officials. The extensive involvement of both AJC management and frontline staff in each early stage of Rapid Response intervention ensures that affected workers are seamlessly transitioned to One-Stop activities.

Employers covered by the Worker Adjustment and Retraining Notification Act (WARN) must submit a notice of plant closures and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's division administrators and state agencies participating in the One-Stop system. The Workforce Administration Division or local AJC management or staff will promptly initiate onsite contact with the employer and the appropriate employee representatives to implement the most effective re-employment activities including financial management, job search assistance and other workshops as requested. If appropriate, fully automated onsite re-employment centers may also be established and staffed. Career and training services are presented as viable options for the workers.

Promoting early intervention to worker dislocations allows the Rapid Response Team to develop the appropriate service delivery strategy for the impacted workers. The response takes into account the impacted workers' skills through individual assessment, their potential for direct job placement and the availability of resources to address their short and long-term needs. Services include onsite information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers.

Each year, the state sets aside a portion of the Title I Dislocated Worker funds, up to 25 percent, to support Rapid Response activities across the state. The funds are first prioritized for supplementing local WIOA Title I services and will support career and training services for the employees of the company. The second priority for funding is to support services for smaller dislocations where the Dislocated Worker Unit and local AJC staff agree that it is appropriate for the local area to take the lead in organizing the response. Funds are available for local areas lacking resources to meet the demand for services. The balance of Rapid Response funds not required to support the above activities is allocated to local Dislocated Worker providers to supplement their area formula-fund allocations. These funds are allocated based on needs (support for carry-in participants and an increase in dislocations). Funds retained for Rapid Response activities at the state level may be allocated for an array of business services, including layoff aversion and other workforce development services to employers to assist and prevent potential layoffs or closures.

The Rapid Response Team also reviews and evaluates the potential for layoff prevention services. The goal of these efforts is to retain the business and to minimize downsizing. If appropriate, the team will present local economic development programs to identify layoff prevention options. These efforts include determining appropriateness of requesting assistance from the state's Workforce Development Training Fund.

The Idaho Department of Labor has years of experience providing Rapid Response services to the Idaho employer community. Its proven track record is evident by its exemplary performance. Department staff take every opportunity to promote the full range of business services with each employer, independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses the department serves. Companies view these services as positive, proactive and business friendly.

The state's management information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Dislocated Worker, National Dislocated Worker Grants (NDWG) and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

**C. IN ADDITION, DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES**

Idaho is a sparsely populated state covering a large geographic area, including millions of acres of federal land. Most natural disasters occur on federal land and displace few, if any, individuals and businesses. The Bureau of Land Management coordinates responses for those events affecting federal land; its responses include hiring trained fire crews or utility workers.

For the occasion of a natural disaster requiring assistance from FEMA or other entities, the Idaho Office of Emergency Management is responsible to coordinate the responses of Idaho's state agencies. In the incident of an emergency, including natural disasters, the Idaho Office of Emergency Management (IOEM) activates an Idaho Emergency Operations Center (IDEOC). Depending on the level of emergency, various levels of service are provided to the community. At all levels, as appropriate, the Idaho Department of Labor participates in the agency coordination to ensure critical functions are operating and assistance is available to those in need. These functions include Rapid Response and Disaster Unemployment.

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for coordinating Rapid Response services around the state. In the event of an emergency requiring an Idaho Emergency Operations Center, the Idaho Rapid Response Coordinator will ensure that a service delivery team is assembled in the affected area and coordinated with the IDEOC.

Idaho's team for Rapid Response service delivery consists of Idaho Department of Labor staff from the local America Job Centers offering the full-range of one-stop services such as Employment Services, Unemployment Insurance, WIOA Title I-B Dislocated Worker, Trade Adjustment Assistance and Veterans services. The team may also include representatives from organized labor (if organized labor is affected), and East-Central Idaho Planning and Development Association when serving the East Central District (Service Delivery Area/Region 6).

The Rapid Response team is responsible for coordinating the local Rapid Response services and help develop a response plan for worker dislocations. The primary services provided by the Rapid Response team are WIOA Title I-B Dislocated Worker.

Disaster Unemployment is provided to individuals whose employment or self-employment has been lost or interrupted as a direct result of a major disaster. The program is activated in conjunction with a Presidential Declaration for Individual Assistance. After the FEMA declaration, state planners will prepare to submit a request for a National Dislocated Worker Emergency Grant within 15 days. After the initial provision of Rapid Response services under WIOA Title I, the state planners will consult the Rapid Response team for a recommendation to apply for a National Dislocated Worker Emergency Grant.

**D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT).**

DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continuance under WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the Dislocated Worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. The state's model for these services allows it to reach out to both employers and employees with all these programs in mind in its delivery of Rapid Response services across the state.

This state-local team communicates with the employer and employee representatives, determines if Trade related, assesses initial community impact, identifies and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Informational packets, which may include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant, are distributed to the impacted workers at the Rapid Response event. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's Rapid Response delivery system provides the impacted worker with coordinated application and enrollment for WIOA, TAA and Wagner-Peyser services. Career assessments conducted by WIOA staff are accepted for the TAA program, eliminating client redundancies and streamlining co-enrollment processes. Although co-enrollment is not mandated, Rapid Response service delivery planning helps to ensure the majority of TAA recipients in Idaho are likely to be served with WIOA funds. The state does require co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

The state receives petition information via the state TAA coordinator in variety of ways. This information comes to light when trade-affected workers or a union needs assistance submitting a petition, an American Job Center staff member seeks guidance regarding petitions, or when the TAA Coordinator files a petition on behalf of the trade-affected workers. Notification letters providing brief descriptions of the available program benefits are sent out to these individuals with the assistance of employee lists the state received from employers. In addition, a program-benefits pamphlet is posted on the Idaho Department of Labor's TAA website. A link to this website will be included in future notification letters which were described earlier. Recent public service announcements and advertisements targeting trade-affected workers include this link, too. The Idaho Department of Labor's Facebook page and other social media postings also provide information about Trade program benefits.

One-Stop TAA staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests, career objectives, and current work search activities. Information may be gathered informally, via interviews or observations, or formally, via assessment tools such as aptitude tests, computer assisted

programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them “navigate” access to the appropriate One-Stop programs and services, as well as other community services.

## B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

### 1. WORK-BASED TRAINING MODELS

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State’s strategies for how these models ensure high quality training for both the participant and the employer.

On-the-job training (OJT) is training activity conducted by a private or public sector employer. This training occurs while the participant is engaged in productive work, learning the skills and information necessary for full and adequate performance on the job. OJTs are an attractive employer option for obtaining employees trained to their specifications, also helping the employees’ acquisition of transferable skills to help them obtain employment later, should their current situation change. This effort also helps employers become more aware of the multitude of valuable resources offered by the state’s One-Stop Centers. This activity allows businesses to rapidly adapt to changes in technology and the marketplace, making them capable of expanding and remaining competitive with affordable OJT options uniquely designed to achieve their specific developmental goals, especially for small businesses looking to expand. The activity targets all individuals (Dislocated Workers, Adults and Youth) who are eligible for services under WIOA and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who are able to provide occupational skill training and full-time employment that leads to self-sufficiency for the participant. Employers must agree first to hire and then to train eligible WIOA/TAA participants. A training payment is provided to the employer to compensate for the extraordinary costs of training; extraordinary costs are those associated with workplace training and additional supervision. This includes those costs the employer has in training participants who may not yet have the knowledge or skills to obtain the job through an employer’s normal recruitment process.

The state emphasizes and coordinates learning-rich, work-based opportunities such as on-the-job training as a method to:

- Connect employers to the future workforce
- Expose participants, including youth, to quality employment opportunities, real-world experiences and to the skills (both technical and non-) required for success on the job.

In addition, OJTs

- Improve the state’s capacity to market demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals persons, such as the long term unemployed, older workers, and those with limited or sporadic job histories;
- Increase opportunities for the One-Stop system to enhance relationships with businesses;

- Increase percentages of employers hiring and retaining a skilled workforce;
- Increase number and percentages of workers trained and hired;
- Elevate skill proficiencies for workers that will result in increased worker viability;
- Increase responsiveness to labor market issues in the private sector; and
- Increase flexibility at the local level to offer businesses training solutions tailored to respond to the specific needs of the business.

Because of the State's reduced WIOA funding levels, its current policy does not include utilizing customized training, incumbent worker training, nor transitional jobs under WIOA.

## 2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Idaho was one of six states selected by the U.S. Department of Labor to participate in an apprenticeship initiative providing customized technical assistance support from experienced apprenticeship coaches. The State's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to take full advantage of this opportunity to support strategies to integrate apprenticeship as a sustainable solution under WIOA.

### Initial project strategies included:

- Launch a renewed apprenticeship effort concentrating on one high growth occupation/industry; provide a positive model for expansion
- Pursue a local area focus first, then expand and strengthen to a statewide strategy
- Lean on USDOL technical assistance and Office of Apprenticeship for guidance, innovation and successful strategies from other states
- Integrate apprenticeships into Idaho's career pathways and industry sector strategies

Since the initial submission of its WIOA Combined State Plan, the state's apprenticeship effort, identified as *ApprenticeshipIdaho*, has made significant progress increasing apprenticeships across the state. Led by the Idaho Department of Labor, *ApprenticeshipIdaho* major partners include the U.S. Department of Labor's Regional Office of Registered Apprenticeship and the Idaho Career & Technical Education, which administers the Carl D. Perkins programs. Representatives from the Division of Vocational Rehabilitation and the Idaho Department of Health and Welfare representing Temporary Assistance to Needy Families and Supplemental Nutrition Assistance Program are also engaged in this effort to develop apprenticeships and create opportunities for their program participants. The Boise, ID chapter of the International Rescue Committee actively participated in the effort to help refugees use their existing skills to re-enter the workforce through a pre-apprenticeship program that pipelines into several large regional hospitals.

*ApprenticeshipIdaho* has increased the use of registered apprenticeships by 67 percent between 2016 and 2018. Much of this was accomplished by the state as it leveraged multiple resources, including several U.S. Department of Labor grants the state received specifically to expand apprenticeship programs throughout Idaho. This was accomplished by 1) establishing a coordinated team effort to be the point of contact for apprenticeship information and



implementation; and 2) developing a concerted outreach effort to educate, convene and partner with business, education and other partners as needed to help fill workforce gaps.

*ApprenticeshipIdaho* has helped to increase the state's focus on integrated, rather than siloed, business outreach and assistance, ensuring identification and development of career pathways and industry-recognized credentials with each new RA. The state's workforce system prioritized supporting its key industries' growth and technological capabilities by developing a trained workforce throughout the state, and spurred on by facilitated cross training with workforce, education, community and business partners to coordinate communication with specific business sectors. *ApprenticeshipIdaho* partners serve to improve the state's RA capacity, having participated at the local level in groups with other state partner agencies focused on organizing services around business recruitment or generating jobseeker interest leading to enrollment in the work-based learning activity across Idaho workforce programs. Many customers, individual and employers, have benefited from this "tag-teaming" of resources, which continues its success today.

### 3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

The Workforce Innovation and Opportunity Act (WIOA) requires states to approve training providers before funds can be used to pay for occupational training. The Governor (via the Idaho Workforce Development Council) is charged with developing the process for determining how training providers may qualify for inclusion on Idaho's Eligible Training Provider List (ETPL). The Idaho Department of Labor (as the State Administrative Entity under WIOA) is responsible for implementing these procedures and maintaining the ETPL.

Previously, Idaho had requested a waiver from annual Eligible Provider Performance reporting requirements to include non-WIOA participants. The waiver helped to alleviate some of the hardship the State has faced in moving toward compliance in trying to implement the WIOA ETP requirements, like so many other states across the country. However, this year the state feels more confident it has the appropriate systems in place to collect the data necessary data to meet WIOA mandates. If a waiver is needed, the state will request it separately from this State Plan.

#### **Eligible Providers of Training Services -**

Subject to meeting federal and state eligibility criteria, WIOA eligible training providers may include:

- Post-secondary education institutions;
- Other public or private providers of training, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under WIOA title II if such activities are provided in combination with occupational skills training; and
- Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with the Idaho Workforce Development Council.

U.S. Department of Labor Registered Apprenticeship programs are automatically eligible training providers under WIOA without regard to federal or state eligibility criteria. The Idaho

Department of Labor reaches out to RA programs on an annual basis to determine if the programs would like to opt in to participate in the program. If an RA program opts for inclusion, they may complete the program information in IdahoWorks and are then automatically approved without applying any other eligibility criteria described below.

### **Eligible Programs of Training Services**

The Eligible Training Provider List is composed of eligible training programs. Both training providers and their individual programs must meet eligibility standards. A program of training services is defined as one or more courses or classes, or a structured regimen that directly leads to employment in an in- demand occupation. The training must lead to:

- a recognized postsecondary credential,
- a secondary school diploma or its equivalent, or
- a distinct measurable skill gain toward such a credential or employment.

These training services may be delivered in person, on-line, or in a blended approach; however, the training provider must provide physical facilities and/or tools to provide a high-quality experience in meeting instructional and skills assessment needs.

### **Training Service Exceptions to Eligible Training Provider List**

Training services that are not subject to the requirements of the eligible training provider provisions are:

- On-the-job training; customized training; incumbent worker training; transitional employment; or
- The circumstances described at WIOA sec. 134(c)(3)(G)(ii), where the Workforce Development Council determines that:
  - There are insufficient providers, or
  - There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or
  - It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice.

*Note: The Eligible Training Provider List is used only to provide occupational skills training services. Basic skills training, "soft" skills training, or other workforce preparation activities do not train individuals for a particular occupation. Additionally, the following are not considered occupational skills training:*

- *Workshops or seminars provided by organizations not registered with the Idaho State Board of per year are not considered occupational skills training*
- *Intensive review courses as instruction for test preparation*
- *Continuing education courses for those with existing occupational skills*
- *Short-term certificates that are only one component of the typical requirements for a job such as CPR, OSHA, WorkKeys, Food Handler Certificates, and basic computer training.*

As part of a WIOA participant's individualized employment plan, career planners may pay for these activities as career services separate from or in addition to occupational skills training.

### **Types of Eligibility**

WIOA provides for *Initial Eligibility* and *Continued Eligibility*. Initial eligibility is for new programs who upon approval receive eligibility for one year. Continued Eligibility is for a biennial (every other year) review and renewal of programs having completed initial eligibility.

*Note: The criteria provided below for both initial and continued eligibility are still considered alternate criteria in Idaho. The state is currently collecting data that will allow the transition to be finalized as the state anticipates setting thresholds for factors related to WIOA performance indicators.*

### **Alternate Criteria for WIOA Eligible Training Providers Initial Eligibility**

#### **Institution Criteria:**

- Provide a certificate of registration or letter of exemption from the Office of the State Board of Education or other oversight body such as the Bureau of Occupational Licensing authorizing the entity to provide training and collect tuition in the State of Idaho.
- Provide the required institution specific data elements in IdahoWorks as directed by the Idaho Department of Labor.  
*Note - These data elements include all of the required criteria listed in Attachment III of TEGL 8-19. See examples of screenshots below.*
- Successfully complete Equal Opportunity desk review survey located here: <https://www.labor.idaho.gov/WIOA/WIOA-EO-Desk-Survey.pdf>
- Sign agreement to securely collect and report required information for programs.

#### **Program Criteria:**

- Program of training leads to a high-growth/high-demand occupation listed in Appendix A. WIOA participants will be encouraged to select training for an occupation that pays at least \$12 per hour.  
*Note: Appendix A is updated annually in July by the Workforce Development Policy Committee of the Idaho Workforce Development Council.*
- Program of training provides a high-quality experience\*, including leading to a recognized postsecondary credential or demonstrate a measurable skills gain toward such a credential or employment.

*Note: WIOA participants will be encouraged to select high quality training that leads to an industry- recognized postsecondary credential and is available free of charge or at low cost to participants.*

\*High quality training experience may be identified by:

- Physical facilities and/or tools appropriate to meet instructional and skills assessment needs;
- Reportable skills gain measured by assessments;
- Industry endorsement;
- Not having a high dropout rate and/or high student loan default rate and/or poor job placement rate; and

-Preferably has regional or national accreditation.

- Provide the required program specific data elements in IdahoWorks as directed by the Idaho Department of Labor.

*Note - These data elements include all of the required criteria listed in Attachment III of TEGl 8-19. See examples of screenshots below.*

- Providing a Program Synopsis, which is a brief description of the training program no more than 5,000 characters.
- Information regarding WIOA performance indicators. (See screenshot from guidance manual for providers below); and

Program Performance	
Begin Date	Enter the program begin date or
End Date	Enter the program end date in mm / dd/ yyyy format
Number Participated	Number of students participated/enrolled in the program
Number Completed	Enter number of students who completed the program.
Completed Percent	Display
Number Employed After Leaving the Program	(Text) Example: Idaho Office of the State Board of Education.
Employed Percent	Display
Median Hourly Wage at Placement	(Text) Example: Idaho Bureau of Occupational Licenses for Barber and Cosmetology Services Licensing Board.

- Information regarding the provider's relationship with businesses. (Screenshot from guidance manual for providers).

✓ Are you in any partnership(s) with business?	(Drop-down) Select Yes or No.
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## Exceptions

- U.S. Department of Labor Registered Apprenticeship (RA) Programs - Upon request from the RA program sponsor, programs are automatically placed on the Eligible Training Provider list. RA programs are encouraged to comply with the ETP procedural requirements, especially providing information for performance reporting; however, they are not required to do so.
- Public Postsecondary Academic Programs - Academic programs provided by Idaho's public colleges and universities will be approved for initial eligibility under WIOA. These programs will be added to the ETP list upon request of a WIOA career planner and confirmed by the Idaho State Board of Education.

*Note - These programs are subject to the State Board of Education's requirements which meet initial eligibility requirements when aligned to an in-demand occupation. If their information is not already in IdahoWorks, the career planner and/or administrative entity representative works with them to ensure all the required information is entered before issuing a voucher.*

- Out-of-State Providers – Out-of-state providers must be on their respective state's WIOA eligible training provider list. A reciprocal agreement must be signed with the respective state's ETP administrator or appropriate signatory.

Initial eligibility will expire 1 year from date of approval.

## Continued Eligibility

A training provider may have their eligibility continued by meeting the following:

- Provide evidence that the Institution Criteria described in the Initial Eligibility section above continue to be met.
- Provider has submitted the required WIOA performance data (*See screenshot above*) and cost information in a timely manner, in accordance with the annual deadlines set by the Idaho Department of Labor.

*Note – This includes updating their program information in IdahoWorks in addition to submitting performance data as outlined in the data sharing agreement.*

Examples include:

-Addressing access to training services throughout Idaho, and

✓Training Services Delivered By: (check all that apply)	(Checkboxes) Check all that apply: <ul style="list-style-type: none"><li>• Online with a browser</li><li>• Directly on a computer</li><li>• Onsite at our location</li></ul>
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-The ability to provide physically and programmatically accessible trainings as noted in the screenshot below.

✓Do you provide access to training for individuals who are employed?	(Drop-down) Select Yes or No.
✓Do you provide access to training for individuals with barriers to employment?	(Drop-down) Select Yes or No.

- The occupation(s) the provider's training program(s) are aligned to continue to be included on the list provided in Appendix A, which is updated annually.

Programs that were exempt from Initial Eligibility criteria:

- US Department of Labor Registered Apprenticeship (RA) programs are not subject to Continued Eligibility and will continue to remain on the Eligible Training Provider list until the sponsor requests to be removed. RA programs are encouraged to comply with the state's ETP requirements, especially providing information for performance reporting; however, they are not required to do so.
- Public Postsecondary Academic Programs will be removed from the Eligible Training Provider list if a WIOA participant has not been enrolled in the training in the past 12 months. These programs can be added back to the list per the Initial Eligibility criteria above on an as-needed basis.
- Out-of-State Providers will be independently verified against the respective state's ETP list.

## Denial or Termination of Eligible Training Provider State

*Note –*

*The reasons listed below are what the state considers to be a substantial violation of the policy.*

A training provider or program may be denied initial or continued eligibility for the following reasons:

1. Required information was not provided correctly or in a timely manner.
2. The training program does not support the occupations in demand in Idaho and/or does not meet minimum entry-level wage criteria.
3. The training program does not meet the WIOA definition of training services, which is a program of one or more courses or classes or a structured regimen that directly leads to employment in an in-demand occupation. The training must lead to:
  - a. a recognized postsecondary credential,
  - b. a secondary school diploma or its equivalent, or
  - c. a distinct measurable skill gain toward such a credential or employment.
4. The training program does not provide a high-quality educational experience in meeting instructional and assessment needs. (Could be evidenced by lack of regional or national accreditation, lack of industry endorsement, lack of skills gain measured by assessments, lack of job placement, a high dropout rate and/or high student loan default rate)
5. The training provider has not maintained required licenses and certifications or is found to be noncompliant with the training provider's assurances or certifications.
6. The training provider does not comply with the WIOA regulations, or any agreement executed under the WIOA.

Providers who apply will be notified if the provider does not meet the compliance standards. Each provider will be notified of the status of each requested program.

### **Formal Hearing-Appeal**

A training provider whose program is denied from the ETP or is deemed ineligible, has the option to submit a written or email appeal to Idaho Department of Labor within 14 business days after receiving notification. The request for appeal must include the following: name of training provider, training program(s) impacted, the reason for the appeal (i.e. grounds), training provider point of contact phone and email, and signature of training provider representative.

#### **Written appeals can be mailed to:**

Appeals Bureau, Idaho Department of Labor, 317 W. Main Street, Boise, ID 83705-0720

**Or Faxed to:** 208-334-6440

**Appeals can also be emailed to:** [WIOAETP@labor.idaho.gov](mailto:WIOAETP@labor.idaho.gov)

**Regardless of delivery method, the appeal must be postmarked or sent by 5 p.m. on the last day to protest.**

As a result of filing an appeal, a telephone hearing may be scheduled in which all interested parties will be invited to participate. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding entity. This will be your only opportunity to appeal this issue. If no appeal is filed, this determination will become final and cannot be changed. If you have questions about this determination or about filing an appeal, please contact the ETP Program Specialist by email at [WIOAETP@labor.idaho.gov](mailto:WIOAETP@labor.idaho.gov).

The presiding entity will issue a decision within 60 calendar days from the date the hearing takes place. The decision of the presiding entity shall be final.

## APPENDIX A

### Idaho Occupations in Demand

*Appendix A is updated annually by the Workforce Development Policy Committee in July.*

### Methodology

The Idaho Department of Labor's labor market information unit has developed a dynamic web tool that ranks Idaho's occupations in demand. The methodology uses quantifiable information to comprise the list and is augmented with projected growth and total annual openings, entry-level wage information and education and training requirements. The list can be filtered by sub-region of the state, typical education requirement and STEM and/or industry designation.

This list may be found online at: <https://lmi.idaho.gov/Occupations-In-Demand>

To be included on the Eligible Training Provider List, programs of training must lead to one or more of the occupations when the following filters have been applied:

1. The tab must be set to "In-Demand Occupations".
2. The "Top N Hot Jobs" must be set to 150.
3. The "Area Selection" should be set to region where the training is being provided.
4. The "Typical Education Requirement" should be set such that Bachelor's degree, Doctoral or professional degree and Master's degree are not selected.
5. The "Median Hourly" wage must be greater than \$10 per hour.

**1** In-Demand Occupations | Hot Jobs | All Occupations

**2** Top N Hot Jobs: 100

**3** Area Selection: ☒ Idaho, ☐ Northern, ☐ North Central, ☐ Southwestern, ☐ South Central, ☐ Southeastern, ☐ Eastern

**4** Typical Education Requirement: ☒ (All), ☒ None, ☒ Associate's degree, ☒ Bachelor's degree, ☒ Doctoral or professional degree, ☒ High school diploma or equivalent, ☒ Master's degree, ☒ No formal educational credential, ☒ Postsecondary nondegree, ☒ Some college, no degree

Hot Job Rank	Typical Education Requirement	SOC Code	Title	Hourly Median Wage	Annual Median Wage	Projected Growth Rate	Projected Growth	Annual Exits	Annual Transfers	Annual Change	Total Annual Openings
1	Bachelor's degree	29-1141	Registered Nurses	\$29.95	\$62,190	30.2%	3,965	433	208	208	1,147
2	Bachelor's degree	15-1132	Software Developers, Applicat.	\$38.15	\$79,369	30.2%	612	32	115	61	268
3	Master's degree	29-1171	Nurse Practitioners	\$45.19	\$96,093	35.1%	251	15	22	23	80
4	Master's degree	29-1171	Physician Assistants	\$45.22	\$94,958	32.8%	262	12	25	20	57
5	Bachelor's degree	15-1122	Information Security Analysts	\$41.95	\$87,269	30.3%	156	11	29	16	56
6	High school diploma or equivalent	49-9041	Industrial Machinery Mechanics	\$24.58	\$51,129	23.2%	591	90	137	55	252
7	Bachelor's degree	13-1161	Market Research Analysts and	\$24.23	\$50,400	27.7%	206	42	110	39	121
8	Doctoral or professional degree	29-1051	Pharmacists	\$56.95	\$118,259	16.7%	261	36	33	26	66
9	Doctoral or professional degree	29-1123	Physical Therapists	\$36.75	\$76,439	26.3%	253	19	21	23	63
10	Bachelor's degree	15-2072	Loan Officers	\$26.53	\$55,398	20.3%	563	74	178	56	304
11	Associate's degree	29-1126	Respiratory Therapists	\$26.48	\$55,078	21.2%	306	18	17	31	66
12	Master's degree	21-1022	Healthcare Social Workers	\$26.69	\$55,369	25.4%	152	24	43	15	82
13	Bachelor's degree	17-2112	Industrial Engineers	\$43.41	\$90,290	15.4%	171	21	49	17	83
14	Master's degree	29-1122	Occupational Therapists	\$35.71	\$74,289	25.4%	106	10	13	11	34

The following "career pathway" programs are approved statewide regardless of where they appear on the regional lists:

- Certified Nurse Assistant
- Related training for Electrical, Plumbing and HVAC apprenticeship programs

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 Idaho policy for adult program eligibility and priority is located here: <https://www.labor.idaho.gov/wioa1/policies/Adult-Eligibility-Priority.pdf>. The excerpt for adult priority of service for individualized career and training services follows:**

**Priority Groups**

1. Veterans and eligible spouses receive priority service for all Department of Labor-funded training programs, including WIOA programs.
2. Individuals receiving public assistance, other low-income adults, and individuals who are basic skills deficient have statutory priority service for individualized career and training services under the Adult program.

**Order for Priority of Service for Individualized Career Services and Training Services**

1. Veterans and eligible spouses who are recipients of public assistance, low income or basic skills deficient.
2. Other individuals who are recipients of public assistance, low income or basic skills deficient.
3. Veterans and eligible spouses who are not recipients of public assistance, low income or basic skills deficient.
4. Other individuals who are not recipients of public assistance, low income or basic skills deficient, but have a potential barrier to employment as defined by WIOA:
  - Displaced Homemakers
  - English Language Learners, Low Levels of Literacy, Cultural Barriers
  - Exhausting TANF within 2 years
  - Ex-offenders
  - Homeless individuals/runaway youth
  - Long-term unemployed
  - Migrant and Seasonal Farmworkers
  - Persons with Disabilities (including youth)
  - Single Parents (Including single pregnant women)
  - Youth in foster care or aged out of system
  - Individuals within an under-represented demographic, such as sex, race, or ethnicity;
5. Other individuals within these recognized groups:
  - Individuals within an under-represented demographic, such as sex, race, or ethnicity.



- Individuals referred by other one-stop partner programs.
- Individuals residing in rural counties.

6. Any other eligible individual determined to be appropriate for services or training to obtain or retain employment.

#### **Low Income Eligibility:**

Idaho uses 70% Lower Level Standard Income Level to determine eligibility for low-income WIOA participants under WIOA §(3)(35)(ii).

#### **Monitoring Adult Program Priority**

The administrative entity collects quarterly continuous improvement reports (CIR) on WIOA Title IB enrollments. The following table from the CIR report serves as a proxy for adult program priority.

#### **Adult Program**

ALL FIELDS ARE CUMULATIVE FOR CURRENT PY	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
<i>1. TOTAL PARTICIPANTS</i>				
<i>1.a. # Low income</i>				
<i>1.b. # Low Levels of Literacy (Basic skills deficient)</i>				
<i>2. TOTAL PARTICIPANTS IN TRAINING</i>				
<i>2. a. # In work-based training</i>				
<i>2. b # attain credential</i>				
<i>3. TOTAL COMPLETED ALL SERVICES</i>				
<i>3. a. EMPLOYED AT EXIT</i>				

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

The state's Local Board Funding Distribution Policy for WIOA Title IB Formula Funds, and Recapture and Reallocation Policy contains the criteria for transfer of funds –

*Local workforce areas, with the approval of the Governor, may transfer up to 100 percent of the Adult Activities funds for expenditure on Dislocated Worker Activities, and up to 100 percent of Dislocated Worker Activities funds for expenditure on Adult Activities.*

in more detail, along with other funding policies and procedures. It may be found on the state Workforce Development Council's website at - <https://wdc.idaho.gov/workforce-innovation-opportunity-act/>, *Distribution of WIOA Title IB Formula Funds, Recapture and Reallocation.*

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

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]

[11] Sec. 102(b)(2)(D)(i)(V)

As allowed in WIOA §681.400, the Idaho Department of Labor, as the state's grant recipient/fiscal agent, has exercised its option to provide youth workforce investment activities. All intake, assessment, completion of individual service strategies, case management and follow-up services are provided within the One-Stop offices by Idaho Department of Labor staff.

### ***Outcomes***

Compliance with federal performance guidelines, which provide specific levels of performance for WIOA program outcomes, is critical. Performance indicators may be added or revised to meet federal and state requirements.

- a. Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the project.
- b. Percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the project.
- c. Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.
- d. Percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.
- e. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment.
- d. Effectiveness in serving employers.

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.

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Despite the economy's progress, young people, as a broad group, still appear at a disadvantage in terms of finding employment. This disadvantage is compounded when applied to persons with additional barriers to employment such as being an out-of-school youth.

Since PY2016, the state's Title I Youth program has directed 100% of program funds towards out-of-school youth. Program staff across the state have exclusively targeted their outreach efforts to this population since then, boosted by the Workforce Development Council's directive to focus PY2016 Youth in Need funds be specifically applied towards outreach efforts to out-of-

school youth with barriers to employment so these youth understand what services are available to them. This has since been followed up by targeting Youth in Need funds towards Hispanic and MSFW youth across the state, improving youth program enrollment by 100% in PY2019 over PY2018.

A workforce goal identified by the Idaho Workforce Development Council (Section 11(b)(2)(A)) is “Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.” Beneath this goal are several strategies specifically designed to target the improvement of out-of-school youth outcomes, including:

- A) Create, align, and sustain partnerships with stakeholders to implement workforce development programs.
- B) Support development in work-based learning, and innovative programs to drive Idaho’s present and future workforce solutions.
- C) Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.
- D) Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

Out-of-school and disconnected youth specifically benefit from expanded alternative learning modalities and training opportunities developed within Idaho’s education and workforce systems. These may include work-based learning, apprenticeships, distance education, and compressed scheduling. The state’s Title II programs connect participants, including those age 16-24, to career pathways through contextualized education in reading, writing, math and the English language, as well as integrated education and training, and transition into training by utilizing the previously noted modalities. This strategy will improve outcomes for out-of-school youth who may not benefit from or have access to traditional modes of education.

The State workforce partners are enacting more focused efforts around specific youth with barriers, including out-of-school youth, youth with disabilities, and low-skilled youth. The Workforce Development Council has identified the following groups with barriers to employment to receive priority service under the WIOA Title I Youth program for out-of-school youth:

- low-income youth involved with the juvenile justice system;
- low-income youth exiting foster care;
- low-income youth that are pregnant and/or parenting; and
- low-income youth with disabilities.

The Council’s prioritization of out-of-school youth with disabilities for the WIOA Title I youth program serves as a counterpart to Title IV’s requirement to emphasize pre-employment transition services to (in-school) students with disabilities. The alignment of WIOA core programs to maximize service through limited resources continues to improve outcomes for both in-school and out-of-school youth with disabilities throughout the state.

Additionally, the Workforce Development Council has continued with its implementation of an incentives policy to encourage youth achievement. The policy follows below:.

### **WIOA Youth Program Incentives**

**Purpose:** Revise Youth Program Incentives to comply with WIOA.

WIOA allows incentive payments to be made to youth participants, provided the incentives are:

- (a) Tied to the goals of the specific program;
- (b) Outlined in writing before the commencement of the program that may provide incentive payments;
- (c) Aligned with the local program's organizational policies; and
- (d) Issued in accordance with the requirements contained in 2 CFR part 200.

WIOA-funded youth incentives must be connected to recognition of achievement of milestones in the program tied to work experience, education or training provided it be made a part of the participant's individualized assessment and service strategy. The Workforce Development Council and its statewide Youth Committee have reviewed these requirements and established the following incentive policy and accompanying incentive options for implementation beginning PY17. It should be noted that WIOA funds may not be used for incentives for recruitment and eligibility documentation.

This policy and incentive options align with the Workforce Development Council's directive to focus 100 percent of WIOA Youth funding on Out-of-School Youth, as well as WIOA's Youth program outcomes - remediation of basic skills, attainment of HS/GED, gaining industry-recognized skills and credentials that will lead to in-demand, self-sustaining employment.

**Limitations on Incentives:**

WIOA regulations allow provision of incentives to youth during enrollment in the WIOA Youth program or during the youth's 12-month follow-up time period after completion of the program. Achievements completed prior to WIOA enrollment do not qualify for incentives. WIOA youth program incentives are not intended for use as emergency assistance, but rather as a tool to encourage ongoing participation and attainment of specific program goals. WIOA Youth in need of emergency assistance must be connected to an appropriate service provider.

**Policy:**

1) Requirements for Youth:

- a) Active in WIOA Youth program *or* follow up activity;
- b) In collaboration with a career planner, has developed an Individual Service Strategy (ISS) delineating training and employment goals.

2) Incentive Documentation:

- a) Description of achievement to qualify for specified incentive award is documented in case file and *IdahoWorks* management information system as part of the Individual's Service Strategy (ISS) and WIOA career planner intervention in accomplishing the established goals leading to the incentive;
- b) Supporting documentation of attainment prior to issuance of incentive award (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) retained in case file.

### 3) Incentive Options:

a) *Credential Attainment* – Attainment of a recognized postsecondary credential or secondary school diploma during WIOA Youth program participation or during the 12-month follow-up period;

b) *Measurable Skill Gain* – Attainment of a WIOA Youth skill gain as defined by USDOL for program reporting:

i) Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level - Test Benchmarks Educational Functioning Levels

ii) Attainment of secondary school diploma or equivalent;

iii) Secondary or postsecondary transcript for sufficient number of credit hour:

(1) **Secondary**: transcript or report card for 1 semester,  
or

(2) **Postsecondary**: at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters

iv) Satisfactory progress report toward established skill-based milestone from an employer or training provider;

v) Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks.

c) *Employment and Retention* – Attainment of fulltime employment in the youth's selected occupation/industry as reflected in the ISS; 9-month retention with the same occupation/employer.

4) WIOA Youth program participants may only participate in one incentive option during a program year.

5) Incentives during follow-up may only assist with completion towards predetermined program goals.

### **Idaho WIOA Youth Incentive Options**

**A.** A progressive, job retention incentive for youth who have successfully completed all their WIOA Youth program services and attained full-time, unsubsidized employment in the individual's selected career/industry as planned in the WIOA ISS. Verification of employment and retention by the career planner are required for reimbursement.

a) \$100 for obtaining employment.

b) \$200 for retaining the same position/employer for 9 months.

**B.** A \$150 skill attainment incentive that allows a youth in a work-based activity (OJT, Internship or Work Experience) who can demonstrably show a measureable skill gain verified

by the employer/worksites, based upon a positive employer evaluation that enumerates the skill obtained. The evaluations are incorporated as part of the overall process to show the participant's progress, either at the mid-point of the work-based activity or at the end of the activity, based upon the participant's goal as established in each activity's Memorandum of Agreement with the worksite/ employer.

**C.** \$100 incentive for each GED section (a total of four) passed during participation in the WIOA Youth Program or during the 12-month follow-up period. Career planners will be allowed the flexibility to provide the GED incentive individually as each test is passed, or cumulatively once the GED is obtained; OR

\$100 Incentive for secondary or postsecondary transcript for sufficient number of credit hours.

a) Secondary: transcript or report card for 1 semester,  
or

b) Postsecondary: at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters

**D.** \$250 incentive for each area - literacy and numeracy - in which a basic skills deficient participant demonstrates an increase of one or more educational functioning levels based on pre- and post-test scores, utilizing any of the assessments recognized by the National Reporting System for Adult Education programs, including the TABE (Test of Adult Basic Education), Casas, etc. The same assessment instrument must be used for pre- and post-tests - Test Benchmarks Educational Functioning Levels

**E.** \$400 incentive for successful passage of an exam required for employment in a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams that lead to a credential. These may include items such as a welding test or passage of the NNAAP (National Nurse Aide Assessment Program). Exams for general skills, such as a typing test, do not qualify for the incentive.

**F.** \$400 incentive for obtaining a recognized postsecondary credential, OR a secondary school diploma or its recognized equivalent. The post-secondary credential must reflect attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation based on standards developed or endorsed by employers or industry associations. Certificates must recognize skills specific to the industry/occupation rather than general skills related to safety, hygiene, etc., which excludes credentials such as CPR, OSHA Health and Safety, flagging certification and other similar certifications. Listed below are examples of credentials eligible for this incentive:

- a. Secondary School diploma or recognized equivalent
- b. Associate's degree
- c. Bachelor's degree
- d. Occupational licensure
- e. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- f. Occupational certification

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials. Please note that not all credentials awarded by these entities meet the definition of recognized postsecondary credential.

- A State educational agency or a State agency responsible for administering vocational and technical education within a State;
- An institution of higher education described in Section 102 of the Higher Education Act of 1965 (20 USC sec. 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- ETA's Office of Apprenticeship or a recognized State Apprenticeship Agency;
- A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons; or
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

**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]**

[12] Sec. 102(b)(2)(D)(i)(I)

The Idaho Department of Labor has been designated as the state's comprehensive WIOA Youth program service provider as allowed under the provisions of the Workforce Innovation and Opportunity Act's Final Rule at 681.400. This section clarified that the competitive procurement provision discussed in the Act (Sec. 123) is only applicable if the local board (please note, Idaho's Workforce Development Council functions as both a state and local board) chooses to award grants or contracts to youth program element service providers other than the grant recipient/fiscal agent.

As the grant recipient, the Idaho Department of Labor is not only eligible to provide service elements under this provision, but also eligible to provide the design framework component of

the youth program. The design framework includes intake, assessment, development of an individual's service plan and overall case management - these will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be *coordinated* with other providers in the communities, rather than purchased with WIOA funds.

As the comprehensive youth program provider, the Idaho Department of Labor Workforce Division staff provide both the design framework and element services. Its career planners provide access and/or referral to any of the elements most appropriate for the eligible youth. The Idaho Department of Labor service providers require a program design that includes the 14 required youth elements with an emphasis on the following:

- activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- preparation for postsecondary educational and training opportunities;
- strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials; and
- preparation for unsubsidized employment opportunities; and
- effective connections to employers, in in-demand industry sectors and occupations of the local and regional labor markets.

To ensure the framework services are effectively implemented, the Idaho Department of Labor has established expectations for objective assessments, individual service strategy and other career planning and follow-up services for youth.

To ensure that youth receive the elements found to be commonly available in local service areas, the providers have developed linkages with the public, private and non-profit service providers of these elements. These linkages include arrangements that ensure a regular exchange of information relating to the progress, problems and needs of participants.

Performance of these service providers are monitored regularly to ensure program integrity. Providers also submit a quarterly continuous improvement report on progress toward the achievement of goals, objectives, expenditure rates, service levels, and other process and outcome measures.

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.



Because the WIOA youth program will not enroll in-school youth, no criteria have been developed for in-school youth “requiring additional assistance to complete an education program, or to secure and hold employment” specified in WIOA section 129(a)(1)(C)(iv)(VII).

The state Workforce Development Council approved the following criteria for out-of-school youth requiring additional assistance, which was initially recommended by the state’s Youth Subcommittee.

The WIOA Definition for Youth Needing Additional Assistance (Out-of-school Youth):

Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment:

- A) Has been treated by a professional for mental health issues including traumatic events, depression, or substance abuse related problems. OR
- B) Has been or is a victim of abuse, or resides in an abusive environment as documented by a licensed professional; OR
- C) Has been unemployed for at least three of the last six months (not necessarily consecutive); OR
- D) Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed); OR
- E) Limited English speaking or cultural displacement. i.e., refugees.

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.

**IDAHO CODE 33-202. SCHOOL ATTENDANCE COMPULSORY**

The parent or guardian of any child resident in this state who has attained the age of seven (7) years at the time of the commencement of school in his district, but not the age of sixteen (16) years, shall cause the child to be instructed in subjects commonly and usually taught in the public schools of the state of Idaho. Unless the child is otherwise comparably instructed, the parent or guardian shall cause the child to attend a public, private or parochial school during a period in each year equal to that in which the public schools are in session; there to conform to the attendance policies and regulations established by the board of trustees, or other governing body, operating the school attended.

Other Idaho codes relating to school attendance:

Idaho Code 33-201. School Age.

Idaho Code 33-203. Dual Enrollment.

Idaho Code 33-206. Habitual truant defined.

Idaho Code 33-207. Proceedings Against Parents or Guardians.

Idaho Code 20-510. Information -- Investigation -- Petition.

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.

Idaho has incorporated the statutory definition from WIOA Section 3(5)(A) - "who is a youth, that the individual has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test."

#### D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

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).)

1. Idaho's WIOA Combined State Plan was available for public comment from March 2, 2020 through March 23, 2020 on the state's Workforce Development Council's website. No public comments were received.

2. Not applicable. The Idaho Department of Labor is the entity responsible for the disbursement of grant funds.

3. Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be coordinated with other providers in the communities, rather than purchased with WIOA funds. In addition, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where the grant recipient/fiscal agent provides these services. The design framework includes intake, assessment, development of an individual's service plan and overall case management. These will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

The remaining youth elements - paid/unpaid work experiences, leadership skills, supportive services, and adult mentoring - are also provided through the Idaho Department of Labor, since it has exercised its option to provide youth workforce investment activities as the grant recipient, as noted in the response to item (C)(1) earlier in this narrative.

Youth with disabilities are a priority group for the WIOA Title I Youth program. The state has made significant efforts to ensure that services to youth with disabilities are provided in the same capacity as those without disabilities and the needs of this population are properly addressed. Many of the WIOA Youth program staff were trained under a DEI grant for service provision to the targeted youth. Most WIOA partner staff providing services to employers develop key relationships with businesses to provide opportunities for work-based activities for youth with disabilities. Strong partnerships with the Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired and Idaho Educational Services for the Deaf and the Blind are utilized to develop and undertake activities as diverse as Ropes courses for teamwork and leadership development to week-long work readiness camps that help these youth achieve success by building their confidence, self-esteem and job seeking skills.

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

The State developed guidelines for developing infrastructure and resource sharing agreements. The entire policy is located here: <https://labor.idaho.gov/wioa1/policies/Infrastructure-Funding-Agreement-Guidance.pdf>. An excerpt relating to the roles of the one-stop partners is below.

#### **Workforce Development Council/Governor's Guidance for WIOA One-Stop Infrastructure Funding Agreements**

The guidance provided here is supplemental to the Idaho American Job Center Network MOU and the Service Delivery Area MOU templates approved by the One-Stop Committee. The Infrastructure Funding Agreement resulting from this guidance will be an addendum to the Service Delivery Area MOUs for SDAs 2 and 6. This guidance may be used by any of the other Service Delivery Areas at a later time.

#### **A) State Administered One-Stop Program Guidelines**

The following are instructions from the State-administered one-stop partners for assigning the roles for identifying infrastructure costs and contributions to the one-stop infrastructure funding agreement in the local areas.

#### **Idaho Career-Technical Education**

Perkins Postsecondary Programs– ICTE delegates authority for local negotiations to the technical college representatives.

Adult Education and Family Literacy Act - Adult Education Programs – ICTE delegates authority to technical college leadership staff person (dean or VP) with authority over Adult Education program. This person will work with the head of Adult Education program as part of the negotiation process.

#### **Idaho Commission on Aging**

Senior Community Service Employment Program – The State-administered SCSEP program delegates authority to their service provider Easterseals-Goodwill. Admir Selimovic will negotiate on behalf of this grant.

#### **Idaho Division of Vocational Rehabilitation**

WIOA Title IV Vocational Rehabilitation – The Division retains state authority for all infrastructure funding negotiations.

## **Idaho Department of Health and Welfare**

Temporary Assistance for Needy Families – The Department retains state authority for all infrastructure negotiations for TANF and any other IDHW-administered program (e.g., Supplemental Nutrition Assistance Program).

Work-related Employment and Training Programs – The Department delegates all negotiation authority to their service provider Maximus, as consistent with the IDHW contract.

**Idaho Department of Labor** - The Department delegates all negotiation authority for the following programs to its area managers.

WIOA Title IB Employment and Training Programs

WIOA Title III – Wagner-Peyser/Employment Services

TAA – Trade Adjustment Assistance

Jobs for Veterans Grants

Unemployment Insurance – The Deputy Director/Unemployment Insurance Division Administrator will negotiate on behalf of this program.

## **Idaho Commission for the Blind and Visually Impaired**

WIOA Title IV VR– The Commission retains all authority for infrastructure funding negotiations.

## **Community Council of Idaho**

National Farmworkers Jobs Program - CCI retains authority for infrastructure funding negotiations across the state.

## **B) Cost Allocation Approach Guidelines**

There are two statutory methods of infrastructure cost funding: the Local and State Funding Mechanisms. Local areas must first attempt the Local Funding Mechanism process before appealing to the State Funding Mechanism.

This section describes the Local Funding Mechanism process, including instructions for developing the one-stop operating budget and a recommended cost allocation methodology.

### ***Local Funding Mechanism Process***

Following WIOA guidance in TEGL 17-16, RSA-TAC-17-03, and OCTE Program Memo 17-03 that spells out the steps for determining shared funding for infrastructure, the one-stop partners are to begin negotiating infrastructure costs under the “Local Funding Mechanism” as follows:

1. Determine local one-stop operating budget by including the following:
  - a) Infrastructure
  - b) Additional costs (career and shared services)
2. Develop a fair cost allocation methodology based on the relative use and benefit of each one-stop partner;
3. Determine the partners’ proportionate share of the infrastructure costs and required services costs. The proportionate share is the starting point for the negotiations.
4. Negotiate partners’ contributions
  - a) Partners can contribute any amount they wish to negotiate as allowed by the program

b) Partners may contribute (as allowed by program grant)

i) Cash

ii) Non-Cash

iii) Third party in-kind

### ***Developing the One-Stop Operating Budget***

#### **Infrastructure**

Infrastructure costs are defined in WIOA Joint Rules (20 CFR 678.700, 34 CFR 361.700, and 34 CFR 463.700) as the non-personnel costs necessary for the general operation of the one-stop center. These are building-related costs only. Local areas are instructed to only identify infrastructure costs for the comprehensive one-stop center in the local area.

#### ***Infrastructure categories***

- Rent
- Property Insurance
- Utilities
- Access Technology (phone, internet)
- Equipment
- Supplies
- Maintenance
- Janitorial contracts
- Security contracts
- Common Identifier (Updating building with American Job Center signage)

#### **Additional Costs (System Delivery Costs)**

System delivery costs are the additional costs required to operate the one-stop delivery system. These additional costs must include career services, and may include other common non-infrastructure costs and shared services costs. These costs should include services provided by all partners within the service delivery area, as well as the costs for the services provided in the comprehensive one-stop center.

Career services are defined in WIOA Joint Rule (20 CFR 678.430, 34 CFR 361.430, and 34 CFR 463.430). Some partner programs provide more career services and expend greater costs for those services than others. For the purpose of developing the operating budget, the costs of career services are attributed to each program providing the career services. Each partner should provide the costs of the staff and other program expenses directly associated with providing career services.

The local partners may determine common non-infrastructure costs. These may include costs for common printed materials in the one-stop center or for one-stop operator services such as coordinating business services and other regional coordination.

Shared services are defined in WIOA Sec. 121(i)(2) as those commonly provided through the one-stop partner programs to any individual, such as initial intake, assessment of needs,

appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other one-stop partners, and other similar services. For the purpose of developing the operating budget, partners may determine which of their career services may be considered shared services.

### ***Recommended Cost Allocation Methodology***

The recommended allocation base uses the square footage of the comprehensive one-stop center.

The methodology described below is recommended, but not definitive. However using the square footage of the public, shared space as an allocation base is a fair way to allow cost contributions from the non-co-located partners who are also required to contribute to infrastructure costs.

- Co-located partners are assigned the proportionate share based on the direct space used by the program, such as program staff cubicles. Direct space shared by two or more co-located partners may be allocated using full-time equivalent positions.
- All partners are assigned proportionate shares based on the public, shared customer space, which includes lobby area, resource room and public restrooms. This space may also include interview rooms or conference rooms available to any one-stop partners. Proportionate shares of the public, shared customer space may be allocated by using number of program participants in the region or the partners may simply decide to split the amount evenly among the partners.

The results from any cost allocation are not definitive; they are viewed as a starting point for what the partner programs can contribute.

### ***Recommendations for One-Stop Partner Program Contributions***

All required one-stop partners have a mandate to contribute to infrastructure costs and system delivery costs. Other one-stop partners in the service delivery system are encouraged to contribute to the costs.

All programs may contribute cash toward these costs. Most programs will be able to contribute noncash or third-party in-kind. Each program's contributions must be consistent with the program's authorizing statute and regulations, as well as 2 CFR 200. Additional information on program contributions is found in each agency's subregulatory guidance (TEGL 17-16, RSA-TAC 17-03, and OCTAE Program Memo 17-3).

All one-stop partners will contribute at least one day of annual cross-training toward the additional system delivery costs.

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

In Idaho, the state Workforce Development Council also operates as the local workforce board for the state as allowed by waiver in the approved 2016-2019 WIOA State Plan and authorized in WIOA Sec. 107(c)(4). Thusly, the Workforce Development Council is responsible for the selection of Title IB providers, including the competitive procurement of the One-Stop Operator. The Workforce Development Council adopted a policy on the selection of service providers on April 11, 2019.

As a state entity, the Workforce Development Council must follow state procurement policy as authorized by the Uniform Guidelines under 2 CFR 200.320. The State Procurement Act in

Idaho Code Title 67, Chapter 92 charges the Administrator of the Division of Purchasing with acquiring all property for state agencies and overseeing all solicitations. Solicitations are required to be competitive, except as otherwise provided by statute or rule.

**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.**

Idaho Title I-B program offers training opportunities to eligible participants in the Adult, Dislocated Worker, and Out-of-School Youth programs, using both Individual Training Accounts (ITAs) and contracts with employers to provide on-the-job training. The State provides detailed technical assistance guides to local service providers referring participants to training.

Because of its small population and rural nature, the Governor does not maintain a list of On-the-Job training (OJT) providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants. A copy of Idaho's Technical Assistance guide, which provides WIOA Title I-B staff direction on the implementation of OJT opportunities, is located here:

<https://www.labor.idaho.gov/dnn/Portals/0/WIOA/Tags/wioa-technical-assistance-guide.pdf>.

Idaho maintains an extensive Eligible Training Provider List (<https://www.labor.idaho.gov/dnn/Portals/0/WIOA/Idaho-etp.xlsx?v=1.7>) to ensure consumer choice for occupational skills training is provided for all areas of the state. The state's technical colleges, proprietary schools, and Registered Apprenticeship sponsors/employers regularly submit new programs to add to the list, especially those programs that align eligible training to in-demand occupations in Idaho's high-demand industry sectors. Although the state has encountered difficulty in the past collecting performance data from the training providers, it has overcome the obstacles preventing this collection from taking place.

WIOA Title I-B career planners provide assistance to program participants navigating the available training options by reviewing the local or market demand for the occupational skills, and costs of training. The state's WIOA Technical Assistance Guide (cited earlier) contains information regarding occupational skills training and how program staff may provide this service to participants who may show the need for this benefit.

**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.**

The state Workforce Development Council (Idaho's WIOA state board), through its One-Stop Committee, ensures that activities and services are coordinated with Title I and Title II, as well as the other one-stop partners.

The Council carried out the review of local applications submitted under Title II in the spring of 2017. The Board received a presentation about the description of the process, including the timeline, and the Board chair appointed an ad hoc committee to conduct the review. A copy of that presentation is located here:

<https://www.labor.idaho.gov/wioa1/meetings/011117/adult-education-wdc.pdf>. With this year's funding cycle (PY2020) for Title II services, the Council will again be included as it participates in the review of this year's applications.

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.

All of the State-level One-Stop Partners, including the entities administering Rehabilitation Act programs and services, developed a statewide Memorandum of Understanding for the Idaho American Job Center Network. This document sets the standard for how service delivery is provided and integrated throughout the entire state. The executed MOU is located here: <https://www.labor.idaho.gov/wioa1/policies/Executed-Idaho-AJC-Network-MOU.pdf>.

To allow for local differences, the One-Stop Committee developed a template to assist local providers in documenting specifics on how the standards are met within a service delivery area, including information about the American Job Centers and other locations where the public can receive one-stop services. <https://www.labor.idaho.gov/wioa1/onestop/091217/Trans1.pdf>

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;
2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;
3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
  - A. SUPPORTING EMPLOYER ENGAGEMENT;
  - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
  - C. SUPPORTING WORK-BASED LEARNING;
  - D. IMPROVING JOB AND CAREER RESULTS, AND
  - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
  - A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
  - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;



C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;

D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.

E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.

7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

**State of Idaho Waiver Request - Allow the State Board to carry out the roles of a Local Board (WIOA Section 107(b))**

*(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 679.310(f) which states that a state board must carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) also direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005, under WIOA since 2014, and the current structure is reflected in the Combined State Plan.

*(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the state.

*(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to program services, especially training and work-based learning, and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources available for service delivery, the state continues to use the Workforce Development Council as the local workforce board throughout the state. When initially implemented, this saved the WIA program in the state approximately \$1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as program funds allowing for more participants to be served.

As evidenced since its initial implementation, Idaho's single statewide planning structure has continued to reduce annual overhead, and maximizes the available funding directed to training and services to business and job seekers.

This statewide structure enhances efforts to transform the system into a demand driven system. The 11 Idaho Department of Labor offices and its mobile locations across the state serve as the

state's American Job Centers offering the full range of workforce development services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

*(4) Describes how the waiver will align with the Department's policy priorities, such as:*

(A) supporting employer engagement; (B) connecting education and training strategies; (C) supporting work-based learning; (D) improving job and career results, and (E) other guidance issued by the Department.

The Workforce Development Council structure has been in place since the Jobs Training Partnership Act. Its current membership aligns with the prescribed composition under WIOA, including a majority of business representatives, along with partners from government, labor, community-based and educational entities. State education policy is thoroughly aligned with the state's workforce development goals.

*(5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment;*

The change to a single statewide regional planning structure, in conjunction with this waiver, has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and has since permitted the state to maintain service levels despite funding cuts over the years.

*(6) Describes the processes used to:*

(A) Monitor the progress in implementing the waiver; (B) Provide notice to any local board affected by the waiver; (C) Provide any local board affected by the waiver an opportunity to comment on the request; (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver. (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed towards program services, including training/work-based learning, and services to business and job seekers. In the spirit of WIOA's intent, the State has emphasized spending program funds towards those individuals most in need and who can benefit from intensive staff intervention, and direct training and support of businesses and participants, all of which positively impact the achievement of performance goals.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. Under this waiver, the strengthened administrative structure has assisted Idaho to avoid future disallowed costs and will continue to do so, thus further enabling the redirection of funds from service provider and administration to direct participant training and support.

Idaho's waiver request has been posted on the Idaho Workforce Development Council's website for comment and review by required parties and the general public. No local boards are affected by the waiver. A copy of this waiver request was provided to all members of the state Workforce Development Council, along with the PY2020-2023 Combined State Plan. The State Workforce Development Council's Executive Committee, approved the request for submission of a waiver and the state plan during its March 12, 2020. The meeting was announced and opened to the public.

Any public comments received regarding this waiver will be forwarded to the USDOL and included as a modification to the state's Combined Plan. The impact of this waiver on the state's performance will be addressed in the state's WIOA Annual Report.

The waiver outcomes will be collected and reported in the State's WIOA Annual Report.

*(7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.*

Not applicable.

#### TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	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

The State Plan must include	Include
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

#### ADULT PROGRAM PERFORMANCE INDICATORS

##### Performance 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	79.7%	81.5%	81.5%	81.5%
Employment (Fourth Quarter After Exit)	51.0%	82.0%	53.0%	82.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$6,241	\$6,900.00	\$6,384	\$6,900.00
Credential Attainment Rate	55.0%	70.0%	57.0%	70.0%
Measurable Skill Gains	40.0%	50.0%	41.9%	50.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## DISLOCATED 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	79.8%	80.3%	80.8%	80.3%
Employment (Fourth Quarter After Exit)	55.0%	81.0%	57.0%	81.0%
Median Earnings (Second Quarter After Exit)	\$7,570	\$8,016.00	\$7,744	\$8,016.00
Credential Attainment Rate	52.0%	65.5%	54.0%	65.5%
Measurable Skill Gains	40.4%	50.0%	42.1%	50.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

#### YOUTH 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	72.2%	76.5%	74.0%	76.5%
Employment (Fourth Quarter After Exit)	53.8%	78.0%	56.0%	78.0%
Median Earnings (Second Quarter After Exit)	\$3,958	\$3,991.00	\$4,024	\$3,991.00
Credential Attainment Rate	57.0%	58.0%	59.0%	58.0%
Measurable Skill Gains	39.7%	50.0%	41.1%	50.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

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

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

As Idaho's designated Wagner-Peyser employment services state agency, the Idaho Department of Labor's (IDOL) ongoing professional development of its Employment Service (ES) merit staff has provided the backbone for the successful performance of Idaho's One-Stop system which has been continually reflected in the state's Wagner-Peyser performance measures as well as in all workforce program performance measures for over a decade.

With the implementation of WIOA, IDOL and other One-Stop core partners have a renewed vision for investment in the professional development activities for not only ES staff, but all staff within the one stop system and particularly within the American Job Centers (AJC). Under WIOA, central office staff will continue to provide initial training, technical assistance and guidance, however, two area managers travel each month, visiting AJCs to engage with core partners and frontline staff on a daily basis, supporting all workforce programs to increase staff capacity and improve communications between state-level and field offices, with the goal of providing a professional level of service in a timely manner to both jobseekers and employers.

**Job seeker services** will see an increased integration of core partner programs' services in Idaho's AJCs and affiliate sites that enhances access to the programs' services and improves long-term employment outcomes for individuals receiving assistance. As witnessed in each Memorandum of Understanding, Idaho's One-Stop core partners will be responsible for ongoing, regularly scheduled cross-training of co-located staff to ensure all staff have a working knowledge of all program services available at the facility to increase public access to those services. Training will develop service delivery skills of all One-Stop staff, but will have a higher focus on ES staff who interact with a wider swath of the public. Ongoing professional development will focus on:

- Understanding of each partner's career services and any eligibility requirements
- Knowledge of training services offered and any eligibility requirements
- 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.

Since early 2019, most of the ES staff located in the AJCs have been cross-trained so that they may deliver WIOA Title I-B program services. Conversely, WIOA staff have been trained in ES service delivery. Having staff cross-trained in these programs allows them to provide a significant complement of WIOA services that may meet the majority of needs a job-seeker visiting an AJC may be looking for. This limits the need to "hand-off" participants/job-seekers from staff to staff, which reduces a participant's waiting time for a new face to come up to speed on their case.

- Working knowledge necessary to correctly provide direct linkage through technology to program staff who can provide meaningful information or services
- Development of capacity to guide job seeker's completion of application forms or online screen programs/activities carried out in the One-Stop system
- User training regarding Idaho's employment service web-based, online system, *IdahoWorks*, which provides job openings and referrals for job seekers
- User training regarding Idaho's web-based unemployment insurance system, iUS, to strengthen linkages between the One-Stop system and the UI program, and to increase awareness of UI issues across core programs
- User training regarding the Idaho Department of Labor's *JobScape* tool, which provides staff and job seekers with comprehensive career information, resources and services to help make successful education and career decisions.

**Employer services** will continue to be provided in quality fashion to employers all across Idaho. With the emergence Idaho's new targeted business sectors, the Idaho Department of

Labor will take the lead as it and other One-Stop partners work in concert to align services aimed at these newly identified industries. Idaho's Workforce Development Council analyzed key industries, occupations, demographics and other workforce and economic conditions to identify a broad array of high-growth, high-demand, livable-wage jobs. The state's analysis has led to the prioritization of specific sectors and occupations to focus on and leverage its resources. Idaho's WIOA Combined State Plan for PY2020 identifies the new target sectors of healthcare, manufacturing, construction, and professional, scientific and technical services - identified by various regional, economic development, industry and community sources - which are viewed as the economic engines to drive regional economic growth and provide individuals with wage growth and career paths.

IDOL continues to implement the following enhanced services activities to support the state's employer community:

- extensive outreach;
- one-on-one meetings with targeted employers to learn their workforce needs;
- office team discussions and strategy sessions on how best to respond to identified employer needs; and
- coordination of workforce needs with education, economic development and workforce partners.

Ongoing professional development will include:

- Staff training for all ES and selected One-Stop partner staff on employer outreach techniques, sales and promotion of services and how to effectively work with industry sectors prioritized by the planning process
- In-depth analysis of regional/local labor market data, particularly 'real-time' labor market data provided by IDOL's Regional Economists
- One-Stop partner staff meetings to develop knowledge of current training projects
- Training regarding work-based learning opportunities that can assist employers in resolving workforce needs, particularly registered apprenticeship models, and One-Stop partner funding opportunities available to support work-based learning.
- As noted earlier in the job seeker section, cross-training between ES and WIOA staff in the AJCs also includes exposure to employer services, including those listed above. As with the job-seeker, cross-training in this fashion will help to improve the system's response to employers.

### 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

In 2014, Idaho modernized and replaced its unemployment insurance legacy mainframe system with the Internet Unemployment System (iUS), a web-based application developed, supported, and maintained by IDOL. The Web-based applications that interface with iUS provide simple, self-service account maintenance for both employers and claimants, which offer alerts to important account changes through system-generated notifications. Both stakeholders can then "chat" with IDOL employees, who can access account information with real-time up-dates,

perform ad-hoc data queries and resolve issues more quickly. The iUS system also allows users to resolve UI issues online if they prefer.

As the state government agency tasked with administering the unemployment insurance program for collection of taxes from employers and disbursement of benefits to claimants, the Idaho Department of Labor will provide ongoing training and general information to all American Job Center staff, including ES and WIOA staff, regarding general eligibility guidelines. UI staff assigned to serve the center will be responsible for handling UI eligibility issues. Since IDOL has administered UI, ES, and other workforce program services (WIOA and its predecessors) for over 40 years, American Job Center staff have a firm foundation to ensure successful processes under WIOA.

The Idaho Department of Labor has instituted the following strategies:

- *IdahoWorks*, the web-based system that supports a number of One-Stop programs including the ES, WIOA, and TAA applicant/participant records and services; ES/WIOA staff are trained to recognize the UI status of job seekers via self-attestation and RESESA participation
- Idaho's unemployment insurance claimants will continue to be required to register for work/job seeker assistance within the *IdahoWorks* system
- Fully-trained unemployment insurance staff will be available by phone and via real-time online help communication technology, during all business hours, to answer any questions from staff or claimants regarding UI issues
- The state's comprehensive One-Stop centers each has a UI navigator 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 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 a number of lobby computer stations to provide self-service access for filing an application for unemployment compensation or to access other online One-Stop services. Each work station has been updated to improve data processing times, and include larger monitors to reduce user scrolling
- Each Comprehensive American Job Center will also provide access to centralized, fully trained UI staff who will answer questions, assist with application or weekly claim filing. Centralized staff are available by phone or via online, real-time conversation technology on the public access lobby computers. In-person UI assistance is also available in these locations via the UI navigators referred to earlier in (a)(2)

- 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

The ES and WIOA staff provide an orientation to all RESEA claimants on the services available to them through the AJC or affiliate. They then 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 solely on UCX (military) claimants and claimants profiled as most likely to exhaust their benefits. RESEA services are provided for each claimant at an average of two and a half hours.

Outside of the RESEA program, UI claimants who are not job-attached are afforded similar customized treatment. Each week, ES and WIOA staff receive an updated list of new UI claimants who are contacted and encouraged to come to the AJC to receive the same customized employment services as the RESEA program participants.

WIOA career planners are also aggressively reaching out to former UI claimants or other dislocated workers to provide career and training 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:

##### 1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

With both W-P and UI programs delivered by the Idaho Department of Labor, coordination of Wagner-Peyser funds to support UI claimants, and ensuring quality communications between W-P and UI has been one of the agency's top priorities for several decades.

All in-state UI claimants are required to register for work to obtain UI compensation. 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.

##### 2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

Department program policy, not state law, requires registration.

##### 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

The Idaho Department of Labor, through both W-P and UI staff and its automated systems, has continuously supported and administered the work test for the State unemployment compensation system and will continue to do so, including providing general eligibility

assessments, referral to UI adjudication, if needed, and providing job finding and placement services for UI claimants.

#### 4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

WIOA Title I-B programs (Adult, Dislocated Worker and Youth) reflect high service levels for UI claimants over the years as Idaho has continued to improve its One-Stop program integrations. IDOL's ES staff are not only co-located with WIOA, they also participate in One-Stop partner and community meetings on a regular basis to remain up-to-date on training, education and resources. Ongoing ES staff interactions with claimants and referrals to training and education programs/resources will continue to occur under special efforts such as WPRS and RESEA. Additional outreach to link UI claimants to training opportunities will also continue under other future funding opportunities, such as WIOA National Dislocated Worker Grant (NDWG) projects which may target long-term unemployment and profiled UI claimants.

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.

There are over 24,990 farms in Idaho with over 160 commodities produced. Most of Idaho's crop farming requiring intensive use of hand labor occurs in the southern part of the state on the Snake River plain. Idaho's top five labor-intensive crops are potatoes, sugar beets, hay/grain, onions, and corn. These crops are labor-intensive primarily because many workers are needed for irrigation. However, these crops also need planting in the spring, hoeing, thinning and then harvesting. In addition to the top five labor-intensive crops mentioned, hops are cultivated in the northern and southwestern parts of the state and there is large production of peas and lentils in north-central Idaho. Nursery operations are another important agricultural activity, mainly for the production of ornamental trees in north Idaho. The dairy industry, concentrated in the south-central part of the state, has skyrocketed, with many large dairy operations producing their own hay on the same properties. In 2019, Idaho led the nation in the production of potatoes, food-size trout, and Austrian winter peas, and ranked third in the production of milk.

Idaho's need for an agricultural labor force has remained steady and it is projected that agriculture possibly may become a high-demand industry. The projections provided by the Idaho Department of Labor's (IDOL) Research & Analysis Bureau show the need for agricultural workers is approximately 61,000 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

Idaho is a large, geographically diverse state, with five significant offices serving migrant and seasonal farmworkers and five additional offices and mobile locations that conduct farmworker outreach. The hiring season begins in April and continually increases until the peak month of October. The geographic area of prime activity is the Snake River area plain, in the southern part of the state.

Agricultural employers primarily hire foreign workers for the use of hand labor. They are heavily dependent on the use of foreign labor to ensure that crops are planted 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 2018 and slightly over that amount in 2019.

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 last later into the fall, October and November respectively. In addition to farmworkers, there is a requirement for truck drivers and equipment operators from May to November. In 2018, Southeastern Idaho had about 9,000 farmworkers and Eastern Idaho had approximately 7,000. 2019 saw the same amount of agricultural employment for both regions.

Southwestern Idaho has a larger variety of significant crop activity: barley, beans, corn, fruits (cherries, apples and other fruits), 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 number of farmworkers in Southwestern Idaho was 14,337 in 2018 and 14,472 in 2019.

The traditional South Central Idaho crops are barley, beans, apples and other fruits, corn, grain, hay, potatoes, sugar beets and wheat. There is also a demand for farm equipment operators and truck drivers. Greenhouse and nursery workers are needed for seedling and plant cultivation. South Central Idaho also needs additional foreign workers for herding sheep. South Central Idaho had 15,848 farmworkers in 2018 and 16,046 in 2019.

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 number of MFWs range from a low of 3,800 in the winter months to the peak of 18,500 in October. The majority of the work is seasonal, which also reflects the greater part of 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 MFW 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 60,000 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 more than 50 communities around the state, a more than 100 percent increase 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:

- **Canyon County** - Located in city of Caldwell, provides services to Canyon County
- **Mini- Cassia** - Located in the city of Burley, provides services to Minidoka and Cassia counties
- **Pocatello/Blackfoot** - Provides services to Bingham, Power, Franklin, Caribou, Bear Lake, Oneida and Bannock counties
- **Rexburg** - Provides services to Clark, Fremont, Madison, and Teton counties

In addition, during the months of high agricultural activity, the Department may provide or coordinate activities to reach MSFWs in the following communities:

- **Bonnors Ferry** -Provides services to Boundary County
- **Magic Valley** - Provides services to Twin Falls, Jerome, Gooding, and Lincoln counties
- **Mountain Home** - Provides services to Elmore and Owyhee counties
- **Payette** - Provides services to Washington and Payette counties
- **Idaho Falls** - Provides services to Jefferson, Butte and Bonneville counties

Migrant and/or Seasonal Farmworker (MSFW) outreach staff are located in the IDOL American Job Centers and mobile locations 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.

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.

AJC REGIONS - Community Locations	Estimated Farmworker Population*	Outreach Goals W-P Staff	Outreach Goals in Conjunction with Other Agencies
<b>NORTH IDAHO – PLANNED</b> <i>STAFFING: .25FTE/year W-P</i>			
Bonniers Ferry	662	40	26
<b>SOUTHWEST IDAHO – PLANNED</b> <i>STAFFING: 1 FTE/year W-P; .03/year Cooperating Agency</i>			
Payette	2525	152	101
Canyon County	5631	338	225
Mountain Home	2503	150	100
<b>SOUTH-CENTRAL IDAHO – PLANNED</b> <i>STAFFING: 1 FTE/year W-P; .06/year Cooperating Agency</i>			
Magic Valley**	10062	298	205
Mini-Cassia	5274	323	204
<b>SOUTHEAST IDAHO – PLANNED</b> <i>STAFFING: 1.5 FTE/year W-P; .06/year Cooperating Agency</i>			
Rexburg	2764	166	110
Pocatello	4529	272	181
Idaho Falls	2974	178	119
Blackfoot	3531	212	141
<b>Total</b>	<b>40,455</b>	<b>2,129</b>	<b>1,412</b>

\*Farmworker population based on counties which make up the AJC regions & service locations. \*\*Magic Valley - 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.

These farmworkers are targeted 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 services through the workforce development system and are used to inform and educate farmworkers and their families about 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 new 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.

Staff assigned to outreach 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 will encourage MSFWs to come in to the local AJC one-stop or mobile office 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 will provide 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, weekly, hour-long radio show 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.

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 of 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.

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. A priority for the Monitor Advocate during the last few years has been to provide “one-on-one” training and technical assistance to newly hired outreach personnel. The Monitor Advocate will continue to make this practice a priority during subsequent years.

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 participated 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 attended this two-day event over the last several years.

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. One-stop system staff can also rely on *Live Better Idaho*, a statewide online platform resource for assisting one-stop service coordination. Available in English and Spanish, *Live Better Idaho* is 'agency agnostic' and available for both public and private providers to deliver their services to the public. A localized and customized tool, it connects individuals to services that are relevant and available in their local areas. With it, staff connect Idahoans in need to relevant services by matching individuals with programs they may qualify to receive.

Not only are outreach workers aware of the WIOA core program services, but they are also active collaborators in advocating for and recruiting participants. At their behest, since PY2017, Governor's Reserve/state funds have been set aside to provide additional assistance to MSFW youth. 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.

### 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 MSFW outreach workers are merit staff for Wagner-Peyser Employment Services, they receive the 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 partner agency staff as well. Management development has also been a focus for delivering quality customer service over the long term. Similar to many other organizations, the department faces the prospect of large numbers of senior manager retirements over the next few years. To remedy this, the department has utilized the state's Division of Human Resources' Supervisory Academy, an eight-course, management program available to all state departments' supervisory staff at various levels.

### E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

The Idaho Department of Labor, working through a cooperative agreement with the Community Council of Idaho (CCI- Idaho's Sec. 167 grantee) and through its One Stop partnerships with Idaho's Vocational Rehabilitation Services, Idaho Department of Education's Migrant Education Program and other community partners, will serve as a lead organization in coordinating outreach efforts at both the state and service area 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 a partner 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 are pursuing data sharing agreements to facilitate reporting and data analyses to improve partnership service delivery, and assessment of opportunities and enhancement of processes to streamline co-enrollment

In order to leverage resources, staff coordinate outreach activities with partner organizations in their area, 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.

## **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 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.

### **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 agencies for Idaho agricultural employers. The state's H-2A activity for FY 2019 shows an application increase of approximately 16.8 percent over the previous year, with 715 applications recorded, and more than 4,473 positions listed. From October through December 2019 (1<sup>st</sup> quarter of FY2020) alone, 133 employers have submitted their request for workers. 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. Working relationships exist with the Community Council, Idaho Legal Aid Services, Inc., and various agricultural producer organizations to provide services and information. 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

As noted earlier, the state has multiple resources available to provide information regarding the complaint system. Outreach workers and one stop partners are encouraged to direct 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.

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 time-slot. 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.

#### 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 in 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).

### **COORDINATING OUTREACH EFFORTS**

The Idaho Department of Labor, working through a cooperative agreement with the Community Council of Idaho (the Idaho NFJP grantee) and through its One Stop partnerships with Idaho's Vocational Rehabilitation Services, Idaho Department of Education's Migrant Education Program and other community partners, will serve as a lead organization in coordinating outreach efforts at both the state and service area levels. All partners are dedicated to increasing MSFW customers' awareness and access to education, training and other services.

CCI is also represented on the One-Stop Committee of the state Workforce Development Council, Idaho's WIOA State Board. The state's monitor advocate and CCI 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.

And as noted earlier, the statewide training conferences coordinated by the monitor advocate have included AJC and NFJP staff, and will continue to do so in the future. This year, attendees also included state education agency and local school district representatives, along with Boise State University's HEP and CAMP programs. This year's training highlighted on 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.

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 has directly contributed in drafting this agricultural plan and consideration has been given to the annual summary developed under 20 CFR 653.108(g)(4).

1.

- a. 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 to submit written comments on January 27, 2020. The final draft of this 2020-2023 Agricultural Outreach Plan and a request for comments were also sent on 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

Ileana Cordova HEP/CAMP Recruiter Boise State University icordova@boisestate.edu

Sara 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

No comments were received from the stakeholders listed during this specific 30-day comment period regarding the state's AOP. This plan will be incorporated as part of Idaho's WIOA Combined State Plan, which will undergo a public comment period beginning March 2, 2020. Any comments will be incorporated as part of the Combined State Plan.

### 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 PY2016, the state struggled to achieve *Attained* status for all three of the MSFW Compliance Indicators. Since then, however, the state has seen marked improvement as over the last three program years, only 2017 shows one measure lacking. This can be attributed to several issues. Because of the reporting requirements under WIOA, many of these measures are based on wage-related data. With the delay in reporting wages, which relies on automated reporting from employers rather than W-P staff follow-up and data-entry of placements, much of this information is not reported in a timely fashion. 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 added to a count. As a result, 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 this numbers. The overall number of applications has decreased overall which affects the subsequent indicators. Again, this is due to the change in who WIOA considers a participant or a reportable individual for the programs under the Act. Primarily, career guidance and job development contacts were found lacking over the last several years.

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.*

PY 2015** Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	Equity
Total Applications		888	100%	120781	100	<b>Yes</b>
Referred to Employment		61	6.87%	4449	3.68%	<b>Yes</b>
Received Staff Assisted Services		79	8.90%	8979	7.43%	<b>Yes</b>
Referred to Support Service		8	0.90%	716	0.59%	<b>Yes</b>
Career Guidance		5	0.56	1030	0.85%	<b>No</b>

PY 2015** Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	Equity
Job Development Contact		0	0	5	0	No
<b>Compliance Indicators</b>		<b># of MSFWs</b>	<b>% of MSFWs</b>	<b># of Non- MSFWs</b>	<b>% of Non- MSFWs</b>	<b>Compliance</b>
Placed in Job		5	0.56%	781	0.65%	No
Placed \$.50 above min Wage		5	0.56%	656	0.54%	No
Placed in Long Term non-ag Job		2	0.23%	558	0.46%	No

\*\*PY2015 denotes the last year that WIA measures were used. Subsequent years' performance has improved significantly under WIOA as measures focus on participants receiving staff services.

PY 2016 Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	Equity
Total Applications		76	100%	12127	100%	
Referred to Employment		46	60.53%	3710	30.59%	Yes
Received Staff Assisted Services		71	93.42%	10301	84.94%	Yes
Referred to Support Service		0	0.00%	0	0.00%	Yes
Career Guidance		14	18.42%	2266	18.69%	No
Job Development Contact		24	31.58%	5119	42.21%	No
<b>Compliance Indicators</b>		<b># of MSFWs</b>	<b>% of MSFWs</b>	<b># of Non- MSFWs</b>	<b>% of Non- MSFWs</b>	<b>Compliance</b>
Placed in Job		63	82.89%	9844	81.17%	Yes
Placed \$.50 above min Wage		9	11.84%	788	6.50%	Yes
Placed in Long Term non-ag Job		63	82.89%	9844	81.17%	Yes
PY 2017 Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	<u>Equity</u>
Total Applications		89	100%	13555	100%	
Referred to Employment		36	40.45%	3272	24.14%	Yes
Received Staff Assisted Services		87	97.75%	12563	92.68%	Yes
Referred to Support Service		0	0.00%	0	0.00%	Yes

PY 2016 Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	Equity
Career Guidance		18	20.22%	3501	25.83%	No
Job Development Contact		49	55.06%	7898	58.27%	No
<b>Compliance Indicators</b>		<b># of MSFWs</b>	<b>% of MSFWs</b>	<b># of Non- MSFWs</b>	<b>% of Non- MSFWs</b>	<b>Compliance</b>
Placed in Job		84	94.38%	11569	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%	11569	85.35%	Yes
PY 2018 Equity Indicators	MSFW	# of MSFWs	% of MSFWs	# of Non- MSFWs	% of Non- MSFWs	<u>Equity</u>
Total Applications		240	100%	16308	100%	
Referred to Employment		67	27.92%	2607	15.99%	Yes
Received Staff Assisted Services		228	95.00%	15399	94.43%	Yes
Referred to Support Service		0	0.00%	0	0.00%	Yes
Career Guidance		41	17.08%	3139	19.25%	No
Job Development Contact		136	56.67%	9461	58.01%	No
<b>Compliance Indicators</b>		<b># of MSFWs</b>	<b>% of MSFWs</b>	<b># of Non- MSFWs</b>	<b>% of Non- MSFWs</b>	<b>Compliance</b>
Placed in Job		144	60.00%	9019	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%	9019	55.30%	Yes

#### 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. For PY16, for example, the state had planned 2,187 outreach contacts. The effort from outreach staff and the monitor advocate totaled more than 4,500 contacts during that period. In PY17, the MSFW contacts totaled 4,589; in PY18, that number totaled 10,397. 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, much of this due to the transition from the WIA to WIOA. In addition, the decline also coincides with the period of time during which the Department has implemented its *IdahoWorks* system as a member of the AJLA consortium.

In testing the system, the state monitor advocate identified some barriers that may have possibly contributed to the diminished access and identification of farmworkers when using the new system. A request for system changes was made, with several of the changes actually implemented. One of the more recent changes requested include the deletion of additional questions that were previously used to identify farmworkers under WIA, but that no longer part of the WIOA MSFW definition at 20 CFR 651. This objective was finally met in PY18, when AJLA modified *IdahoWorks* to align with the recently revised Participant Individual Record Layout (PIRL) which had just incorporated the new MSFW definition.

#### 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 five 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.

After providing input to this plan's development, the Monitor Advocate reviewed the final product and approved it on January 23, 2020.

#### WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been	Yes

The State Plan must include	Include
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.	

#### 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	68.4%	70.1%	70.1%	70.1%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Fourth Quarter After Exit)	53.0%	70.0%	55.0%	70.0%
Median Earnings (Second Quarter After Exit)	\$5,217.00	\$5,800.00	\$5,337.00	\$5,800.00
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 <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

### A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

Idaho’s Adult Education program has formally adopted the College and Career Readiness (CCR) Standards for Adult Education, as developed by Susan Pimentel and MPR Associates for the US Department of Education in 2013. As stated in the introduction to the standards, the CCR Standards represent a subset of the Common Core State Standards, which are “most indispensable for college and career readiness and important to adult students.”

The Idaho Department of Education (K-12) has adopted the Common Core State Standards for mathematics and English language arts for K-12, also known as the Idaho Core Standards. Because both the Idaho Core Standards and the CCR Standards for Adult Education are derived from the Common Core State Standards, they are well aligned. In the case that Idaho’s K-12 standards are revised, replaced, or otherwise changed, the State’s Adult Education program will realign its standards appropriately.

### B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

## ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

**Special Rule.** Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

### *i. How Idaho Will Fund Eligible Providers*

As the Eligible Agency administering Title II programs, the Idaho Division of Career & Technical Education awards AEFLA funds through a competitive grant application process. Please refer to section III.b.5.B.i—ii in the *common-elements* portion of Idaho’s Combined State Plan for more detailed information about the Title II competitive grant application process.

Eligible providers are any organizations who have ‘demonstrated effectiveness’ in providing adult education and literacy activities and may include: local educational agencies; community-based or faith-based organizations; volunteer literacy organizations; institutions of higher education; public or private nonprofit agencies; libraries; public housing authorities; a nonprofit institution having the ability to provide adult education and literacy services to adults; and a consortium of agencies, organizations, institutions, and libraries described above. (*Section 203(5)*)

There are two ways in which an eligible provider may meet the requirements:

1. An eligible provider that has been funded under Title II of the Act must provide performance data required under section 116 to demonstrate past effectiveness.
2. An eligible provider that has not been previously funded under title II of the Act must provide performance data to demonstrate its past effectiveness in serving basic skills deficient

eligible individuals, including evidence of its success in achieving outcomes listed in the first paragraph of this section. See WIOA Final Rules Subpart C, §463.24 and 29 U.S.C 3272(5)

Funds are awarded as multi-year grants on a competitive basis to eligible providers via regional competitions. All regional competitions use the same process and application materials issued by the State to ensure direct and equitable access. The competition is announced across a variety of platforms to ensure statewide participation. These platforms include local newspapers, the States' monthly newsletter, press release, social media, and contacts with other state and local agencies and workforce partners.

The regional competitions adhere to the provisions set forth in WIOA Title II Section 231 – *Grants and Contracts for Eligible Providers*, and Section 232 – *Local Applications*. Grantees receiving funds under the initial competition are required to submit annual renewal plans and negotiate program budgets each year. By federal law, eligible providers are prohibited from using federal grant funds to supplant state or local dollars.

The State office provides technical support to local providers in aligning programs with local workforce needs and addressing existing skills gaps. Partnerships with local workforce boards, local departments of labor, and community-based organizations are fundamental to the success of Adult Education programs in Idaho. Integrated Education and Civics Education and Integrated Education and Training programs are delivered in collaboration with community partners; local programs are encouraged to build partnerships to provide wraparound support services for students in their AEFLA funded programs.

The competitive application process requires applicants to document their qualifications per each of the thirteen considerations set forth in Section 231(e). Information is collected via a State-issued Request for Grant Applications (RFGA). The information collected from each applicant in the RFGA may include, but is not limited to:

- **Documentation of eligibility** per Section 203(5)
- **Type of Adult Education Program(s) and/or Activities to be funded**, limited to those activities allowed in Title II of WIOA and set forth in this plan

Section 243 Integrated Education and Civics Education

Section 225 Corrections Education

Section 231 Regional Adult Education and Literacy Programs

- **Alignment with Idaho's Combined State Plan** including state strategies and goals, career pathways, and local one-stop alignment.
- **Administrative capacity** such as: organizational structure, funding streams, financial oversight, data collection and reporting, and assurances
- **Operational capacity** such as description of qualified staff and hiring processes, available locations and classroom space, community partnerships, and number of Title II-eligible students served per year.

- **Quality of Services** such as proposed class schedules, description of curriculum and alignment with state-adopted standards, and professional development/training activities.

- **Demonstrated Effectiveness** such as past targets and actual performance for previous Title II recipients. For applicants who have not previously received funding under Title II, the Eligible Agency will define and provide examples of other qualifying data that can be provided to demonstrate the applicant's effectiveness in serving basic-skills deficient individuals, including success in achieving the outcomes required under Section 116 of WIOA.

The Idaho Division of Career & Technical Education distributes funds awarded under Title II, as set forth in WIOA Section 222(a). The State distributes funds at:

1. Not less than 82.5% of the grand funds to award grants and contracts under Section 231 (Eligible Providers) and to carry out section 225 (Programs for Correctional and Institutionalized individuals), of which not more than 20% of such amount shall be available to carry out section 225.
  2. Not more than 12.5% of the grant funds to carry out State leadership activities under section 223;
- and
3. Not more than 5% of the grant funds or \$85,000, whichever is the greater, for the administrative expenses of the eligible agency (the State).

#### C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

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 5 years of participation in the program.

The Idaho Division of Career & Technical Education uses no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Grant funds are awarded to an eligible provider that offers applicable services to incarcerated or institutionalized individuals. Funds are awarded using a competitive application

process outlined in part (b (i)) above, after which, providers may request funds on an annual basis through an extension application.

The State requires that any eligible provider using Title II funds to carry out programs authorized under section 225, give priority to those offenders who are likely to leave the correctional institution within five years of participation in the program.

Correctional programs may use funds to carry out activities as authorized under Section 225, including:

1. Adult Education and Literacy (as defined in part (b) above)
2. Special education, as determined by the eligible state agency administering the grant
3. Secondary school credit
4. Integrated education and training
5. Career pathways
6. Concurrent enrollment
7. Peer tutoring and
8. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

The type of activities offered by correctional service providers depends on the needs of the populations being served. Programs are expected to provide those activities, which are appropriate to meet the needs of the populations in their facility. For example, short-term facilities (such as county jails) should prioritize activities that can have a meaningful impact in a short amount of time and help meet a student's re-entry needs. Longer-term facilities (such as state prisons) may choose to focus on longer, more intensive education programs for students who will be incarcerated for multiple years.

When submitting applications for funds to support activities authorized under Section 225, applicants are required to provide rationale for each activity for which funds are requested, including data that demonstrates a need for the activity in their facility.

#### D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

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.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

In Idaho, Integrated English Literacy and Civics Education (IELCE) funds are awarded to eligible providers through a competitive application process for multi-year grants, outlined in part (b(i)). After providers receive funds through the competitive process, they may request continuing funds on an annual basis through a renewal application. Funds are used to support the operational expenses of local IELCE programs, including teacher salaries and benefits, classroom supplies, textbooks, and other items necessary to carry out instruction. The State collaborates with local providers to build on existing best practices while expanding and/or implementing new workplace training components, as necessary.

Services provided through Section 243 must include education services that enable adult English language learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Programs must include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training.

Additionally, Section 243 IELCE programs must provide access to integrated education and training (IET). Per the IELCE program requirements, each program that receives funding under Section 243 must be designed to provide access to integrated education and training; a service approach that provides training concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. The State Director in Idaho coordinates with the State Workforce Development Council to stay informed of workforce needs and promote employer collaboration with IET programs across the state. Section 243 recipients also prepare adults who are English language learners for, and place such adults in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and integrate with the local workforce development system and its functions to carry out activities of the program. Local providers build relationships with their local departments of labor and community based organizations to understand the workforce needs of their local community as well as the training needs of community members. Local providers design programs according to the skills gaps that exist in their communities. Given the diversity of students, employers, and service providers throughout Idaho, local providers have flexibility in implementation and management of IELCE and IET programs. The program plan and budget for all such activities are reviewed and approved by the State to ensure they meet the purpose and requirements of the law.

## 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

The State distributes no more than 12.5% of Title II funds allocated to the state to carry out required and permissible leadership activities, as required under Section 223. While the state reserves the right to carry out any of the permissible activities authorized under Section 223, the permissible activities listed below will be the primary focus.

#### Required activities supported with Leadership funds:

- Align adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to develop career pathways and provide access to employment and training services for individuals in adult education and literacy activities.
- Establish or operate high-quality professional development programs to improve the instruction provided pursuant to local activities, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners, instruction provided by volunteers or by personnel; and disseminate information about models and promising practices related to such professional development programs.
- Provide technical assistance to eligible providers including the dissemination of instructional and programmatic practices based on research, the role of eligible providers as one-stop partners, and the use of technology to improve system efficiencies.
- Monitor and evaluate the quality of, and improvement in, adult education and literacy activities, and disseminate information about models and proven or promising practices within the State.

#### Permissible activities supported with Leadership funds:

- Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such component relate to adults
- Develop content models for integrated education and training and career pathways.
- Provide technical assistance regarding the use of data to measure the progress of programs, evaluate program effectiveness, and guide program improvement, especially as such data relates to the State's adjusted levels of performance described in section 116.
- Develop and implement transition programs, including linkages with postsecondary education institutions
- Integrate literacy and English language instruction with occupational skill training, including linkages with employers
- Develop and pilot strategies for improving teacher quality and retention.

#### *Alignment with Other Core Programs*

Two key strategies for program alignment, as identified in Idaho's Combined State Plan, Section (II)(c)(2), supports this requirement. The first is to establish a WIOA Advisory Group comprising key state-level staff from each of the programs covered by the plan. The purpose of the WIOA Advisory Group is to coordinate operational policies and partnerships at the state level between programs covered under the Combined State Plan. The WIOA Advisory Group will work with regional coordinating groups and with local programs to ensure consistency in the application of program policy throughout the state and to help local programs overcome operational and policy-related barriers to full collaboration.

The State Coordinator for Adult Education is a member of this group and will provide technical assistance to local Title II providers as needed. Leadership funds may be used, as appropriate and allowable, to support local staff in attending any training or meetings hosted by the State to provide such technical assistance to local staff and leadership.



The second strategy identified in Idaho's Combined State Plan is to coordinate training across workforce programs to enhance opportunities for professional growth and development. This might include, for example, inviting local Vocational Rehabilitation staff to training on adult learning styles, or inviting local Adult Education staff to training by Wagner-Peyser/Employment Service staff on the use of Idaho's Career Information System to help students identify potential careers. Title II Leadership funds may be used, as appropriate and allowable, to support Adult Education program staff in attending such training.

### *High Quality Professional Development Programs*

Given Idaho's large geography and relatively small population, local Adult Education programs have historically been spread far apart. As a result, it is expensive and time consuming for local staff to travel to centralized training. The State has therefore designed a three-tiered approach to professional development in Idaho. The first tier is state-level training, the second is local routine/required training, and the third is local discretionary training. All levels of training are supported with State Leadership funds under section 223.

State-level training, while not mandatory, is highly encouraged for all programs. The State generally chooses one or two such training options per year, these trainings will be centrally located and host a larger cohort of participants (20-30). These trainings will focus on instructional topics or practices, which will have the greatest impact for the most number of attendees across the state. In the past, this has included nationally recognized trainings like the Adult Numeracy Institute. To the extent that it is feasible, the State will prioritize trainings that use a model of sustained contact between trainers and a cohort of teachers throughout the year. This may include multiple in-person meetings, online discussion groups, and opportunities to try new practices in the classroom between meetings. However, the exact model of such trainings will depend on the needs and resources identified in the State each year.

More routine and required training, such as new teacher onboarding, training on the NRS and data collection, and assessment training, have been, and will continue to be handled locally. Under WIA, each program identified a staff member or members to serve as expert trainers, and employed a professional- development coordinator to track training needs and participation. This model has worked well, and will continue under WIOA. The State will provide guidance on the frequency and content of such local training and will host refresher trainings for these local trainers and PD coordinators as appropriate. The State may also explore options that allow programs to collaborate on such trainings, as well as tools that will help centralize the development and storage of training materials for use by multiple programs.

Finally, local programs can also apply for discretionary funds to support local professional development projects. Such projects should be aligned with local needs and supported with evidence. For example, a local provider may determine through teacher evaluation and observation that training on the use of contextualized reading would help improve instructional quality at its outreach centers. The program would then create a training plan and request funds from the State to support this plan.

### *Technical Assistance*

The State provides technical assistance, as appropriate, based on the needs and performance of local providers. Such assistance may be provided directly to one program, or may be provided for the entire state. Such assistance may include:

- Technical assistance for establishing transition programs, team teaching, and other areas where Adult Education programs connect with other core and partner programs and the One-Stops
- Guidance from WIOA Advisory Group to ensure policy alignment between programs, training and technical assistance on these policies and their impact on programs
- Training as needed or requested to address new and relevant technology in the classroom

### *Monitoring and Evaluation*

The State will use a variety of methods to monitor and evaluate the quality of adult education and literacy activities. Such methods will include on-site monitoring, quarterly desk audits, continuous data-quality monitoring, annual program plans, and annual reports.

The State will make every reasonable attempt to conduct an on-site monitoring visit to each local provider at least once every three years. Such visits may occur more frequently if warranted by program performance or compliance issues, or if requested by a program. Monitoring will include a review of processes, practices and documentation related to program finances, administration, data collection, and instruction. A complete monitoring tool will be developed by the State to facilitate such visits and ensure consistency across programs.

Programs will also be evaluated based on regular submission of reports, applications, and program plans to the State. The State will monitor program data-quality through the use of the State's Management Information System. Technical assistance will be provided on an ongoing, as-needed basis regarding compliance, program quality, and data quality. Leadership funds will be used to support training and other activities resulting from such evaluations. Programs that are found to be out of compliance with State or Federal policies or law, or which have demonstrated unacceptable administrative practices or consistently low performance will be subject to a Corrective Action Plan. "Consistently low performance" will be determined based on actual performance against program indicators, the extent to which state targets are met, past performance of the program, the relative performance of other providers, and mitigating program circumstances. Programs which fail to implement a Corrective Action Plan as determined necessary by the State may be subject to loss of funds.

## 2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

- Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such component relate to adults
- Develop content models for integrated education and training and career pathways.
- Provide technical assistance regarding the use of data to measure the progress of programs, evaluate program effectiveness, and guide program improvement, especially as such data relates to the State's adjusted levels of performance described in section 116.
- Develop and implement transition programs, including linkages with postsecondary education institutions
- Integrate literacy and English language instruction with occupational skill training, including linkages with employers
- Develop and pilot strategies for improving teacher quality and retention.

## F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

The State assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Local providers are accountable to the State to meet the standards of quality for administration and instruction outlined in the competitive grant application, certifications, assurances, and state policy. The effectiveness and quality of local providers is assessed through the use of performance data aligned with the indicators of performance set forth in WIOA Section 116, as well as the evaluation and monitoring processes described in part (e) above.

### *Assessment of Program Quality*

Local programs are assessed based on the six performance indicators set forth in Section 116 of WIOA and pursuant to federal regulations and guidance. These six indicators are:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
4. The percentage of program participants who obtain either a recognized postsecondary credential or a secondary school diploma, or its equivalent, during participation in or within one year of exit from the program
5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains towards such a credential or employment; and
6. The indicators of effectiveness in serving employers established pursuant to clause (iv).

Each year, the State is required to negotiate the above-defined percentages with the US Department of Education for the upcoming program year (July 1 – June 30). Local programs are be expected to meet or exceed the state targets and report on their performance in an annual report submitted to the State.

### *Data collection and analysis*

In order to determine the levels of performance under each of the indicators listed above, local programs are required to collect data through a standard collection process (including standardized assessments), input data into the statewide Management Information System on a regular basis, and analyze data for the purpose of performance reporting and program improvement. Programs must adhere to all state and federal policies when collecting student data.

Programs are expected to use this data to determine progress toward meeting the State targets. Programs are also expected to use such data to evaluate program effectiveness and align program improvement efforts.

### *Program Improvement*

In the case that a provider has consistently low success in achieving the negotiated levels of performance, the State may require the program to implement a Program Improvement Plan. To the extent that such a plan includes professional development and training, allocable costs of such training may be provided for with state leadership funds under section 223.

### *Assessing Professional Development*

The State has a vital interest in assessing the quality of programs funded under Title II, and in providing adequate professional development and technical assistance to those programs in order to ensure continuous improvement. To that end, the State currently implements certain measures to assess its professional development activities. These measures are outlined:

- **Professional Development Coordinators:** Each local program is required to identify a staff person to identify local training needs, organize and implement local training, track staff attendance at both state and local trainings, collect training evaluations, and provide an annual report to the State regarding the program's professional development activities. The State will support the time spent on these activities through Leadership funds.
- **On-site Evaluations:** All statewide training and professional development shall include evaluation forms to solicit feedback from participants about their experience, what they learned, what was effective, what could be improved, and what they are likely to implement when they return to their local program. The State will review this feedback and make adjustments as needed.
- **Follow-up Evaluations:** To the extent that such follow-up is appropriate and feasible, the State will ask for follow-up evaluations from participants of statewide trainings three months after the conclusion of the event to assess whether practices have been implemented and sustained.
- **Ongoing Performance Review:** Both the State and local programs will review performance data on a regular and ongoing basis. Such review will take into account federal reporting tables, student outcomes, attendance, measurable skill gains, and other factors. This review will occur regularly, but at a minimum must occur each quarter. The information gained from these performance reviews will help the State and local programs identify areas that are improving and those areas which demonstrate gaps or a decline in performance.

The results of the above assessment activities will be used when considering the effectiveness of past professional development. These results will also inform future training and the types of professional development activities the State will offer or require.

## ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes

The State Plan must include	Include
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

#### ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

#### AUTHORIZING OR CERTIFYING REPRESENTATIVE

#### CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to [wioa@ed.gov](mailto:wioa@ed.gov) at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	Idaho Career & Technical Education
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Clay
Last Name	Long
Title	Administrator, Idaho Career & Technical Education
Email	clay.long@cte.idaho.gov

#### SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

The State of Idaho is requiring all Adult Education providers to sign a Section 427 GEPA Attestation form as part of the grant renewal application. The attestation includes a narrative of the steps that will be taken locally to comply with the GEPA requirements. The purpose of this requirement is to assist the United States Department of Education in implementing its mission to ensure equal access to education and to promote educational excellence.

If funded, the stated steps will be taken to ensure equitable access to and equitable participation in the project or activity to be conducted with federal adult education assistance by addressing the access needs of students, teachers, and other program beneficiaries in order to overcome barriers to equitable participation, including barriers based on gender, race, color, national origin, disability and age. Additionally,

Idaho Career & Technical Education will ensure equitable access for WIOA Title II applicants in line with GEPA requirements and will disseminate information regarding the grant application and funding process across the state. Idaho Career & Technical Education will provide technical assistance for all interested applicants to support entities in applying for grant funds.

#### ADULT EDUCATION AND LITERACY 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	55.0%	55.0%	60.0%	60.0%
Employment (Fourth Quarter After Exit)	40.0%	40.0%	45.0%	45.0%
Median Earnings (Second Quarter After Exit)	\$4,300	\$4,500	\$4,600	\$4,600
Credential Attainment Rate	35.0%	35.0%	40.0%	40.0%
Measurable Skill Gains	40.0%	40.0%	43.0%	43.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

#### PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

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[13] Sec. 102(b)(2)(D)(iii) of WIOA

## A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

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 responsibilities of the Idaho State Rehabilitation Council (SRC) are outlined in the Rehabilitation Act of 1973, as amended.

The SRC and IDVR changed the input period from a calendar year to a program year with this State Plan, to better align with the VR program reporting period.

The SRC's efforts during PYs 2017 and 2018 can be summarized within four broad areas: 1) strengthening the council overall; 2) providing input on IDVR's vision and mission statements as well as a strategic plan; 3) ongoing guidance on critical IDVR data gathering instrumentation; and 4) participating in conversations on IDVR activities and direction.

### 1. SRC Member Focused Work

#### ***SRC Input***

Understanding a fully staffed, well-informed SRC provides for high quality engagement within the IDVR/SRC partnership, the SRC members requested recruitment tools, updated new member orientation, and training on the role of the SRC.

A recruitment pamphlet was developed by the SRC to provide a base of understanding for potential members.

New member orientation was collaboratively updated with IDVR.

The SRC and IDVR leadership participated in a one-day training by Paul Dzedzic focused on "what VR is", understanding WIOA, and the SRCs role, in face-to-face engagement and shoulder-to-shoulder advocacy to ensure IDVR is as strong and effective as possible to serve people with disabilities. This training was both informative and well received. Further, it led to additional conversations and actions around a renewed focus on the SRCs shoulder-to-shoulder policy and advocacy roles, as well as face-to-face opportunities to help inform state plan goals and priorities.

### 1. SRC Structure Changes

#### ***SRC Input***

To better position the SRC to move forward with shoulder-to-shoulder policy and advocacy roles as well as face-to-face engagement in the state plan's goal and priorities; the SRC went through a thorough analysis process to restructure Council committees and subcommittees with updates to bylaws.

This training was both informative and well received. Further, it led to additional conversations and actions around a renewed focus on the SRCs shoulder-to-shoulder policy and advocacy roles, as well as face-to-face opportunities to engage in the state plan's goals and priorities.

### 1. SRC National Engagement

### ***SRC Input***

Policy and advocacy work continued when an SRC member and IDVR staff attended the 2019 Spring Council of State Administrators of Vocational Rehabilitation (CSAVR) and met with Idaho's Congressional delegation and staff for personal stories and facts regarding the impact that IDVR has on Idaho's citizens.

#### **1. New Mission and Vision Statements**

### ***SRC Input***

SRC provided input in on IDVR's new Mission and new Vision statements.

#### **1. Strategic Planning**

### ***SRC Input***

SRC in concert with IDVR Executive Leadership Team, the Regional Managers, and permanent Assistant Regional Managers engaged in strategic planning session to arrive at top three (3) strategic priorities goals and objectives for the upcoming year. It is interesting to note, in working face-to-face on this opportunity to engage in the state plan's goals and priorities, the SRC and the IDVR staff were much agreed on what rose to the level of a priority.

#### **1. Customer Satisfaction Instrument**

### ***SRC Input***

The SRC survey subcommittee, together with IDVR, expressed concerns over low return rates for the Customer Satisfaction Survey. The focus was to increase response, retention, and satisfaction rates. Further, there was a need to revisit the questions, which made up the survey. The SRC was asked to take the draft survey and provide input such as retaining, modifying or eliminating items. Post question updates and changes in the survey platform both the response and retention rates increased dramatically.

#### **1. Comprehensive Statewide Needs Assessment**

### ***SRC Input***

In anticipation of the new CSNA survey cycle, the SRC asked for an overview presentation during the council meeting. The council was provided a draft to review and asked to provide input to be incorporated into the final document.

#### **1. Supported Employment Policy**

### ***SRC Input***

The IDVR presented Supported Employment under WIOA. There were multiple questions from council members that were answered by IDVR staff.

#### **1. Pre-Employment and Transition Services Policy**

### ***SRC Input***

IDVR staff presented to the SRC on Pre-ETS and the emphasis on WIOA structure and 15% budget requirements. Further, information was provided on the variety of Pre-ETS services being provided around the state. SRC members indicated the quality and variety of services is commendable.

## **1. Closure and Trial Work Policies**

### ***SRC Input***

The SRC Executive Committee supported the IDVR in changing the closure policy and updated the trial work policy. The changes to the closure policy were made to match RSA guidance. The SRC also assisted with rule making, which will not go into effect in 2020. Only minor changes were made to the trial work policy.

### **1. Subminimum Wage Policy**

### ***SRC Input***

The SRC reviewed the draft Services for Individuals Employed or Seeking Employment at Subminimum Wage policy. The SRC suggested that the agency add a documentation section at the end of the policy.

## **12. VR Services Portion of the Combined State Plan**

### ***SRC Input***

In the January 2020 SRC quarterly meeting, IDVR presented emerging goals and priorities resulting from the current draft CSNA to the SRC at large, compared to previous VR State Plan goals and priorities. The SRC agreed that these were relevant and important goals and priorities and that they remained fairly consistent with the previous state plan and strategic plan goals. In February 2020, several members of the SRC participated in a strategic planning session with IDVR management staff to jointly develop the goals and priorities for the Division, which would be included in the VR Portion of the State Plan.

The SRC Vice Chair reviewed the entire VR Portion of the Combined State Plan and acknowledged agreement with the goals and priorities.

The majority of the SRC provided comments were typographical and grammatical in nature. One question asked by the SRC: How will high quality sustainability training be developed and implemented for CE Pilot 2.0?

## **2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND**

During PYs 2017-2018 the SRC provided input and recommendations to IDVR on a variety of subjects. IDVR agreed with and or adopted the SRC's input during PYs 2017 and 2018. The following summarizes IDVR's responses to that input and recommendations.

### ***IDVR Responses***

### **1. SRC Member Focused Work**

IDVR agreed with the SRC that an orientation would assist new and existing members. SRC training materials were provided by the SRC chair and disseminated prior to a two-hour meeting held the afternoon prior to the full SRC Council meeting, and all members were invited to attend. The Division also contracted with Paul Dziedzic to facilitate a one-day meeting to improve collaboration.

### **1. SRC Member Changes**

IDVR supported the Council's committees restructure.

#### **1. SRC National Engagement**

IDVR and SRC member engaged with Idaho's Congressional delegation to collaboratively share the impact that IDVR has on Idaho's citizens.

#### **1. New Mission and Vision Statements**

IDVR's new mission and vision statements better reflects the intent of the program and aligns with the dual customer and employer focus which is mandated under WIOA.

#### **1. Strategic Planning**

The Division included the SRC in a strategic planning session and included their perspective for priorities for the upcoming year. Both the SRC and IDVR have similar interests regarding the goals and priorities for the Division.

#### **1. Customer Satisfaction Instrument**

IDVR worked collaboratively with the SRC survey subcommittee to improve the overall Customer Satisfaction Survey process and instrument, which has resulted in greater survey response rate.

#### **1. Comprehensive Statewide Needs Assessment**

The Division provided an overview of the CSNA purpose and surveys to better engage with the SRC and accepted the SRC's input on the draft report.

#### **1. Policy Input**

IDVR presented several draft policies to the SRC; Supported Employment, Pre-Employment and Transition Services, Closure and Trail work and Subminimum Wage. The Division, in general, accepted the SRC's input; adding, deleting, or amending sections to each policy.

#### **9. VR Services Portion of the Combined State Plan**

IDVR worked with the Vice-Chair of the SRC regarding comments provided on the VR Services Portion of the State Plan. All of the typographical and grammatical errors noted by the SRC Vice-Chair were corrected. The Division provided a response to the Vice-Chair regarding CE sustainable training. IDVR's response acknowledged that this is a concern for Division as well and will be addressed as we move forward with CE Pilot 2.0.

### **3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.**

IDVR considers all SRC input and did not reject the SRC's input or recommendations.

#### **B. REQUEST FOR WAIVER OF STATEWIDENESS**

When requesting a waiver of the statewide requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

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;

Waiver of Statewideness

IDVR is requesting a waiver of statewideness for cooperative agreements with numerous Local Education Agencies (LEAs) across Idaho and with the Idaho Department of Correction (IDOC). All funds made available to IDVR are certified non-federal funds.

IDVR has entered into School to Work Transition (SWT) cooperative agreements through 11 agreements with 50 of the 175 total LEAs across Idaho. The cooperative agreements are solely to facilitate the transition of students with disabilities from K-12 public education into adult life. This transition to adult life may involve any or all of the following goal oriented activities: post-secondary education, training and job placement, direct placement into appropriate employment (to include supported employment if required), advocacy and any other activities that are relevant to the student and within the scope of IDVR's mission and role. Additionally, IDVR agrees to collaborate with LEAs to provide or arrange for the provision of pre-employment transition services for eligible and potentially eligible students with disabilities who are in need of these services in accordance with 34 CFR 361.48. IDVR will not provide pre-employment transition services that the school customarily provides under IDEA.

All funds allotted to IDVR via these agreements are certified non-federal funds. Each signed individual agreement with participating LEAs provides this assurance.

These agreements promote better understanding and convenient access to VR services, including pre-employment transition services, to qualifying students offered through School to Work Transition, but do not expand the scope of services available statewide. The services offered under these agreements include:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in postsecondary educational programs at institutions of higher education
- Workplace readiness training and
- Instruction in self-advocacy
- All other traditional VR services

These agreements are revised and renewed on an annual basis.

These agreements increase outreach through stronger relationships between the LEA, VR, and individuals with disabilities promoted by a better understanding of services by LEAs where agreements are in place. Enhanced relationships between all parties to the agreement promote an informed transition to traditional VR services and the opportunity for potentially eligible students to participate in Pre-ETS.

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements.

Data from the agreements are included in the following table, including the LEAs, number of students served, receipt of non-federal funds and VR 110 grant funds (not including match

funds). IDVR anticipates serving and expending funds similar to the data used for the projection.

#### **Agreements by LEA for SY 2021**

Local Education Agency (LEA)		Non-Federal Funds Captured	VR 110 funds Expended
Region 1 Agreement with LEAs:  #83, #84, #101, #272	41	\$18,522	\$45,816
Region 1 Agreement with LEAs:  #271, #273	67	\$18,522	\$86,709
Region 2 Agreement with LEA: Lewiston Independent School Dist. #1	35	\$18,522	\$32,386
Region 3 Agreement #1 with LEA: Boise Independent School Dist. # 1	148	\$18,522	\$129,962
Region 3 Agreement #2 with LEA: West Ada School Dist. #2	179	\$37,044	\$138,636
Region 3 Agreement #3 with LEA: Nampa School Dist#131	88	\$18,522	\$51,503
Region 3 Agreement #4 with LEAs:  #133-137, #221, #363, #370, #372, #373,	91	\$18,522	\$48,383
Region 4 Agreement with LEAs:  #61, #234, #121, #151, #314, #231, #232, #233, #261, #331, #418, #316, #312, #465	151	\$18,522	\$125,824
Region 5 Agreement #1 with LEAs: #25, #52, #55, #58, #381	239	\$18,522	\$55,443
Region 5 Agreement #2 with LEAs: #33, #148, #351, #21, #149, #150, #201, #202	52	\$18,522	\$157,49
Region 6 Agreement with LEAs:  #59, #60, #91, #93, #251, #252	134	\$18,522	\$73,859
<b>Totals</b>	<b>1,225</b>	<b>\$222, 264</b>	<b>\$804,269</b>

IDVR has also entered into two cooperative agreements with the Idaho Department of Correction (IDOC) which covers six of the seven IDOC Districts in Idaho, excluding District 2. The purpose of these agreements is to provide comprehensive Vocational Rehabilitation (VR) services to eligible male and female offenders with disabilities leaving the prison system that have been identified as at risk of revocation, thus needing more intensive reentry services.

These agreements promote better understanding and convenient access to VR staff and services to promote the reentry of the offenders into society, with an emphasis on stability and

employment. All relevant VR services may be provided, depending upon the need of the individual. The scope of services provided under these agreements may include:

- Vocational Rehabilitation Counseling and Guidance
- Assessment
- Diagnosis and Treatment
- Training services to include, graduate, 4-year college, junior or community college, occupational or vocational, on-the-job, job readiness, miscellaneous, registered apprentice, basic academic remedial or literacy and disability related training
- Information and Referral
- Short-Term Job Supports
- Job Search and Placement Assistance
- Supported and Customized Employment
- Benefits Counseling
- Rehabilitation Technology
- Personal Assistance and Technical Assistance Services Including Self-Employment
- Reader and Interpreter Services
- Extended Services, if applicable and individual meets the eligibility criteria to receive such services
- Supportive services to include, maintenance and transportation
- Other Services

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements. Both agreements are revised and renewed on an annual basis.

All funds allotted to IDVR via these agreements are certified non-federal funds. Both signed agreements provide this assurance.

The total receipt of certified non-federal funds is \$178,951 for SY 2021. The total number of individuals served in SY2020/PY2019 by both agreements is 709 individuals with disabilities. The Division expended \$207,679 with VR 110 grant funds (not including match funds). The Division anticipates similar projections for the number of individuals services and funds expended in SY2021/PY2020 for these agreements.

## 2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

IDVR will approve each proposed service prior to it being provided.



### 3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

All State plan requirements, including order of selection requirements, will apply to all of the cooperative agreements with Local Education Agencies (LEAs) across Idaho and with the Idaho Department of Correction (IDOC).

#### C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

##### 1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The Idaho Division of Vocational Rehabilitation (IDVR) and the following entities have entered into or are developing formal agreements with programs to outline and explain the collaborative relationship between the program and IDVR. The agreements outline some or all of the following: goals, planning processes, information sharing and confidentiality, technology, accountability, service delivery support, cost sharing, annual action plans, duration, amendments, and termination/conflict resolution, when applicable.

The cooperative agreements with agencies mentioned in this section of the state plan were created to allow for more efficient service delivery to those populations under each cooperative agreement. They have allowed for more efficient referral, eligibility determination and collaborative service provision. Customers have benefited from these cooperative agreements because of the well-established relationships and improved understanding of cross program requirements. Customers also receive more effective referral and expedited service provision because of the established agreements.

IDVR's case management system collects outcome data for individuals served under many of these agreements. The Division has yet to analyze this information for program improvement purposes.

IDVR has the following cooperative agreements:

**Idaho Industrial Commission (ICC):** This agreement outlines the relationship between IDVR and the ICC with regard to persons injured on the job who may also have other non-work-related injuries. The Industrial Commission will be the lead Agency for injured workers in Idaho and will refer them to IDVR when they are unable to return to previous or similar employment due to the work-related injury.

The cooperative agreement with the Idaho Industrial Commission benefits customers who have experienced an industrial injury, covered by worker's compensation law. Customers benefit in terms of access and service provision because of the well-developed relationships fostered by this agreement. Customers receipt of services is generally faster and more streamlined because program staff have strong working relationships and an understanding the requirements of each program.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

**Idaho Department of Health and Welfare Division of Behavioral Health, Adult Mental Health (H&W-Behavioral Health):** The IDVR and H&W-Behavioral Health update this

agreement annually for the purpose of better serving Idahoans experiencing severe and persistent mental illness. A team approach will be used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those customers who have a severe and persistent mental illness deemed not eligible for this program will be referred to the general IDVR counselor. Those customers who have a severe and persistent mental illness deemed ineligible for IDVR services will be referred to other appropriate resources for assistance. A designated VR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The Department of Health and Welfare provides certifiable non-federal monies for IDVR services per explained in the interagency cooperative agreement.

Individuals with mental health disabilities served under the cooperative agreement by DBH and IDVR receive services in a more efficient and timely manner because IDVR staff are located and work in the behavioral health facilities and deliver services through a team approach. IDVR staff are able to engage with customers on a regular, more frequent basis and collaborate with other Behavioral Health staff. Counselors who work with this population better understand the individual's functional limitations and treatment planning requirements and can better identify comprehensive IPE services and goals to increase successful employment outcomes.

Outcomes are tracked in the case management system by caseload. Of those customers working with an IDVR mental health specialist counselor, in PY2018, 105 individual's successfully obtained employment.

**Reciprocal Referral Services between the two VR Programs in the State:** The State of Idaho has two VR programs, the Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired. The two programs have a Memorandum of Understanding (MOU) to establish guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

Customers of both VR programs in the state of Idaho receive comprehensive VR services in a more timely manner. The Division has recently started obtaining coenrollment data across all WIOA programs. This data will help improve our cross-program referrals and other collaborative efforts. As of the most recent performance quarter (PY 2019Q3), both VR programs are collaboratively serving 28 individuals.

**Independent Living:** IDVR is the Designated State Entity (DSE) for the Title VII Part B funds distributed by the Administration for Community Living (ACL). IDVR currently contracts and allocates a percentage of the total grant funds to the following:

- Idaho Commission for the Blind and Visually Impaired (ICBVI) 30%
- State Independent Living Center (SILC) 30%
- Living Independence Network Corporation (LINC) 20%
- Disability Action Center – Northwest (DAC) 10%
- Living Independently for Everyone (LIFE) 10%

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act of 1973 as amended by the WIOA. This agreement increases the IL centers ability to provide services to individuals with disability who require independent living services. IDVR does not track services or outcomes as they relate to this cooperative agreement.

**Project Search:** Project Search is a high school transition collaborative effort between school districts, VR, Community Rehabilitation Programs (CRPs) and host businesses. It is an international, evidence-based model which prepares transition students identified as requiring long term supports for the world of work, thus helping them move into community employment after high school graduation. The Project Search program combines two hours of daily classroom training along with four hours of unpaid internship. These internship experiences are provided in three different eight-week rotations and can include: housekeeping, dietary, laundry, childcare, and equipment transportation. Even though the students may not be hired by the host business, they are better prepared for work and better able to access employment after Project Search completion.

This collaborative agreement describes the roles, responsibilities, and process between all parties involved. Students participate in internships and other Pre-ETS activities in several rotating work sites. Students develop work skills which will increase their employment options at the completion of the program. The Division maintains employment information on all successful outcomes. Those students who successfully obtained employment after their participation in Project Search is: The Division needs to evaluate a better method for collecting and reporting data on customers involved in Project Search.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

The intent of these agreements is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those provided by the State of Idaho. IDVR has the basic responsibility to provide rehabilitation services to all eligible customers in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Paiute and Shoshone/Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with IDVR.

American Indian (or Alaska Native) customers benefit from the enhanced cross program collaboration described in these cooperative agreements. They experience greater access to services in an expedient manner because of the well-developed relationships and increased collaboration fostered by the agreement. IDVR staff are provided cultural awareness and sensitivity training so they are better prepared to engage with shared customers. Customers also receive a comprehensive array of unduplicated service.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

**U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment (VR&E) Program and IDVR:** This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment Program

(VR&E), and the Idaho Division of Vocational Rehabilitation with the purpose of ensuring seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities.

Veteran customers with disabilities jointly served by VR&E and IDVR receive faster, more streamlined access to services and shared program resources because of the increased collaboration created by this agreement.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

**Partnership Plus (PPLUS):** Partnership Plus (PPLUS): IDVR has established PPLUS agreements with four Employment Networks (EN's) around the state. The PPLUS agreements facilitate referrals between IDVR and the EN under the Social Security Administration's (SSA) Ticket to Work program. The Agreement defines the responsibilities of each party in working with Social Security beneficiaries (those receiving Supplemental Security Income or Social Security Disability Insurance benefits). This partnership is created once the beneficiary selects an EN. A referral to the EN is made when the beneficiary is stable in their employment. This agreement establishes the basis for collaboration and coordination between the beneficiary, IDVR and the EN as the beneficiary transitions from the VR program. The EN will provide continued support on the job, i.e. benefits counseling, job retention services, and other types of ongoing support, at no cost to the beneficiary. The EN can help the beneficiary maintain or advance in employment and increase their earnings.

**Idaho Department of Labor as an Employment Network:** The Idaho Department of Labor (IDOL) has revised their PPLUS agreement with IDVR. American Dream Employment Network (ADEN), an administrative EN, has taken over the technical assistance and training of PPLUS for IDOL. The PPLUS agreement describes the referral process between IDVR and ADEN/IDOL under the SSA's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 (P.L. 106-170, Title 1, Subtitle A, 42 U.S.C. 1320b-19 et seq.) and the revised regulations Social Security promulgated under 20 CFR Part 411 that took effect July 21, 2008. The Agreement further describes the responsibilities of each agency in working with Social Security beneficiaries (those receiving SSI/SSDI benefits).

The cooperative agreements with Employment Networks in the state of Idaho, including the agreement with IDOL, assist those customers who could benefit from additional supports and services needed to maintain their employment. IDVR has experienced low volume referrals to ENs across the state, however IDVR continues to reinforce the value of services provided by ENs for customers who could benefit from additional supports to maintain their employment. IDVR continues to educate staff and works with ENs to market their services to increase the number of referrals. Outcomes are not tracked in the case management system but are tracked by the Central Office Ticket to Work Program Specialist.

**Adult Corrections:** The Division in collaboration with the Idaho Department of Correction (IDOC), has two Memorandum of Agreements (MOAs) to provide a cooperative effort in the delivery of comprehensive vocational rehabilitation services to customers who are involved with the criminal justice system. The goal of the MOAs is to provide IDVR eligible customers who are reentering the community and under felony supervision in the following service areas: Region I Coeur d'Alene, Regions III and VII Treasure Valley area, Region IV Twin Falls and

Region V Pocatello area the opportunity of the full spectrum of IDVR services. IDOC will contribute certifiable non-federal funds towards the case service expenditures.

Incarcerated individuals with disabilities who are ready to transition back into society, receive services in a more efficient and timely manner because IDVR staff are collocated in correction facilities per the cooperative agreement. Staff are able to engage with customers more frequently, prior to release. Counselors who work with incarcerated and ex-offenders better understand the probation and parole requirements which can assist individuals with their IPE services and goals and reduce potential recidivism.

Outcomes are tracked in the case management system by caseload. Of those offenders working with an IDVR corrections counselor, in PY2018, 83 incarcerated or ex-offenders successfully obtained employment.

**Transitioning Students with Disabilities:** In collaboration with Special Education and IDEA, as well as federal initiatives, the Division has developed cooperative agreements with schools or school districts in various areas throughout the state to provide comprehensive vocational rehabilitation services to students with disabilities to assist with transition to work. A designated VR counselor and staff member are assigned to a consortium affiliated facility to better serve customers in the respective areas.

The school districts contribute certifiable non-federal funds to IDVR to be used for allowable IDVR case service expenditures per the cooperative agreement. The memoranda agreements cover the following areas of the state:

- Region I Coeur d'Alene - Two Projects
- Region II Lewiston - One Project
- Region III Treasure Valley Special Programs - Four Projects
- Region IV Twin Falls - One Project
- Region V Pocatello - Two Projects
- Region VI Idaho Falls - One Project

It is worth contrasting the services in the regions of the state covered by the cooperative agreements versus those not covered. IDVR counselors are either located in high schools or travel to those high schools participating in the project. This increases accessibility to the students eligible and/or potentially eligible for IDVR services. Counselors maintain a dedicated caseload of transitioning students and youth with disabilities until case closure. Dedicated school to work counselors collocated in schools creates closer working relationships with school personnel, provides for more timely referrals, better support throughout the rehabilitation process, and the expertise that comes with specialization. The arrangement has proved important in developing an excellent working relationship between IDVR staff and school districts across the state.

In school districts not covered by the cooperative agreements, students continue to receive the same level of service provision; however, referrals to IDVR are made by school counselors, special education teachers, or by word of mouth. All of the traditional and relevant activities and services are provided by a general caseload counselor. There are no services offered under the cooperative agreements that are not also made available by counselors providing services in the areas not covered by the cooperative agreements. The counselors who only serve students and youth typically are more knowledgeable and specialized in serving this population.

Students with disabilities benefit from the cooperative agreements IDVR has with LEAs across the state because VR staff are colocated in the when practicable, which results in increased accessibility and availability to students, parents, and teachers. This enhanced access has increased Pre-ETS to those potentially eligible students and students who wish to apply for VR services. The cooperative agreements serve as the foundation for improved relationships between VR, students, parents, and teachers.

The Division is beginning to see more students reach their employment goal because of the early engagement with teachers, parents, and students. IDVR's case management system does capture employment outcomes for students who apply for VR services. Not all potentially eligible students apply for services, however those that do are also being tracked.

## 2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The state program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), housed by the Center on Disabilities and Human Development at the University of Idaho. IATP's goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. IDVR and IATP have had a long-term working relationship to assist IDVR customers with assistive technology services and devices, to include VR representation on the IATP Council. IDVR is in the early development stages of formalizing a cooperative agreement with IATP. The components of the cooperative agreement will include coordination and availability of services, the reciprocal referral process, and other programs and resources available through the Idaho Assistive Technology Project.

The collaboration between IDVR and IATP has improved access to AT services and devices for those individuals with disabilities who can benefit from these services. IDVR staff have a linkage directly to AT resources our existing collaborative efforts to include AT assessments, services, and devices from AT subject matter experts. AT services and devices can reduce barriers to employment, allowing individuals with disabilities the opportunity to be more productive and succeed in employment. The Division does not currently track outcomes related to services provided under this agreement. The Division needs to evaluate a method for collecting jointly served participants. The formal agreement with IATP will be completed by the end of FFY 2020.

## 3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The Idaho Division of Vocational Rehabilitation does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

## 4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

The Division does not currently have any agreements with non-educational agencies serving out-of-school youth.

When indicated, IDVR will engage in a co-enrollment strategy with other WIOA Plan partners, to provide general VR services and disability related supports.

Out-of-school youth (youth age 14-24 not enrolled in a secondary program) are encouraged to complete their high school education or pursue a formal or self-study GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program (available to those

over the age of 16). Idaho Job Corps maintains a partnership with the College of Western Idaho to offer a path to a high school diploma or GED for those age 16-24.

The WIOA Youth program under the Idaho Department of Labor focuses on education, training and employment opportunities for out-of-school youth. WIOA Youth provides an array of services to qualifying youth including dropout recovery services, paid and unpaid work experiences, occupational skill training, leadership development opportunities, facilitation of employer connections, interviewing skills, and mentoring.

Idaho Job Corps offers qualifying youth extensive support for up to two years depending on individualized need. This includes career exploration and education assistance.

Idaho's Disability Employment Initiative grants and the formal agreement IDVR had with the Idaho Department of Juvenile Corrections have ended or are near completion. Regardless of the presence of formal agreements, these past projects have resulted in better knowledge of IDVR services and staff. Referrals to IDVR from IDJC for example continue to be strong.

Numerous regional partnerships take advantage of local resources or serve as referral sources to IDVR to engage out-of-school youth. These resources differ by location with a common theme of providing a mechanism of outreach for out-of-school youth

#### 5. STATE USE CONTRACTING PROGRAMS.

Through the State Use Contracting program, Community Rehabilitation Programs provide skill development and training for individuals with disabilities. While many programs providing state use goods do not meet the integrated criteria established under WIOA, the program does generate income for CRPs allowing increased stability of their overall programs with supplemental revenue. Fiscally healthy CRPs are then able to continue operations in their Competitive Integrated Employment divisions. This indirectly benefits those customers of IDVR who require CRP services.

#### D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

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

**IDVR Pre-Employment Transition Highlights.** IDVR's Transition Coordinator has extensive experience and an established network across Idaho public K-12 education system. The Division has developed Pre-ETS implementation strategies to provide services at the following levels, including all required pre-employment transition services (job exploration counseling, work based learning experiences, counseling on opportunities for enrollment in postsecondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy). The Division has continued to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. For example, The Division has developed numerous Memorandum of Agreements (MOAs) with various Local Education Agencies (LEAs). These include contracting with educators to provide a Self-Advocacy curriculum for students previously developed through a partnership between the State Department of Education, IDVR, a LEA, and National

Technical Assistance Center on Transition (NTACT). The Division has also developed MOAs to provide students with an opportunity to participate in a paid work experience while earning summer school credit.

The Division has also improved coordinated activities by having our VR Counselors work collaboratively with local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities. These strategies also include opportunities for students who are receiving accommodations under Section 504 of the Rehabilitation Act. VR Counselors are attending numerous IEP meetings and are working with districts to develop a better process for inviting VR counselors to IEP meetings. In addition, VR Counselors are working with districts to coordinate pre-employment transition services. VR Counselors are working with LEAs to provide career fairs and career mentoring.

The Division also works with the State Department of Education, the Idaho Commission for Blind and Visually Impaired, LEAs, Institutes of Higher Education (IHEs), and the Council for Developmental Disabilities to put on a Transition Institute for LEAs and VR staff. The Institute is modeled after NTACT Taxonomy for Transition Programming. The Taxonomy for Transition Programming provides solid practices identified from effective programs and evidence-based predictors of post-school success for implementing Pre-ETS and transition focused education. This Institute allows collaborative planning between LEAs and VR. Teams discuss what transition/pre-employment transition services are available to students and what services are needed by students based on each district. Teams then create plans to help increase the necessary services for students with disabilities.

The Division has strong relationships with education agencies throughout the state, including formal interagency agreements with several Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

The Division and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency and identifies the minimum age for service delivery to students with disabilities. The minimum age is currently 15 and upon approval of the 2020 state plan the agreement will be modified to reflect a minimum age of 14 for service delivery to students with disabilities.

The pre-employment transition services will be provided to students with disabilities who are potentially eligible or eligible for VR services. This agreement was formalized and signed in August 2018. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed.

Additionally, the Agreement details that the IPE must be developed, agreed to and signed by the student, or the student's representative, and the VR counselor, as early as possible in the transition process, within 90 days from eligibility and no later than the time the student leaves the school setting, whichever is earlier.

Lastly, the Division has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, Career and Technical



Education (CTE), and service providers to provide quality transition activities and pre-employment transition services to students across Idaho. \*The plan is detailed in section 2B.

## 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 formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to promote communication and the sharing of technical expertise in transition planning.

The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment.

The agencies agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

## Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho State Department of Education (SDE), Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for the Blind and Visually Impaired (ICBVI), Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project, Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

### B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

**Statewide Transition Plan** - IDVR, the State Department of Education (SDE), Idaho Parents Unlimited, Nampa School District, Lake Pend Oreille School District, and Idaho Falls School District, have developed and implemented a statewide secondary Transition Plan with support and assistance from NTACT (National Technical Assistance Center on Transition). The goal of the plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, CTE, and service providers to provide numerous transition activities and pre-employment transition services.

Expected outcomes include increased teacher knowledge of agencies and services, increased number of students receiving pre-employment transition services or needed educational transition services, increased student knowledge of agencies and other services, increased families' knowledge of agencies and services, increased collaboration with CTE, increased number of students participating in higher education or competitive employment, and provide more effective Pre-ETS based on student need.

Furthermore, the formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to facilitate the development and implementation of Individualized Education Programs (IEPs). The agencies agree to cooperate in the development of transitioning students' Individualized Education Programs (IEPs) and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

### C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

IDVR has continued to participate in agreements with many LEAs across Idaho, initiated prior to WIOA, however these agreements do not afford unique services to students in these districts. In

other words, pre-ETS and transition services offered under these agreements do not increase services or expand the scope of services over any other political subdivision of the state. All Pre-ETS and transition services are offered statewide to all LEAs regardless of agreement status. IDVR has staff assigned to all public high schools across the state.

### **Idaho State Department of Education (SDE) - Secondary Transition:**

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Pre-Employment Transition Services will be provided to students with disabilities who are potentially eligible or eligible for VR services beginning at the age of 14 (age will change upon state plan approval).
- Roles and responsibilities of each agency, including which agency is state lead
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Procedures for outreach, consultation, training, and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Dispute resolution
- Prohibition on entering into an arrangement with an entity holding a 14(c) special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.
- Coordination and documentation requirements under section 511

IDVR has created a Youth Subminimum Wage Document Requirements Checklist which includes the documentation requirements and responsibilities under Section 511. Various requirements are detailed in the top-level checklist for youth, including the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511. The Transition Services Documentation and Checklist details LEA requirements for documenting provision of a transition service. Finally, the Youth Career Counseling Verification Requirements section outlines areas and responsibilities of IDVR in ensuring regulations are met ahead of providing verification of receipt of CCI&R.

### **Section 511 Subminimum Youth Checklist**

The following steps must be completed before IDVR can provide **verification** of Career Counseling and Information and Referral to Youth Seeking Subminimum Wage Employment

1. The provision and documentation of transition services or pre-employment transition services (a. or b. must be completed)
  - a. Transition Services Documentation Checklist Completed
  - b. Pre-employment Transition Services Documentation Checklist Completed
2. Application for VR services AND one of the following (a. b. or c. must be completed):
  - a. Ineligibility Determination Checklist Completed
  - b. Closure after an Approved IPE Checklist Completed
  - c. Informed Choice Not to Pursue Competitive Integrated Employment Form Completed
3. The provision of Career Counseling, and Information and Referral Services (ALL must be completed)
  - a. Youth Career Counseling Verification Elements Signed by Counselor
  - b. Information and Referral Packet Provided to Youth
  - c. Career Counseling, Information and Referral Youth Verification Form for Stated Subminimum Employment Goal Completed
4. Once the all of the preceding steps have been satisfied, verification of CC/I&R can be provided to the youth and they would be able to legally work for less than minimum wage. The 511 Subminimum Youth Checklist only has to be completed once. After the youth completes this process, they would engage in group sessions at the 14c to meet ongoing requirements for CC/I&R for youth.

### **Section 511 Transition Services Documentation Checklist and Cover Sheet**

34 CFR § 397.30 outlines the responsibilities of local educational agencies to youth with disabilities who are known to be seeking subminimum wage employment. All elements of this form must be completed in order for the checklist to be considered valid evidence of the completion of transition services for the purposes of satisfying Section 511 requirements of the Workforce Innovation and Opportunity Act.

1. (To be completed by the Local Education Agency): The documentation of completion of appropriate transition services for a youth with a disability under IDEA
  - a. This can be transmitted in the form of an Individualized Education Plan, but must contain at a minimum (please verify the following are contained in this release):
    - i. Youth's name
    - ii. Description of the service or activity completed
    - iii. Name of the provider of the required service or activity
    - iv. Date required service or activity completed
    - v. Signature of educational personnel documenting completion of the required service or activity

- vi. Date of signature documenting completion of the required service or activity
  - vii. Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to IDVR
  - viii. A cover sheet that itemizes the documentation that has been provided to the VR program regarding that youth (completion of the elements above satisfies this requirement)
  - ix. Verification that the educational agency will keep a copy of all documents sent to the VR program
  - x. Signature of the individual transmitting this documentation
2. (To be completed by Vocational Rehabilitation):
- a. Verification that VR has filed a copy of this information
  - b. Verification that this information has been provided to the youth

### **Youth Career Counseling Verification Elements**

Prior to initial verification of CCI&R for youth known to be seeking subminimum wage employment, IDVR must ensure counselors providing the service address the following elements of the VR process including a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

- 1. Self-advocacy, self-determination and high expectations
  - a. Identify the individual's desires for employment including type, pay, hours, benefits, etc.
  - b. Ensure informed choice
- 2. Review of any assessment information available
  - a. Primary employment factors
    - i. Strengths
    - ii. Interests
    - iii. Abilities
    - iv. Capabilities
    - v. Resources
    - vi. Priorities
    - vii. Concerns
    - viii. Informed Choice
  - b. Person-centered planning
  - c. Marketable skills

- d. Soft skills (current and where development is needed)
3. Use of labor market information
  - a. In-demand occupations
  - b. Job exploration
    - i. Education and experiential requirements
    - ii. Pay
    - iii. Hours
    - iv. Functional capacity requirements
    - v. Career pathways
  - c. Electronic resources and navigation fundamentals
4. SSA Benefits Planning

When engaging in career counseling with individuals with disabilities, rehabilitation professionals should ensure that they are aware of cultural differences and that they discuss the available options such as supported or customized employment. A discussion of the need for assistive technology or reasonable accommodation on the job is important to maximize the potential for success. It is helpful to assess the individual's support system and to provide information on available resources for the individual.

A completed signature sheet (signed by the customer and VR counselor) affirming that the elements of Career Counseling have been discussed with the customer in the course of the provision of Vocational Rehabilitation Counseling and Guidance.

The current agreement establishes the following roles and responsibilities for the involved parties:

**The Idaho State Department of Education (SDE) agrees to:**

- Assume the role of lead agency in facilitating interagency planning with LEAs and implementing educational programs and transition services for students with disabilities from high school to post-high school services.
- Support LEAs in their efforts to write IEPs using an outcome oriented focus and to coordinate transition activities for each IEP eligible student, beginning no later than the IEP created before the student turns age 16 years old (earlier if appropriate), and to address future student needs in the areas of post-secondary education, vocational training, employment, and adult living and communication participation, including assistive technology.
- Invite IDVR and/or ICBVI to provide information regarding their services, including their role as an IEP team member to school district personnel, students, and their families.
- Invite IDVR and/or ICBVI counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred to IDVR and/or ICBVI for rehabilitation services, or earlier if appropriate.

- Work with IDVR and ICBVI Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- Identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

**Idaho Division of Vocational Rehabilitation (IDVR) and Idaho Commission for the Blind and Visually Impaired (ICBVI) agree to:**

- Agree to establish the age of 14 to begin working with students with disabilities.
- Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
- IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
- IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video/telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.
- All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

#### D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that the vocational rehabilitation agency will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Division has also participated in a series of face to face meetings in communities across Idaho including key stakeholder engagement through a series of regional special educator meetings, presenting at statewide administrator meetings, presenting at Tools for Life to parents, students, and educators, reaching out to Idaho Parents Unlimited, reaching out to the Idaho Interagency Council on Secondary Transition, and providing ongoing discussions with the Idaho State Department of Education.

The Division also developed a Transition Leadership Team. This team has members from each of the eight regions. These leaders provide outreach across the state.

Additionally, IDVR counselors have worked with educational counterparts to significantly increase the number of potentially eligible students receiving pre-employment transition services and those found eligible for the VR program.

Finally, IDVR staff, the State Department of Education, the Idaho Parents Center, Idaho Educational Services for the Deaf and Blind, WINTAC, and NTACT worked to create a strategic plan for pre-employment transition services in Idaho. The first goal developed by the team was to increase internal (VR staff) and external (school districts, parents, students, community partners) clarity and messaging regarding VR process and how Pre-ETS fits into the overall continuum of VR services. The following action steps were created to achieve this goal:

- Create a process to address information sharing between school and VR counselors
  1. Service request form
  2. IEP
  3. 504
- Develop materials to share information about VR services with parents and schools
  1. Pre-ETS
  2. VR Services
- Options for VR Counselors to participate in the IEP process by
  1. Providing information about services
  2. Developing services to address student goals/needs
  3. Creating a timeline for initiating referral/eligibility



- Create training and materials that will increase students' understanding about the VR process and services
  - Complete the internal Guidance Document regarding Pre-ETS to be used by IDVR staff
1. Accountability Measures- Outcomes for Students
  2. Develop a continuum of services reflective of Pre-ETS and Transition Services
- Create opportunities and materials to use with families to increase their understanding of expectation of work and VR Services

The second goal is to strengthen cross agency partnerships to increase collaboration in development and implementation of Transition Services. The following action steps were created to achieve this goal:

- Review and adjust data collection that will improve ability to better inform decision making
1. Work with SDE to obtain break out of schools, # of students on IEP and 504
  2. Identify additional data points and how to use them
  3. Communicate to the VR field staff how to use the new data points
  4. Share IEPs using a new system
- Regional managers are informed and engaged in how they can support VR Counselors in providing Pre-ETS and Transition Services.
1. Identify strategies to include Regional Managers
- Outreach strategies to rural schools are identified with steps to address student participation
  - Outreach strategies identified for juvenile justice and Foster Care.

#### E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

IDVR does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers. Services are purchased on a fee for service basis. IDVR does have cooperative agreements with several nonprofit CRPs for the coordination of services provided by Employment Networks for individuals who are Social Security beneficiaries who are Ticket holders. These cooperative agreements describe the coordination between both agencies.

IDVR maintains a Community Rehabilitation Providers (CRP) portal on the Division's website. The portal hosts communication relevant to CRPs and IDVR's CRP Manual. This Manual was first issued in January 2019 and incorporates significant input solicited from CRPs. The CRP Manual contains information on:

- Service Billing Criteria and Process
- Service Definitions

- Overview of the On-Site CRP Monitoring Review and Corrective Action Process
- Definition of Remote and Underserved Areas where IDVR supports travel due to lack of local services in identified areas
- CRP Services Crosswalk to better align services under WIOA
- Appendix information on the initial pilot for Customized Employment including rates and milestones for that pilot

The manual is intended to serve as a living document which will be updated over time, as needed, with input from CRP stakeholders. A new version of the CRP Manual is tentatively slated to be released July 2020. IDVR has already collected CRP comment in late 2019 for Manual improvements. Planned iterations of the guide include:

- Examples of completed referrals/sample reports to promote quality referrals from VR staff and reports from CRP staff
- Modified monitoring protocol to align with WIOA priorities
- CRP onboarding requirements (accreditation, insurance, and prerequisites to ensure a baseline of quality and accountability)
- Updated fee schedule to better align service compensation and service complexity

CRPs provide specific services for customers based on a fee-for-service or through a specific invitation to bid on a Request for Proposal (RFP). Idaho CRPs must be accredited by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or the Rehabilitation Services Accreditation System (RSAS), follow the process and procedures mentioned in this manual, and undergo periodic monitoring by IDVR to continue a working relationship with the Division. This manual addresses the Idaho Division of Vocational Rehabilitation's state-federal program. The CRP Manual outlines the service billing criteria and process required before the Division will process bills, including prohibitions on billing for multiple customers unless group services are authorized. Group service rates differ from individual service rates and are outlined in IDVR's Fee Schedule. Furthermore, day rates are published for non-community-based assessment where no other options are available in the community. This section also mandates notification in the eventuality of anticipated service discontinuation and prohibits customer abandonment (instead requiring at least 30 days notification for a soft handoff to another CRP ahead of CRP closure in a region). A dispute resolution process including an escalation chain is also established in this section of the guide.

IDVR identifies allowable services under Section Two of the CRP Manual: CRP Service Definitions. Service outlined in this section include the major headings of assessment, job related supports (job search activities, short-term job supports, job readiness training), Pre-ETS (required activities under 34 CFR 361.48(a)(2)), and Supported Employment. Additionally, requirements to document fading and/or skill acquisition for the continue of SE hours are articulated in this section. IDVR is working with CRPs to strengthen understanding of documented progress toward SE stability, and CRPs have requested additional guidance in this area. The Division will issue improved guidance in the tentative July 2020 release of the Manual. Slated improvements include increased guidance on specific services with a potential incorporation of the agency's benefits planning initiative. The manual covers documentation of stability and transition to extended support and outlines the Youth Extended Services option to provide this service to qualifying youth where no alternate funds for extended support are available.

IDVR is in the process of evaluating the CRP fee schedule for allowable costs using:

- WINTAC's "Review of Vocational Rehabilitation Agency Rates, Methodology, & Monitoring of Performance for Purchased Service" which includes
  - An evaluation of rates for similar services paid by other SVRAs
  - Federal cost principles at 2 CFR 200.405(a) to align costs to relative benefit
  - Accreditation requirements
  - Payment methods (fee-for-service, performance, contracts)
  - Reporting requirements
  - Monitoring

The Division's 2020 modification of the guide will apply each of these considerations to inform potential fee updates: While the Division's current CRP Manual (January 2019) does address each requirement, the Division's analysis may incorporate innovative practices used by other SVRAs. Currently the Division does not separate rate by complexity of rehabilitation needs but is seeking to remedy this deficiency. The Division is enlisting the assistance of the Idaho Division of Purchasing to inform the analysis of service rates. Novel rates for Customized Employment and Benefits Planning are expected outcomes of this process, in addition to a reconsideration of the agencies total fee schedule.

Pre-employment Transition Services (Pre-ETS) agreements including rates are established under a separate process. In areas where volume is sufficient, the Division employs bids/contracts. The majority of contracts are filled in regional population centers, however when an area has no contract (rural and remote Idaho), or all slots are filled for a contracted group, the Division employs individual Pre-ETS provision at existing hourly rates to ensure the availability of Pre-ETS,

IDVR issues an annual report of CRP performance, the Community Rehabilitation Partner Employment Report (CRP-R) process which produces the following elements by CRP and region:

- Number of CRP Provided Employment Services
- Employment Outcomes with CRP involvement in closure
- Average Hourly Wage of placements
- Average Hours Worked
- Average Annual Earnings
- Percentage of Employer Sponsored Benefits
- OES employment outcomes by category
- Primary impairments served by percentage of total served
- Percentage served within age strata

The CRP-R is disseminated to CRPs annually and used by VR staff to assist with informed choice of CRP when selecting a provider for planned services.

## F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by VR for a period of time not to exceed 24 months, unless the VRC and customer jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE service are restricted to those customers assigned to the Most Significant Disability (MSD) category. The Disability Priority Page in AWARE is used to document the justification of priority category assignment. The category assignment is also displayed on the eligibility determination. A brief breakdown of severity categories follows:

### **Severity of Disability Priority Categories**

#### Priority 1 – Most Significant Disability (MSD)

- Meets criteria for SD; **AND**
- Experiences severe physical or mental impairment that seriously limits **three or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; **AND**
- Requires multiple primary IPE services over an extended period of time

#### Priority 2 – Significant Disability (SD)

- Receives Social Security Disability Income or Supplemental Security Income.

#### ***OR all of the following:***

- Meets criteria for Disability (D); **AND**
- Experiences severe physical or mental impairment that seriously limits **one or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; **AND**
- Requires multiple primary IPE services over an extended period of time

#### Priority 3 – Disability (D)

- Has a physical or mental impairment (or one severe physical or mental impairment); **AND**

- Has a substantial impediment to employment as a result of the impairments; **AND**
- Who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

Furthermore, SE is indicated for individuals for whom CIE has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability; and because of the nature and severity of their disabilities, need intensive supported employment services and extended services after the transition from support provided by IDVR in order to perform this work.

A Comprehensive Assessment of Rehabilitation Needs (CARN) must contain information supporting a need for SE and ES prior to engaging a customer in SE services

Any additional assessments/evaluations purchased by IDVR to determine this need should be conducted in an integrated setting to the greatest extent possible.

For the purposes of this policy, SE refers to support services (like job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including Youth Extended Services (YES), provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability). IDVR limits the provision of extended services exclusively to youth.

Youth Extended Services (YES): WIOA requires IDVR to make YES available when youth have no comparable ES resources available in the community. YES can continue to be provided until: Comparable benefits become available (External funders are identified) OR YES is provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'. The Division does not provide Extended Services to customers 25 or over as this is an explicitly prohibited activity under WIOA. Youth extended services are only available to youth with most significant disabilities using Titles I and VI funding; and supported employment services are only available to individuals with most significant disabilities.

Supported Employment services under IDVR are only offered by qualified providers as identified in section (e): Cooperative agreements with private/nonprofit organizations.

IDVR is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. IDVR has established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

IDH&W provides the following guidance on extended services under IDVR's Health & Welfare banner:

The Supported Employment Agency Recommendation must be completed by the Idaho Division of Vocational Rehabilitation (IDVR) when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

IDVR provides funding for job development services and initial job coaching through a Community Rehabilitation Provider (CRP) agency. The length of time needed for job development varies depending on the individual. As soon as the person has become employed, it is critical to work quickly to ensure there is no gap in the individual's job coaching support in the workplace. The CRP will communicate to the Service Coordinator/plan developer that the participant has been hired so planning for transition to Medicaid-funded Supported Employment services [extended services] can begin. An Employment Agency Recommendation form has been developed to help with the transition process. It includes information from the CRP agency about the participant, their job tasks in the workplace, and a recommended level of service needed by the participant. This information will be used by the plan developer to complete an addendum to the ISP. A transition meeting will be called and facilitated by the Vocational Rehabilitation Counselor. This meeting should include the Service Coordinator/Plan Developer, guardian and any other identified members of the Person-Centered Planning team to ensure all parties understand the shift to Medicaid Waiver Supported Employment and any signatures can be gathered as needed for addendum or plan development. IDH&W refers to CARF and RSAS (or equivalent) accreditation requirements in order to receive waiver funding.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case by case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for IDVR customers under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, the Division will continue to support YES with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. YES funds are considered only when external sources of extended services funding are immediately unavailable and would unnecessarily interrupt the continuity of services.

IDVR supports the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports

through people or other resources typically available in the work, home, and community environment.

Stakeholder commitment for Natural Supports include a Plan for change and the Division encourages a written commitment by the individual providing NS, including contact information for a soft handoff in the event a support loss is anticipated.

The following must be satisfied before VR can close an SE case successfully:

- The individual must have completed SE services and is no longer receiving VR funded services including extended services for youth under VR (those receiving YES remain an open case in the VR system).
- The individual has maintained employment stability for a period of 90 days after transitioning to extended services.
- The job meets the definition of CIE.
- The job is consistent with the vocational goal specified in the IPE.
- At the end of the 90 days the customer and VRC agree that the customer is performing well in employment (a lack of employer agreement would indicate instability).
- The individual is informed, through appropriate modes of communication, about the availability of Post-Employment Services.

#### G. COORDINATION WITH EMPLOYERS

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

##### 1. VR SERVICES; AND

IDVR hired a Business Relations Liaison in 2016 to oversee the coordination of employer related outreach efforts within the Division and to coordinate employer contact under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners.

Initial efforts illustrated additional staffing was required to advance the vision established for serving Idaho businesses. As a result, in 2017 the Business Engagement Team (BET) was created comprised of at least one-to-two IDVR staff in each regional office and activities of the BET are directed by the Business Relations Liaison. Regional Management representation is strong on the team, with three of eight RMs participating in an advisory role.

The BET has evolved a mission statement, "To intentionally create and maintain long term partnerships with businesses for mutually beneficial outcomes for employers and job seekers with disabilities".

Following the creation of an initial charter, sponsored by Division administration, the BET has engaged in a number of preliminary activities, including the creation of a mandatory "Business Basics" online training for all staff, a method for tracking business outreach activities through our internal case management system, updates to IDVR's external business relations portal, and development of marketing materials for business outreach and education.

Activities for the BET are partly informed by an annual survey. This survey helps the Business Relations Liaison prioritize activities based on input from the field. The latest survey indicated

high perceived needs for the following: Disability Awareness training (68 percent), Accommodations and Assistive Technology (65 percent), and Hiring Incentives for Employers (68 percent). Additionally, the BET is now active in most of the chambers of commerce across Idaho including representation in each region of IDVR.

A toolbox for members of the BET has now been established and is growing. The toolbox features resources BET and other IDVR staff can use to promote positive employer engagement. There are tools for staff as well as a growing number of tools designed for employers including a new initiative to create a training for employers around disability etiquette. This group will be meeting early in 2020 to draft a formal strategic plan and further refine and articulate goals, strategies, priorities and staff responsibilities under the team. Expanding outreach to employers for students and youth in transition is a primary consideration for the coming year for the BET with a business engagement transition pilot for IDVR Region 1 launching in 2020.

As a part of the BET activities in PY 2018, the team led a presentation at IDVR's annual all-staff Inservice to help explain how they serve as regional resources to promote positive business engagement opportunities.

The unit, while new, has engaged in two in-depth activities with major Idaho corporations (WinCo and HP). While talks with WinCo are still preliminary, the HP Spectrum Success Program is a direct result of sustained engagement and partnership with HP and would not have been possible without the help of Washington State Division of Vocational Rehabilitation and Microsoft who had engaged in some trailblazing efforts matching individuals with autism and STEM jobs. The willingness of these partners to provide technical assistance and expertise were instrumental in the program's success and as a result HP is engaging in a second cohort with IDVR beginning in early 2020.

IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities.

IDVR's Business Relations Liaison is engaged with the National Employment Team (the NET) and attends the national conference in addition to receiving regular updates, conference calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches.

IDVR has traditionally engaged in the creation of "VR Success Stories" to showcase strong annual placements. The Business Relations Liaison and the BET have worked to overhaul, expand, and professionalize these segments and will now producing multiple success stories per Region, with two being selected for a full video production which showcases the customer and employer's success with these placements.

IDVR began collecting information related to business services in late PY2017. During this PY the Business Engagement Liaison and Deputy Administrator began working on an Autism Spectrum Program with HP. This collaborative effort assisted HP to develop a pilot program to hire student interns with disabilities who were interested in pursuing computer science and information technology related careers. This single business engagement activity is currently on-going as HP intends in offering this program on an annual basis. This initial pilot development took over 6 months of collaborative engagement with IDVR and HP. To view a summary of the HP program and application procedures visit <https://www8.hp.com/us/en/hp-information/about-hp/diversity/spectrum-success.html>



In PY2018 the Division began earnest efforts to capture data on business engagement activities using our case management system. In PY2018 the Business Engagement staff made contact with over 350 business across the state. Of those business contacts, approximately 14% (49) BET staff had consistent (two or more) contact with the employer. IDVR anticipates that data collection and business engagement activities will continue to advance in the upcoming years.

Additionally, IDVR's marketing and website development efforts recently yielded benefits. Norco, a local home health durable medical equipment company, submitted an inquiry through our website. The Business Engagement Liaison is now working on business development activities with the company and also working with staff across the state as Norco is interested in hiring people with disabilities, as they are federal contractor.

## 2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The age requirement for a student with a disability who can receive Pre-ETS for Idaho Title IV WIOA programs is 14 years old to not older than 21 (up to the individual's 22nd birthday), effective this state plan. In prior plans, the lower age was 15.

IDVR works with employers to provide the five required Pre-Employment Transition Services and Transition services to both students and youth with disabilities in a competitive integrated setting. The Division provides a coordinated set of transition activities that are outcome oriented and promote movement from school to post-school activities; including postsecondary and vocational training, career exploration, in competitive integrated employment. Other transition services we provide include working with employers to provide job-related services, job search and placement assistance, job retention services, and follow-up and follow along services.

The Division provides transition services as "group services" or as "individualized services". Group transition services are provided to potentially eligible students; group transition services may also be provided to eligible students and youth with disabilities. Individualized transition services are only provided to students and youth who have been determined eligible and have an IPE.

In the past, Zoo Idaho worked with students who attended Academy Next. Academy Next is an IDVR project where students spend one week on the Idaho State University campus to participate in job exploration, career counseling, practice interview skills in a simulated environment using an avatar, self-advocacy, independent living skills, community integration, and college life. Students learn to budget; experience college classes; learn to use technology to support note taking including the use of Livescribe pens, Chromebooks, and iPads; tour campus; and with meet disability services staff to better understand services and resources available to them. In the future, the Division will consider making this service available to youth, when appropriate.

IDVR has also coordinated with Idaho Parents Unlimited to offer the Work of Art Program. Idaho Parents Unlimited offered numerous programs to students where students work with employers to secure a job to create corporate art; Human Rights Education, Cultural Alliance, and Lineberry Orthodontics are a few examples of employers participating in this program during the last year. Students were paid minimum wage by Idaho Parents Unlimited for their work on the project. The program connected students with disabilities to employers in the community and provided them with a meaningful employment opportunity. HP provided the students, their families, and agency partners with a reception following the experience where they could display their creations. The reception was a way to thank the students for their hard

work and dedication to the project. In the future, the Division will consider making this service available to youth, when appropriate.

IDVR has also worked directly with employers to provide students with 100 hours of paid work-based learning experiences. Early efforts have focused on services available to students with disabilities. In the future we will make this service available to youth, using the new RSA911 service category: Work-based learning experience.

The Division is currently developing a curriculum for employers to use with groups of students and youth to provide career exploration and to understand employment opportunities and career pathways in specific career clusters. This will promote relationships with businesses, and between business, students, and youth.

Additionally, we are working on piloting a reverse job fair followed by a work-based learning experience in northern Idaho. The program will begin during the student's senior year of high school. Students will complete their senior project with a specific employer to prepare for the reverse job fair. Following graduation, the student or youth will then complete the work-based learning experience with the employer.

#### H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

##### 1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. We have a process that easily and conveniently identifies what services customers are eligible for through approved Medicaid Waivers. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past 2 years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to support the VR staff on Medicaid services and benefits. This training assist IDVR VR staff to assist customers and families identify how those services can support success in an employment outcome.

The formal cooperative agreement has not been finalized but is anticipated to be signed by the end of FFY 2020. The agreement outlines joint responsibilities, eligibility criteria, referrals,

financial responsibilities, confidentiality provisions, and accountability and controls for IDH&W and IDVR.

## 2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

IDVR has a solid working relationship with the Adult Developmental Disabilities Services (ADDs) program under the Department of H&W. There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. A significant portion of the SE population are individuals with developmental disabilities. IDVR and ADDs has a process that easily and conveniently identifies what services customers are eligible for through Medicaid Waiver. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs, and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past two years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to educate VR staff on Medicaid services and benefits. This training allows IDVR staff to better assist customers and families to explain how those services can support success in an employment outcome.

## 3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

The IDVR and H&W-Behavioral Health update this agreement annually for the purpose of better serving Idahoans experiencing severe and persistent mental illness. A team approach will be used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those customers who have a severe and persistent mental illness deemed not eligible for this program will be referred to the general IDVR counselor. Those customers who have a severe and persistent mental illness deemed ineligible for IDVR services will be referred to other appropriate resources for assistance. A designated VR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The Department of Health and Welfare provides certifiable non-federal monies for IDVR services per explained in the interagency cooperative agreement.

## I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

#### A. QUALIFIED PERSONNEL NEEDS

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

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;

Job Title	Total Positions	Current Vacancies	Projected Vacancies Over the Next 5 years
Qualified Rehabilitation Professionals Vocational Rehabilitation Counselors and Assistant Regional Managers	41	3	35
Vocational Rehabilitation Specialists	26	1	16
Vocational Rehabilitation Assistants	48	0	10
Field Management Staff	8	0	2
Human Resources	2	1	0
Fiscal	5	1	1
Staff Trainer	1	0	0
Planning and Evaluation	5	0	1
Transition Coordinator	1	0	0
Business Liaison	1	0	0
Administrative Assistants	3	0	2
Deputy Administrator	1	0	0
Administrator	1	0	0
Chief of Field Services	1	0	0

**IDVR currently employs a total of 148 staff. The breakdown of personnel is listed above.**

The Agency has determined that a ratio of one Qualified Rehabilitation Professional (QRP) for every 20,000 people in the state is an ideal staffing ratio. The population of Idaho is approximately 1.75 million people, thus a minimum of 87.5 QRPs over the next five years would be required to meet this ratio. IDVR currently has a total of 41 QRP (VRC & ARM) and anticipates needing 50.5 additional positions. This shortfall in part will be addressed by employing Vocational Rehabilitation Specialists with the understanding that they work toward VRC QRP status which includes the CRC designation. IDVR currently has 26 VRS positions filled leaving a shortfall of 24.5 QRP positions across Idaho. The Division does not anticipate all VRS positions will achieve QRP status, leaving the Division to supplement QRPs with VRS position in the short and intermediate term. Furthermore, numerous factors, including shifting Idaho working-age demographics and WIOA workload increases will require a reassessment of the 1 in 20,000 staffing model. In addition, one VRA position would be necessary to support the QRP to meet the demand for IDVR services. The anticipated number of vacancies expected due to retirements or individuals leaving the Agency over the next five years are noted in the above chart. Finally, the Division's financial projections for FTE availability illustrate that we will not

be able to fully staff to meet the 1:20,000 ratio to match record growth rate in Idaho. The Governor is currently focused on austerity measures to prepare for an imminent recession and will not support any increase of FTEs for non-K-20 educational programs.

Current FTE allotment has been reorganized since the 2018 plan. This includes the addition of Permanent Assistant Regional Manager positions, who are CRCs and carry a caseload, a Human Resources Associate, a VRC Senior Trainer position, an Aware Specialist, and two specialized VRA positions. These positions were necessitated by WIOA changes.

Assistant Regional Managers for each our 8 regional offices were created to provide more consistent oversight and training to Vocational Rehabilitation Specialists and Vocational Rehabilitation Counselors. The goal is to provide consistent statewide training for all field staff. A Human Resources Associate was added to focus on recruitment efforts and to enhance relationships and improve recruitment efforts at Universities with Rehabilitation Counselor Education programs. The VRC Senior Training position was created to identify training needs and to design focused trainings that address requirements of WIOA for VRC and VRS positions.

The Governor's initiative to consolidate Information Technology Services across Idaho state government agencies has substantially impacted and reduced our staff composition. With the loss of our internal IT staff, we identified the need for an Aware Specialist position to oversee all aspects of our internal case management system, Aware. We have added two new VRA positions, one to assist the new VRC trainer and one to assist the transition coordinator position.

An evaluation of staff resulted in no increase in VR caseloads but an increase in potentially eligible student cases, thus necessitating additional support for our transition coordinator. Both new VRA positions are located at our Central Office.

## II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

The current vacancies broken down by personnel category can be found in Table VR.1: Qualified Personnel in the preceding section of this plan.

## 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.

Projected vacancies by personnel category and the rationale informing these projections can be found in Table VR.1: Qualified Personnel and the subsequent narrative which is located in i.1.A.i. of this section.

## B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

### I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The University of Idaho is currently the only institution of higher education in the State that offers a VR program in Idaho. However, in 2020 the University will be sunsetting this program.

The U of I Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. Several of the current students are employed full-time with IDVR. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020.

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Masters of Counseling specialty program: Clinical Rehabilitation Counseling. This program will begin in the fall of 2020 and will be offered in two Idaho locations (Meridian and Pocatello). The program will accommodate 24 full-time students.

## II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

The U of I Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020. No further students will graduate as the program is ending.

## 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.

The U of I Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020. No further students will graduate as the program is ending.

## 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 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.

IDVR will continue to recruit qualified staff from Rehabilitation Counselor Education programs. We maintain contact with Auburn University, Hofstra University, Montana State University, New Mexico Highlands University, Portland State University, San Diego State University, University of Arizona, University of Kentucky, University of North Texas, University of Northern Colorado, University of Texas Rio Grande Valley, University of Wisconsin - Stout, Utah State University, Virginia Commonwealth University, West Virginia University, and Western Washington

University. Management staff also attends the Fall and Spring National Council on Rehabilitation Education (NCRE) conferences for recruitment.

Additionally, IDVR supports paid and unpaid internships for master's level students in Rehabilitation or related fields. IDVR continues to face challenges in recruiting qualified applicants. The entry-level wage for a QRP is lower than comparable state and private positions. IDVR has increased wages for QRP's and classified personnel in PY 2018. IDVR will continue to build a compensation package which will be competitive with other states and agencies contingent upon available funding.

To enhance recruitment and retention, IDVR has increased wages for QRP's and classified personnel in PY 2018. IDVR will continue efforts to build a compensation package which will be competitive with other states and agencies contingent upon available funding.

Furthermore, all Regional Managers, Central Office Management and other leadership personnel are involved in recruitment activities. Development of recruitment materials and marketing plans continue to be a priority for the Division. IDVR participates in career fairs around the state to encourage and seek individuals from diverse backgrounds including individuals with disabilities.

IDVR conducts exit interviews with staff, when possible, to determine whether there are areas of concern affecting staff retention. The current trend suggests counselors are leaving VR for positions which do not require a Master's degree and/or are paid more per hour. Recent changes in our compensation structure seem to have reduced the rate of turnover for the agency, however, more time is needed to confirm the effect.

For PY 2018 the turnover rate for QRP's was 10.9 percent, down from 16.1 percent in PY 2016.

### 3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

The State of Idaho does not have a state licensure for rehabilitation counseling. IDVR's personnel standards satisfy Federal requirements as outlined in 34 CFR 361.18(c).

IDVR has established two QRP levels: Vocational Rehabilitation Counselor (VRC) and Vocational Rehabilitation Counselor Senior (VRC Senior). The standards that satisfy the Agency's Comprehensive System of Personnel Development (CSPD) policy for VRC positions are as follows:

1. A current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). OR
2. Confirmed eligible (from CRCC) to take the exam to become a CRC. OR
3. Graduation from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) with a master's degree in Rehabilitation Counseling. OR

4. A current Licensed Professional Counselor (LPC), Licensed Clinical Professional Counselor (LCPC) or Licensed Clinical Social Worker (LCSW) designation issued by the State of Idaho Bureau of Occupational Licensing (IBOL); Rules of the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists, IDAPA 24.15.01.

The standard for the VRC Senior position that satisfies the Agency's CSPD policy is a current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). The LPC or LCPC designation does not meet the CSPD requirement for a VRC Senior.

Requirements to meet CSPD for staff hired at Vocational Rehabilitation Specialist (VRS) level and maintain employment eligibility include the following:

The VRS will be required to meet IDVR's CSPD standard within five years of the staff member's hire date.

1. The VRS, with assistance from Regional Manager (RM), will develop a CSPD Plan within six-months of hire date to be reviewed for approval by Human Resources.

Each CSPD plan will require the following elements:

a. Educational requirements necessary to complete CSPD (if applicable). Number of courses required and an outline of anticipated timeframe for completion of each course.

b. As the coursework is completed grades must be submitted to the Regional Manager and Human Resources within one month upon completion of term.

c. Employment internship or work experience requirement necessary to complete CSPD (if applicable).

d. Official acceptance documentation should be submitted to Regional Manager and Human Resources.

e. Acceptance of RSA scholarship (if applicable).

f. Estimated cost of tuition and books.

g. Outline of timeline for completion from the university.

2. CSPD will be evaluated for progress as part of the VRS overall performance requirements as outlined in the VRS job description each year.

3. The VRS is expected to meet periodically with their manager until the CSPD plan is implemented. The manager will submit a monthly report to HR, which will provide a summary of progress.

4. Staff members at VRS level will be required to produce adequate semester progress to Human Resources for their personnel file.

When IDVR experiences a limited number of recruits for a QRP positions the agency will consider hiring individuals into the VRS classification.

IDVR requires a CRC for all Regional Manager or Assistant Region Manager positions.

IDVR will reimburse the cost of the CRCC application and testing fee upon verification of achievement of CRC certification, when funds are available.



IDVR will recognize current standards as outlined in the CRC Certification Guide when determining qualifying degrees, programs, coursework and acceptable employment experience. <http://www.crccertification.com/>.

The agency will annually review and evaluate if financial assistance can be provided to support VR Specialists (VRS) that are working towards meeting CSPD. HR will notify all VRSs at the time IDVR determines that financial assistance is available. The notification will specify the time frame and process on how to obtain the financial assistance offered.

**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.**

IDVR is committed to providing all employees with professional development opportunities which will enhance employee job performance; support the Agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities.

IDVR has established education and experience requirements for each position in the Agency with a focus on alignment of requirements contained in section 101(a)(7)(B)(ii) which meet or exceed the standards required in 101(a)(7)(B)(ii)(I)-(II) including a requirement for a master's or doctoral degree in vocational rehabilitation or a related field to be recognized as a qualified rehabilitation professional at IDVR. When unable to hire VRCs, the Division supports a Vocational Rehabilitation Specialist position with fewer requirements (explained under 3(a) in the preceding section, but requirements which are specifically outlined to meet the conditions of the 21<sup>st</sup> century workforce understanding.

IDVR hires with a preference for people who have experience working with people with disabilities, particularly around advocacy and providing direct support.

With the increased WIOA emphasis on workforce development the Division will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs. IDVR will establish ongoing requirements to participate in continuing education around a 21<sup>st</sup> century understanding of the workforce including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

Through an increased emphasis on data-driven decisions, IDVR will increase utilization of the most recently available labor market information to best inform customer vocational decisions.

#### **4. STAFF DEVELOPMENT**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

**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**

IDVR tracks and monitors each employee's individual training and development. Special emphasis is placed on training in those areas of need as indented by the case file review and

emerging field needs and as prioritized by the executive leadership team and the SRC. Additional priorities include training required to maintain CRC and/or LPC certification. Training for staff also includes the following topics: ethics, disability related topics, vocational counseling, assessment, job placement strategies, and assistive technology.

#### **B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.**

An annual training needs assessment is conducted to determine personnel training needs. Individual employee skill sets, position descriptions, and position duties are also assessed to identify areas that require further development. In addition, organizational needs are analyzed to identify areas in need of succession planning, to expand those employee skills essential to provide effective services to special populations, and to meet job demands. Information gathered from employee performance evaluations; supervisory feedback, employee exit interviews, and internal monitoring results also assist the Division with identifying areas of need.

In October 2019 IDVR held a statewide in-service. Topics for our general session included Contemporary Ethics in Vocational Rehabilitation and WIOA Performance and Reporting. Breakout sessions included Idaho Medicaid Overview, Traumatic Brain Injury and Vocational Rehabilitation, Medical Director's Overview, Idaho's One-Stop Service Delivery System, Pre-Employment Transition Services, the Ever-Changing Landscape, Navigating the Supported Employment Labyrinth: EES and Medicaid Waiver Programs.

A four-day Motivational Interviewing (MI) training for new employees occurred on August 6-7 and September 4-5, 2019. A refresher option for current staff occurred July 30-31, 2019. Providing Motivational Interviewing training for staff continues to be an Agency priority.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars. Topics/conferences included but were not limited to: Ethics, Idaho Conference on Alcohol and Drug Dependency, Tools for Life, counseling theories and techniques, assistive technology, Programmatic and Physical Accessibility, disability-specific trainings, and annual Rehabilitation Professionals conferences.

Succession planning and leadership development continue to be a focus for the Division. All Central Office and Field Services Managers complete a Supervisory Academy offered by the Idaho Division of Human Resources. The academy includes 10 modules on Performance Management: Development, Coaching and Feedback, Expectations, Motivation, Documentation, Calibrating Ratings, Evaluation, I-Perform (performance evaluation software program), and Progressive Discipline. When financially able the Division supports staff in the Emerging Leaders series. The Division utilizes permanent Assistant Regional Manager positions throughout the state to support succession planning and leadership development.

New VR staff participate in a new employee orientation which is provided online, by Central Office staff, the immediate supervisor, and other designated employees. New VRAs also participate in an online series designed for paraprofessional staff. The course covers the History of VR, Basic Ethical Considerations, Navigating Sticky Situations, Developing Collaborative Relationships, and Cultural Diversity.

#### **5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS**

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

IDVR provides or purchases interpreter or language services required to access the program.

The Agency is currently working with the Division of Human Resources to determine a process and standards to assess staff competency in Spanish or other foreign languages. If staff meet competency standards, they may work with and interpret for customers who's primarily language is other than English.

IDVR has created a statewide counselor position for the deaf. This position will better serve individuals who are deaf and increase the overall effectiveness of our service delivery for this underserved population.

Since Idaho has a separate entity that addresses issues related to low vision and blindness, IDVR does not provide specific training to its staff in braille, but instead refers customers who require braille to the Idaho Commission for the Blind and Visually Impaired.

#### 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.

The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Coordinator has extensive knowledge of IDEA personnel qualifications, under 34 CFR 300.156. Training and education will be identified for staff regarding service provision, coordination and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by IDVR which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, in the fall of 2019, IDVR brought together public educators and VR Transition staff at the Transition Institute. The Transition Coordinator facilitates monthly Transition Leadership team meetings where changes are shared with the Leadership Team. The Team takes the information from the meeting and shares it with their regions. The Transition Coordinator also provided In-Service breakout session on Pre-ETS available to all staff. The Transition Coordinator also presented at all the regional special education directors' meetings in the Fall 2019. Finally, the Transition Coordinator participates in Special Education Advisory Panel for the State Department of Education.

#### J. STATEWIDE ASSESSMENT

##### 1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

**A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;**

The number of people with disabilities in Idaho is growing. The American Community Survey (ACS) one-year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 224,887 in 2016, and 233,494 in 2018 representing an increase of 3.8 percent over two years, and 14 percent over the past four years (ACS Disability Characteristics, 2014, 2016 and 2018 1-Year Estimates).

According to data from the American Community Survey (2018), 13.5 percent of Idaho civilians living in the community report having a disability, including 11.6 percent of residents of working age (18–64). The prevalence of disability in Idaho roughly corresponds to that of the United States. A more extensive profile of Idahoans with Disabilities is contained in section II(a)(1)(B) Workforce Analysis portion of the combined section of this plan.

IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services.

The independent CSNA identified the following themes in the area of needs of individuals with the significant disabilities including their need for supported employment:

- Supported Employment is a necessary service for people with the most significant disabilities and needs, which IDVR has been successfully providing for many years. Changes due to WIOA has created some challenges in implementing new practices, but overall IDVR excels in this area.
- Participants expressed that there is a need to improve the quality of employment outcomes for individuals with the most significant disabilities.
- Customized Employment is seen as an important employment strategy for individuals with the most significant disabilities. Training in CE has been completed in partnership with the WINTAC, but it has not been sustainable to date. Many participants indicated that they are looking forward to the implementation of CE 2.0 after IDVR revamps the training, expectations and fee structure.
- The rehabilitation needs of individuals with the most significant disabilities that were cited the most frequently (beyond SE and CE) include transportation, job skills, training, job coaching and soft skills.

**Individual Survey: Barriers to Obtaining or Keeping a Job**

Respondents were presented with a list of 16 barriers to obtaining employment and asked to indicate whether the item had been a barrier that impacted their ability to obtain or keep a job. The table below summarizes the most frequently stated barriers and the impact on obtaining or keeping employment.

Barriers to Obtaining or Keeping Job	Percent Reporting Barrier
Employer concerns about my ability to do the job due to my disability	55.3%
Lack of education or training	53.6%

Barriers to Obtaining or Keeping Job	Percent Reporting Barrier
Mental health concerns	46.3%
Lack of job skills	44.8%
Lack of job search skills	32.3%
Lack of reasonable accommodations at work	29.9%
Lack of assistive technology	24.2%
Concern over loss of Social Security benefits due to working	22.1%
Substance abuse	12.2%

Respondents were presented with a list of barriers and asked to identify the three most significant barriers that they have faced specifically toward getting a job. Table VR.3 contains a summary of the top-three ranked barriers identified by participants and the frequency of identification.

Significant Barriers to Getting a Job	Times identified as a "top-three" barrier	Percent of Total Number of Respondents Selecting Barrier
Lack of education or training	488	43.7%
Employer concerns about my ability to do the job due to my disability	437	39.2%
Lack of job skills	358	32.1%
Mental Health concerns	319	28.6%
Lack of available jobs	286	25.6%
Criminal record	203	18.2%
Lack of job search skills	163	14.6%
Lack of reasonable accommodations at work	145	13.0%
Concern over loss of Social Security benefits due to working	137	12.3%

A total of 1,116 respondents answered the question. Lack of education or training, employer concerns about my ability to do the job, and lack of job skills were the three top items selected by respondents, matching two of the top three responses in the previous Table X. The last 5 items on this list also resemble the last five items on the list in Table X.

Individual survey respondents were asked a yes-no question asking whether they had suggestions to improve IDVR to help people with disabilities to get a job or move to a better job. There were 285 "yes" responses (23.6%) from the 1,206 respondents.

Respondents were asked a subsequent open-ended question and given the opportunity to provide suggestions on how IDVR can improve in assisting people with disabilities to get a job or move to a better job. Responses to this question that were grouped into the following themes:

1. Provide services in a timely manner
2. Improve VR counselors' communication and customer service
3. Increase medical aspects of disability training to understand a wide variety of disabilities
4. Increase awareness of IDVR and services for customers and employers

Individual survey respondents were asked an open-ended question to provide any additional comments that they would like to share regarding IDVR services. There were 393 narrative responses. Two-hundred two comments were appreciative and positive toward IDVR services and counselors. Themes within the remaining narrative responses noted delays in communication, counselor attitudes, wait times for services, and clarification of services available.

There is a strong correlation between those individuals requiring supported employment (SE) services and presumptively eligible participants in the VR program. To approximate the potential need for SE services, the Division will utilize counts of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries.

Individuals who qualify for SSI/SSDI are by law presumptively eligible for Vocational Rehabilitation services. The United States Social Security Administration (SSA) estimates that as of December 2018 the number of Idahoans age 18-64 who received SSDI was 47,608. Social Security Administration (SSA) estimates that as of December 2018, SSI benefits were received by 26,241 individuals age 18-64 while 6,219 Idahoans concurrently received SSI and SSDI. These 73,849 individuals represent 7.2% of all working age Idahoans.

According to internal data, IDVR took applications on 4,006 cases in PY 2018 including 1,271 cases where SSI and/or SSDI benefits were verified. This represents a presumptive eligibility rate of 31.73 percent at application, an increase of 2.5 percent over FFY 2016.

#### B. WHO ARE MINORITIES;

Historically, the population of Idaho has been ethnically homogenous in comparison to other states in the region. However, Idaho's recent population growth has seen an accompanying growth in the number and diversity of minority populations residing in the state, and some minority populations are experiencing double digit growth. While IDVR continues to trend to a minority service ratio of 1.00, IDVR remains committed to expanding outreach to minority populations.

The last available five-year ACS data (2018) indicates Idaho is 89.9% White with no other single race representing over 1.5 percent (Asian). Two or more races are reported by 3.0 percent of Idahoans. When considering ethnicity, Hispanic or Latino (of any race) is second with 12.7%

Idaho's population is expected to grow by on average 1.1 percent annually between 2019 to 2026:

- "for both Hispanics and non-Hispanics, growth rates in Idaho are higher than the nation as a whole. However, population growth has slowed over the last five to ten years. While average annual growth rates among Idaho's Hispanics were 9.0% in 1990s, they slowed to 7.3% in the 2000s and 1.5% since 2010. At the national level, average annual growth rates among Hispanics declined from 5.6% in 1990s to 4.3% in the 2000s and 1.2% in the 2010s. While Hispanic growth has slowed, this group continues to grow faster than the non-Hispanic population." (Hispanic Profile Data Book for Idaho, 4th Edition, 2017).

In addition to demographic information and internal case management data, IDVR remains informed on the needs of minority population through efforts which are further elaborated on in section o, the program specific section of this plan for the Division.

#### C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- In general, a case can be made that individuals living in rural areas, with less access to services, support, training and education are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. Translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.
- IDVR has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations.
- Ex-offenders with a high rate of substance abuse issues require services from multiple agencies and face resistance from the employment community.

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

The Division utilizes telephone-based translation services when necessary to bridge language barriers presented by Idaho's growing refugee population.

The outreach activities targeted toward Idaho's refugee and minority populations are detailed in section o of the program specific section of this plan for the Division.

American Indian and Alaska Native alone are estimated to represent 1.1 percent of Idahoans while IDVR provided services to this group at a rate of 4.4 percent. The latest available statistics indicate this population is overserved, however these data should be interpreted with caution as estimates of error can skew these results. The Division notes that the intersection of rural service provision and tribal affiliation can present substantial barriers to obtaining employment in these rural communities and will continue to view this population as underserved. IDVR will continue outreach efforts accordingly for this population.

The Division will continue to strengthen partnerships with entities in the workforce development system to reach populations of interest such as youth.

The Division co-locates with the Idaho Department of Correction but has ended our agreement with the Idaho Department of Juvenile Correction. However, IDVR will maintain relationships with IDOC and IDJC and will continue to engage with these entities to further efforts to reach youth and adults in the corrections system across Idaho.

#### D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- Overall, partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level.
- Positive collaboration and partnership aspects include:
  - IDVR inclusion in statewide workforce development listening sessions;
  - Collaborative work on the combined state plan;
  - IDVR administrator is member of the workforce development council and chairs the one-stop committee;
  - IDVR provides consultation (e.g., physical and programmatic accessibility) with the American Job Centers.
- The level of local partnership between IDVR and the American Job Centers was described as varying across the State at the local level. Some felt that co-enrollment was of no concern as it is a common occurrence in small communities, while others felt as though there was no active level of co-enrollment where participants would be served by multiple agencies through strategic partnerships.
- IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing participants, and developing youth program partnerships

The themes described above are informed by VR staff and other partner respondents.

Conversely, the following themes are expressed by individuals with disabilities. The CSNA asked individuals with disabilities several questions regarding the American Job Centers, including accessibility, access to training and employment, the value of and the effectiveness of the services available through the AJC. The table below details results from individuals with disabilities using the Job Center for seeking training and employment.

	Yes	No	Total Number of Responses
Did you go to the Center to find a job?	68.2%	31.9%	314
Did they help you find employment?	39.4%	60.6%	203

Two-hundred fourteen (68.2%) out of 314 individuals went to the Center with the purpose of seeking assistance to find a job. Two-hundred and three respondents answered the question regarding receiving help that resulted in employment with 60.6% indicating that they did not receive assistance in finding a job.

The majority of the individuals seeking assistance at the AJC were seeking employment (68.2%). Of the 203 respondents, 123 (60.6%) did not find employment with AJC assistance.

Table VR.5 identifies the ratings for the helpfulness and the value of the American Job Centers by individuals with disabilities that responded to the survey.

Value of Services Rating	Count	Percent of Total
Yes, the services were very valuable	105	34.1%
The services were somewhat valuable	122	39.6%
No, the services were not valuable	81	26.3%



<b>Value of Services Rating</b>	<b>Count</b>	<b>Percent of Total</b>
<b>Total</b>	308	

Almost 74% of respondents found the services available at the American Job Centers to be either somewhat or very valuable. Just over one-fourth of the respondents indicated the services were not valuable.

Table VR.6 breaks down the reported effectiveness of the American Job Center by individuals that responded to the survey.

<b>Effectiveness Rating</b>	<b>Count</b>	<b>Percent of Total</b>
Very effective	65	20.7%
Somewhat effective	81	25.8%
Somewhat ineffective	40	12.7%
Very ineffective	37	11.8%
No opinion	91	29.0%
<b>Total</b>	314	100%

Only 46.5% of the 314 respondents that answered the question indicated that the American Job Center was effective, while roughly 25% of the respondents indicated that the Centers were not effective in serving people with disabilities and 29% did not have an opinion.

The CSNA provided IDVR several recommendations based on the results of the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System including:

1. IDVR should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of co-enrollment across workforce programs to leverage resources and better serve Idahoans with disabilities..
2. IDVR is encouraged to identify effective ways to share client data and develop joint opportunities to increase the level of partnership at the local level.
3. IDVR should continue efforts to improve services for people with disabilities in the larger Idaho workforce system by maintaining partnerships and the level of engagement of IDVR within the WIOA core programs. For example, IDVR can provide ADA training, disability awareness and etiquette training, community accessibility, etc. to workforce agencies as well as community partners.
4. IDVR is encouraged to develop more formal partnerships with the Title I youth program to increase the array of services available to youth in Idaho.

The WIOA Advisory Group, in collaboration with the Workforce Development Council's One-stop Committee will continue to engage in a series of ongoing meetings to identify common and unique strategies which are in need of improvement on a statewide level. The Division engaged in the second strategic planning meeting with all WIOA Advisory Group and the One-Stop Subcommittee members. The purpose of the meeting was to identify the shared goals, priorities, and strategies for this Combined State Plan. While collaborative work in this area has begun, more work in this area is still needed.

Meetings at the local-area level are ongoing which include all core partner agencies and numerous One-Stop partners to determine and advance strategies for common referral and orientation, reducing duplication of effort and potential increased levels of co-enrollment. These meetings will help inform a better understanding of the needs of individuals with disabilities served by agencies external to VR in the One-Stop system.

The Administrator of IDVR currently chairs the WDC's One-Stop Subcommittee.

#### E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to several factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. Only 5.6 percent of Idahoans aged 5-17 experience disability compared to 16.2 percent for those aged 18-64, and 36 percent of those ages 65 or more.

Idaho has a higher percentage of workers aged 24 and younger than the nation as a whole, this is historically reflected in the percentage of transition age youth served by IDVR. Students and youth under 25 represented 29.3 percent of all new cases in PY 2018.

IDVR's 2019/2020 CSNA noted several major recurring themes relating to Pre-ETS and Youth needs:

- Overall, IDVR has successfully implemented pre-employment transition services and has increased opportunities for youth with disabilities to prepare for meaningful employment. Work-based learning experiences have been a particular strength of pre-employment transition services developed through contracts across the state.
- Although the implementation of pre-employment transition services has been successful, IDVR will need to monitor the increasing demands of students, educators and families across the State to ensure that there are adequate resources available to meet the demand.
- IDVR has implemented services to meet the needs of students with the most significant disabilities. Youth with less significant disabilities (e.g., specific learning disabilities) need to have access to IDVR services, with varying levels of support to meet their specific needs. These include disability related services, training and educational opportunities and support, work readiness and job exploration skills.
- A growing number of relationships with educators have been established resulting in increased access to IDVR and other workforce system partners for students and youth. However, a continued lack of understanding and support by parents persists, indicating a need for IDVR to increase direct communication with parents and families of students and youth with disabilities.

#### **Transition-age Youth Survey: Three Most Important Services for Obtaining and Keeping Desired Job**

Respondents were provided a list of IDVR services and asked to identify the three most important services they needed to help obtain and keep the job they desired. There was no limit to the number of services respondents could choose. Table VR.7 summarizes the results.

	<b>Number</b>	<b>Percent of Total</b>
Help finding a job	156	50.6%
College education	116	37.7%
Transportation	110	35.7%
Help with employment preparation activities like writing a resume, completing an application and interviewing.	103	33.4%
Support on the job like a job coach	102	33.1%
Vocational training	86	27.9%
Affordable housing	53	17.2%
Mental health counseling	35	11.4%
Assistive technology	19	6.2%

Help finding a job, college education, and transportation were the most frequently selected items in response to the question regarding the three most important services needed to obtain and keep a desired job by transition-age survey respondents. When compared to the previous question, note that results are different college education is the top item, help finding a job ranked fourth, and transportation is in the sixth position in Table X above.

Transition-age survey respondents were asked an open-ended question regarding any other comments about the services that would help to prepare for, obtain and retain employment. Seventy-nine narrative responses were received. Three comments were positive in regard to IDVR transition services and seventeen were critical of services.

The following recommendations from IDVR's 2019/2020 CSNA related to the needs of youth with disabilities in transition:

1. IDVR is encouraged to continue efforts to identify needs and programs for implementing pre-employment transition services. The agency should consider adding some tiered approaches that will enhance the delivery of pre-employment transition services to students with disabilities that have differing functional capacities. In addition, IDVR is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of pre-employment transition services to all areas of the State.
2. IDVR is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to IDVR through collaboration with special education services. The agency should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, IDVR is encouraged to tailor services to meet the diverse needs of these individuals.
3. IDVR is encouraged to increase marketing, communication and expectations directed toward parents and families of youth with disabilities.
4. IDVR should consider assessing the availability of IDVR services and making them more accessible across the state, particularly in the remote areas of high concern for youth.

The Division will continue to increase our efforts to deliver services to students with disabilities in response to WIOA mandates. The Division's proposed activities to address Pre-ETS and youth is detailed in section 'o' of this plan.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

The 2019/2020 CSNA summarizes results in section 6 of the document "Need to Establish, Develop or Improve Community Rehabilitation Programs in Idaho", the most common themes that emerged in this area were:

The following themes were recurring from the individuals interviewed for this assessment in the area of the need to establish, develop or improve community rehabilitation programs serving individuals with disabilities in Idaho:

1. Overall, IDVR has strong partnerships and access to CRPs in the more populous areas of the state, however provider coverage and range of available services becomes more irregular in the rural and remote areas of Idaho.
2. There were concerns about the quality and quantity of employment outcomes for IDVR consumers that receive CRP services.
3. CRP employment services were generally described as in need of improvement. There are varying perspectives on why employment services provided by CRPs are not as successful as they can be.
4. Pre-employment transition services have created additional opportunities for CRPs. This is seen as a great opportunity for all involved, but the level of quality varies. Some view contracted services versus fee for service as a practice which promotes differing outcomes.
5. Depending on the lens of those interviewed, there are a variety of CRP services needing attention or improvement. These include, but are not limited to:
  - a. Improvement in CRP evaluations to include a wider variety of community-based evaluation sites.
  - b. Concerns of conflict of interest when CRPs are recommending continued services in their program with no measurement for when success or skill levels will be achieved.
  - c. Partners of IDVR are not generally pleased with the outcomes or services provided through CRPs.
  - d. There is a need for improved consistency across IDVR regions related to policy, forms and expectations of CRPs.
  - e. Participants indicated that CRPs are not clear on their role under WIOA. The learning curve has been challenging for all parties and training/communication to CRPs could improve.
  - f. Implementing fading options for IDVR participants was a positive change in services but understanding of the concept and expectations has been challenging. Additional guidance has been requested by CRPs.

- g. Both CRPs and IDVR need training in employment opportunities in today's labor market. Use of LMI and strategies for finding non-traditional types of employment are not possible without additional training and support.
6. Largely, CRPs seem to be confused on the difference between IDVR and Extended Employment Services (EES), a separate state funded program under the Division. This appears to be an area of confusion that needs to be addressed.
    - CRPs are faced with high turnover and this instability of staff affects the quality of services.
    - The perception is that low pay of many CRP staff is the major cause of turnover.
    - The quality of job coaches is highly questionable. Many have little more in the way of credentials than a high school diploma.
    - There is a need for more effective and standardized quality assurance monitoring and evaluation of CRPs.
    - CRPs have a questionable capacity to serve individuals with language barriers.
    - There is a need for increased communication between VR and CRPs to gain clarity on expectations and coordination of services.
    - CRPs should devote more time in training individuals with disabilities on life skills such as hygiene, budgeting, etc.

There are two primary areas where needs are present to establish, develop, or improve CRPs within the state of Idaho:

1. Meeting the need of emerging/novel requirements of WIOA and expanding the statewide capacity of CRPs to deliver these services with fidelity (e.g. Customized Employment, Pre-ETS and similar services to youth, Youth Extended Services).
2. Monitoring and improving Community Rehabilitation Program performance through a collaborative iterative learning process.

The continuous improvement of CRPs is an ongoing function of IDVR: The establishment, development and improvement of CRPs within the state fall under the purview of IDVR's Planning and Evaluation team. One of P&E's responsibilities within the agency is a comprehensive CRP monitoring process. This process seeks to provide an initial threshold of quality for new CRPs who wish to serve IDVR consumers, provides a maintenance function in retaining a base level quality standard, and a remediation process for CRPs who fall short of standards via a three-year site review process.

### 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

## **Overview**

As previously mentioned earlier in section e, IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services. Detailed information is provided in section e.

The Idaho Division of Vocational Rehabilitation is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with a number of Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

IDVR, ICBVI, and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency. LEAs provide different transition services to students with disabilities for various reasons, adequate funding being one of the major reasons. Therefore, the Division needs to understand the types of transition services that are currently provided by each LEA in order to determine what Pre-ETS activities should be considered for students with disabilities at the LEA level.

As a result of that need, IDVR is coordinating with educational officials and other state agencies to provide an annual Transition Institute last held in fall of 2019. The third annual Transition Institute is scheduled for fall 2020.

Districts will bring teams, that will include a VR Counselor to the Institute to develop specific goal directed plans based on district data to improve Pre-ETS and transition focused education based on district need. This will provide IDVR with the specific criteria to determine which agency (IDVR or LEA) has primary responsibility for providing and paying for transition related services for students with disabilities as well as what additional Pre-ETS should be targeted to each LEA.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services.

#### K. ANNUAL ESTIMATES

Describe:

##### 1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

This estimate includes the number of the individuals in Idaho who experience disabilities, ages 16 and over who are in the labor force according to the American Community Survey 5-Year Estimates (Table S1811, 2014, 2015, 2016, 2017, and 2018) . Forecasting suggests there will be 67,087 eligible Idahoans in FFY 2020 and 68,893 FFY 2021.

FFY	Estimate	Forecast	Lower Confidence Bound	Upper Confidence Bound
2019	64328	64327.89	62505.03	66150.75
2020	67087	67086.93	65207.08	68966.77
2021	68893	68892.30	66956.27	70828.32
2022	71652	71651.33	69660.71	73641.95

## 2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

### A. THE VR PROGRAM;

The number of customers served by IDVR is diminishing. Historic rates of low unemployment across Idaho and new mandates created by WIOA are likely factors in this recent downturn. However, it is obvious that unemployment will not remain at this level. April 2020 preliminary data suggest Idaho's unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, the Division believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent service volume increases to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

IDVR has 3895 participants in plan and receiving services in the most recently fiscal projection model. This includes 1724 participants under Most Significant Disability (MSD), 1374 participants under Significant Disability (SD), and 797 participants classified under the Disability (D) severity categories.

Estimates of Customers in Plan Status (Receiving Services) for IDVR

	MSD	SD	D	Total in Plan
Current (100%)	1724	1374	797	3895
FFY 2020 (103%)	1776	1415	821	4012
FFY 2021 (105%)	1810	1443	837	4090

### B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

April 2020 preliminary data suggest Idaho's unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, the Division believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

Estimates of Supported Employment (SE) Customers in Plan Status (Receiving Services) for IDVR and Average Annual Cost of SE Services for Customers in Plan Status)

	SE Participants in Plan	Total Annual Cost	Anticipated Title VI Funds	SE Title I Funds
Current (100%)	470	\$554,553	\$300,000	\$254,553
FFY 2020 (103%)	484	\$571,189	\$300,000	\$271,189
FFY 2021 (105%)	494	\$582,280	\$300,000	\$282,280

The Division expects to receive \$300,000 in Title VI Supported Employment funds for PYs 2020 and 2021. As projected expenditures exceed Title VI funds, The Division will supplement Title VI SE services utilizing Title I VR funds. The Division does not anticipate any issues expending the \$150,000 set aside for SE services, and Extended Services to students and youth.

Note: This section includes estimates for SE qualifying services only (i.e. job coaching). Supportive services, or services beginning prior to job placement are not included in this section.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

IDVR is not operating under an Order of Selection. IDVR will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. IDVR currently operates three-tier significance of disability scale in line with Federal D, SD, and MSD reporting guidelines.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

N/A

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.

April 2020 preliminary data suggest Idaho's unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, the Division believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

Additionally, IDVR's fiscal unit conducts fiscal projections using two models. One is a scenario using the five-year average cost per customer, and the second is a scenario using current YTD average costs per customer.

As the Division has substantially modified policy post WIOA on SE, IDVR has selected the current year average costs for projections in this state plan. As additional time elapses under the current SE provision model, the Division will consider switching these estimates to the five-year projections. For the purposes of this plan the division believes the YTD projections represent the best model to project expenditures under current conditions.

FFY 2020 Service Cost Estimates				
	MSD	SD	D	Total
Estimated in Plan Status	1776	1415	821	4012
Estimated Cost per Plan	\$1,533.84	\$1,410.48	\$1,579.56	\$1,499.69



FFY 2020 Service Cost Estimates				
Estimated Customers on SE Plan	484	N/A	N/A	
Average SE Services Cost	\$1179.90			
Estimated SE Annual Expenditure	\$571,189.38			\$571,189.38
Non-SE Plan Expenditure	\$2,152,480.98	\$1,995,829.20	\$1,296,818.76	\$5,445,558.42
Total Estimated Annual Plan Cost	\$2,723,670.36	\$1,995,829.20	\$1,296,818.76	\$6,016,747.80
FFY 2021 Service Cost Estimates				
	MSD	SD	D	Total
Estimated in Plan Status	1810	1443	837	4090
Estimated Cost per Plan	\$1,533.84	\$1,410.48	\$1,579.56	\$1,499.69
Estimated Customers on SE Plan	494	N/A	N/A	
Average SE Services Cost	\$1179.90			
Estimated SE Annual Expenditure	\$582,280.44			\$582,280.44
Non-SE Plan Expenditure	\$2,194,276.73	\$2,035,322.64	\$1,322,091.72	\$5,551,691.09
Total Estimated Annual Plan Cost	\$2,776,250.40	\$2,035,322.64	\$1,322,091.72	\$6,133,664.76

#### L. STATE GOALS AND PRIORITIES

The designated State unit must:

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

IDVR and the State Rehabilitation Council (SRC) revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program

goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

IDVR, in collaboration with the SRC, will continue to develop specific strategies that are in alignment with these goals and priorities.

## **2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS**

The goals and priorities for the Division are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the Comprehensive Statewide Needs Assessment (CSNA) which is conducted every three years.

### **Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential**

- Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.
- Priority 2 - Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).
- Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.
- Priority 4 - Improve usage of Labor Market Information/Career Pathways to inform customer career choice.
- Priority 5 - Improve overall quality of CRP services.

### **Goal 2 - Improve VR program efficiency through continuous quality improvement activities**

- Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-6 established by the US Department of Education, Rehabilitation Services Administration.
- Priority 2 - Monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate.
- Priority 3 - Maximize the utilization of comparable benefits.
- Priority 4 - Continue efforts to align IDVR activities with the workforce development system.
- Priority 5 - Evaluate IDVR assessment expenditures.
- Priority 6 - Continue the implementation of a monitoring strategy which is adaptive to changing risk conditions, aligns with WIOA requirements, and meaningfully informs the continuous quality improvement cycle.
- Priority 7 - Evaluate customer access to and timeliness of services.

### **Goal 3 – Improve outreach and services to IDVR business customers**

- Priority 1 – Increase business utilization of IDVR expertise and services.

#### **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;**

IDVR commissioned a CSNA in Summer 2019 which includes an assessment of Pre-ETS and youth need as well as considering the needs of business.

The Division's goals and priorities reflect those areas where the Division plans to focus efforts for improvement and are directly informed by the CSNA. The Division worked closely with Idaho's State Rehabilitation Council using the results of the latest Comprehensive Statewide Needs Assessment and have updated these goals and priorities with language that meets the direction provided by the SRC.

##### **B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND**

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. The Division is still collecting baseline information on most of these indicators. As a result, performance levels are being reported for only Measurable Skill Gains at this time. The remaining indicators will be coming online in the next two years and IDVR anticipates being able to report performance across all indicators in the next plan:

- Employment in the 2<sup>nd</sup> quarter
- Employment in the 4<sup>th</sup> quarter
- Median earnings
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers.

The Division has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement as a non-access PACIA. While, IDVR has requested access to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes. The Division is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data.

The Division continues to improve our data validation and accuracy efforts by working with Aware, testing data validation and accuracy checks with the field and implementing strategies which provide strong automatic internal control and quarterly data check to detect anomalies and errors. The Division's Information and Communication strategy promote compliance and learning by informing staff each quarter of errors and anomalies detected by this strategy and

working with staff to fix errors and fix or certify anomalies. The expectation is that errors and anomalies for staff working through these corrections will diminish over time.

The Division will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA. Thusly, the Division looks forward to negotiating targets with RSA.

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.

The Division has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

IDVR's last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Division continuing to expand its continuous improvement activities.

M. ORDER OF SELECTION

Describe:

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

IDVR is not currently in order of selection.

B. THE JUSTIFICATION FOR THE ORDER

IDVR is not currently in order of selection.

C. THE SERVICE AND OUTCOME GOALS

IDVR is not currently in order of selection.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

IDVR is not currently in order of selection.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

IDVR is not currently in order of selection.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

IDVR is not currently in 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**

IDVR received \$300,000 in Title VI, Part B funds in FFY 2020. These funds are made available for all Supported Employment cases statewide. IDVR focused Title VI, Part B funds on direct case service provision for job coaching exclusively, including \$150,000 for SE youth. The Division has established a process to provide Youth Extended Services using Title I funds after exhausting Title VI funds.

The Division anticipates that adult SE funds and youth SE funds will be exhausted annually and the Division will continue to provide these services under general Title I funds.

Since this population is by definition MSD they would also continue to receive services, even in the event that IDVR implemented an Order of Selection, unless Order were expanded to temporarily suspend services to part or all of the MSD population. No existing fiscal projection would indicate this action.

**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**

IDVR reserves 50 percent of Title VI Part B funds for the provision of Supported Employment and Extended Services to youth. IDVR's expenditures on SE services far outstrips the funds allocated under Title VI Part B. The Division does not anticipate any problems expending these funds as authorized.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for individuals under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. The Division will continue to support YES with Title VI or Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. Youth Extended Services are only for individuals who are MSD and have completed SE services.

**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.**

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding.

**O. STATE'S STRATEGIES**

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

**1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES**

The Division's Statewide Assessment (j) outlines an array of potential priorities to expand and improve services to Idahoans with disabilities. Initial innovation and expansion activities under WIOA were focused primarily on establishing new and modified services to conform with the requirements of the regulations. While the Division will continue to expand these services in some areas, there will be an increasing focus on raising the quality of services to customers under all priorities listed under Goal 1 in section (l) of this plan.

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, IDVR in PYs 2020-2021 will continue limited pilot projects under Pre-ETS while continuing to monitor and refine those programs now being offered at a statewide level. More detail on plans for improving services to students and youth can be found under part four of this section.

The Division will engage in a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers.

Following the creation of new policy on Supported Employment (SE) under WIOA to address regulatory changes pertinent to SE and an initial wave of internal staff training, the Division conducted multiple activities to collect input on services to individuals with MSD.

Expansion of service delivery options is an expressed need in more rural and remote areas of Idaho, while improvements were indicated for traditional CRP and Pre-ETS services including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. More detail on plans for CRP improvement can be found under part five of this section.

## **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**

IDVR is committed to expanding the availability and provision of Assistive Technology. The Division has an ongoing partnership with the Idaho Assistive Technology Project (IATP) housed at the Center on Disabilities and Human Development at the University of Idaho. Through this partnership IATP provides continuing education and technical assistance to IDVR personnel via face to face and distance methods. An IDVR staff member maintains representation on IATP's Advisory Council.

Current challenges to meet this need include the procurement of devices that students with disabilities have used through IDEA entitlements. The Division has an agreement as of FFY 2015, with the Idaho State Department of Education (SDE) outlining shared responsibilities and implementing a program which:

- Allows IDVR to purchase some AT devices at 50% of original cost from individual school districts, keeping familiar assistive technology in the hands of transitioning students.
- Shares responsibilities with the SDE where IDVR will purchase vocationally relevant AT for students with an IPE. Per WIOA guidance, the SDE retains responsibility for providing AT they have traditionally had the responsibility for.

IDVR anticipates updating this agreement for PY 2020.

Additional AT resources for staff training include the Idaho Training Clearinghouse, which hosts multiple resources and is funded by SDE's Special Education Division.

IDVR has provided counselors who serve deaf and hard of hearing customers with the AT needed to enhance communication.

### 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

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .961, up from .924 in PY 2017. Current estimates indicate a slight regression in this rate for PY 2019.

The identification and service estimates for minority populations in Idaho are derived from contrasting population estimates with internal agency data on applicants and plans developed for each minority population.

The Hispanic population is by far Idaho's largest minority group at 12.7 percent (2018 ACS Demographic and Housing 1-Year Estimate) and represents 9.1 percent of applicants and 8.6 percent of plans served by the Division in PY 2018 to date. This is contrast with the corresponding figures of a 12.0 percent population estimate and a 10.5 percent of applications in PY 2016. Additionally, over 16 percent of plans two years ago served individuals with Hispanic ethnicity. The Division is aware of the increasing gap in both applications and plans and has included an initiative in this plan to explore/expand Spanish language options for customers across Idaho.

Further analysis of outreach and service delivery by race is confounded by substantial error margins present in the ACS estimates due to low populations in remaining categories: While the error margin presented for White alone in Idaho is around one-half of one percent, the error present in each of the remaining categories is substantial, ranging from 9.6 percent for Asian alone, and 52.5 percent for Native Hawaiian and Other Pacific Islander alone. In other words, the margin of error for all racial minority categories could place any of these categories in over or underserved status. Disregarding this limitation, outreach efforts as illustrated by applicants suggest all racial minority categories are being overserved with the exception of 'Asian alone' which has a population estimate of 1.5 percent and an application rate in PY 2018 of 1.1 percent.

Idaho's demographics are changing, and Idaho was the fastest growing state relative to population in the United States in 2017, experiencing 2.2% annual growth. Idaho is a major state for resettlement and has experienced a significant influx of refugees in Regions 3, 4, 7 and 8. In order to best understand the needs of this population, IDVR conducts joint staff training in conjunction with the Agency for New American's. IDVR works maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions. The Division maintains contact with Family Medicine, a medical provider to newly arrived refugees in the in these regions to coordinate referrals.

Additionally, IDVR conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Division works collaboratively with IDOL, the Community Council of Idaho (a rural-

centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs to identify these individuals and processes to best conduct outreach activities.

The Division conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Monthly participation in the Amigo Round Table hosted by the Mexican Consulate
- Working with community based mental health programs to identify leads for potential outreach
- Continuing meetings with Boise State University's Hispanic equivalency recruiter
- Meeting with the Idaho Department of Health and Welfare's bilingual staff as well as ongoing meetings with DHW's Targeted Service Coordinators to identify potential referrals
- Participation in the multi-partner Refugee Employment Networking and Training group hosted by the Idaho Department of Labor
- Collaboration with the College of Southern Idaho Refugee Center for referral for refugees with disabilities needing VR services

IDVR also conducts tribal outreach, per agreement, in conjunction with 121 projects to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

IDVR has a representative on the Sho-Ban Job Fair and Hiring Event committee in partnership with Shoshone-Bannock VR, IDOL, tribal leadership and employers which connects prospective employees to employers. The last event drew 40 employers and over 500 job seekers.

IDVR has connected with the ESL coordinator at the College of Western Idaho who disseminates information to VR staff on free English language classes and training opportunities for customers.

IDVR regularly engages with qualified interpreters for a variety of languages to better serve VR clients with limited English proficiency.

Idaho currently has eight Community Rehabilitation Programs who hold 14(c) special wage certificates serving under 350 customers statewide. IDVR has developed a Career Counseling and Information & Referral process which is delivered multiple times per year at each certificate holder sites. As a part of obligations under 397, IDVR encourages individuals with MSD to engage with the Division if interested in Competitive Integrated Employment as a part of their informed choice.

#### 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)

The expansion, provision, and evaluation of various Pre-ETS activities are ongoing. Continued collaboration with the SDE and LEAs alongside feedback from customers and parents/guardians when applicable are instrumental in better understanding which services should be continued, modified, or ended. Activities like the Transition Institute will bring these stakeholders together



and allow for the collection of rich qualitative data to further inform improvements to these services.

The Transition Coordinator will also use the district plans that are created at the Institute to identify specific transition service needs of each district. This will allow VR to target districts who need intensive levels of support as priority districts. VR will also continue to provide targeted and universal support to districts who have identified lower levels of need.

Our Transition Coordinator also developed a transition needs assessment that was sent to every school district regarding transition and pre-employment transition services needs in order to target districts and expand VR services.

VR will track which Pre-ETS individual students received over the past couple years and the educational goal attainment and/or if the student has achieved his or her employment outcome.

Toward these ends, expected outcomes include an increase in student participation in Pre-ETS, an increase in the number of students participating in Pre-ETS based on student need, an increase in the number of students achieving his or her employment outcome.

IDVR is evaluating the following services and partnerships

- Post-secondary partnerships
- Summer paid work experience
- Local Education Agency partnerships
- Idaho Educational Services for the Deaf and Blind partnership
- Idaho Parent Unlimited partnership

IDVR would still like to develop a partnership with the state independent living centers for pre-employment transition services.

#### 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

The Division is committed to engaging in innovation and expansion activities designed to establish, develop and/or improve Community Rehabilitation Programs (CRPs) across Idaho. Based on sustained demonstrated need highlighted in the past two Comprehensive Statewide Needs Assessments and aligned with the joint goals of IDVR's administration and IDVR's State Rehabilitation Council the Division is currently exploring a number of potential initiatives to promote quality CRP outcomes including but not limited to:

- Promoting the Professionalization of CRP Staff:
  - An exploration of established training models used by CRPs/other DSUs to promote initial competence when providing services to people with disabilities
  - An exploration of continuing education requirements used by CRPs/other DSUs to promote career-long learning and quality outcomes
  - Formalization of initial and on-going education requirements for providers who want to serve IDVR customers
- Reconciling IDVR's CRP Fee Schedule for WIOA Expectations:

- Evaluation of rates for services to include an assessment of potential new competency and training requirements
- Formalizing new rates for services based on enhanced education and competency requirements
- Clarifying Expectations/Information and Communication:
  - Establishment of new requirements and guidance around IDVR expectations for individualized service provision, documentation, and more tailored/personalized community-based evaluations.
  - Explore a potential streamlining of requirements to serve rural and remote communities, allowing more potential providers with a lower barrier to entry in underserved/unserved areas.
  - Due to persistent confusion in the CSNA: Work with Extended Employment Services to help CRPs, customers, and parents/guardians understand Competitive Integrated Employment requirements of IDVR and how the programs intersect.
- Strengthen the Feedback Loop with CRPs:
  - Work with partners to clarify agency expectations and requirements through continued development of the CRP Manual.
  - Overhaul IDVR's CRP Monitoring Protocol to align with the requirements of WIOA and increase relevance to frontline staff and CRPs
  - Continue to engage with CRP partners to address ongoing and emerging issues
  - Explore performance accountability options following implementation of heightened requirements
- Targeted Evaluation of CRP Services for Effectiveness:
  - Work to understand quality of assessments conducted by CRPs
  - Evaluate quality of assessment sites (where applicable) to the individualized personal/vocational needs of customer
  - Evaluate documentation of fading and stability

To further develop positive working relationships with Community Rehabilitation Providers (CRPs) and to enhance service delivery for customers, IDVR participates in CRP association meetings or hosts alternate meetings when necessary.

IDVR is engaged in a structured program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers in order to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored

benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this information in a manner the consumer can understand to help promote informed choice.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. The Division continues to explore options to improve this instrument.

#### 6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. No new guidance has been received to date; however, the Division does have baseline data for the Measurable Skill Gains (MSG) rate indicator and will enter into negotiations with RSA for PYs 2020 and 2021. Once an understanding of baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures for all performance indicators.

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and is working with the core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes.

IDVR has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements, unfortunately, the SLDS education data received to this point has not been current enough to use.

The Division has used the RSA Data Dashboards as an interim tool to better understand reporting under Section 116. The Division will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA for indicators coming off baseline in the near future. We expect to have more complete baseline data by the next plan submission and will then be able to articulate strategies for performance improvement based upon emerging trends and data for all WIOA primary performance indicators.

#### 7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

IDVR is involved in numerous strategies to increase and improve services to individuals with disabilities being served through the statewide workforce development system. The information below describes some of those initiatives, which are ongoing.

The WIOA Advisory Group has agreed that both IDVR and the Idaho Commission for the Blind and Visually Impaired (ICBVI) will serve as lead agencies in addressing the continuing education and technical assistance needs of workforce partners in best serving individuals with disabilities. Both VR programs have evaluated VR offices for physical and program accessibility, as well as participated in the One-Stop Committee's assessment of programmatic and physical accessibility of the two comprehensive One-Stop Centers in Idaho, and numerous affiliate sites across Idaho. These assessments were completed in PY 2018.

The Division and ICBVI each conducted a Comprehensive Statewide Needs Assessment which included surveys of core workforce partners.

IDVR's Administrator is an official, voting member of Idaho's Workforce Development Council (WDC), and IDVR's Administrator currently serves as the One-Stop Chair for the WDC. This appointment followed a major reorganization of the WDC which was mandated by the Governor's Executive Order.

Maximization of External Resource Utilization: IDVR in concert with other workforce partners will be discussing areas for improvement within the American Job Centers. Appropriate referral and co-enrollment are top priorities in order to reduce duplication of services and maximize the array of services people with disabilities can leverage.

The Division will continue to participate in cross-training activities with mandatory One-Stop partners which will include sharing program contact information, eligibility criteria, and training on program services and mission.

Core program partners are participating in a three-year Workforce Data Quality Initiative (WDQI) grant, secured by the Idaho Department of Labor, to enhance and automate data sharing across core programs. The shared data will include performance indicator data (e.g., wage information) as well as co-enrollment information across core programs, which will be useful to help facilitate cross-agency collaboration and service delivery. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

The Division has partnered with Live Better Idaho (LBI) (<https://www.livebetteridaho.org/>), a virtual portal which "connects service providers with Idahoans seeking those services." This website, exclusively funded by the Idaho Department of Health and Welfare, is an 'agency agnostic' service which is offered to public and private providers of services and connects Idahoans in need to relevant services by matching individuals with programs they may qualify for. The tool is localized and customized, connecting users to services that are relevant and available in their local areas.

The WIOA Advisory Group is discussing strategies in the following areas: improving public awareness and access to the workforce system, coordinating business services across partners, serving rural and remote communities and developing a career pathways/sector strategies with core program partners. The following briefly describes these strategies. More detailed information can be found in Section II(b)(1) and (2)(A)(B) of the Combined Plan.

**Improving Public Awareness and Access to the Workforce System** – The public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both job seekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. The VR programs will specifically:

- Work to improve program visibility including improved marketing tools for both employers and people with disabilities.
- Continue to work with one-stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities.
- Continue to partner with the "Live Better Idaho" local community resource portal to market services to targeted populations.
- Coordinate activities with One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission for each core program.

- Comprehensive information and training will be provided to outside organizations, especially Community Rehabilitation Partners.

**Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions** – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. The VR programs will track business services provided/delivered by staff and report this information to IDOL on a monthly basis.

**Serving Rural and Remote Communities** - In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. The VR programs will collaborate with One-Stop partners, including libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence.

**Career Pathways/Sector Partnerships** - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, trades, retail and service, construction, and health care. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. The VR programs will specifically:

- Contribute to the sector approach established by the IDOL.
- Train staff and expand utilization of the career pathways established by ICTE, including the Career Atlas tool.
- Explore the development of similar tools for pathways common to quality VR outcomes.
- Continue to focus on and train staff to use IDOL or other sources of local area LMI (e.g. Career Index Plus, CIS) to better inform customers' employment goal selection.

## 8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

### A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The Division has completed the latest Comprehensive Statewide Needs Assessment (CSNA) process which will be published in 2020. This CSNA has been used to inform our latest goals and priorities and to develop strategies to achieve the goals and priorities within IDVR's four-year work plan.

The agency's goals and priorities have been outlined in section (l): state goals and priorities. This section (o) has addressed the program specific strategies to achieve the goals and priorities and related these to the CSNA and other data sources to support these arguments. This

information in concert with the initiatives laid out in the combined plan operational elements  
iii.a precisely addresses how the State will approach these priorities.

#### B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, the Division is particularly interested in designating funds for the purpose of improving the quality of CRP services to individuals with disabilities. The Division will evaluate the best approach for improvement, including input from the CRP community, and allocate resources to begin this innovative activity. It is expected that the Division will begin this process in PY2020 and continue efforts into PY2021.

These innovation activities are driven by WIOA regulatory changes and information derived from the past two CSNA's.

The expansion of Benefits Counseling services to individuals who are SSI/SSDI recipients:

The Division historically has used the services provided by Montana State University, Billings, Work Incentives Planning and Assistance Program (WIPA), however, this service is only for those individuals with disabilities who are employed. The Division is prioritizing the delivery of benefits counseling to customers who receive Social Security Disability benefits to promote better informed decisions regarding work, and to resolve any ambivalence/anxiety about losing benefits, as early in the VR process as possible. Few individuals are certified to deliver benefits counseling in Idaho. The Division plans to assess the number of current qualified benefit counselors (Community Work Incentives Coordinators (CWIC) and develop a plan to increase the number to adequately address the Benefits Counseling needs of individuals with disabilities served by the program. The Division intends to designate funds for this expansion activity in PYs 2020 and 2021.

The expansion of Customized Employment (CE) services through a pilot relaunch (Pilot 2.0):

IDVR engaged in an initial pilot program to launch CE services in three pilot sites across Idaho. The Division worked closely with WINTAC and our CE training provider, Griffin-Hammis Associates to train educators, CRP staff and IDVR staff including five-days of face-to-face instruction and distance and in-person technical assistance. Ultimately, the CRPs who participated in the training were unable to retain the staff trained in the pilot, and subsequently IDVR was left without the capacity to deliver CE or expand CE delivery statewide. Staff turnover continues to be a significant issue for CRPs, and the Division is exploring potential changes to the structure of the pilot to include expanding the array of providers who are recognized as qualified CE providers as well as evaluating sustainable CE training delivery models. IDVR will continue efforts in the CE Community of Practice as well as continued engagement in the intensive technical assistance agreement with WINTAC. A CE Pilot 2.0 is planned to be developed and implemented in PYs 2020 and 2021. The Division intends to designate funds for this expansion activity in PYs 2020 and 2021. Division personnel are slated to attend the CE National Forum on May 19-20 in Washington, DC to better understand where other programs are gaining traction in the launch of their own CE initiatives.

#### 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.

The 2020 IDVR CSNA reported that the Division has improved its outreach services to unserved, underserved and minority populations.

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .961, up from .924 in PY 2017.

Staff recommendation to improve services contained in the CSNA indicated the next focus should be on transition age youth. Sections (o)(3) and (o)(4) of IDVR's program specific strategies (contained above) further elaborate on how the Division will address equitable access and participation as it relates to this section, including coordination of outreach efforts with combined plan partners at IDOL and DEI.

#### P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

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

**Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential**

**Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.**

The Division began collecting new baseline data for the number of students receiving Pre-ETS and has initial data in PY 2016 with the first full year of data in PY 2017 with 1180 students receiving at least one Pre-ETS activity. PY 2018 number dipped 19.7 percent to 947 students receiving at least one Pre-ETS activity. IDVR requires more data to determine whether this is due to natural regression, or other yet to be determined factors. Additionally, IDVR has experienced a Division wide decrease in overall applications for all services. This overall trend of fewer applicants statewide may have a relationship to the overall reduction in Pre-ETS cases across Idaho. The Division will continue to monitor these indicators and will respond accordingly as the baseline numbers solidify.

The Division continues to evaluate and improve services to students. The transition coordinator, along with other transition staff, developed a strategic plan in Fall 2019 with the goal of systematically advancing the Division forward with the delivery of Pre-ETS. This new strategic plan for Pre-ETS expansion and improvement is detailed in section L of this plan.

**Priority 2- Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).**

IDVR has engaged in a determined expansion of Supported Employment services, including a heightened focus on employment stability prior to the transition to long-term supports. As a result, the Division has seen the cost of SE cases increase year-over-year from \$1218 per case in PY 2016 to \$2,345 in PY 2018, an increase of 92% spent per SE case. This increase helped promote initial stability through additional hours of Job Coaching for individuals to master the essential function of the position to employer satisfaction.

The Division has introduced stronger guidance, for staff and CRPs, on fading and appropriate reduction of support over time to ensure strategies are in place to either address current issues on the job or determine a base level of ongoing support required prior to transition to ongoing support services. These efforts are ongoing, and the Division is currently working through public comment to enhance this guidance in a new iteration of the IDVR's CRP Manual. Enhanced guidance on fading and documenting progress necessary to justify the continuation of SE services will be major components of the PY 2020 iteration of the manual.

Additionally, the Division has completed phase one of its Customized Employment pilot. The three-site pilot intended to determine appropriate rate, capacity and inform policy development around the delivery of CE statewide. While CE can be offered to individuals who require SE, components of CE are valuable to individuals with the most significant disabilities as well. The initial phase of the pilot illustrated significant challenges to provider turnover and sustainable training to achieve fidelity to the CE model IDVR has selected. The Division is currently structuring a second pilot to address challenges experienced in phase one. The Division anticipates a relaunch of Customized Employment 2.0 sometime in PY 2020.

The Division has received intensive TA from WINTAC and is currently engaged in WINTAC's Community of Practice (CoP) on both Supported and Customized Employment.

The Division has included Benefits Planning on its Strategic Plan for PY 2019 but has pushed this initiative to PY 2020. Benefits Planning has been identified as a priority by Idaho's State Rehabilitation Council, and IDVR's field management.

Youth Extended Services has been established as a service category and is now available in cases where no alternative external source of extended services is available.

### **Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.**

IDVR has accomplished several initiatives to increase retention and attract new hires for counselor and management level positions, including:

- Marketing materials update to highlight VR career path, meaningful work, and benefits offered to State Employees
- Increased outreach to universities, CRCC, and through attendance at NCRE to expand candidate reach
- Streamlined the recruitment process and updated job postings to make them more jobseeker focused
- Created internship program to build talent pipeline and continue collaboration with neighboring universities
- Updated CSPD policy to offer financial support to employees working towards their VR credentials
- Created permanent Assistant Regional Manager (ARM) positions to support the coordinated development of staff (with an emphasis on new staff), increase potential for career growth, and for succession planning purposes
- Continuously supporting managers and their employees in performance management process



- Restructured onboarding processes to engage new hires, standardize training, and foster a positive experience for new employees
- Partner with IDVR's VRC Trainer to increase and align skill set of agency personnel
- Updated pay structure for all Division position classifications to hire at the minimum of 80% policy rate

**Priority 4 - Improve usage of Labor Market Information/Career Pathways to inform customer career choice.**

IDVR engaged with the Career Index Plus and the Idaho Department of Labor in various ways:

The Career Index Plus (TCI+) training was offered to frontline staff statewide to provide additional options for staff when exploring LMI with customers. The Idaho Department of Labor came to IDVR's Inservice to provide training on local labor markets and how to use the tools provided by IDOL including accessing local labor economists to better understand local area conditions. Training on Comprehensive Assessment incorporating local labor market data was emphasized in a major statewide training on quality case documentation, an area of focus for PY 2018.

The Division included an evaluation of LMI present in Comprehensive Assessments in its 2019 Case File Review Season and will be promoting greater utilization of local (or anticipated) labor market for the vocational goal of choice. Additionally, the Division imposed a ban on the utilization of generic 'all other service workers' type goals outside of Pre-ETS cases (where a vague vocational goal is allowable while student/youth career exploration solidifies).

**Goal 2 - Improve VR program efficiency through continuous quality improvement activities**

**Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.**

Initial efforts to utilize targets first require the establishment of data agreements and subsequent baseline data. IDVR, through an initial ad-hoc data agreement, was able to secure in-state wage data through IDOL, however only aggregate out-of-state data were available through IDOL's WRIS-2 due to constraints imposed by the agreement. As of September 2019, Idaho's core program partners have all signed on to the State Wage Interchange System (SWIS) and will now be able to gather additional out-of-state data from other SWIS states. IDVR is well positioned to enter target negotiation with RSA. It is worth noting that there are significant out-of-state overlaps with local labor markets, particularly in north Idaho with estimates that approach 12% out-of-state placement.

IDOL secured a Workforce Data Quality Initiative WDQI grant from US DOL with expressed support from the Division. IDVR is working with the WDQI lead and other core WIOA programs to leverage the WDQI resources to improve and automate the exchange of secure co-enrollment data and other critical shared elements of importance to the group. As a result of efforts identified in the WDQI, core programs should realize more efficient and secure data exchange of required WIOA data elements needed by multiple core partners.

Outcomes of Primary Performance Indicators are preliminary. Currently complete data is only available for Measurable Skill Gains, while employment/wage data continues to come online.

A critical focus of the new Case File Review Protocol was the verification of documentation of educational goals. Preliminary findings indicate that while Division staff are doing an

exceptional job of collecting educational verification, we are challenged with entering MSGs in all cases for performance reporting purposes. The Division currently has an understanding of areas it can improve on from PY 2018 performance. The Division will champion an effort to report more complete MSG data in PY 2019. The Division will also use information gained in the review of PY 2018 performance to establish and improve an MSG anomalies/data validation check to better promote field entry of educational goals where they are currently lacking. Further identification of core performance elements for improvement are dependent on the future exchange of this data to solidify baselines.

**Priority 2 - Revise IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council to increase the response rate, retention rate, and overall satisfaction rate.**

IDVR has completely revamped the Customer Satisfaction Survey based on feedback from Idaho's SRC and SRC Survey Subcommittee. As a result, the Division realized major gains in completion rates (from 40 to 98 percent) and response rates (from five to 15 percent). Moving forward, the Division will focus on an increase in satisfaction and maintain a focus on keeping a solid response rate.

Regarding satisfaction, the foundational questions have been changed, and data are not directly comparable. However, the Division has seen a seven percent drop in the 'satisfaction' construct with the change in language, and a change in method in calculating overall satisfaction (87 percent to 80 percent satisfied or very satisfied). Additional variance in this in this rate may be explained by a modification of the Division's Financial Participation Agreement, which coincided with the change in CSS survey and substantially increased customer financial involvement in their plans. General impacts of WIOA implementation may also play a role in explaining the reduced satisfaction rate.

**Priority 3 - Maximize the utilization of comparable benefits.**

Preliminary attention has been given to this priority and understanding comparable benefit utilization and documentation was a focus of IDVR's 2019 Case File Review. Emerging data suggests a need to further information and communication activities to not only maximize the utilization of comparable benefits and services, but also to better document these benefits on the plan when they are used.

IDVR is increasing appropriate referral to American Job Center Network Partners in local areas: IDVR's administrator is Idaho's Workforce Development Council One-Stop chairperson, and in this capacity has increased local area engagement between WIOA combined plan partners and other stakeholders. This is accomplished via multiple monthly in-person meetings to facilitate better understanding of programs and increase utilization of available resources and expertise. This should have an impact on volume and validity of referrals to comparable services and resources and a corresponding increase in co-enrollment between combined plan partners.

The Division has also issued recent guidance clarifying the scope of comparable benefits and included procedures for better documenting comparable benefits on the IPE.

IDVR is using RSA's data dashboards as a part of its data validation strategy. In this analysis the Division has uncovered a flaw in how these are represented in the report through the Aware case management system. IDVR is working hand-in-hand with Aware to better understand and rectify this reporting error.

**Priority 4 - Increase IDVR integration with the workforce development system.**

The IDVR Administrator is the Workforce Development Council (WDC) One-Stop Committee Chair. The Committee has prioritized numerous activities since the last State Plan, including:

- Formalizing Idaho's One-Stop/American Job Center structure: two comprehensive centers (Idaho Falls and Lewiston), designating affiliate sites, and network partners.
- Negotiating a cost-sharing agreement.
- Conducting both physical and programmatic accessibility of comprehensive, affiliate, and network partner sites.
- Advancing data sharing to obtain co-enrollment information.

**Priority 5 - Evaluate IDVR assessment expenditures.**

While the evaluation of assessment expenditures remains a priority for the agency, progress on this priority was minimal this PY.

**Priority 6 - Revise internal case review process to align with WIOA requirements, and inform the continuous quality improvement cycle.**

Priority 6 has been met with a complete revision of the internal case review process which now aligns with RSA's Internal Control and data validation requirements and is periodically informed by the MTAG and emerging and existing agency priorities and progress. An annual review season pilot of this protocol is focused on high risk areas as identified by compliance objectives, agency personnel, CSNA, SRC and other sources. Additionally, more complex or ad hoc topics will be addressed through a series of targeted reviews which will rotate based on administration prioritization.

The result of the revision has been a substantial increase in meaningful information that can be easily translated into action for program improvement. Emerging data from the 2019 case file review season indicated numerous areas for immediate training and improvement statewide, and at a regional level. As a result, this protocol will be institutionalized and completed annually as a part of addressing IDVR's overall internal control monitoring requirements. The Planning and Evaluation unit will continue to iterate to improve on this process, but can now focus on incremental improvements versus the transformational system overhaul that is now complete.

**Priority 7 - Collaborate with Community Rehabilitation Program partners to improve the quality of services.**

IDVR is in the middle of fundamentally shifting how we communicate with and work with our Community Rehabilitation Providers (CRPs). Fundamental to these changes was the establishment of a formalized CRP Manual articulating and clarifying expectations and requirements around billing, service delivery, monitoring, pilot CRP projects, rural and underserved areas and frequently asked questions. The Division is in the middle of a revision phase and is currently collecting comment from internal field staff and CRPs to make incremental improvements to the guide and will continue to do so over time.

The Division partnered with three Idaho CRPs to launch phase one of the Customized Employment pilot. While ultimately unsuccessful, the pilot indicated many potential changes for improvement in phase two and identified areas for clarification in expectations. The second phase is being developed with input from national technical assistance centers, Idaho pilot CRPs and field staff who were a part of the original training series. The second pilot phase is expected to launch in PY 2020.

Customer Satisfaction Survey results for CRP services (including assessment services) are particularly low and indicate a strong need to elevate this priority in the coming PY.

IDVR realizes a need to further enhance collaboration with CRPs to work on a variety of services from assessment, to job development and placement and to include supported and customized employment. Data from the 2016 CSNA and preliminary results from the 2019-2020 CSNA (in process) strongly indicate a need to utilize Innovation and Expansion funds to elevate the quality of CRPs in the coming state plan. This will be a primary emphasis for the Division in this plan.

### **Priority 8 - Evaluate Customer Access to Services**

Priority 8 was de-emphasized following a risk assessment and prioritization activity held with frontline management staff and members of the SRC. This element was a product of a prior SRC priority, but after a shift in member composition the priorities changed.

### **Goal 3 - Meet the needs of Idaho businesses**

#### **Priority 1 - IDVR to be recognized by the business community as the disability experts in the workforce system.**

The Business Relations Liaison oversees the coordination of employer related outreach efforts within the Division and to coordinate employer contact under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners.

In 2017 the Business Engagement Team (BET) was created comprised of at least one-to-two IDVR staff in each regional office and activities of the BET are directed by the Business Relations Liaison. Regional Management representation is strong on the team, with three of eight RMs participating in an advisory role. The BET has evolved a mission statement, "To intentionally create and maintain long term partnerships with businesses for mutually beneficial outcomes for employers and job seekers with disabilities".

Following the creation of an initial charter, sponsored by Division administration, the BET has engaged in a number of preliminary activities, including the creation of a mandatory "Business Basics" online training for all staff, a method for tracking business outreach activities through our internal case management system, updates to IDVR's external business relations portal, and development of marketing materials for business outreach and education.

Activities for the BET are partly informed by an annual survey. This survey helps the Business Relations Liaison prioritize activities based on input from the field. The latest survey indicated high perceived needs for Disability Awareness training (indicated by 68 percent of BET staff as a need), Accommodations and Assistive Technology (65 percent), and Hiring Incentives for Employers (68 percent). Additionally, the BET is now active in most of the chambers of commerce across Idaho including representation in each region of IDVR.

A toolbox for members of the BET has now been established and is growing. The toolbox features resources BET and other IDVR staff can use to promote positive employer engagement. There are tools for staff as well as a growing number of tools designed for employers including a new initiative to create a training for employers around disability etiquette. This group will be meeting early in 2020 to draft a formal strategic plan and further refine and articulate goals, strategies, priorities and staff responsibilities under the team. Expanding outreach to employers for students and youth in transition is a primary consideration for the coming year for the BET with a business engagement transition pilot for IDVR Region 1 launching in 2020.

As a part of the BET activities in PY 2018, the team led a presentation at IDVR's annual all-staff Inservice to help explain how they serve as regional resources to promote positive business engagement opportunities.

The unit, while new, has engaged in two in-depth activities with major Idaho corporations (WinCo and HP). While talks with WinCo are still preliminary, the HP Spectrum Success Program is a direct result of sustained engagement and partnership with HP and would not have been possible without the help of Washington State Division of Vocational Rehabilitation and Microsoft who had engaged in some trailblazing efforts matching individuals with autism and STEM jobs. The willingness of these partners to provide technical assistance and expertise were instrumental in the program's success and as a result HP is engaging in a second cohort with IDVR beginning in early 2020.

IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities.

IDVR's Business Relations Liaison is engaged with the National Employment Team (the NET) and attends the national conference in addition to receiving regular updates, conference calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches.

IDVR has traditionally engaged in the creation of "VR Success Stories" to showcase strong annual placements. The Business Relations Liaison and the BET have worked to overhaul, expand, and professionalize these segments and will now producing multiple success stories per Region, with two being selected for a full video production which showcases the customer and employer's success with these placements.

## **B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES**

Factors that impeded the achievement of goals and priorities are discussed within the narrative of the preceding section (p)(1)(A) under their respective goals and priorities.

### **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**

The Division would anticipate serving approximately 128 individuals with the \$300,000 available in the SE Supplemental grant at an average cost of \$2,346.

Goal: To promote quality SE services through stability as demonstrated through higher 2<sup>nd</sup> and 4<sup>th</sup> quarter employment rates for customers who received SE services.

Per customer expenditures for SE cases are up 92% as the Division places more support behind achieving quality, long term stable SE outcomes.

IDVR provides supported employment services for eligible customers with the most significant disabilities. IDVR's Title VI, Part B funds have not traditionally covered all necessary expenditures associated with a supported employment strategy for IDVR customers. The Division has and will continue to supplement Title VI, Part B funds when needed with Title I grant funds.

It should also be noted that WIOA has a new financial requirement for Title VI, Part B funds. IDVR is required to set aside 50% of these funds for service provision to youth with disabilities and provide a 10% state match to these funds. The Division anticipates it will spend these funds and more in the coming year on students and youth.

#### B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The current labor market and fiscal conditions make recruitment and retention significant ongoing challenges for many of Idaho's Community Rehabilitation Programs: In this PY, two major CRPs have shuttered their programs as a result of fiscal conditions, many others reported difficulties in staffing, and realized a decline in referrals. Record sustained unemployment across Idaho has created an environment where CRP staff can often receive nominal wage increases to work entry level positions in their local labor markets. CRPs are in many cases unable to compete for these staff.

#### 3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

IDVR is continuing to gather baseline data from which to determine whether performance is degrading, maintaining or improving per section 116 standards. Once an understanding of these baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures. IDVR currently has is Measurable Skill Gains with a rate of 35.3 percent for the 915 gains reported. IDVR also has preliminary median earnings of \$3,733.93 reported in PY 2018.

The Division is hesitant to rely too strongly on the current MSG rate as recent file reviews have illustrated an opportunity for IDVR to initiate improvements which can further advance performance on this rate. That said, the Division is ready to engage in the initial MSG target negotiation and has developed a competitive benchmark process to help inform negotiations.

The Division continues working with core partner agencies to establish the open exchange of information which surround these performance measures and will be positioned to predict and establish baselines for negotiation with RSA based upon this data. However, since the core group of people continues to fundamentally shift as we operationalize WIOA requirements, the error introduced into these predictions is unknown, but is diminishing over time.

This plan is filed at a transitional period for standards and indicators in vocational rehabilitation.

Section 116 of WIOA establishes six new performance indicators to align these measures across numerous programs in the state. IDVR has not traditionally reported these measures as defined. This in concert with fundamental changes in Pre-ETS service provision further confound the Division's ability to accurately forecast targets for negotiated performance. Furthermore, many of these data elements remain undefined. That said, IDVR has made progress toward establishing baseline targets for a number of these indicators. Current data sharing agreements are not adequate to gather the level of information necessary to establish baseline targets. The Division is currently working on a new array of agreements to ensure the requirements of partner agencies are met.

#### 4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

IDVR provided funding support for the State Rehabilitation Council expenditures including travel, lodging, supplies, meeting room rentals, interpreters when necessary, facilitation services.

**Cost: \$22,414**

IDVR funds the State Independent Living Council (SILC) for the purpose of Innovation and Expansion activities. Title I funds reserved for the SILC were used to support personnel and functions necessary for the operation of the SILC.

**Cost: \$134,379**

#### Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

##### 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

The Idaho Division of Vocational Rehabilitation (IDVR) provides the full scope of Supported Employment Services (SE) to those Vocational Rehabilitation (VR) eligible customers with the most significant disabilities, who require extended services to maintain employment. Supported employment services are available to individuals with the most significant disabilities, including youth with the most significant disabilities.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Youth Extended Services (YES) are available for qualifying youth in the absence of other ongoing support services available in the community.

Each customer's IPE describes the timing of the transition into extended services, which is to be provided by the long-term support provider following the termination of time-limited services by IDVR.

Fifty percent of the Title VI-B (Supported Employment) grant will be reserved for youth with the most significant disabilities; the Division will set aside a 10% non-federal matching fund to meet the requirement of §363.23. For FFY 2018 this amount will be \$15,000 (Title VI-B Youth). The corresponding adult SE grant does not require a set aside.

Supported Employment Services are delivered by CRPs throughout the State of Idaho. IDVR's CRP quality assurance process is detailed in section (o)(5) of this plan.

##### 2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

WIOA extended the SE time period from 18 to 24 months. The Division has created protocols for and has made Youth Extended Services (YES) available for youth who are MSD when needed as required by WIOA. As Idaho has external funders of ongoing support services through multiple avenues, the Division does not currently have to expend YES funds.

Extended services may be provided to youth with the most significant disabilities for a period up to four years, or until the individual turns 25 and no longer meets the definition of a "youth with a disability", whichever comes first. SE services for adults shall not exceed 24 months, unless an exception is granted. The Division requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each customer receiving SE services is making satisfactory progress, including twice-monthly requirements to document progress toward these goals.

#### VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

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

Idaho Division 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

Idaho State Board of Education

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

Jane Donnellan

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

Administrator

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

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	[Jane Donnellan]
Title of Signatory	[Administrator]
Date Signed	[03/04/2020]

### ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	

The State Plan must include	Include
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	

The State Plan must include	Include
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 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	

The State Plan must include	Include
individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to 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 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	37.8	38.5	40.3	41.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

#### PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

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[13] Sec. 102(b)(2)(D)(iii) of WIOA

#### A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

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 Idaho Commission for the Blind and Visually Impaired (ICBVI) falls under a Commission of 5 Board Members (ICBVI Board) who are appointed by the Governor of Idaho. The ICBVI Board holds four meetings a year that are open to the public and a designated consumer input time is always on the agenda. The ICBVI Board reviews and approves all policy regarding the Vocational Rehabilitation Program at ICBVI. Any recommendations by the ICBVI Board are discussed at the public meetings.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

Does not apply (see a(1))

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Does not apply (see a.(1)).

#### B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewide requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

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;

Services provided under the State Plan are available in all political subdivisions of the state.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:



a. non-federal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;

b. services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and

c. state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in attachment 4.7(b)(3) a waiver of the state wideness requirement in accordance with the following requirements:

- identification of the types of services to be provided;
- written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
- written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
- written assurance that all other State Plan requirements, including a state's order of selection, will apply to all services approved under the waiver.

### 3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state may be used as part of the nonfederal share without the state requesting a waiver of the state wideness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

### C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

#### 1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

ICBVI has the following cooperative agreements:

**Idaho Educational Services for the Deaf and Blind (IESDB):** This agreement outlines how the two agencies will coordinate referrals, data sharing, services and communication to benefit the transition of students with blindness and visual impairments throughout the state.

**Idaho Division of Vocational Rehabilitation (IDVR):** This Memorandum of Understanding (MOU) establishes guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

**State Department of Education (SDE):** ICBVI, along with IDVR and the Idaho SDE established and approved a Memorandum of Understanding for Transition Services for Students with Disabilities, which includes the provision of Pre- Employment Transition Services, and clarifies the roles and responsibilities of each agency.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ICBVI does not engage in any cooperative agreements carried out under section 4 of this Act. ICBVI does not maintain any contracts or vendor agreements in order to provide assistive technology (AT) to clients.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

ICBVI does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

While ICBVI does not engage in any cooperative agreements with any noneducational agencies who serve out of school youth, the Commission does collaborate with all WIOA Core partners to identify and engage those out of school youth in the state who are blind or visually impaired.

5. STATE USE CONTRACTING PROGRAMS.

ICBVI does not engage in any state use contracting programs.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

In collaboration with the Transition Coordinator, ICBVI VR Counselors and the Idaho Education Services for the Deaf and Blind (IESDB) staff coordinate with regional education officials to identify blind and visually impaired students in the K-12 school system. VR counselors regularly meet with the special education teachers, teachers of the visually impaired (IESDB Staff), school counselors, school nurses and other personnel involved in school to work transition. A transition Individualized Plan for Employment (IPE) is developed within 90 days of eligibility determination (unless an extension is agreed upon) to assist the student with their successful transition from school to work.

To facilitate the transition of students with the disabilities, the following cooperative agreements have been established:

Idaho State Department of Education - July 2018

Idaho Educational Services for the Deaf and Blind - November 2019

Pre-Employment Transition Services (Pre-ETS): In collaboration with local educational agencies (LEA's), IESDB, and IDVR are required to offer to transition age students with disabilities (ages 14-21), Pre-Employment Transition Services (CFR 361.48(a)).

Pre-ETS are available to students with disabilities who are potentially eligible and eligible for ICBVI VR services.

In 2020, ICBVI and IDVR administration agreed to a minimum age of 14 years old that students with disabilities may begin receiving Pre-Employment Transition Services. This agreed lower threshold will be effective upon approval of this plan.

Pre-ETS include:

- Job exploration counseling;
- Work-based learning experiences, (which may include in-school or after school opportunities, experience outside the traditional school setting including internships that are provided in an integrated environment);
- Counseling on opportunities in comprehensive transition or enrollment in post-secondary educational programs;
- Workplace readiness training to develop social skills; and
- Independent living instruction in self-advocacy/peer mentoring.

In order to reach those goals, each ICBVI region is ensuring they have a strong relationship with the local school districts, Transition Councils, and One-Stop partners. State-wide Pre-Employment Transition Services and programs have been implemented and will continue to expand as the population of high school students we serve increases.

ICBVI's Project Coordinator for Transition Services is working with all state-wide LEA's to educate and inform them of Pre-ETS activities. This individual is also communicating with all staff engaged in the delivery of Pre-ETS to help develop and enhance existing referral and outreach strategies within schools.

### **Youth seeking subminimum wage employment**

ICBVI has created a checklist for youth seeking subminimum wage employment, which includes the documentation requirements and responsibilities under Section 511. The checklist includes the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511.

#### *Responsibilities of the VR program:*

The ICBVI checklist includes:

- Documentation of the provision of transition services or pre-employment transition services;

- Application for VR services;
- The provision of Career Counseling, and Information and Referral Services.

*Responsibilities of the Local Education Agency (LEA):*

Documentation of completion of appropriate transition services for a youth with a disability under IDEA, which includes:

- Youth's name
- Description of the service or activity completed
- Name of the provider of the required service or activity
- Date required service or activity completed

*Career Counseling, and Information and Referral Services (CCI&R)*

Counselors providing the service address the following elements of the VR process which includes a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

CCI&R activities include:

- Counseling in self-advocacy, self-determination and high expectations
- Review of any assessment information available (e.g. Interest inventories)
- Person-centered planning
- Discussion of marketable skill
- Soft skills
- Review of labor market information
- SSA benefits planning

**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 formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The agencies agree that:

- They will encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.

- ICBVI and IDVR counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- ICBVI and IDVR counselors are available to consult with educators concerning preemployment transition and vocational rehabilitation services for students to assist them toward employment.
- ICBVI and IDVR counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI.
- Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- ICBVI and IDVR counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. ICBVI continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of youth with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level.

#### **B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;**

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to facilitate the development and implementation of Individualized Education Programs (IEP). The agencies agree to cooperate in the development of transitioning students' IEP and any relevant Individual

Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

#### Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level. Members include the Idaho State Department of Education, Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired, Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project (administered by the University of Idaho), Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

#### C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Idaho State Department of Education (SDE) - Secondary Transition: Idaho Commission for Blind and Visually Impaired (ICBVI), Idaho Division of Vocational Rehabilitation (IDVR), and the State Department of Education (SDE) currently have a formal cooperative agreement. This agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Roles and responsibilities of each agency
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Outreach and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Planning to include timeframes for development of the IPE
- Service delivery

- Dispute resolution
- Coordination and documentation requirements under section 511
- Prohibition on entering into an arrangement with an entity holding a 14(c)-special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

The current agreement establishes the following roles and responsibilities for the involved parties.

The Idaho State Department of Education (SDE) agrees:

- To assume the role of lead agency in facilitating interagency planning with LEAs and implementation of educational programs and transitional services for youth with disabilities in transition from high school to post-high school services.
- To support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each eligible student, beginning no later than the IEP before the student turns age 16 years (earlier if appropriate), and to address future student needs in the areas of employment, post-secondary education, vocational training; and adult living and community participation, including assistive technology.
- To invite ICBVI and /or IDVR to provide information regarding their services, including their role as an IEP team member, to school district personnel, students and their families.
- To invite ICBVI and /or IDVR counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred of ICBVI and/or IDVR for rehabilitation services.
- To work with ICBVI and IDVR Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- To identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

Idaho Commission for the Blind and Visually Impaired (ICBVI), and the Idaho Division of Vocational Rehabilitation (IDVR) agree:

- To encourage staff to work closely with school district personnel to ensure coordination between education services and vocational rehabilitation services.
- That ICBVI and IDVR counselors will provide training to school district personnel, students and families on all aspects of vocational rehabilitation services, including their roles as IEP team members.
- That ICBVI and IDVR counselors are available to consult with educators concerning vocational rehabilitation services for transitioning students to assist them toward employment.

- That ICBVI and IDVR counselors will collaborate with the school districts in their service areas to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- That ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI providing rehabilitation services
- That ICBVI and IDVR counselors will accept referrals, when it is appropriate based on the individual needs of the student, to determine eligibility and will work collaboratively, with input from the student's IEP team, to develop IPEs. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that move the student to their employment goal.
- That ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- All state plan requirements, including a state's order of selection, will apply to all services provided under this cooperative agreement.

The Idaho Commission for the Blind and Visually Impaired (ICBVI) agrees:

- To continue serving school districts across the state. All Idaho school districts are served through each regional office. ICBVI does not maintain any cooperative agreements with school districts specific to the funding of school to work transition counselors.

#### D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

ICBVI, IDVR, and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that ICBVI will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Commission also engaged key stakeholders in the state through the following activities:

- Collaboration at regional special educator meetings.
- Presenting at statewide administrator meetings.
- Presenting at the Tools for Life Conference to parents, students, and educators.
- Outreach to Idaho Parents Unlimited.
- Participation in the Idaho Interagency Council on Secondary Transition.
- Ongoing collaboration with the Idaho State Department of Education.



- Ongoing collaboration with the Idaho Educational Services for the Deaf and Blind.

Outreach strategies to identify students who need transition services include:

- Counselors and Rehabilitation Teachers are assigned to the school districts in their regions. Staff participate in district transition councils, meetings, and trainings.
- The ICBVI Transition Coordinator participates in district In-Service trainings across the state.
- The MOU with IESDB emphasizes regional collaboration, data sharing, and identifying secondary school students in Idaho who are blind or visually impaired.

The Commission currently working on developing specific goals to improve outreach, which include:

- Creating training and materials that will increase students' understanding about the VR process and services.
- Create opportunities and materials to use with families to increase their understanding VR Services.
- Increasing outreach activities to rural communities in Idaho.

Since the implementation of WIOA in 2016, most students are still currently being served in the VR program. While the relationship between outreach strategies and employment outcomes is unknown at this time, ICBVI does recognize the need for program evaluation methodologies that include measures such as these.

#### E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

ICBVI does not have cooperative agreements with private nonprofit service providers as we pay fee for service.

ICBVI has a Policy and Service Provision Agreement with 11 Community Rehabilitation Providers (CRP) that is updated as requested by either party. This agreement includes:

- Policies regarding the ICBVI authorization process and invoicing
- Staffing of referrals
- Dispute resolution
- Billable services
- Requirements for employment verification
- Policies around the provision of Pre-Employment Transition Services

This agreement also includes the provision of services, which include:

- All five of the required Pre-Employment Transition Services

- In-house vocational evaluations
- Community-based work evaluations
- Job search assistance
- Job readiness training
- On the job supports - short term
- On the job supports - supported employment

#### F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

In 2018, ICBVI relinquished all of its Title VI, Part B funds to the Idaho Division of Vocational Rehabilitation (IDVR). As a result, IDVR now manages the supported employment (SE) program for the state.

ICBVI and IDVR agree to the following:

- ICBVI and IDVR agree to collaborate on all supported employment (SE) cases when the individual has a disability profile which includes blindness or visual impairment meeting the eligibility criteria of ICBVI.
- ICBVI agrees to fund services related to addressing the visual disability.
- IDVR agrees to fund employment related services.

Furthermore, ICBVI has adopted IDVR's policies around SE, which include service provider standards.

The VR program policy around the arrangement of supported employment services and extended employment services includes:

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by the state VR programs for a period of time not to exceed 24 months, unless the VRC and client jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE refers to support services (such as job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including extended services for youth, are provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability).

Extended Services for Youth: The state VR program makes extended services for youth available when youth have no comparable ES resources available in the community. Extended services can continue to be provided until:

- Comparable benefits become available (External funders are identified) OR
- Extended services are provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'.

Supported Employment services are only offered by qualified providers as identified under IDVR standards.

ICBVI is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. ICBVI and IDVR have established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

ICBVI and IDVR utilize the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The VR program will continue to work closely with each agency overseeing these resources to streamline the referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

The Supported Employment Agency Recommendation must be completed, and this is done by IDVR on behalf of both state VR agencies when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

The ICBVI counselor is a member of the Person-Centered Planning Team and participates in all planning and coordination activities.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case by case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

Extended services for youth can be provided up to four years as needed for youth under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, IDVR will continue to support extended services with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services.

ICBVI and IDVR support the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

ICBVI works collaboratively with IDVR through the entire life of the SE case, and will continue to provide any supportive services needed to address the visual disability of the participant up to program exit.

#### G. COORDINATION WITH EMPLOYERS

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

##### 1. VR SERVICES; AND

Through coordinated engagement, ICBVI and its workforce development partners will contribute to a more prosperous Idaho, providing businesses with talented job seekers to fill skill gaps and Idahoans living with blindness or visual impairments with the rehabilitation, training, and employment services needed to thrive in Idaho workplaces and communities. Employers may request an Assistive Technology (AT) assessment in order to hire a person with a visual impairment or who is blind. ICBVI will provide this service at no expense to the employer. This assessment may include website and network software accessibility as well as job site accommodations. ICBVI has an AT Technologist that assists all of the VR counselors in life skills assessments job site accommodations. Additionally, in 2019, ICBVI appointed the Statewide AT Technologist to coordinate business engagement activities in the state. ICBVI will work collaborative with the Idaho Department of Labor and the IDVR Business Engagement Team in achieving WIOA business outreach activities.

In early 2020, ICBVI staff will attend an IDVR strategic planning session with their Business Engagement Team (BET). The outcome of this training will be to facilitate a vision and plan for ICBVI services to businesses. Another natural outcome of participating in this planning session will be to develop a collaborative approach to business engagement activities for the VR programs.

ICBVI will continue to work with employers to provide general and customized technical assistance and support services to businesses and industries including input from employers in the 2020 Comprehensive State-wide Needs Assessment (CSNA):

- Through collaboration with employers to increase internship, mentoring, and training opportunities for ICBVI participants;

- By providing training in blindness and visual impairments to employers;
- By increasing visibility to employers in Idaho through marketing and outreach to businesses; and
- Through collaboration with One-Stop partners in the coordination of services to businesses (emphasis on collaboration with IDVR).

ICBVI will also focus on areas of need identified in the 2020 CSNA in respect to recommendations on how to improve business partnerships to engage employers in recruiting and hiring individuals who are blind or low vision:

- Greater community awareness and education of individuals who are blind or visually impaired, especially in rural communities;
- Increase visibility and engagement in rural communities;
- Provide quality training and job placement services; and
- Provide outreach and education to communities and employers on ICBVI services.

## 2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

### Pre-Employment Transition Services -

In addition to regional activities that are put on throughout the year, ICBVI host three main summer programs:

Work Readiness Camp – This one-week program is a collaborative effort between ICBVI, IESDB, and IDOL. This program focuses on job readiness skills, and helps to prepare students for summer employment experiences, or participation in our SWEP program.

College Days – This one-week program is for students who plan to pursue higher education after high school. This program is a collaborative effort between ICBVI, IDOL, and Boise State University.

Summer Work Experience Program - Every summer, ICBVI hosts transition aged students with disabilities (SWD) for a 7-week Summer Work Experience Program (SWEP) in Boise. Students eligible for Pre-ETS from across the state participate in the SWEP program. Throughout the program, all of the five required Pre-Employment Transition Services, as identified under WIOA, are delivered. ICBVI staff work with community employers to host our students for a work experience program. Students are paired with employers based upon interest and ability.

In addition, ICBVI's Project Coordinator for Transition Services, in collaboration with regional staff, will develop and implement Pre-ETS activities and programs in every region of the state.

In 2018, ICBVI launched a innovation program entitled the Visually Impaired Students Transitioning in to Adulthood (VISTA) Leadership Program. This program is specifically for transition aged students who are eligible for Pre-Employment Transition Services (Pre-ETS).

The definition of leadership, for the purposes of this program, is more contemporary from a theoretical perspective, with a student-informed emphasis to program design. This contemporary, strength-based approach; which leverages the student's contextual resources

(e.g., healthy relationships, engagement and access to community) is consistent with the theories of positive youth development.

There are 3 elements that make up the foundation of the VISTA Leadership Program:

- Social Emotional Learning
- Service Learning
- Mentoring (both peer and adult)

The formal program is one-year in length, and graduates of the VISTA Leadership Program mentor and support the incoming cohort and will continue to be supported up to their 22<sup>nd</sup> birthday, or in the event they are no longer eligible for Pre-ETS.

#### H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

##### 1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

Since IDVR manages the SE program for both state units, they oversee the development of policies and procedures for the program.

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

ICBVI participates in H&W sponsored trainings to support the VR staff on Medicaid services and benefits. This training enables VR staff to assist clients and families identify how those services can support success in an employment outcome.

##### 2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

ICBVI has a partnership with the Adult Developmental Disabilities Services (ADDS) program under the Department of Health & Welfare (H&W). While there currently is no formal agreement; H&W is a WIOA core partner. ICBVI works closely with IDVR (who manages the SE program for the state) in the provision of VR services to individuals with developmental disabilities. ICBVI have also had trainings to educate VR staff on Medicaid services and benefits thus allowing ICBVI staff to better assist clients in achieving their employment goals.

##### 3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

Under cooperative agreement, ICBVI leverages the relationship between IDVR and H&W-Behavioral Health via their agreement (updated annually) for the purpose of better serving Idahoans experiencing severe and persistent mental illness. As part of their agreement, the Department of Health and Welfare provides certifiable non-federal monies for IDVR services; explained in their interagency cooperative agreement.

ICBVI and IDVR agree to collaborate on all cases in who meet ICBVI eligibility criteria and who also have secondary severe and persistent mental health diagnosis. A designated IDVR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The ICBVI counselor is a critical part of the treatment team with these shared cases.

This team approach is used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those client's who have a severe and persistent mental illness deemed not eligible for the H&W-Behavioral Health program will be provided necessary VR services through ICBVI and IDVR.

## I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

#### A. QUALIFIED PERSONNEL NEEDS

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

#### 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;

In PY 2019, 420 participants were served in the VR program through 37.5 ICBVI staff. Personnel categories are broken down in the next section (ii).

#### II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

ICBVI currently employs a total of 37.5 staff necessary to provide VR services. The breakdown of personnel is as follows:

Professional Staff:

- 1 Administrator
- 1 Rehabilitation Services Chief
- 4 Program Managers
- 6 Senior VR Counselors for the Blind\*
- 13.5 Instructors for the Blind (includes the State Wide Assistive Technologist / Business Services Coordinator)

- 1 Project Coordinator for Transition Services.

Administrative staff:

- 1 IT Technology Senior
- 2 Fiscal Technician
- 5 Vocational Rehabilitation Assistants
- 1 Management Assistant
- 1 BEP specialist
- 1 Receptionist

\* Requirements for Senior VR Counselor for the Blind are consistent with the national standard of CRC. Individuals who do not meet those standards are designated Counselor for the Blind. All counselors currently employed at ICBVI are designated Senior Counselor of the Blind.

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.

ICBVI anticipates its current number of staff (37.5) will be required to provide VR services, based upon projections.

Additionally, ICBVI projects 4 staff retiring in the next 5 years:

Professional- Administrative Services Manager (1), Vocational Rehabilitation Counselor (1), Instructor of the Blind (1).

Administrative - Financial Technician (1).

## B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

### I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The University of Idaho is currently the only institution of higher education in the State that offers a VR program in Idaho. However, in 2020 the University will be sunsetting this program.

Idaho State University is considering and exploring the possibility of a new Master's in Counseling program which will include a track for Rehabilitation Counseling. This program is likely to move forward in 2020 and is anticipated to be offered in two Idaho locations and will accommodate 25 students. They also offer a category "R" education program for individuals who have related master's degrees and need up to six additional courses to be eligible to sit for the CRC exam. The 'Category R' program is intended to bridge the gap between traditional counseling programs and the specific requirements of rehabilitation counseling by outlining coursework and employment requirements to attain a CRC including Counseling Theory, Foundations of Rehabilitation Counseling, Assessment, Occupational Information/Job Placement, Medical and Psychosocial Aspects of Disability, and Case Management and



Rehabilitation Services. Completion of this program allows for an expedited path to a CRC for field staff with degrees in allied disciplines.

## II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

The University of Idaho is expecting 19 graduates in 2020 and no further students will graduate as the program is ending.

## 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.

The University of Idaho Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020.

## 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 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.

ICBVI plans for recruitment will be to continue to recruit qualified staff from the University of Idaho and at other regional and national institutions of higher education. We maintain contact with Western Washington University, Utah State University, Portland State University, Western Oregon University, University of Wisconsin-Stout, University of Northern Colorado and Montana State University, all of which have Master's programs in Rehabilitation Counseling.

ICBVI also uses the following for recruitment of Senior VR Counselors and Senior Instructors for the Blind:

- Commission on Rehabilitation Counselor Certification (CRCC)
- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) website
- The internet as utilized by the Idaho Division of Human Resources
- Internships and practicums completed by students with ICBVI
- Personal contact with instructors in university programs
- National Federation of the Blind (NFB) website
- CSAVR and NCSAB
- Region X Coalition

ICBVI has provided practicums and internships for Master's level students in the Rehabilitation Counseling program over the last five years and anticipates that it will provide an additional one to three practicums or internships in the next two years.

Training and continuing education is provided to VR staff from a variety of venues:

- National Rehabilitation Association (state and national conferences)
- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER)
- Helen Keller National Institute
- State and regional conferences and workshops
- Collaborative trainings with IDVR
- Technical Assistance Centers (e.g. WITAC, YTAC)
- Annual in-service training
- Webinar based trainings

Presently, we employ 16 individuals with a disability, eleven of whom are blind or visually impaired and 2 individuals are from a minority background. With a total staff of 40, this amounts to 40% of ICBVI's staff.

ICBVI participates in Career Fairs around the state to encourage and seek out individuals from diverse backgrounds including individuals with disabilities and from minority backgrounds.

ICBVI salaries compare favorably with the surrounding states in the Pacific Northwest. The agency also encourages and supports, costs, training/education time of staff and formal education and certification for staff.

ICBVI hires any person into a permanent position from a temporary position if they have met the minimum standards for that position as determined by the State of Idaho's Department of Human Resources for that classified position.

### 3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

- 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

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;

The State of Idaho does not require a state licensure for rehabilitation counselors. Educational standards for personnel established by ICBVI for qualified rehabilitation professionals (QRP) are intended to meet a base level of quality expected of the counselors by the Commission.

ICBVI's minimum standards for Senior VR Counselor for the Blind are consistent with the national standard of CRC. ICBVI places great importance on recruiting, hiring and retraining staff that are appropriately and adequately trained to provide services to our blind and visually impaired clients. We currently have eight staff with CRC certification, including the Chief of Rehabilitation Services. In addition, we have 145 Instructors for the Blind and six of them have Master's degrees and/or AER Certification in Rehabilitation Teaching or Orientation and Mobility.

ICBVI tracks and monitors each employee's individual training and development. Special emphasis is placed on training required to maintain CRC or AER certification. This includes training on disability topics, vocational counseling, ethics, case management, assessment, job placement strategies and especially assistive technology for the blind and visually impaired. Specific development needs identified for each employee are addressed during annual performance evaluations. While specific priorities evolve year-to-year, ICBVI consistently addresses WIOA, data collection and reporting, assessment, counseling and guidance, vocational planning, job placement, as well as assistive and rehabilitation technology.

**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.**

ICBVI is committed to providing all employees with development opportunities which will enhance employee job performance; support the agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities. With emphasis on workforce development, ICBVI will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs.

Through an increased emphasis on data-driven decisions, ICBVI will increase utilization of the most recently available labor market information to promote more informed decision making on the part of client's when selecting potential employment options.

In order for staff to have a 21<sup>st</sup> century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI is committed to providing training and support in the following:

- Idaho Labor Market Information
- The Career Index Plus
- Career Pathways

**4. STAFF DEVELOPMENT**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

**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**

Specific areas of training that are emphasized are:

- The Rehabilitation Act and its regulations, as amended by WIOA;
- The Workforce Innovation and Opportunity Act (WIOA)
- Social Security Work Incentives and Employment;
- Transition planning for students with blindness and visual impairment;
- Continuing education on the medical aspects of vision related disabilities; and
- Assistive Technology for the blind and visually impaired.

All agency personnel have an annual evaluation of his or her performance, goals and plans. It is during this process that ICBVI assesses how training has impacted an employee's ability to perform the essential functions of his or her position, and to set new goals and priorities for the next year.

#### B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

Succession planning and leadership development are discussed and emphasized to assist staff to enhance current skills or to build their skills for future opportunities for advancement within the agency. ICBVI has a policy to promote from within, which gives opportunities for current employees to advance and remain with the agency.

ICBVI continues to look for opportunities to collaborate on training and staff development with the Department of Education and the schools. ICBVI coordinates its CSPD activities with those provided under IDEA. ICBVI currently participates in:

- The Idaho Interagency Council on Secondary Transition;
- The Transition Institute;
- Tools for Life Conference;
- Independent Living Conference;
- Training and conferences provided by the Association for the Education and Rehabilitation for the Blind and Visually Impaired (AER);and
- Collaborative training with the Idaho Educational Services for the Deaf and Blind.

ICBVI will continue to work closely with the Idaho Educational Services for the Deaf and Blind addressing the needs of the transition population of the blind or visually impaired.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars.

#### 5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

ICBVI employees that are fluent in Spanish are recruited to serve the needs of the Hispanic communities located throughout the state.

ICBVI has chosen to purchase sign language interpreting services for individuals who are deaf. In cases where the client is deaf and blind, ICBVI will often work collaboratively with the general VR agency and the Helen Keller's national and regional centers to provide services. If ICBVI has a client who is monolingual speaking an interpreter will be hired by the agency.

#### 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.

ICBVI VR counselors, under the direction and supervision of the Rehabilitation Services Chief, will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA. Additional training and education will be identified for staff regarding new services, new coordination and best practices in serving students with disabilities. VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

#### 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;

ICBVI completed a Comprehensive Statewide Needs Assessment (CSNA) in FFY 2020 in accordance with the requirements of Section 101.15 of the Rehabilitation Act as amended. Three separate surveys were developed to thoroughly assess the needs of Idahoans who are blind or visually impaired. The survey participants included a sample of VR clients ( $n$  = ICBVI clients served within the time frame October 1, 2018 through September 30, 2019), all ICBVI staff, and a sample of employers and other key informants.

According to 2017 ACS estimates, 2.9% of the population reported a visual disability in Idaho, which is a higher than the percentage reported in the U.S (2.3%). It should be noted that the population reporting a visual disability in Idaho increased from 2.3% in 2015 to 2.9% in 2017. The percentage of individuals living in Idaho with a visual disability ages 18-34 (1.31%) is slightly higher than the US population (1.13%)

According to the results of the 2020 CSNA, the most common themes that emerged in the area of rehabilitation needs of blind and visually impaired individuals in the state were:

- Lack of transportation was identified as the major barrier to employment for individuals who are blind or low vision in Idaho.
- Societal attitudes, family attitudes, and employer attitudes regarding individuals who are blind or low vision continues to be a major barrier in Idaho.
- Independent living and mobility skills are seen as a major need of ICBVI clients.
- Access to career services, education and employment training programs.

##### B. WHO ARE MINORITIES;

According to the results of the 2020 CSNA, individuals who are blind or low vision and also Hispanic or Native American may be underserved by ICBVI. The existing data indicated a low percent of Hispanic cases served by ICBVI in relation to the percent of the population with any disability in the Hispanic category.

The prevalence by race/ethnicity and vision disability in Idaho and the U.S. are based on 2017 ACS estimates. The prevalence of vision disability for Idahoans is higher than the U.S. in two categories, white and other. The prevalence of vision disability for White Idahoans (2.9%) is higher than in the U.S. (2.4%). The prevalence of vision disability for Idahoans who identify as Other (4.0%) is higher than in the U.S (1.5%). The percentage of Idahoans who identify as Hispanics with vision disability is the same (2.1%) than the percentage of Hispanics with a vision disability in the US.

Idaho's population is expected to grow by 15.3% between 2015 to 2025, while the growth rate for Hispanics the state's largest minority, is expected to be 14.9%. ICBVI is cognizant of this change and will continue and expand outreach efforts to match this growth.

#### C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

According to the results of the 2020 CSNA, almost all participants surveyed commented on the rural nature of Idaho and the difficulty in providing services with limited financial and staff resources. Along this theme the lack of information in rural areas about ICBVI was also noted.

The WIOA Advisory Group has clearly identified rural areas as a traditionally underserved population. ICBVI regional counselors and rehabilitation teachers have always served rural communities; often times in the manner of home visits. ICBVI will continue to provide services (and expand as funding allows) more rural communities.

#### D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

ICBVI recognizes the need to increase partnerships with the statewide workforce system to develop innovative programs to serve co-enrolled individuals. ICBVI staff and counselors are committed to providing ongoing training of One Stop Center staff on issues related to blindness and visual impairments. Other strategies include continuing to expand partnerships and encourage coordination of services, developing of new ways to provide for job creation or to provide incentives to employers, and to work cooperatively to remove barriers and stigmas in the workplace.

#### E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

According to the 2020 CSNA, the most common themes that emerged in this area are:

- Collaboration with Local Education Agencies (LEA) / school districts needs to increase.
- Transition-age youth need more engagement in the workforce.
- Increase collaboration with WIOA partners to develop internships and other work based learning activities.
- There is lack of information regarding ICBVI services and opportunities.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

According to the 2020 CSNA, there is a need to improve the collaboration with CRP's in job training and placement services in the state for ICBVI clients.

To accomplish this, ICBVI will:

- Commit to annually reviewing CRP cooperative agreements and collaboratively identify areas for service improvement;
- Commit to providing training and support with CRP's to help them increase their capacity to provide all employment services, including Pre-Employment Transition Services (Pre-ETS).
- Continue to provide CRP's training in blind skills, and how to work with individuals who are blind or visually impaired. This has been a huge success, and ICBVI is committed to continue doing this in all of the regions across the state as a part of this state plan.

## 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

Current (2020) data from the Idaho Educational School for the Deaf and Blind (IESDB) reveals that there are 111 students identified in Idaho who are blind or visually impaired (this number does not account for home schooled youth).

According to the 2020 CSNA, the most common themes that emerged in the needs of students include:

- Improve access to assistive technology and training.
- Supports for transition from high school to college.
- Independent living skills training.
- More work-based learning experiences.

Recommendations to improve Transition Services include:

- Provide multiple and a broad variety of work-based learning experiences.
- Increased cross-training and collaboration between agencies and organizations.
- Improve marketing efforts of ICBVI transition services.
- Engage students at a younger age.

To address these needs, the ICBVI Project Coordinator for Transition Services is collaborating with Local Education Agencies (LEAs) in all five administrative regions. This collaboration includes an assessment to determine what transition services were currently being provided by the LEA, and to determine the need for additional pre-employment transition services. The Transition Project Coordinator also provides technical assistance regarding service changes as a result of WIOA.

Using information provided by the LEAs and Regional ICBVI staff, the Project Coordinator for Transition Services will continue to develop statewide programs founded on the evidence-based practices that are aligned to the five authorized Pre-ETS categories. The Transition Project Coordinator also collaborates with LEAs, institutions of higher education, state and federal programs serving students, and employers to enhance pre-employment transition services provided around the state.

The Project Coordinator for Transition Services is also employing marketing strategies and developing materials to reach students and youth in transition and school district personnel to inform parents, educators, administrators, and others about the ICBVI Vocational Rehabilitation program.

ICBVI / IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. In addition, ICBVI participates in the planning and coordination of an annual Transition Institute for VR program staff and educators across the state.

The current CSNA clearly articulates the need for both the required and authorized Pre-ETS activities. In responses to this, ICBVI has completed its fiscal forecasting for Pre-ETS, and it is included in the 2020 CSNA. ICBVI will review this forecasting on an annual basis.

#### K. ANNUAL ESTIMATES

Describe:

##### 1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

following are derived from Table S1811 at American Community Survey (ACS):

In FFY 2020, the number of individuals with disability in Idaho (16 and older), and who are eligible for participation in the workforce is 67087.

In FFY 2021, the number of individuals with disability in Idaho, and who are eligible for participation in the workforce is 68893.

Data in the 2020 CSNA suggests that 2.2% of the disability population in Idaho have a visual disability. Therefore, we can estimate the number of individuals in the state to be eligible for services to be:

FFY2020 – 1476 individuals

FFY 2021 – 1516 individuals

##### 2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

###### A. THE VR PROGRAM;

The number of clients served by ICBVI is diminishing. Historic rates of low unemployment across Idaho and new mandates created by WIOA are likely factors in this recent downturn.

The following are from the ICBVI 2020-2023 Strategic Plan:

In FFY 2020, Title I, Part B the number of eligible individuals is estimated to be 350.

In FFY 2021, Title I, Part B the number of eligible individuals is estimated to be 360.

###### B. THE SUPPORTED EMPLOYMENT PROGRAM; AND



The Supported Employment (SE) is managed by the Idaho Division of Vocational Rehabilitation. ICBVI no longer receives Title VI funds for the SE program. However, ICBVI does continue to serve all eligible SE clients, including students with disabilities, utilizing Title I funds.

In FFY 2018 and FFY 2019, ICBVI provided supported employment services to a total of 4 participants (3 youth with the most significant disabilities and 1 adult with the most significant disabilities). As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICBVI anticipates providing supported employment services to the following over the next 2 years:

FFY 2020

- 2 adults with the most significant disabilities
- 2 youth with the most significant disabilities (including extended services).

FFY 2021

- 2 adults with the most significant disabilities
- 2 youth with the most significant disabilities (including extended services).

The SE projections are included in the section k2A and k4 projections.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

ICBVI is not operating under an Order of Selection. The Commission will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. ICBVI currently operates a three-tier significance of disability (MSD, SD, D).

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

ICBVI is not operating under an Order of Selection.

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.

- Title I Part B \$655,000
- Title VI Part B \$0

Estimated costs of services, per individual:

FFY 2020 – ICBVI projects serving 350 individuals with an estimated cost of \$1871 per individual.

FFY 2021 – ICBVI projects serving 360 individuals with an estimated cost of \$1819 per individual.

ICBVI has seen service volumes diminish while service costs per customer continue to increase. This increase in cost, coupled with the redistribution of funds for Pre-ETS could accelerate the need to implement an Order of Selection in Idaho.

ICBVI believes it will be difficult to determine the long-term impact of WIOA on number served without baseline data. While the Commission is committed to extending services to all eligible individuals, the emphasis and spending requirements associated with Pre-ETS requirements will both; (1) diminish overall funds available to individuals categorized as 'eligible' and, (2) fundamentally shifts the way ICBVI spends 15% of program funds.

#### L. STATE GOALS AND PRIORITIES

The designated State unit must:

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

ICBVI management team, along with the Board of Commissioners revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

ICBVI, in collaboration with the Board of Commissioners, will continue to develop specific strategies that are in alignment with these goals and priorities.

Specific goals and priorities for the VR and SE programs are discussed in l.3.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The Commission's goals and priorities were informed via the 2020 CSNA conducted by the University of Washington. The goals and priorities were developed through discussions with the ICBVI Board of Commissioners and through collaboration among WIOA core partner programs. As well, program goals and priorities are identified through the Commission's Strategic Plan (2020-2023).

The 2020 CSNA solicited input from a diverse body of stakeholders, including client's (both current and exited), ICBVI staff, ICBVI Board of Commissioners, employers, CRP's, education officials, consumer groups, and other key stakeholders.

The goals and priorities for PY2020-2023 are described in section l.3.A.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

- A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners;
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
- Priority 3: Continue to address accessibility issues within the One-Stop system;
- Priority 4: Increase/improve access to assistive technology and training; and
- Priority 5: Increase outreach activities to rural communities.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school;
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Revise ICBVI's program satisfaction survey(s) to identify areas for program improvement;
- Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

#### B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. The Division is still collecting baseline information on most of these indicators. As a result, performance levels are being reported for only Measurable Skill Gains at this time. During this plan, the implementation schedule for the Common Performance Measures is as follows:

- Employment in the 2<sup>nd</sup> quarter (baseline)

- Employment in the 4<sup>th</sup> quarter (baseline)
- Median earnings (baseline)
- Credential attainment (baseline)
- Measurable skill gains (begin reporting PY20)
- Effectiveness in serving employers (not yet established)

The Commission has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement. While, ICBVI has requested access to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes. The Commission is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data.

The Commission continues to improve our data validation by implementing strategies which provide strong automatic internal control and quarterly data checks to detect anomalies and errors.

The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

**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.**

The Commission has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

ICBVI's last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Commission continuing to expand its continuous improvement activities.

**M. ORDER OF SELECTION**

Describe:

**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**

ICBVI is currently not operating under an Order of Selection. However, the impact of WIOA and the 15% reserve requirement on the ability to serve all client's remains unknown for the future.

**B. THE JUSTIFICATION FOR THE ORDER**

n/a

**C. THE SERVICE AND OUTCOME GOALS**

n/a

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

n/a

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

n/a

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

ICBVI currently is able to serve all eligible clients.

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

In PY2018, under agreement with the Idaho Division of Vocational Rehabilitation (IDVR), ICBVI no longer receives any Title VI funds, as IDVR has agreed to manage the SE program for the state. Formerly, these funds were distributed in case service allotments to ICBVI regional offices to fund supported employment services under individualized plans for employment (IPE's). ICBVI focused Title VI, Part B funds on SE services including extended services for youth.

As needed, the Commission will continue to provide SE services under general Title I funds.

In PY 2018 and PY 2019, ICBVI provided supported employment services to a total of 4 participants (3 youth with the most significant disabilities and 1 adult with the most significant disabilities). As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICVBI anticipates providing supported employment services to the following over the next 2 years:

PY 2020

- 2 adults with the most significant disabilities
- 2 youth with the most significant disabilities (including extended services).

PY 2021

- 2 adults with the most significant disabilities
- 2 youth with the most significant disabilities (including extended services).

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

The Idaho Division of Vocational Rehabilitation (IDVR) manages the supported employment program for the state.

ICBVI has collaborated with IDVR on policies and procedures to ensure that extended services are available for youth with the most significant disabilities for up to 4 years, or until the individual turns 25 and no longer meets the definition "youth with a disability." Extended services can be provided following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. ICBVI will support extended services with Title I funds, as needed, and will continue to leverage other sources of extended services.

#### 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.

Under a cooperative agreement, ICBVI shares supported employment cases with IDVR. In addition, ICBVI has and will continue to support clients that require supported employment services through the basic support grant during program participation, and work with community partners, families, and other organizations to develop long term support or natural supports whenever feasible.

#### O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

##### 1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

The following strategies will be utilized to address the rehabilitation needs of blind and visually impaired in the state, as identified in the 2020 CSNA:

- Lack of transportation – Due to the rural nature of Idaho, transportation always emerges as a major barrier for individuals. To address this, ICBVI counselors and rehabilitation teachers will increase outreach activities to rural communities. As well, the Assessment and Training Center staff will continue their project of “mobile workshops” in regions across the state. ICBVI regional staff will continue to serve on public transportation boards and commissions that address transportation issues and projects.
- Societal attitudes – Outreach and education will include the “mobile workshops” conducted by our Assessment and Training staff. CRP’s, employers, educators, families are all invited to these regional workshops. ICBVI recently appointed the statewide AT Specialist also serve as a statewide business engagement specialist. A strategy of this individual to increase outreach and training to employers.
- Independent Living Skills-To address the continuing need of independent living skills training, ICBVI will ensure that rehabilitation teachers are provided opportunities for blind skills training. The VR program recently increased assessment activities for all eligible individuals to ensure all training needs are identified and provided in the IPE.

Access to career services and training programs – To address this, ICBVI has been working with all WIOA core programs to continue the development of the One-Stop System. As part of One-Stop strategy, ICBVI will also be emphasizing staff participation in all comprehensive and affiliate centers. Participation will include training of One Stop center staff and developing

opportunities for co-locating. Additionally, as part of our personal development strategies, staff trainings on Career Pathways, Labor Market Index, and Career Index Plus are all geared to ensuring staff have a 21<sup>st</sup> century understanding of the labor force and training programs.

## 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

ICBVI will continue to:

- Conduct assessments of blindness skills on all VR clients to determine their level of competence with the alternative skills of blindness;
- Continue implementing training curricula and timelines for clients to learn how to best utilize their Assistive Technology devices;
- Utilize loaner system and increase the number of models of adaptive technology for clients to try out before we purchase items;
- Maintain comprehensive Assistive Technology supports and training through our Assessment and Training Center, Statewide Assistive Technologist and regional Rehabilitation Teachers.

## 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

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities. This agreement will facilitate ICBVI's engagement with the Native American Indian Tribes that reside within the State to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes.

ICBVI will work collaboratively with Department of Labor and the Idaho Commission on Hispanic Affairs to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes. ICBVI will continue to collaborate with Department of Education to ensure that transition age students are made aware of ICBVI services and how to access them. This is occurring at a State level with ICBVI's involvement in the Interagency Transition Council as well as regional level where the VR counselors are in direct communication with individual school staff. ICBVI will continue to strengthen its collaborative work with Idaho Educational Services for the Blind and Visually Impaired (IESDB).

## 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)

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The Commission's Project Coordinator for Transition Services will continue to improve and expand Pre-ETS across the state.

ICBVI is committed to working collaboratively with the IESDB, IDVR, and all regional school districts to identify all eligible (or potentially eligible) secondary students in the state of Idaho. Furthermore, ICBVI is committed to reaching out to rural communities in this effort. ICBVI currently has two summer programs that are targeted towards high school students: 1) Summer Work Experience Program (SWEP) and, 2) College Days. Curriculum in both of these programs is being reviewed, expanded and modified, as appropriate, to ensure they meet all of the criteria of Pre-ETS.

As previously mentioned in this plan, the state VR program (ICBVI and IDVR) have agreed to lower the minimum age for the receipt of Pre-ETS to 14 years old. This will increase the number of students who will be eligible for Pre-ETS in the state.

### 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

ICBVI is committed to working with Idaho's CRP community. ICBVI has implemented training for CRPs who are interested in working with the blind and visually impaired. ICBVI is bringing this training to every region in the state. In 2018, ICBVI developed a cooperative agreement with all CRP's, which is reviewed on an annual basis with all CRP's who provide services to ICBVI clients; with emphasis on the provision of Pre-Employment Transition Services.

### 6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. No new guidance has been received to date; however the Commission does have baseline data for the Measurable Skill Gains (MSG) rate indicator and will enter into negotiations with RSA for PYs 2020 and 2021. Once an understanding of baselines emerge, ICBVI will be well positioned to develop strategies to improve upon these baseline figures for all performance indicators.

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and is working with the core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes.

While ICBVI has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements that will allow ICBVI to better understand what factors promote quality sustained competitive integrated employment, unfortunately, the SLDS education data received to this point is not current enough to use for MSG performance.



The Commission has used the RSA Data Dashboards as an interim tool to better reporting under Section 116. The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA. We expect to have more complete baseline data by the next plan submission and will then be able to articulate strategies for performance improvement based upon emerging trends and data.

#### 7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

The WIOA Advisory Group, in conjunction with the Idaho Division of Vocational Rehabilitation has agreed that both ICBVI and IDVR will be lead agencies in addressing the continuing education and technical assistance needs of external workforce partners in best serving individuals with disabilities. ICBVI and IDVR will jointly sponsor a yearly needs assessment of workforce partners regarding employment and disability. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings and informal consultation as needed. ICBVI will coordinate activities with mandatory One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. The Commission will maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations such as, the Department of Mental Health and Welfare's Division of Behavioral Health, School to Work Transition, American Indian Vocational Rehabilitation Services, and Centers for Independent Living. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

The Commission has partnered with Live Better Idaho (LBI) (<https://www.livebetteridaho.org/>), a virtual portal which "connects service providers with Idahoans seeking those services." This website, exclusively funded by the Idaho Department of Health and Welfare, is an 'agency agnostic' service which is offered to public and private providers of services and connects Idahoans in need to relevant services by matching individuals with programs they may qualify for. The tool is localized and customized, connecting users to services that are relevant and available in their local areas.

ICBVI has created a presence on LBI to connect potential customers to Vocational Rehabilitation and other ICBVI services and programs. The tool can help connect rural Idahoans to locally available resources, including VR, and expands the range of options youth can use to find appropriate employment programs.

#### 8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

##### A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2021 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training.

- Priority 2: Improve access to job training and placement services.
- Priority 3: Provide outreach training to all community partners.
- Priority 4: Improve services to business across the state.

Strategies for Goal 1 include:

- Monitor program outcomes through client surveys. ICBVI is updating the VR participant survey for PY 2020.
- Expand statewide business engagement activities through ICBVI initiatives or other activities with WIOA partners.
- ICBVI will improve the strategies utilized to monitor outreach and training for regional offices.
- ICBVI will provide training services through regional instructors and the Assessment and Training Center (ATC).
- Develop new and innovate strategies for the delivery of VR services throughout the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners.
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system.
- Priority 3: Continue to address accessibility issues within the One-Stop system.
- Priority 4: Increase/improve access to assistive technology and training.
- Priority 5: Increase outreach activities to rural communities.

Strategies for Goal 2:

- Develop new and/or innovative approaches to outreach and education to our community partners.
- Continued participation in the development of the One-Stop system, with emphasis on service delivery to rural communities.
- Consultation and accessibility training to One-Stop partners to address barriers to individuals who are blind or visually impaired.
- Develop new and innovative strategies for providing rehabilitation technology and disability related skills training.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school.
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services.

- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-employment Transition Services.

#### Strategies for Goal 3:

- ICBVI will revise current policies around work-based learning experiences to reflect a more curriculum-based approach to these activities. ICBVI will also begin developing outcome measure for all Pre-Employment Transition Services.
- Collaborate with regional CRP's in the development and provision of work-based learning experiences for students with disabilities. ICBVI will update the current MOU to reflect policy changes in Pre-Employment Transition Services.
- ICBVI will engage LEA's and other key education (Idaho State Board of Education, State Department of Education) stakeholders in the provision of transition services. ICBVI will continue its collaborative efforts with the Idaho Division of Vocational Rehabilitation in the coordination, monitoring, and evaluation of Pre-employment Transition Services in the state.
- Develop new and innovative strategies for providing Pre-Employment Transition Services.

#### Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Evaluate VR program services and delivery
- Priority 2: Monitor program service records to ensure compliance to state and federal laws and regulations.
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

#### Strategies for Goal 4:

- Revise ICBVI's program satisfaction survey(s) to help identify areas for program improvement.
- Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.
- Revise and improve policies, procedures, and internal controls relating to the RSA-911 data collection and reporting.
- Revise and improve policies, procedures, and internal controls relating to Pre-Employment Transition Services.
- Continued participation in the Workforce Data Quality Initiative (WDQI) with WIOA core partners.

#### B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

The Commission's strategies to support innovation and expansion activities have been outlined above in section (o)(1). A substantial support of ICBVI activities are:

- the appointment of a business engagement specialist, and

- a substantial increase of the Rehabilitation Teachers role in all aspects of VR service delivery.

All of these strategies are included and supported in ICBVI's strategic and operational plans and are approved and supported by the Board of Commissioners.

Innovation and expansion funds will not be utilized to support the Board of Commissioners or the State Independent Living Council during PY 2020 or PY 20121.

**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.**

Sections (o)(3) and (o) (4) of the Commission's program specific strategies (contained above) further elaborate on how the ICBVI will address equitable access and participation as it relates to this section.

**P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS**

Describe:

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

The following program goals were identified in 2018 Combined State Plan Update:

**Goal 1 - Increase Independence and Employment Outcomes through Quality Rehabilitation Services.**

- ICBVI conducted periodic program surveys from participants to identify program strengths, and to facilitate continuous improvement of program curriculum;
- Services were provided statewide, with emphasis on rural and remote communities. ICBVI regional rehabilitation teachers provided individualized training to promote independent living, and community inclusion:
  - Orientation and Mobility Training
  - Activities of daily living
  - Assistive Technology
  - Accessing transportation and the One Stop System.
- ICBVI, in collaboration with IESDB, identified students in all regions of the state who were eligible for Pre-ETS.
- ICBVI began evaluating 911 data via the dashboard reports provided by RSA to help make informed decisions to improve program performance and reporting.
- In order to improve program performance and quality outcomes, ICBVI provided staff training via in-service training, TAC Webinar training, local and regional workshops and conferences, and national conferences (CSAVR, NCSAB, Summit Group (PEQA)).

- ICBVI provided clinical services for clients via the Boise Low Vision Clinic. The Low Vision Clinic traveled to all regions in the state in 2019.

***Performance Measures for Goal 1:***

PY 2018

Number of client's who achieved competitive integrated employment- 32

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 14

Pre-Employment Transition Services provided – 324

Average hourly wage at program exit – \$18.40

**Goal 2 - Increase public and client awareness of the mission, purpose, goals, function and services of the agency.**

- ICBVI continued to reach out to consumers and employers throughout the state in 2019.
- To enhance visibility and services to businesses, ICBVI appointment a staff member (AT Technologist) to serve as a statewide business engagement specialist.
- ICBVI staff, under the direction of the Chief of Rehabilitation Services and the Transition Project Coordinator, collaborated with key stakeholders to increase student participation in Pre-ETS.
- ICBVI continued their outreach to the four Native American Tribes in Idaho (facilitated by the MOU between ICBVI / IDVR and the Tribes. ICBVI provided outreach to Hispanic communities, and supported a counselor dedicated to translation services across the state when needed.
- ICBVI continued their commitment to the partnership with the Idaho Chapter of the National Federation of the Blind with the BELL (Braille Enrichment for Literacy and Learning) for children who are blind or visually impaired.

***Performance Measures for Goal 2:***

PY 2018

Total number of referrals to the VR program: 153

- One individual was referred from the tribal VR program.
- No individuals were referred from the One Stop system.

Total number of applications: 129

Total number of individuals found eligible for services: 129

Total number of individuals with an approved IPE: 106

Total number of Hispanic individuals served: 30

*Outreach performance (defined as substantial information shared about the VR program and services)*

Number of contacts to CRP's: 23

Number of contacts to LEA's: 56

Number of contacts to employers: 29

**Goal 3 - Increase training availability, effectiveness and access for clients.**

- ICBVI increased training and access for clients via the regional rehabilitation teachers and the state-wide assistive technologist.
- ICBVI continued to be a core partner in the development and implementation of the Idaho One-Stop System;
- ICBVI has been committed and involved in the continuous improvement of programmatic and physical accessibility in the One-Stop System;
- In 2019, ICBVI continue a project of sending Assessment and Training Center (ATC) instructors to all regions in order to provide blind skills training to parents, employers, CRP's, LEA personnel, and other interested community stakeholders.

***Performance Measures for Goal 3:***

PY 2018

Total number of client's who received rehabilitation technology services: 141

Total number of regional on-site office visits by the statewide Assistive Technologist: 10

Total number of state-wide training seminars conducted by our ATC: 6

**Summary:**

Consistent with the mission of the VR program, ICBVI can conclude that the goals and priorities set forth in the 2018 State Plan were achieved. Since benchmarks were not established in 2018, it is difficult discuss the achievement of such metrics. ICBVI recognizes that through improvements in it's case management system and reporting capabilities that ICBVI will be able to make better data-informed decisions when identifying and evaluating future goals and priorities.

**B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES**

n/a

**2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:**

**A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS**

ICBVI has collaborated with the general agency to serve clients with SE needs, and will continue that practice. Since ICBVI only served 6 individuals in the SE program in FFY2019, the Commission collaborates with IDVR in setting goals and priorities for the program. A strategy that has been implement the current FFY is the requirement of co-enrollment with IDVR for all eligible individuals. This has benefitted ICBVI clients in terms of comprehensive IPE development and case coordination. The two state units have implemented a procedure for tracking co-enrollment, and this is monitored on a quarterly basis.

## B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The ongoing challenge for the state's Supported Employment program to maintain the current level of funding for long term supports from the legislature.

### 3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

ICBVI is continuing to gather baseline data from which to determine whether performance is degrading, maintaining or improving per section 116 standards. Once an understanding of these baselines emerge, ICBVI will be well positioned to develop strategies to improve upon these baseline figures. ICBVI currently has is Measurable Skill Gains with a rate of 23.7%.

The Commission is hesitant to rely strongly on the current MSG rate as recent file reviews have illustrated there is more work to be done before relying on this rate as a baseline.

The Commission continues working with core partner agencies to establish the open exchange of information which surround these performance measures and will be positioned to predict and establish baselines for negotiation with RSA based upon this data. However, since the core group of people continues to fundamentally shift as we operationalize WIOA requirements, the error introduced into these predictions is unknown, but is diminishing over time.

This plan is filed at a transitional period for standards and indicators in vocational rehabilitation.

Section 116 of WIOA establishes six new performance indicators to align these measures across numerous programs in the state. ICBVI has not traditionally reported these measures as defined. This in concert with fundamental changes in Pre-ETS service provision further confound the Commission's ability to accurately forecast targets for negotiated performance. Furthermore, many of these data elements remain undefined. That said, ICBVI has made progress toward establishing baseline targets for a number of these indicators.

### 4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

Innovation and Expansion activities in PY 2018 were the services of a statewide assistive technologist. Expenditures were \$71,364.28, which included salary, benefit and operating expenses.

ICBVI's specific Innovation and Expansion (I&E) strategy for PY 2020 is to develop the project of a Statewide Business Engagement Coordinator.

## Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

### 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 services are provided to our blind or visually impaired clients who have multiple disabilities, who have the most significant disabilities, who are consequently are eligible to receive supported employment services. These multiple disabilities include developmental disabilities, traumatic brain injuries, and mental illness or a combination of

these disabilities. SE services are provided by the community rehabilitation programs which are accredited by CARF or RSAS.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Extended services for youth are available for qualifying youth in the absence of other ongoing support services available in the community.

ICBVI and IDVR provide the upfront training until the clients are stabilized on their jobs and at that point they are transferred to the long-term support services through Health and Welfare HCBS waiver or the IDVR Extended Employment Services (EES) Program.

Extended services are available to youth with most significant disabilities for up to 4 years, or until the individual turns 25 years old and no longer meets the definition of a "youth with a disability", whichever comes first.

## 2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

WIOA extended the SE time period from 18 to 24 months. The Commission has created protocols for and has made extended services for youth available when needed as required by WIOA.

Extended services may be provided to youth with MSD for a period not to exceed four years, or until the individual reaches the age of 25 and no longer meets the definition of a "youth with a disability" (whichever comes first) with the funds reserved under §363.22. SE services for adults will not exceed 24 months, unless an exception is granted. The Commission requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each client receiving SE services is making satisfactory progress.

## VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS

States must provide written and signed certifications that:

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



Idaho Commission for the Blind and Visually Impaired

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

Idaho Commission for the Blind and Visually Impaired

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

Beth Cunningham

Administrator

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

Beth Cunningham

Administrator

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

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

#### CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Beth Cunningham
Title of Signatory	Administrator
Date Signed	03/05/20

#### ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	

The State Plan must include	Include
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)	Yes
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	No
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this 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	

The State Plan must include	Include
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the 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	

The State Plan must include	Include
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to 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	

The State Plan must include	Include
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 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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	baseline	baseline	baseline	baseline
Employment (Fourth Quarter After Exit)	baseline	baseline	baseline	baseline
Median Earnings (Second Quarter After Exit)	baseline	baseline	baseline	baseline
Credential Attainment Rate	baseline	baseline	baseline	baseline
Measurable Skill Gains	37.8	38.5	40.3	41.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

1

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

### JOBS FOR VETERANS’ STATE GRANTS



(OMB Control Number: 1225-0086)

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

**A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG;**

Idaho covers a large geographic area with limited funding making it unfeasible to station a DVOP in every local office. In order to improve employment outcomes for veterans, the IDOL strategically stations our DVOP's and LVER throughout the state. In 2019, the agency reorganized its service delivery organization. Seven offices located in Kootenai County, Lewiston, Canyon County, Boise, Magic Valley, Pocatello and Idaho Falls serve as central coordinators for all department veterans services activity within their geographic regions. DVOP staff are primarily assigned to local offices with the highest numbers of registered veterans. Another factor considered is whether or not an area has a large educational institution that can translate to large numbers of Vocational Rehabilitation and Employment (VR&E) participants.

IDOL employs a full-time regional Local Veterans Employment Representative (LVER) who works in the largest labor market area in the state: Boise/Meridian/Nampa. There is also a full time DVOP presence in the Boise and Canyon County offices. In rural areas of the state where fewer veterans reside, IDOL assigns DVOPs on a half-time basis. Idaho has two half-time individuals (20 hours/week) performing DVOP functions and the other 20 hours in Employment Services (ES) or Workforce Innovation and Opportunity Act (WIOA) duties. In an effort to ensure that all veterans have access to our most knowledgeable resource, a DVOP conducts monthly outreach to rural areas of the state where there is no permanently stationed DVOPs to provide individualized career services to veterans with significant barriers to employment (SBEs).

Our DVOPs work closely with the state's Employment Services (ES) staff. The ES staff are trained to work with employers and to provide job developments, and recruit veterans for employment. Our DVOP staff also maintain a list of job ready veterans for our LVERs to use during employer visits. The LVERS review the veteran's resume and case management file to ensure appropriate referrals are made to employers.

IDOL utilized Special Initiative (SI) funding from its JVSG grant to support three LVERs and a consolidated DVOP position throughout the state. The north, east and southwest areas of the state implemented the LVER positions, while the consolidated DVOP/LVER position resides in the southeast Idaho. The SI LVERS perform the same LVER functions as outlined in sections b and c. Splitting time between DVOP and LVER duties, the consolidated position not only

provides services to veterans and eligible persons but also conducts business functions. This position also serves as the local Wyakin Foundation outreach person

These are limited-service positions which will not continue once the Special Initiative funding is exhausted. However, if Idaho veterans demonstrate the need, the agency may incorporate three consolidated positions into its annual JVSG grant submission, to be placed in the northern, eastern and southwestern areas of Idaho.

Front desk staff are instructed to ask the veteran or veteran's spouse, to complete an intake form to determine eligibility for DVOP services or if a referral to an Employment Services consultant is appropriate.

A veteran who enters an Affiliate American Job center with a half-time DVOP Specialist receives the same services as a veteran who enters one of the state's larger American Job Centers with full-time grant-funded staff. If a veteran is in need of more than core services from one of the AJC offices without an assigned DVOP Specialist, they are assessed by staff to determine if a referral to the nearest DVOP Specialist is appropriate. An appointment is made during their next rural office visit where they will receive all the services available in the larger offices.

The state's shared internal website for all department staff includes enhancements that allow AJCs without a DVOP Specialist to provide the same information available in offices with veterans' staff. This tool is available to all DVOP Specialists as well as managers and other employment services staff who serve veterans. All training documents are uploaded to the internal website for all AJC staff to view.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE;  
SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES  
AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH  
CURRENT GUIDANCE;

### **Duties of the DVOP**

DVOP staff provide the full array of workforce services to veterans with significant barriers to employment (SBEs) and eligible persons with their primary focus on providing individualized career services to those veterans indicated in the most current guidance. DVOP staff utilize the case management approach to serve veterans with barriers to employment and with special workforce needs. These services include, but are not limited to:

- Outreach to locate veterans in need of individualized career services; Assessment, including a documented plan of service (Individual Employment Plan (IEP));
- Counseling/group counseling and career/vocational guidance;
- Referral of veterans to supportive or remedial services;
- Promoting VR&E and WIOA services to eligible veterans and other eligible persons;
- Referral of veterans to job focused and outcome-driven training, certification;
- Job development services;
- Development of VA funded Special Incentive and On-the-Job-Training for V&RE participants; and
- Referral of veterans to employment opportunities.

Many of the state's AJC managers have attended NVTI training and are keenly aware of the role of the DVOP specialist. They promote priority of service for covered persons, through training and facilitation, in all federally funded programs, primarily Wagner-Peyser and WIOA. All office staff are familiar with the full array of veteran services and are instructed to provide priority of service to qualified covered persons.

All local offices train non-grant-funded staff to refer to the department's internal website to provide basic veterans information. The IDOL website also has a veterans' link specifically to help the self-service veteran navigate through the job search functions as well as the services available to them.

Non-grant-funded AJC staff are trained to triage customers and screen for veteran status as they arrive. Staff assess for career services such as job referral, resume assistance, job search guidance, the need for layoff assistance or more intensive WIOA services. If the assessment indicates a need for more than just core services and the veteran is eligible to meet with a DVOP, they are referred to the DVOP. The DVOP informs the veteran of all the available services and determines if enrollment in WIOA is beneficial and appropriate. The DVOP concentrates his or her efforts on serving those veterans who have special employment and training needs by focusing on the facilitation of individualized career services through case management.

### **Duties of the LVER**

The Local Veterans Employment Representative (LVER) according to the most current guidance must perform only the duties outlined in 38 USC 4104 (b), which states, "the LVER's principle duties are to:

- (1) conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; and
- (2) facilitate employment, training and placement services furnished to veterans in a State under the applicable State employment service delivery systems.

Therefore, the LVER is assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. When employer outreach is primarily accomplished by a "business services team" or like entity, the LVER must be included as an active member of that team. The LVER advocates for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities such as:

- Planning and participating in job and career fairs;
- Conducting employer outreach;
- In conjunction with employers, conducting job searches and workshops, and establishing job search groups;
- Coordinating with unions, apprenticeship programs and businesses or business organizations to promote and secure employment and training programs for veterans;
- Informing federal contractors of the process to recruit qualified veterans;
- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating with other business outreach efforts.

Duties of the consolidated position:

The consolidated position will have the same role and responsibilities as the DVOP and LVER listed above. The only difference will be the time spent in each position. It will vary but be approximately 20 hours performing DVOP duties and 20 hours performing LVER duties each week.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER;

In order to initiate services through the One-Stop system, all veterans are registered in the IdahoWorks system (IDOL's automated customer registration and job matching system). Because this job matching system relies heavily on the information supplied by customers, veteran registration files are routinely reviewed for completeness and for opportunities to update experience or newly acquired job skills. Those veteran customers with registration files needing additional information are contacted via e-mail, telephone, or mail and offered assistance in completing their registration record, and are informed of available services and invited to contact the office for further assistance.

Intake forms listing significant barriers to employment (SBE) are handed to veterans at the intake desk. If an SBE is indicated the veteran is routed to see a DVOP. If no barrier is indicated the veteran is routed to see an ES staff person.

DVOPs attend ES and WIOA meetings on a regular basis and make appropriate referrals to WIOA staff and at times Incarcerated Veterans Transition Program (IVTP) participants are dual enrolled in WIOA.

They also keep a list of job ready veterans that is available to all ES staff for appropriate job referrals.

Other partners are made aware of the services available from a DVOP through outreach. Partners are invited to visit local offices to see the services available directly.

IDOL has one strategically placed regional LVER whose primary job is to conduct outreach, promote job developments with local employers, and market our services to those employers. The LVER is tasked with performing job development and employer outreach with the ultimate goal of facilitating employment opportunities for veteran job seekers. The LVER works with other organizations to jointly host events such as job search workshops and hiring events in local offices. Since our LVER fills a regional role, he works with employers and employer groups in a large geographical area. He markets veterans to employers using IDOL's marketing materials.

The LVER periodically visits employers within his area of responsibility to explain the benefits of using IDOL services and to remind them of the benefits of hiring veterans as well as the availability of a job-ready pool of highly trained veterans. He attends quarterly employer committee meetings held by various AJC's throughout the state to promote the hiring of available veterans. Idaho strives to gain an intimate knowledge of employer practices and review the services available to them from the Department.

The LVER works closely with our ES staff to promote the hiring of veterans to private and public employers. During these outreach visits, the LVER informs the employer about the services that IDOL provides, including DVOP services. ES staff also create employer awareness of this program and the duties of both the DVOP specialist and LVER. This joint effort opens the door to

the LVER to work with these employers to create potential veteran job development opportunities.

The IDOL mails or hand delivers veteran/employer information packets to employers. The intended result is to share with the employer community the benefits of hiring veterans and to encourage employers to announce their job openings through IDOL, where veterans have priority to apply for the jobs for which they qualify. The consolidated position performs both the LVER and DVOP duties as described above.

**D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;**

1. Idaho will use up to 1 % of the JVSG on incentive awards. These awards are designed to recognize service that is beyond normal expectations to Veterans and the Veteran community.
2. The annual incentive award is announced in our agency's monthly newsletter each year. This incentive program encourages individuals to achieve excellence and promote original thinking in the provision of services to Veterans and/or to demonstrate improvements to the system for the delivery of such services by offering the most deserving the opportunity to attend the annual NASWA VETS conference held in D.C.
3. The costs of these individual trips will not exceed \$3,000.00. And all the trips provided will not exceed 1% of the incentive award amount of \$8,440.00 or subsequent incentive award amount totals.
4. IDOL will administer the funds. Cash awards are not utilized, rather each award winner will be provided an official trip to the NASWA National Veterans Conference.
5. Each award winner (3-4 per year, depending on the budget) will be provided official travel to include flight, mileage, hotel and government per-diem trip to the NASWA National Veterans Conference held in Washington DC. The monetary amount of each award will be adjusted accordingly to stay within the allocated budget.
6. Eligible nominees are individuals providing employment, training, and placement services to Veterans under the Workforce Innovation Opportunity and Act (WIOA) or through an employment service delivery system in accordance with Wagner-Peyser, as well as Disabled Veterans Outreach Program Specialists, Local Veteran Employment Representative(s) and consolidated positions for excellence in the provision of such services or for having made demonstrable improvements in the provision of such services to Veterans.
7. Any individual may nominate an eligible individual whose efforts they believe have made a substantive improvement in the delivery of services to Veterans or whose exemplary service to Veterans during the program year merit consideration for an award. The goal is to recognize truly outstanding service to Idaho's Veteran community.
8. Nominations must be sent to the attention of the State Veterans' Coordinator.
9. Employees who demonstrate outstanding outreach and effectiveness at providing employment and training services to hard-to-serve Veterans such as homeless Veterans will be considered. The criteria will not rely solely on performance data and will include among other factors, attitude, motivation, program improvement, and feedback from job

seeking and business customers. These factors will be considered along with any quantitative data that is available.

10. Selection criteria: How much impact did the actions by the nominee have:

- Submit one or two paragraphs explaining why the employee was nominate

11. Process:

- Solicitation for entries are made Department-wide, submissions are e-mailed and reviewed by the State Veterans Coordinator for eligibility and completeness.
- A selection committee consisting of a representative from each of the following:
  - \* One area manager
  - \* Two managers
  - \* One central office employee
  - \* One ES staff member
- The selection committee reviews individual submissions and each member assigns a point score from 0 to 20. Scores assigned by committee members are discussed and then tabulated. The winners are selected from the highest scores.
- The State of Idaho, Department of Labor administers the Award funds.
- The selection process and awards notification takes place in the 3<sup>rd</sup> quarter (April-June) of the Federal Program Year. The award selection, award amounts and any funds used are reported on the 3<sup>rd</sup> and 4<sup>th</sup> quarter Technical Performance Narrative. All funds are to be obligated by September 30 and spent by December 31. An annual Incentive Awards report on those obligations or expenditures will be provided with the fourth quarterly report.

IDOL will provide an annual incentive award report IAW VPL 07-19 or most updated policy guidance on this subject.

E. THE POPULATIONS OF ELIGIBLE VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

IDOL's DVOP specialists involve themselves in their communities in many ways to make veterans aware of the benefits, employment and training services available to them. Monthly outreach to the homeless shelters in their areas is an activity that enables the DVOP to complete outreach and provide individualized career services to those veterans that have no mode of transportation. Many of these veterans have the need for individualized career services that are provided by our DVOPs. Those who just need core services such as job search, and resume assistance are referred to AJC employment consultants.

DVOPs serve the following population of veterans per VPL 03-14 change 1 and 2 and VPL 03-19 or current guidance.

- 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 service connected disability.
- Homeless as defined in Section 103(a) and (b) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(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; i.e. the term of unemployment over the previous 12 months remains 27 weeks; however, the requirement of 27 consecutive weeks is eliminated;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration, i.e. the expanded definition of SBE includes eligible veteran or eligible spouse who is currently or was formerly incarcerated by removing the within the last 12 months requirement.;
- Lacking a high school diploma or equivalent certificate; or
- Low-income individual (as defined by WIOA Section 3 (36).
- Veterans aged 18-24
- Vietnam-era Veterans
- 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 MTFs or WTUs; and
- The spouses or other family caregivers of such wounded, ill, or injured members.

The VR&E National Technical Assistance Guide (TAG) formalized a partnership and process that has been in place in Idaho for years. However, when the TAG was released, the IDOL worked closely with the VA VR&E and our DVET to update our local agreement. The Idaho Memorandum of Understanding (MOU) was finalized and signed in July 2017. The IDOL's central point of contact for the VR&E program is the Individualized Career Services Coordinator (ICSC), a half-time position filled by a full-time DVOP. The ICSC is out-stationed at the Boise VA Regional Office, but veterans enrolled in the VR&E program are referred to Idaho DVOPs from counselors assigned to Spokane, Seattle, and Salt Lake City. The ICSC or assigned DVOP provides Labor Market Information (LMI) as part of the vocational evaluation process. The VA VR&E develops a rehabilitation plan and then approximately 90 days prior to the participant's expected completion of training or education, the VR&E office completes a Job Ready Assessment and refers the veteran to the IDOL ICSC or appropriate DVOP for individualized career employment assistance. The VA VR&E office and IDOL jointly monitor the job seeking process to determine when the veteran has entered employment and when the veteran can be considered "rehabilitated."

The IDOL operates under a signed Memorandum of Understanding (MOU) on "Services Available to Veterans in Idaho who served in Iraq and Afghanistan." The MOU partners include the State of Idaho Military Division, Idaho Division of Veterans Services, Department of

Veterans' Affairs (affected Regional Office and Medical Centers), U.S. Department of Labor, and Idaho Veterans Affairs Commission. The MOU outlines the roles and activities of all partners and encourages maximum communication and coordination to provide seamless referral and support services for OEF/OIF veterans.

The IDOL continues to develop new strategies to reach homeless veterans and those at risk of becoming homeless. Our DVOPs and LVER, based on their role and responsibility identified in current guidance, actively help plan and participate in three Stand Down events throughout the state -Boise, Pocatello, and Post Falls. These events provide much needed information, assistance, and supportive services to over 1,500 needy veterans and family members every year.

The Boise VA Regional Office administers the Grant Per Diem program which helps shelter many homeless veterans while attending an education program. The VA Homeless Coordinators work closely with our DVOPs to secure employment for participants in this program. Partnerships like these are proving very beneficial for Idaho veterans. Over the past several years, the number and quality of facilities and services for the homeless have improved dramatically in Idaho's most populated area, the Treasure Valley. DVOPs are in the process of developing partnerships with staff at these new facilities to provide individualized career services and the referral to employment needed to help veterans break the cycle of homelessness. As these partnerships develop, we plan to participate in service information days at the shelters on a regular basis.

Idaho has DVOPs strategically placed in areas near Native American reservations. Outreach activities are conducted at the state's option and conducted with approval of the tribes. A fulltime DVOP is located minutes away from the Shoshone Bannock reservation in Southeast Idaho and provides outreach and individualized career services to the disabled veterans in that area.

In Lewiston, a half-time DVOP works with the Nez Perce Tribe in Lapwai, Idaho. He meets with referrals from tribal veteran representatives, attends Tribal Homeless Veteran Stand Downs and Tribal Resource Fairs, and maintains an open dialogue with Tribal Employment Rights Office (TERO).

In Post Falls, our DVOP has worked with the Veterans Coordinator representing the Coeur d'Alene Tribe based in Worley, Idaho. Most of the contact has been in regards to Veteran hiring events, the Stand Down and for special events, emphasizing the provision of individualized career services.

IDOL also works with incarcerated veterans. July 2018 IDOL was awarded the Incarcerated Veterans Transition Program (IVTP) grant for \$114,500 to serve homeless and other than dishonorably discharged veterans released from incarceration within the past 12 months. The objective is to provide participants in-depth assessment, on the job training (OJT), apprenticeships, classroom training for high-growth in-demand occupations, tuition, case management, work readiness preparation, job search assistance, temporary housing and supportive services as appropriate. Co-enrollment with WIOA is also sought to ensure the full complement of wrap-around services. To help defer possibilities of recidivism, the Idaho Department of Corrections regularly sends IDOL a list of veterans soon to be released from the state's correctional facilities. And DVOPs maintain contact with city and county jails and probation and parole officers throughout the state to target these populations.

During the grant's first year of implementation, 52 veterans were enrolled and provided supportive and employment services. 32 found employment with the program's help, leading



the state to meet all program goals and objectives, including placement rate, hourly wage, retention rate and cost per placement.

IDOL received an award for a second year of grant funding for the same amount, enrollment, and planned performance goals. Currently, the program is on track to meet its goals for the year. If it succeeds in meeting its goals during the first six months, the state will receive a third and final year of funding to continue the program.

**F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;**

Per Grant Officer Memorandum 01-20, a response to this section is not required.

**G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND AMERICAN JOB CENTER STAFF:**

**1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,**

Per Grant Officer Memorandum 01-20, a response to this section is not required.

**2. EMPLOYMENT PLACEMENT SERVICES, AND**

Per Grant Officer Memorandum 01-20, a response to this section is not required.

**3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;**

Per Grant Officer Memorandum 01-20, a response to this section is not required.

**H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND**

Local office	Vet Rep	Date Hired	Position	Labor and Employment Specialist	Case Management*
Idaho Dept. of Labor, 317 W. Main St., Boise, ID 83735	Bill Reed	5/19/1999	State Veterans' Coordinator	May-99	NA
Boise - IDOL, 317 W. Main Street, Boise, ID 83735	Larry Zirtzman	12/16/2019	1-DVOP	Pending	Pending (anticipated by 7/31/2020)
Canyon County - IDOL, 4514 Thomas Jefferson St., Caldwell, ID 83605	Dave Howerton	1/6/2006	1 DVOP	5/16/2006	3/17/2007
Canyon County - IDOL, 4514 Thomas Jefferson St., Caldwell, ID 83605	Matt Bennett	4/25/2016	1 DVOP	Pending	12/9/2016

Local office	Vet Rep	Date Hired	Position	Labor and Employment Specialist	Case Management*
Kootenai County-IDOL, 600 N. Thornton St., Post Falls, ID 83854	Robert Shoeman	1/4/2001	1 DVOP	5/8/2001	7/24/2001
Idaho Falls - IDOL, 1515 E. Lincoln Rd., Idaho Falls, ID 83401	Denise Spring	2/1/2016	1 DVOP	6/14/2016	6/21/2016
Lewiston - IDOL, 1158 Idaho Street, Lewiston, ID 83501	Don Erickson	3/24/2013	.5 DVOP	7/9/2013	11/19/2013
Magic Valley - IDOL, 420 Falls Avenue, Twin Falls, 83301	Joe Lozano	9/15/1993	1 DVOP	4/11/1994	6/13/1994
Meridian - IDOL, 4514 Thomas Jefferson Street, Caldwell, ID 83605	Robert Feliciano	2/17/2013	1 LVER	7/9/2013	12/3/2013* (Promoting Partnerships for Employment instead of Case Management)
Sandpoint - IDOL, 2101 West Pine Street, Sandpoint, Idaho 83864	Justin Offermann	2/12/2008	0.5 DVOP	3/15/2014	3/21/2016

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

Per Grant Officer Memorandum 01-20, a response to this section is not required.

### UNEMPLOYMENT INSURANCE (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an

annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

#### A. CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

##### 1. TRANSMITTAL LETTER

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.



September 13, 2019

Mr. Nicolas E. Lalpui  
Employment and Training Administration  
United States Department of Labor  
90 7<sup>th</sup> Street, Suite 17300  
San Francisco, CA 94103

Dear Mr. Lalpui,

Enclosed is the Idaho Department of Labor's Unemployment Insurance State Quality Service Alternate Year Plan for the biennial fiscal year 2019-2020.

If you have any questions, please contact John Taylor at 208-332-3570 ext. 3809,  
[john.taylor@labor.idaho.gov](mailto:john.taylor@labor.idaho.gov).

Sincerely,



Jani Revier  
Director

CENTRAL OFFICE • 317 W. Main St. • Boise, Idaho 83735 • Tel. (208) 332-3570 • Web: [labor.idaho.gov](http://labor.idaho.gov)  
An Equal Opportunity Employer and Service Provider. Reasonable accommodations are available upon request. Dial 711 for Idaho Relay Service.

## 2. BUDGET WORKSHEETS/FORMS

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

**Application for Federal Assistance 99-499**

**\*A. Type of Assistance 1. Select Applicable Type:**

☐ a. **Grants - Non-Profit**

Type of Assistance 1. Select Applicable Type

☐ b. **Grants - State Government**

Type of Assistance 2. Select Applicable Type

☐ c. **Other (Specify)**

**\*B. Name of Federal Agency:**

**\*C. Filing of Federal Non-Profit Exemption Number:**

501(c)(3)

501(c)(6)

Other (Specify) Non-Profit

**\*D. Non-Profit Organization Number:**

**\*E. Competition (Identification Number):**

**\*F. Description of the Applicant's Project:**

**\*G. Description of the Applicant's Project:**

**\*H. Applicant's Name and Address (Include Zip Code):**

**\*I. Applicant's Name and Address (Include Zip Code):**

**\*J. Applicant's Name and Address (Include Zip Code):**

**\*K. Applicant's Name and Address (Include Zip Code):**

**\*L. Applicant's Name and Address (Include Zip Code):**

**\*M. Applicant's Name and Address (Include Zip Code):**

**\*N. Applicant's Name and Address (Include Zip Code):**

**\*O. Applicant's Name and Address (Include Zip Code):**

**\*P. Applicant's Name and Address (Include Zip Code):**

**\*Q. Applicant's Name and Address (Include Zip Code):**

**\*R. Applicant's Name and Address (Include Zip Code):**

**\*S. Applicant's Name and Address (Include Zip Code):**

**\*T. Applicant's Name and Address (Include Zip Code):**

**\*U. Applicant's Name and Address (Include Zip Code):**

**\*V. Applicant's Name and Address (Include Zip Code):**

**\*W. Applicant's Name and Address (Include Zip Code):**

**\*X. Applicant's Name and Address (Include Zip Code):**

**\*Y. Applicant's Name and Address (Include Zip Code):**

**\*Z. Applicant's Name and Address (Include Zip Code):**

[illegible]

### 3. THE STATE PLAN NARRATIVE

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

State Quality Service Plan

Alternate Year – State Plan Narrative

Idaho – FY 2019-2020

#### a. Overview

1. The Idaho Department of Labor's priorities for the FY 2019-20 SQSP include:
  - a. The timely and accurate payment of UI benefits.
  - b. An overall integrity goal to reduce the number of improper payments and reduce the number of misclassified workers.
  - c. Continuous business process analysis in all areas of UI to improve program efficiencies through process and the use of technology.
  - d. To provide adjudication and claims processing performance that meets the standards established by USDOL.
  - e. To assist and improve the timely reemployment of UI claimants.
  - f. To improve program performance through the implementation of various tax and benefit integrity related data mining and enforcement projects.
  - g. Continuing work on data validation. In 2014, Idaho's UI Division underwent a major Business Process Analysis and deployed a modernized UI Tax and Benefits system. Those initiatives have shaped the current structure and processes of all UI operations in Idaho. The Business Process Analysis provided a strategic plan for the reorganization of the UI Division that allowed for consistency in planning, training, and UI delivery. The implementation of the modernized system has improved UI operations by providing user-friendly graphical interfaces, significant automation, and real-time claim processing.

Idaho is currently reducing the number of field offices from 25 to 11. The restructuring will allow staff to provide remote services to more communities to shift their focus to demand driven Employment Services and WIOA activities. Idaho continues to utilize the Lean process to reduce inefficiencies and eliminate redundancies. Idaho is placing UI Navigators in the larger field offices to better serve our customers.

2. Idaho's performance remains strong considering the continuing reductions in base funding levels over the past years.

Idaho has met or exceeded most of the ALP's for all measures in tax, benefits, and appeals. Idaho ranks very high in first pay timeliness, effective audit measures, and lower authority appeals and is above the average in all other areas.

Idaho has six issues that are included in the 2019-2020 Biennial SQSP Corrective Action Plan(s). All of the issues are minor and the plans to correct the deficiencies are included in the 2019-2020 SQSP Alternate Year Quarterly Reporting Workbook.

In the area of Integrity, Idaho received passing scores on all but one of the core measures. The failing score was the improper payment rate, which was .06 percent over the benchmark of 10%. Idaho continues to make improvement in this area and is committed to achieving a reasonable solution.

Idaho continues to make progress on Data Validation and expects to have all populations submitted and passing by the end of this Alternate Year plan.

The BAM population variances have undergone significant work in the 1<sup>st</sup> quarter of 2018 and all variances are in tolerance. The discrepancy in the case pulls was a result of pulled cases being determined invalid. Human error caused the miscount and adjustments were made to prevent future occurrences. All BAM issues are resolved and continuous monitoring is in place to ensure they do not resurface.

Idaho has met or exceeded all USDOL GPRA goals.

Idaho has used Supplemental Budget Requests to enhance IT security and to carry out many of the integrity efforts with respect to identity theft, fictitious employer schemes, UCFE wage cross matching, and identifying invalid work searches. Idaho will continue to actively participate in the SBR process when funding is available.

3. Due to the inclusive organizational structure of the Idaho Department of Labor, coordination within the department with other plans is a common practice. The department's Workforce Development Division administers the Employment Services and WIOA. UI Adjudication and Claims Processing has been consolidated with UI Compliance into one UI division. This change has allowed closer coordination between the RESEA and WIOA as field management staff is no longer required to oversee UI Functions. These changes continue to enhance Idaho's ability to meet the employment needs of the employer community. In addition, claimants are directed during the claims process to utilize the IDOL reemployment services offered in our 11 field offices located statewide.

The Idaho Department of Labor is the administrative entity for unemployment insurance, employment security and Labor Market Information and is also the WIOA Adult, Dislocated Worker and Youth service provider in each of the 11 One-Stop centers. Collaboration and connectivity is inherent and will ensure claimant access to the full array of services. Career center staff have the skills to provide a comprehensive One-Stop service orientation and assessment and are able to provide claimants with the information, tools and technology to build quality work search and career development plans

Idaho has exceeded the performance measure of 72% for Facilitating Reemployment with a score of 84.6%.

#### B. Federal Emphasis (GPRA)

1. Idaho has met all GPRA measures
  - a. First Pay Promptness – 97.28%
  - b. Detect Benefit Overpayments – 64.00%
  - c. Establish Tax Accounts Promptly – 91.50%
2. Idaho will continue to provide adequate administration to achieve the GPRA goals and targets in FY2019-2020.

### C. Program Review Deficiencies

1. Idaho did have two program reviews during the prior period and in each review, minor discrepancies were identified. The discrepancies were found in two previously submitted UIDV populations and additional errors were found in a quadrennial onsite TPS review. The UIDV populations have already been corrected and resubmitted and steps have been taken to correct the TPS failure(s).

2. Idaho will continue to participate in the reviews when requested.

### D. Program Deficiencies –

Tax Quality Part A and B- There were four quality issues discovered in the last TPS audit. All four have been addressed and are being corrected. Detail regarding New Status, Collections, and Report Delinquency have been addressed and Corrective Action Plans are in place to address these issues.

### E. Reporting Deficiencies -

The ar207 report was late - Idaho was one day late in submitting the ar207 report for the 1<sup>st</sup> quarter of 2017. Idaho takes reporting seriously and we will strive to ensure timely submission of all reports.

### F. Customer Service Surveys (optional)

The department has not completed formal customer service surveys this past performance year.

### G. Other

The Idaho Unemployment Insurance Division has significantly streamlined initial claims processing as well as increasing the use of technology to enhance integrity efforts.

Idaho was one of the pilot states in the Suspicious Actor Repository project (SAR) and as of April of 2017, matches 100% of all new and continued claims against the SAR database.

Idaho participated as one of the pilot states in the UI Self-Assessment project and now that that project is complete, Idaho has completed the self-assessment and is now working on year two.

Idaho **has** sent staff to training sponsored by NASWA's National Integrity Academy. Idaho also participates in Integrity Center projects.

Idaho has no requests for technical assistance at this time.

### H. Assurances:

**The Idaho Department of Labor certifies we will comply with the assurances listed below:**

- a. Assurance of Equal Opportunity (EO).
- b. Assurance of Administrative Requirements and Allowable Cost Standards.
- c. Assurance of Management Systems, Reporting, and Recordkeeping.
- d. Assurance of Program Quality.
- e. Assurance on Use of Unobligated Funds.



f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).

g. Drug Free Workplace (29 CFR Part 98).

h. **Assurance of Contingency Planning:**

**Information Technology (IT) Contingency Plan Implemented:** In March 2006, the Idaho Department of Labor published a major release of its Disaster Recovery Plan which is the basis for the plan in its current state.

**IT Contingency Plan Reviewed/Updated:** The plan is reviewed annually, particularly since the State of Idaho requires the Idaho Department of Labor to coordinate its contingency plan efforts with the Idaho Office of Emergency Management. The plan was reviewed and updated in September 2019 and will be reviewed annually again in September 2020.

**IT Contingency Plan Tested:** The Idaho Department of Labor tested the contingency recovery procedures in August 2019. In addition, a tabletop training exercise was conducted in July, 2018.

**The Idaho Department of Labor certifies the state will comply with the assurances listed below:**

I. Assurance of Conformity and Compliance.

Idaho Department of Labor assures that it complies in all areas of Conformity and Compliance.

J. Assurance of Automated Information Systems Security.

Idaho Department of Labor assures that it complies in all areas of Automated Information Systems Security.

**Risk Assessment Conducted:** In October 2016, in concert with the Legislative Services Office, Audits Division, the Idaho Department of Labor conducted an Information Technology Controls/Risk Assessment Review.

**System Security Plan Reviewed/Updated:** In August 2019, the Department of Treasury, Internal Revenue Service, Department of Safeguards, preformed their triennial IRS Publication 1075 audit of the Department during which a review of Risk Assessment and System Security Plan was conducted. The next System Security Plan review is due March of 2020.

**k. The Idaho Department of Labor certifies we will comply with the Assurance of Confidentiality.**

#### 4. CORRECTIVE ACTION PLANS (CAPS)

CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

This image shows a vertical strip of a complex spreadsheet. The spreadsheet is divided into several distinct sections, each with a different background color: yellow, green, red, and grey. These sections contain various data tables, including what appears to be a calendar or timeline at the top, followed by multiple rows of data with columns for dates, names, and numerical values. The text is small and difficult to read, but the overall structure suggests a detailed project management or financial tracking tool.

## 5. UI PROGRAM INTEGRITY ACTION PLAN (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

UI Integrity Action Plan (IAP)			
Back to Annual Overview 2018		Back to Alternate Overview 2018	
State	Federal Fiscal Year	Accountable Agency Official(s)	
Idaho	2018	Comptroller	
	<b>Top Three Root Causes (Calendar Year 2017)</b> <a href="https://www.id.gov/getthedata">https://www.id.gov/getthedata</a>	<b>Calendar Year 2008</b> [% of \$ Overpaid]	<b>Calendar Year 2017</b> [% of \$ Overpaid]
Root Cause #1:	Work Search	36.4%	46.3%
Root Cause #2:	Benefit Year Earnings	23.8%	26.6%
Root Cause #3:	Able-Available	7.5%	11.8%
State	Federal Fiscal Year	Accountable Agency Official(s)	
Idaho	2018	(Enter the name and title of the staff person who is accountable for reducing UI error rates)	
	<b>Top Three Root Causes (Calendar Year 2018)</b> <a href="https://www.id.gov/getthedata">https://www.id.gov/getthedata</a>	<b>Calendar Year 2017</b> [% of \$ Overpaid]	<b>Calendar Year 2018</b> [% of \$ Overpaid]
Root Cause Alternate Year #1:	Work Search	46.3%	58.8%
Root Cause Alternate Year #2:	Benefit Year Earnings	26.6%	22.4%
Root Cause Alternate Year #3:	Able-Available	7.2%	7.8%
<b>Summary:</b> (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)			
<p>The Idaho Department of Labor (IDL) takes program integrity very seriously and constantly seeks to make improvements in all functional areas of UI. The improper payment rate in Idaho, and across the nation, is above the standard of 10% established by IFRA. IDOL has been diligently working at getting the numbers below the ceiling established by the Act. The three areas being addressed by the Integrity Action Plan (IAP) are, work search, benefit year earnings, and able and available. IDOL's plan is to create a focus group to study each of the "Top Three Root Causes" to find out if there are not thought of solutions that can be implemented to reduce the improper payments in each category. If the solutions recommended by the focus groups are viable and resources are available, those recommendations will be put into practice. One of the two additional items that will be acted in the near term is a flyer to all claimants detailing the work search requirements in detail for a valid work search contact. The second is a modification to the claimant portal that will allow the claimant to enter wages from more than one employer.</p> <p>The Improper Payment Rate alternate year plan is similar to the biennial plan. Focus groups will meet regularly to determine what actions are reasonable to take and to determine if prior actions have had measurable impact on the Improper Payment Rate (IPR). IDOL recently added a video to the Claimant Portal that explains the claimant's responsibilities with respect to the work search and benefit year earnings and we are still measuring the impact from this activity. IDOL is still looking at Idaho's rules, policy and procedures to determine if other changes would have an impact on the IPR. We are looking at alternative messaging for claimants that explains the specific requirements for receiving benefits. Currently, a focus group is exploring the possibility of counting work seeking activities as a work search contact as was recommended during an intensive services visit by NAWA. IDOL is also looking at new hire procedures as recommended by NAWA and IDOL 13-19 is an effort to reduce the Benefit Year Earnings (BYE) error rate. The third root cause changed from separation to able and available for the alternate year update. A focus group will look into these errors and make recommendations to management.</p> <p><b>Instructions for the following sections:</b> In each individual section below, enter a Root Cause, from above, and the top three focused strategies that will be employed to correct or reduce this source of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.</p>			
<b>Root Cause #1: Work Search</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Form a focus group to analyze why claimants fail to comply with the work search requirements and develop potential solutions. Make Management will review the recommendations and see if there are solutions are viable.	12/31/2018	UI Staff/BAM Staff
2. Management Review		3/31/2019	UI Management
3. Outreach	Outreach to UI and Workforce Staff to discuss the work search issue and provide guidance.	9/30/2019	UI Staff/Workforce Staff
Additional:			
Flyer	Create a 'what is a valid work search contact' flyer for claimants that describes what work search activity is acceptable and what is not	9/30/2019	UI Staff/Communications
<b>Root Cause #2: Benefit Year Earnings</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Form a focus group to determine if there are additional methods to reduce the improper payment rate with respect to benefit year earnings. Make Management will review the recommendations and see if there are solutions are viable.	12/31/2018	UI Staff/BAM Staff
2. Management Review	Outreach to UI Staff to discuss the benefit year earnings issue and provide guidance.	3/31/2019	UI Management
3. Outreach		9/30/2019	UI Staff
Additional:	Add additional feature in Claimant Portal that allows entry of wages from multiple employers vs. entry from one employer like the existing	12/31/2018	UI and IT Staff - funding may be an issue.
System Modification			
<b>Root Cause #3: Able-Available</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Form a focus group to look at the able and available issues that contribute to the improper payment rate to determine if it is claimant or department Management will review the recommendations and see if there are solutions are viable.	12/31/2018	UI Staff/BAM Staff
2. Management Review	Outreach to UI Staff to discuss the able and available issues and provide guidance.	3/31/2019	UI Management
3. Outreach		9/30/2019	UI Staff
Additional:			
<b>Root Cause Alternate Year #1: Work Search</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Continue with focus group meeting to determine different approaches lowering the work search error rate. Make recommendations to Review focus group recommendations with the recommendations from NAWA's Intensive Services visit and recommendations from USDOJ.	12/31/2019	UI Staff/BAM Staff
2. Management Review	Outreach to UI Staff/BAM to discuss the work seeking error rate and provide guidance.	12/31/2019	UI Management
3. Outreach		3/31/2020	UI Staff
Additional:			
<b>Root Cause Alternate Year #2: Benefit Year Earnings</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Continue with focus group meeting to determine different approaches lowering the benefit year earnings error rate. Make recommendations to Review focus group recommendations with the recommendations from NAWA's Intensive Services visit and recommendations from USDOJ.	12/31/2019	UI Staff/BAM Staff
2. Management Review	Outreach to UI Staff/BAM to discuss the BYE error rate and provide guidance.	12/31/2019	UI Management
3. Outreach		3/31/2020	UI/BAM Staff
Additional:	Considering the possibility of adding a calculator to the Claimant Portal to help claimant report earnings correctly.	9/30/2020	UI and IT Staff - funding may be an issue.
System modification			
<b>Root Cause Alternate Year #3: Able-Available</b>			
Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	Form a focus group to look at the able and available issues that contribute to the improper payment rate to determine if it is claimant or department Review focus group recommendations with the recommendations from NAWA's Intensive Services visit and recommendations from USDOJ.	12/31/2019	UI Staff/BAM Staff
2. Management Review	Outreach to UI Staff/BAM to discuss the able and available error rate and provide guidance.	12/31/2019	UI Management
3. Outreach		3/31/2020	UI/BAM Staff
Additional:			

## 6. ORGANIZATIONAL CHART

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.



## 7. SQSP SIGNATURE PAGE

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

The original copy of this document with signatures can be obtained at the US DOL Regional Office in San Francisco or a copy can be obtained from the IDOL office in Boise.

### U.S. Department of Labor

### SQSP SIGNATURE PAGE

OMB Control No.: 1205-0132

Expiration Date: 02/28/2021

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEAR  FFY 2020	STATE  Idaho
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### UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

Idaho Department of Labor

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE	SIGNATURE	DATE
<b>X Jani Revier, Director x</b>		
<b>Printed Name of STATE ADMINISTRATOR</b>		

TYPED NAME AND TITLE	SIGNATURE	DATE
<u><b>nicolas E. Lalpui</b></u> <b>Printed Name of DOL APPROVING OFFICIAL (Regional Office)</b>		
<u><b>Gay Gilbert</b></u> <b>Printed Name of DOL APPROVING OFFICIAL (National Office)</b> (if required)		

**B. REQUIREMENTS FOR STATES ELECTING TO INCLUDE UI IN THE COMBINED STATE PLAN**

States that elect to include UI in the Combined State Plan must:

**1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:**

**A. IF A STATE IS IN THE FIRST YEAR OF THEIR 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE. A COMPLETE SQSP PACKAGE WILL INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, STATE PLAN NARRATIVE, CAPS (INCLUDING THE MILESTONES AND THE COMPLETION DATE FOR EACH MILESTONE), THE UI IAP, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. ONE OF THE KEY GOALS FOR THE UI PROGRAM IS TO ENSURE THAT CLAIMANTS ARE ABLE TO SUCCESSFULLY RETURN TO WORK. AS SUCH, THE SQSP STATE PLAN NARRATIVE MUST PROVIDE A DISCUSSION OF THE PLAN COORDINATION WITH OTHER WIOA COMBINED PLAN PROGRAMS TO ENSURE A COORDINATED EFFORT AND INTEGRATED SERVICE DELIVERY.**

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

**B. IF A STATE IS IN THE SECOND YEAR OF THE 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE WITH A MODIFICATION THAT MUST INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. THE MODIFICATION MAY ALSO INCLUDE CAPS FOR NEW IDENTIFIED PERFORMANCE DEFICIENCIES, AND ANY REQUIRED MODIFICATIONS TO EXISTING CAPS. THE CAP MUST LIST BOTH SPECIFIC MILESTONES FOR KEY CORRECTIVE ACTIONS OR IMPROVEMENT ACTIVITIES, AND THE COMPLETION DATE FOR EACH MILESTONE.**



Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

**2. SUBMIT THE REQUIRED OFF-YEAR SQSP COMPONENTS AS A MODIFICATION TO THE COMBINED STATE PLAN ON THE SAME CYCLE AS THE REGULAR SQSP PROCESS WHICH MUST BE APPROVED BY SEPTEMBER 30TH EACH YEAR**

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

**SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)**

(OMB Control No. 1205-0040)

**A. ECONOMIC PROJECTIONS AND IMPACT**

**1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D)) (MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)**

The ICOA's long term senior employment strategies focus on the Workforce Development Council's four main industry sectors: [RB1] . Below is the number of jobs per targeted industry and the growth over the past seven years.

**SCSEP Table 1: Workforce Development Council's Target Industries**

WDC Target Industries	2010	2011	2012	2013	2014	2015	2016	Growth
Advanced Manufacturing	53,124	54,501	56,510	59,186	59,823	61,577	63,769	10,645
Aerospace	1,867	1,882	1,900	2,016	1,988	2,170	2,304	437
Food Processing	15,407	15,322	15,620	16,359	16,437	16,809	17,452	2,045
High Tech	49,635	50,230	50,237	49,613	50,456	52,393	52,194	2,559
Health Care	68,989	70,561	71,492	74,538	77,634	80,407	82,822	13,833
Power & Energy	10,617	10,647	10,583	10,496	10,465	10,760	11,153	536

*Source: Idaho Department of Labor, Quarterly Census of Employment & Wages 2010- 2016*

The occupations identified as high demand provide the data needed for ICOA and Easterseals-Goodwill to develop and recruit specific organizations to consider employing individuals 55+. The Top Ten High-Demand Occupations by annual openings is identified below.

**SCSEP Table 2: Top Ten High-Demand Occupations by Annual Openings**

Occupation	2014 Employment	2022 Projected Employment	Annual Openings*	Median Hourly Wage
Retail Salespersons	22,349	26,814	1,221	\$11.04
Cashiers	15,007	16,825	820	\$9.36
Waiter and Waitresses	10,733	13,145	757	\$8.90
Customer Service Representatives	16,265	19,646	738	\$13.71
Combined Food Preparation and Serving Workers, Including fast Food	11,082	14,538	704	\$8.92
Farmers, Ranchers, and Other Agricultural Managers	14,350	17,983	607	\$28.72
Office Clerks, General	14,350	17,409	558	\$13.70
General and Operations Managers	15,077	14,244	556	\$31.53
Registered Nurses	11,629	14,357	524	\$29.90
Heavy and Tractor Trailer Truck Drivers	11,933	16,322	507	\$18.33

*\* Annual Openings include openings due to growth and replacement needs*

*SOURCE: 2014-2024 Idaho Department of Labor Occupational and Industry Projections*

Communications and Research November 2016

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

[AS1]

**SCSEP Table 3: High Demand Jobs and Active Training Host Sites**

Host Agency Types	Number of Active Sites	High Demand Skill Sets
<b>Social Assistance</b>	11	Customer Service Representatives, Office Clerks, Administrative Assistants
<b>Stores</b>	3	Customer Service Representatives, Office Clerks, Administrative Assistants, Maintenance and Repair Workers
<b>Shelters</b>	1	Customer Service Representatives, Office Clerks, Administrative Assistants

Host Agency Types	Number of Active Sites	High Demand Skill Sets
<b>Meal Sites</b>	3	Customer Service Representatives, Office Clerks, Administrative Assistants
<b>Historical Centers</b>	1	Customer Service Representatives, Office Clerks, Administrative Assistants
<b>Health Clinic</b>	1	Personal Care Aides, Nursing Assistance

Source: SPARQs SCSEP Reporting System

In addition, SCSEP participants have access to online training certifications for Customer Service Representative, Essential Entry-Level Workplace and Clerical Skills, Supervisor/Manager, Essential Entry-Level Work Skills, Essential Medical Office Skills, Administrative Assistant, and Sales Representative.

3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))

In the table below, ICOA utilized the Wagner-Peyser Act statistical information to identify projected senior employment opportunities for the targeted occupation based on senior education level. ICOA's SCSEP contractor provides seniors with training to compete in the marketplace for these occupations.

TABLE 4 Targeted Occupations	2024 Projected Employment	Annual Openings*	Wage	Education	Senior Education 65+
Retail Sales Person	26,814	1,221	\$11.04	LHS	29,020
Cashier	16,825	820	\$9.36	LHS	29,020
Waiter and Waitress	13,145	757	\$8.90	LHS	29,020
Customer Service Representative	19,646	738	\$13.71	HDE	71,167
Combined Food Preparation and Serving Workers, Including fast Food	14,538	704	\$8.92	LHS	29,020
Farmers, Ranchers, and Other Agricultural Managers	17,983	607	\$28.72	HDE	71,167
Office Clerks, General	17,409	558	\$13.70	HDE	71,167
General and Operations Manager	14,244	556	\$31.53	BD	34,808

TABLE 4 Targeted Occupations	2024 Projected Employment	Annual Openings*	Wage	Education	Senior Education 65+
Registered Nurses	14,357	524	\$29.90	BD	71,167
Heavy and Tractor-Trailer truck Drivers	16,322	508	\$18.33	PHDA	71,167

*2012-2016 American Community Survey 5-year Estimates - Table B15001. No formal educational credential includes two groups: less than 9th grade and 9th to 12th grade, no diploma. Note: Education level data from Bureau of Labor Statistics. Source: 2014-2024 Occupational & Industry Projections Released November 2016, Idaho Department of Labor, Communications & Research. Source: 2012-2016 American Community Survey 5-year Estimates released December 7, 2017, February 15, 2018.*

## B. SERVICE DELIVERY AND COORDINATION

1. A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS. THIS MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF THE STRATEGIC PLAN, BUT REGARDLESS OF PLACEMENT IN DOCUMENT, MUST INCLUDE:

A. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

**Strategy:** ICOA collaborated with one-stop partners to develop a Memorandum of Understanding outlining roles and responsibilities.

### Planned Actions:

- This Memorandum of Understanding includes referral information between SCSEP, the Idaho Department of Labor, the Idaho Division of Vocational Rehabilitation, the Idaho Commission for the Blind and Visually Impaired, the Idaho Division of Career and Technical Education, and the Department of Health and Welfare.
- IDOL will plan to provide Adult and Dislocated Worker Program training to ICOA's SCSEP contractor.
- ICOA will build the agreement roles and responsibilities into statewide contractor reviews.

B. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES BEING CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OLDER AMERICANS ACT (OAA). (20 CFR 641.302(H))

**Strategy:** ICOA will coordinate employment resource sharing between ICOA's SCSEP contractor and the Area Agencies on Aging's (AAAs).

### Planned Actions:.

- SCSEP participants have the opportunity to participate in services available through their local AAA's such as administrative assistants, food service, health care, housing, recreation and social service agencies. SCSEP employment Training Coordinators will meet with the AAA Directors in each of the six areas.

- ICOA's SCSEP contractor will provide eligibility training, establish referral protocols with the AAAs and coordinate regional resources and outreach activities.

**C. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH- BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))**

**Strategy** (Private Agencies): ICOA will develop a schedule to meet one on one with the following WIOA Advisory Groups for resource sharing and outreach:

- Title I - Adult, Dislocated, and Youth Programs
  - Title II - Adult Education and Family Literacy Programs
  - Title III - Wagner-Peyser/Employment Services
  - Title IV-Vocational Rehabilitation
  - Vocational Rehabilitation Services in Idaho are provided through two agencies: The Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired
  - Combined Plan Partner - Jobs for Veterans State Grant Program
  - Combined Plan Partner - Trade Adjustment Program
  - One-Stop Partner - Unemployment Insurance
  - One-Stop Partner - Carl D Perkins and Career-Technical Education
  - One-Stop Partner - Community Development Block Grant
  - One-Stop Partner - TANF & SNAP
  - One-Stop Partner - Idaho Commission for the Libraries

**Planned Actions:**

- ICOA will plan to collaborate with the Idaho Commission for the Libraries to share information about the SCSEP program at the 140 libraries and ICOA connected the Employment Training Coordinators (ETCs) with the six AAA's to do presentations for their providers including their three Tribes in Idaho. ICOA will connect the ETCs with all contracted 97 meal sites in Idaho. This collaboration has the potential to establish additional host agencies and attract more participants. ICOA's SCSEP contractor will provide training and establish referral protocols with all WIOA partners and the Centers for Independent Living. This training will focus on referral coordination and meeting participants' supportive service needs, such as, transportation, caregiver support, congregate meals and health promotions.

**D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))**

**Strategy:** Through collaboration with the State WIOA Advisory Group (IDOL, Division of Career-Technical Education, Vocational Rehabilitation, Commission for the Blind and Visually Impaired

and ICOA), ICOA will promote job training initiatives through ICOA's SCSEP contractor, the Area Agencies on Aging and the Centers for Independent Living.

**Planned Actions:**

- ICOA participates in the quarterly State WIOA Advisory Group meetings to ensure strategies are being implemented throughout Idaho.
- ICOA will distribute job training initiatives to local ICOA's SCSEP contractor offices, Area Agencies on Aging and Centers for Independent Living for implementation.

**E. ACTIONS TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)**

**Strategy:** ICOA worked with the Idaho Department of Labor to develop a standardized Memorandum of Understanding between state organizations and contracted providers.

**Planned Actions:**

- ICOA will continue to work with partners to standardize requirements to be incorporated into regional and local Memorandums of Understanding.

**F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.**

**Strategy:** ICOA's SCSEP contractor will conduct SCSEP outreach to economic development offices located in rural counties with persistent unemployment.

**Planned Actions:**

ICOA's SCSEP contractor will provide SCSEP outreach to local economic development offices in rural counties with persistent unemployment: Benewah, Bonner, Boundary, Butte, Jefferson, Latah, Minidoka, Nez Perce, Oneida, Payette, Shoshone, Valley, Washington.

**2. THE STATE'S LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN.)**

**Strategy:** Out of the four Workforce Development Council targeted industries (Advanced Manufacturing, High Tech, Health Care, and Power & Energy), ICOA will focus on increasing the two highest growth sectors - Health Care and Advanced Manufacturing.

**Planned Actions:**

- o ICOA's SCSEP contractor will recruit nonprofit Health Care and Advanced Manufacturing organizations to participate as Host Agencies and prepare participants to compete for these job positions.

**3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))**

**Strategy:** ICOA evaluates SCSEP labor and management reports and develops strategies to increase minority participation.

**Planned Actions:**

o ICOA will work with regional one-stop offices and ICOA's SCSEP contractor to address low minority participation as identified in the SCSEP management and USDOL's SCSEP State minority reports.

4. A LIST OF COMMUNITY SERVICES THAT ARE NEEDED AND THE PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

**Strategy:** ICOA will develop strategies connecting individuals who are most in need with community services in the Targeted Industry.

**Planned Actions:**

o ICOA's SCSEP contractor will identify non-profit/governmental Host Agencies to provide individuals, who qualified for the SCSEP program, the training needed to compete for jobs in the Workforce Development Council Targeted Industries. The target locations are those counties that are not meeting equitable distribution level as identified in SCSEP Table 8.

**SCSEP Table 5: Community Job Service Needs**

Non-profit or Governmental Host Agencies that meet community service training needs	Targeted Industries
Warehouses (shipping and receiving), Thrift stores, Correctional Industries, Restore, Habitat for Humanity	Advanced Manufacturing
Technical Businesses, Universities, City, County and State Governments	High Tech
Hospitals, Home Health Companies Doctor Offices, non-profit clinics (i.e. Terry Reilly)	Health Care
Utility Organizations	Power and Energy

5. THE STATE'S LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

**Strategy:** Participate with WIOA partners to align the SCSEP vision and mission with other agencies employment strategies.

**Planned Actions:**

o As part of the WIOA's State Plan Advisory Group, ICOA will coordinate SCSEP efforts with one-stop offices, develop on the job experience policy, coordinate statewide SCSEP resource training, promote job training initiatives, provide outreach to economic development offices, focus skill development on high job growth sectors, increase minority participation, and target service needs.

6. THE STATE'S STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

**Strategy:** ICOA works closely with the SCSEP contractor to exceed “enter employment” levels. In program years 2015 and 2016, ICOA achieved the program goal of 72% and 85% for entered employment.

**Planned Action:**

- ICOA monitors the SCSEP contractor quarterly and develops strategies to meet USDOL’s annual goals.

**SCSEP Table 7: Performance Measure**

Program Year		PY 15			PY 16	
Performance Measure	Goal	Performance	Goal %	Goal	Performance	Goal %
Entered Employment	44.70%	32.10%	72%	46.10%	39.10%	85%

**C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION**

**1. A DESCRIPTION OF THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))**

**Strategy:** ICOA’s SCSEP contractor will meet the Equitable Distribution levels set by USDOL.

**Planned Action:** ICOA uses the USDOL’s Equitable Distribution level and determines the underserved areas to be targeted by the SCSEP contractor. Currently there are 14 counties that are underserved and 5 counties that are overserved.

**SCSEP Table 8: SCSEP Authorized Positions by County**

Urban and Rural Counties	2018 Authorized Positions	2019 Authorized Positions	2019 Current Under Served (1 Quarter)	2019 Current Over Served (1 Quarter)
ADA (U)	3	3	0	2
ADAMS (R)	0	0	0	0
BANNOCK (U)	0	0	0	2
BEAR LAKE (R)	0	0	0	0
BENEWAH (U)	0	0	0	0
BINGHAM (R)	0	0	0	0
BLAINE	0	0	0	0
BOISE (R)	0	0	0	0
BONNER (R)	2	2	-2	0
BONNEVILLE (U)	2	2	-2	0
BOUNDARY (R)	1	1	-1	0
BUTTE (R)	1	1	-1	0



Urban and Rural Counties	2018 Authorized Positions	2019 Authorized Positions	2019 Current Under Served (1 Quarter)	2019 Current Over Served (1 Quarter)
CAMAS (R)	0	0	0	0
CANYON (U)	4	4	0	0
CARIBOU (R)	0	0	0	0
CASSIA (R)	1	1	-1	0
CLARK (R)	0	0	0	0
CLEARWATER (R)	1	1	0	0
CUSTER (R)	0	0	0	0
ELMORE (R)	1	1	-1	0
FRANKLIN (R)	1	1	-1	0
FREMONT (R)	1	1	-1	0
GEM (R)	1	1	0	1
GOODING (R)	1	1	0	0
IDAHO (R)	0	0	0	0
JEFFERSON (R)	1	1	-1	0
JEROME (R)	2	2	0	0
KOOTENAI (U)	1	1	0	0
LATAH (U)	1	1	0	0
LEMHI (R)	1	1	0	0
LEWIS (R)	0	0	0	0
LINCOLN (R)	0	0	0	0
MADISON (U)	0	0	0	0
MINIDOKA (R)	2	2	0	0
NEZ PERCE (U)	1	1	-1	0
ONEIDA (R)	1	1	-1	0
OWYHEE (R)	2	2	-1	0
PAYETTE (R)	5	6	-2	0
POWER (R)	0	0	0	0
SHOSHONE (R)	1	1	-1	0
TETON (R)	0	0	0	0

Urban and Rural Counties	2018 Authorized Positions	2019 Authorized Positions	2019 Current Under Served (1 Quarter)	2019 Current Over Served (1 Quarter)
TWIN FALLS ( U)	2	2	0	4
VALLEY (R)	1	1	0	2
WASHINGTON (R)	2	2	0	0

2. LIST THE CITIES AND COUNTIES WHERE THE PROJECT WILL BE CONDUCTED. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

**Strategy:** ICOA implements the SCSEP program in the 27 counties in Idaho to meet the USDOL's required Equitable Distribution levels. The bolded numbers above indicate where the positions changed from their prior year.

**Planned Action:**

- ICOA uses data from [www.scseped.org](http://www.scseped.org) (shown in SCSEP Table 8) to identify changes in performance and areas that are underserved or have no positions.

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

**Strategy:** ICOA will develop a policy to meet the USDOL's equitable distribution level and focus on increasing enrollment in the underserved areas.

**Planned Action:**

- Develop a policy that sets maximum participation levels and transition from overenrolled areas to underserved.
- The Policy will be submitted with the PY2018 grant and incorporated into the SCSEP contract.

4. THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

**Strategy:** ICOA will analyze the state equitable distribution to determine the need to move authorized positions from the state to the federal program or vice versa. **Planned Action:**

- For those ICOA areas that are over or underserved, ICOA would work with the federal contractor to determine if a position transfer would allow both programs to meet USDOL's goals.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

**Strategy:** ICOA will ensure rural and urban counties are served equitably.

**Planned Action:**

- The ICOA will require the SCSEP contractor to follow and meet the equitable distribution formula released by the USDOL.
- The SCSEP contractor will conduct outreach to eligible host agencies that reside in rural areas to address underserved rural areas.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

**Strategy:** The ICOA requires the SCSEP contractor to follow the service rule priority.

**Planned Action:**

- ICOA will monitor priority of service (65 Years of age or older, Disabled, Limited English proficiency or low literacy skills, Resides in a rural area, Veteran, Low employment prospects, Failed to find employment, Homeless or at risk of homelessness) through quarterly progress reports.

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

The Idaho counties and “Ratio of Eligible Individuals” (55 years old and over and below 125% poverty) are listed in SCSEP Table 9: Relative Distribution of Eligible Individuals.

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
Adams (R)	1,923	0.42%	39	8	0	48
Bannock (U)	21,396	4.62%	325	5	39	547
Bear Lake (R)	2,032	0.44%	49	0	0	37
Benewah (U)	3,576	0.77%	79	6	0	120
Bingham (R)	11,495	2.48%	250	30	161	262
Blaine (R)	7,298	1.58%	170	0	61	50
Boise (R)	3,296	0.71%	121	0	0	101
Bonner (R)	17,554	3.79%	498	1	0	261
Bonneville (U)	25,563	5.73%	326	5	126	498
Boundary (R)	4,348	0.94%	57	0	0	96
Butte (R)	942	0.20%	15	0	0	17
Camas (R)	382	0.08%	4	0	0	10
Canyon (U)	50,266	10.85%	1,493	140	820	1,087

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Caribou (R)	2,137	0.46%	30	0	15	54
Cassia (R)	5,947	1.28%	129	12	129	139
Clark (R)	232	0.05%	3	0	17	8
Clearwater (R)	3,670	0.79%	97	0	0	85
Custer (R)	1,897	0.41%	87	0	0	92
Elmore (R)	6,220	1.34%	134	11	144	228
Franklin (R)	3,369	0.73%	82	13	0	20
Fremont (R)	3,877	0.84%	70	0	63	85
Gem (R)	6,316	1.36%	270	12	1	279
Gooding (R)	4,409	0.95%	105	30	129	142
Idaho (R)	7,005	1.51%	172	9	13	267
Jefferson (R)	6,221	1.34%	78	0	18	78
Jerome (R)	5,494	1.19%	111	0	97	198
Kootenai (U)	49,324	10.65%	874	188	19	810
Latah (U)	9,134	1.97%	174	20	7	180
Lemhi (R)	3,625	0.78%	137	11	0	54
Lewis (R)	1,630	0.35%	29	0	2	53
Lincoln (R)	1,309	0.28%	40	0	12	42
Madison (U)	4,901	1.06%	69	0	35	76
Minidoka (R)	5,840	1.26%	147	0	251	184
Nez Perce (U)	13,470	2.91%	289	40	13	276
Oneida (R)	1,464	0.32%	49	0	9	19
Owyhee (R)	3,497	0.75%	156	0	99	123
Payette (R)	6,944	1.50%	219	22	63	226
Power (R)	2,046	0.44%	21	0	3	4
Shoshone (R)	4,964	1.07%	160	5	0	114
Teton (R)	2,370	0.51%	27	0	3	2
Twin Falls (U)	22,222	4.80%	652	17	176	734

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population, Minorities: 65 or older who are unemployed, Limited English Proficient: 55 years or older, Greatest Social Need: 65 years or older with a disability and below 125% of poverty.

Source: U.S. Bureau of Census, Annual estimates of the Residential Population by Sex, Age, Race and Hispanic. Origin: July 1, 2016, Released : June 22, 2017

2012-2016 American Community Survey 5-year Estimates Table C1830 -Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with no disability)

2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A

2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".

2012-2016 American Community Survey 5-year Estimates Table C1830-Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with a disability) 2012-2016 American Community Survey 5-year Estimates released December 7, 2017 Provided by the IDOL & Communications & Research Division February 15, 2018

## 6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

### A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
Adams (R)	1,923	0.42%	39	8	0	48
Bannock (U)	21,396	4.62%	325	5	39	547
Bear Lake (R)	2,032	0.44%	49	0	0	37
Benewah (U)	3,576	0.77%	79	6	0	120
Bingham (R)	11,495	2.48%	250	30	161	262
Blaine (R)	7,298	1.58%	170	0	61	50
Boise (R)	3,296	0.71%	121	0	0	101

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Bonner (R)	17,554	3.79%	498	1	0	261
Bonneville (U)	25,563	5.73%	326	5	126	498
Boundary (R)	4,348	0.94%	57	0	0	96
Butte (R)	942	0.20%	15	0	0	17
Camas (R)	382	0.08%	4	0	0	10
Canyon (U)	50,266	10.85%	1,493	140	820	1,087
Caribou (R)	2,137	0.46%	30	0	15	54
Cassia (R)	5,947	1.28%	129	12	129	139
Clark (R)	232	0.05%	3	0	17	8
Clearwater (R)	3,670	0.79%	97	0	0	85
Custer (R)	1,897	0.41%	87	0	0	92
Elmore (R)	6,220	1.34%	134	11	144	228
Franklin (R)	3,369	0.73%	82	13	0	20
Fremont (R)	3,877	0.84%	70	0	63	85
Gem (R)	6,316	1.36%	270	12	1	279
Gooding (R)	4,409	0.95%	105	30	129	142
Idaho (R)	7,005	1.51%	172	9	13	267
Jefferson (R)	6,221	1.34%	78	0	18	78
Jerome (R)	5,494	1.19%	111	0	97	198
Kootenai (U)	49,324	10.65%	874	188	19	810
Latah (U)	9,134	1.97%	174	20	7	180
Lemhi (R)	3,625	0.78%	137	11	0	54
Lewis (R)	1,630	0.35%	29	0	2	53
Lincoln (R)	1,309	0.28%	40	0	12	42
Madison (U)	4,901	1.06%	69	0	35	76
Minidoka (R)	5,840	1.26%	147	0	251	184
Nez Perce (U)	13,470	2.91%	289	40	13	276
Oneida (R)	1,464	0.32%	49	0	9	19

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Owyhee (R)	3,497	0.75%	156	0	99	123
Payette (R)	6,944	1.50%	219	22	63	226
Power (R)	2,046	0.44%	21	0	3	4
Shoshone (R)	4,964	1.07%	160	5	0	114
Teton (R)	2,370	0.51%	27	0	3	2
Twin Falls (U)	22,222	4.80%	652	17	176	734
Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

*County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population, Minorities: 65 or older who are unemployed, Limited English Proficient: 55 years or older, Greatest Social Need: 65 years or older with a disability and below 125% of poverty.*

*Source: U.S. Bureau of Census, Annual estimates of the Residential Population by Sex, Age, Race and Hispanic. Origin: July 1, 2016, Released : June 22, 2017*

*2012-2016 American Community Survey 5-year Estimates Table C1830 -Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with no disability)*

*2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A*

*2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".*

*2012-2016 American Community Survey 5-year Estimates Table C1830-Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with a disability) 2012-2016 American Community Survey 5-year Estimates released December 7, 2017 Provided by the IDOL & Communications & Research Division February 15, 2018*

## B. HAVE THE GREATEST ECONOMIC NEED

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
Adams (R)	1,923	0.42%	39	8	0	48
Bannock (U)	21,396	4.62%	325	5	39	547

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Bear Lake (R)	2,032	0.44%	49	0	0	37
Benewah (U)	3,576	0.77%	79	6	0	120
Bingham (R)	11,495	2.48%	250	30	161	262
Blaine (R)	7,298	1.58%	170	0	61	50
Boise (R)	3,296	0.71%	121	0	0	101
Bonner (R)	17,554	3.79%	498	1	0	261
Bonneville (U)	25,563	5.73%	326	5	126	498
Boundary (R)	4,348	0.94%	57	0	0	96
Butte (R)	942	0.20%	15	0	0	17
Camas (R)	382	0.08%	4	0	0	10
Canyon (U)	50,266	10.85%	1,493	140	820	1,087
Caribou (R)	2,137	0.46%	30	0	15	54
Cassia (R)	5,947	1.28%	129	12	129	139
Clark (R)	232	0.05%	3	0	17	8
Clearwater (R)	3,670	0.79%	97	0	0	85
Custer (R)	1,897	0.41%	87	0	0	92
Elmore (R)	6,220	1.34%	134	11	144	228
Franklin (R)	3,369	0.73%	82	13	0	20
Fremont (R)	3,877	0.84%	70	0	63	85
Gem (R)	6,316	1.36%	270	12	1	279
Gooding (R)	4,409	0.95%	105	30	129	142
Idaho (R)	7,005	1.51%	172	9	13	267
Jefferson (R)	6,221	1.34%	78	0	18	78
Jerome (R)	5,494	1.19%	111	0	97	198
Kootenai (U)	49,324	10.65%	874	188	19	810
Latah (U)	9,134	1.97%	174	20	7	180
Lemhi (R)	3,625	0.78%	137	11	0	54
Lewis (R)	1,630	0.35%	29	0	2	53



Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Lincoln (R)	1,309	0.28%	40	0	12	42
Madison (U)	4,901	1.06%	69	0	35	76
Minidoka (R)	5,840	1.26%	147	0	251	184
Nez Perce (U)	13,470	2.91%	289	40	13	276
Oneida (R)	1,464	0.32%	49	0	9	19
Owyhee (R)	3,497	0.75%	156	0	99	123
Payette (R)	6,944	1.50%	219	22	63	226
Power (R)	2,046	0.44%	21	0	3	4
Shoshone (R)	4,964	1.07%	160	5	0	114
Teton (R)	2,370	0.51%	27	0	3	2
Twin Falls (U)	22,222	4.80%	652	17	176	734
Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population, Minorities: 65 or older who are unemployed, Limited English Proficient: 55 years or older, Greatest Social Need: 65 years or older with a disability and below 125% of poverty.

Source: U.S. Bureau of Census, Annual estimates of the Residential Population by Sex, Age, Race and Hispanic. Origin: July 1, 2016, Released : June 22, 2017

2012-2016 American Community Survey 5-year Estimates Table C1830 -Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with no disability)

2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A

2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".

2012-2016 American Community Survey 5-year Estimates Table C1830-Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with a disability)2012-2016 American Community Survey 5-year Estimates released December 7, 2017 Provided by the IDOL & Communications & Research Division February 15, 2018

### C. ARE MINORITIES

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
Adams (R)	1,923	0.42%	39	8	0	48
Bannock (U)	21,396	4.62%	325	5	39	547
Bear Lake (R)	2,032	0.44%	49	0	0	37
Benewah (U)	3,576	0.77%	79	6	0	120
Bingham (R)	11,495	2.48%	250	30	161	262
Blaine (R)	7,298	1.58%	170	0	61	50
Boise (R)	3,296	0.71%	121	0	0	101
Bonner (R)	17,554	3.79%	498	1	0	261
Bonneville (U)	25,563	5.73%	326	5	126	498
Boundary (R)	4,348	0.94%	57	0	0	96
Butte (R)	942	0.20%	15	0	0	17
Camas (R)	382	0.08%	4	0	0	10
Canyon (U)	50,266	10.85%	1,493	140	820	1,087
Caribou (R)	2,137	0.46%	30	0	15	54
Cassia (R)	5,947	1.28%	129	12	129	139
Clark (R)	232	0.05%	3	0	17	8
Clearwater (R)	3,670	0.79%	97	0	0	85
Custer (R)	1,897	0.41%	87	0	0	92
Elmore (R)	6,220	1.34%	134	11	144	228
Franklin (R)	3,369	0.73%	82	13	0	20
Fremont (R)	3,877	0.84%	70	0	63	85
Gem (R)	6,316	1.36%	270	12	1	279
Gooding (R)	4,409	0.95%	105	30	129	142
Idaho (R)	7,005	1.51%	172	9	13	267
Jefferson (R)	6,221	1.34%	78	0	18	78
Jerome (R)	5,494	1.19%	111	0	97	198

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Kootenai (U)	49,324	10.65%	874	188	19	810
Latah (U)	9,134	1.97%	174	20	7	180
Lemhi (R)	3,625	0.78%	137	11	0	54
Lewis (R)	1,630	0.35%	29	0	2	53
Lincoln (R)	1,309	0.28%	40	0	12	42
Madison (U)	4,901	1.06%	69	0	35	76
Minidoka (R)	5,840	1.26%	147	0	251	184
Nez Perce (U)	13,470	2.91%	289	40	13	276
Oneida (R)	1,464	0.32%	49	0	9	19
Owyhee (R)	3,497	0.75%	156	0	99	123
Payette (R)	6,944	1.50%	219	22	63	226
Power (R)	2,046	0.44%	21	0	3	4
Shoshone (R)	4,964	1.07%	160	5	0	114
Teton (R)	2,370	0.51%	27	0	3	2
Twin Falls (U)	22,222	4.80%	652	17	176	734
Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population, Minorities: 65 or older who are unemployed, Limited English Proficient: 55 years or older, Greatest Social Need: 65 years or older with a disability and below 125% of poverty.

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2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A

2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".

2012-2016 American Community Survey 5-year Estimates Table C1830-Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with a disability)2012-2016

D. ARE LIMITED ENGLISH PROFICIENT

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties		Ratio of Eligible State Population	Greatest Economic Need		Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
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E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

SCSEP Table 9: Relative Distribution of Eligible Individuals

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Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

*County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population, Minorities: 65 or older who are unemployed, Limited English Proficient: 55 years or older, Greatest Social Need: 65 years or older with a disability and below 125% of poverty.*

*Source: U.S. Bureau of Census, Annual estimates of the Residential Population by Sex, Age, Race and Hispanic. Origin: July 1, 2016, Released : June 22, 2017*

2012-2016 American Community Survey 5-year Estimates Table C1830 -Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with no disability)

2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A

2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".

2012-2016 American Community Survey 5-year Estimates Table C1830-Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with a disability)2012-2016 American Community Survey 5-year Estimates released December 7, 2017 Provided by the IDOL & Communications & Research Division February 15, 2018

7. A DESCRIPTION OF THE STEPS TAKEN TO AVOID DISRUPTIONS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOME AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

**Strategy:** ICOA will collaborate with partners to reduce negative impacts of redistribution, new Census or over-enrollment.

#### **Planned Action:**

ICOA will negotiate participant's transfers with national grantee when USDOL's releases the authorized positions, will update target employment areas based on , Census and labor market reports, and reviews quarterly progress reports and works with one-stop partners and SCSEP contractor to address over-enrollment.

### PERFORMANCE INDICATOR APPENDIX

#### ALL WIOA CORE PROGRAMS

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.

#### 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 <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

#### ADDITIONAL INDICATORS OF PERFORMANCE

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.

## OTHER APPENDICES