

IDAHO PYS 2024-2027

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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.))¹

[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.² States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission if such links remain active and adhere to Section 508 accessibility requirements.

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 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. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes 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. Additional populations include veterans, unemployed workers, youth, and others that the State may identify.

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.

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 will also be part of the equation. Employment in the government sectors, excepting education, will be included graphically but excluded from 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 to just those with the highest number of workers.

Idaho data shows Idaho had a monthly average of 827,500 nonfarm payroll jobs. Total nonfarm employment is further classified in seven industry supersectors. Table 1 shows the seven highest-demand industry sectors, based on the number of jobs. The top three –trade, transportation, and utilities, education and health services, and construction– accounted for 46 percent of growth between 2020 and 2022. These other four high-demand employment industries are professional and business services; leisure and hospitality; manufacturing; and financial activities. The number of jobs in these seven supersectors range from 41,100 to 161,500.

Employment growth and trends since 2020 illustrate the recovery since the 2020 COVID-19 pandemic. Each of the industry sectors has shown significant growth since the end of the pandemic. The pandemic initially reduced jobs in Idaho, but since then Idaho's economy has

created 72,400 nonfarm jobs. Leisure and hospitality added the most jobs—13,800, while financial activities added the least, 3,700. Construction, like manufacturing, experienced job losses during the pandemic but grew after. Construction and leisure and hospitality HAVE increased relatively the most between 2020 and 2022, by 18 percent, in part due to post pandemic spending.

Table 1: Employment in Idaho Private Supersectors Adding the Most Jobs, 2010-2022

Supersectors	2010	2020	2022	2010-20, Difference	2020-2022, Difference
Education and health services	83,100	112,600	121,500	29,500	8,900
Trade, transportation, and utilities	119,900	145,900	161,500	26,000	15,600
Construction	31,200	55,900	66,000	24,700	10,100
Professional and business services	75,600	98,700	107,600	23,100	8,900
Leisure and hospitality	57,900	75,300	89,100	17,400	13,800
Manufacturing	53,400	68,700	73,200	15,300	4,500
Financial activities	29,200	37,400	41,100	8,200	3,700
Idaho Nonfarm Payroll Jobs	603,100	754,700	827,500	151,900	72,400

Source: U.S. Bureau of Labor Statistics: Current Employment Statistics

Another way to determine demand is by the percent increase in the number of jobs. Following the pandemic, jobs in four employment sectors grew more than 10 percent, while total nonfarm jobs grew 10 percent between 2020 and 2022. They were construction (18 percent); leisure and hospitality (18 percent); trade, transportation, and utilities (11 percent); and financial activities (10 percent). 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, 2010-2022

Supersectors	2010	2020	2022	2010-20, Numeric Change	2020-22, Numeric Change	2020-22, Percent Change (Percent rounded to the nearest percentage)
Construction	31,200	55,900	66,000	24,700	10,100	18%
Education and	83,100	112,600	121,500	29,500	8,900	8%

Supersectors	2010	2020	2022	2010-20, Numeric Change	2020-22, Numeric Change	2020-22, Percent Change (Percent rounded to the nearest percentage)
health services						
Professional and business services	75,600	98,700	107,600	23,100	8,900	9%
Leisure and hospitality	57,900	75,300	89,100	17,400	13,800	18%
Financial activities	29,200	37,400	41,100	8,200	3,700	10%
Manufacturing	53,400	68,700	73,200	15,300	4,500	7%
Trade, transportation, and utilities	119,900	145,900	161,500	26,000	15,600	11%
Idaho Nonfarm Payroll Jobs	603,100	754,700	827,500	151,600	72,800	10%

Source: U.S. Bureau of Labor Statistics: Current Employment Statistics

Idaho Target Sectors

In recent years, the Idaho Department of Labor staff along with the state's 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 employment sectors leaving manufacturing and professional and business services the next top contributors. In the industry makeup of the state retail trade is a large industry sector and while many of its jobs are entry-level and low skill this industry sector 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 remain vital for the state as they provide educational opportunities and skill development for the current and future workforce.

Table 3: Ranking of Private Supersectors by Employment and GDP: 2022

Industry Supersector	Employment	Employment Rank	GDP (millions of current dollars)	GDP Rank
Private industries	700,700		\$98,585.1	
Educational services,	121,500	1	\$9,796.5	4

Industry Supersector	Employment	Employment Rank	GDP(millions of current dollars)	GDP Rank
health care, and social assistance				
Professional and business services	107,600	2	\$12,084.9	2
Retail trade	94,000	3	\$9,408.4	5
Manufacturing	73,200	4	\$10,726.7	3
Construction	66,000	5	\$6,942.3	7
Wholesale trade	34,800	6	\$7,980.2	6
Finance, insurance, real estate, rental, and leasing	29,900	8	\$19,963.9	1
Transportation and warehousing	32,600	7	\$3,685.3	9
Arts, entertainment, recreation, accommodation, and food services	11,700	9	\$4,878.9	8
Information	7,400	10	\$2,309.9	10
Mining (except gas and oil)	3,700	11	\$802.6	12
Utilities	3,000	12	\$1,777.4	11

Source: Federal Reserve Bank of St. Louis: Economic Research

Employment projections, wages paid and the multiplier impact of employment sectors on Idaho's economy are also important areas to look at. Staffing patterns of the potential supersectors were analyzed by in-demand jobs and their wages. The Research and Analysis Bureau presents economic updates on a quarterly basis regarding Idaho's target industry sectors 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
Total Employment	806,943	933,563	126,620	15.7%	
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

Source: U.S. Bureau of Labor Statistics: Current Employment Statistics

The above table and the following table include projections from the last state plan. This is due to the 2018-2028 long-term projections developed in the midst of the COVID-19 pandemic and yielding results that seemed uncertain to the Labor Economist team of the Idaho Department of Labor at the time. The 2020-2030 long term projections were completed a year and a half earlier than typical resulting in them being the most current for the last WIOA plan. As a result, they are the most current projections for this plan. The next round, the 2022-2032 long-term projections will be completed by the Idaho Department of Labor in the first half of 2024, putting it back on the normal long-term projection schedule.

The five employment sectors in Table 4 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, childcare, 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 12.8 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 comprises 8.0 percent of Idaho’s non-farm jobs.
- **Leisure and Hospitality** comprises five industries – including accommodation, amusement, performing arts, sports, and food services. This industry comprises 10.8 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 6 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 number of nonfarm jobs in manufacturing contributed to 8.8 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 openings reflect churn in the labor force. Openings include 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,	1,143	13%	280	888	114	1,282	\$31.17	HSDE

Occupation Title	2020 - 2030 Projected Growth	2020 - 2030 Growth Rate	Annual Exits	Annual Transfers	New Jobs	Total Annual Openings	Hourly Median Wage	Education Level
Ranchers, and Other Agricultural Managers								
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

Sources: U.S. Bureau of Labor Statistics: Occupations, Employment and Wage Statistics, Lightcast

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

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	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
Construction Trades					
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

Sources: U.S. Bureau of Labor Statistics: Occupations, Employment and Wage Statistics, Lightcast

The occupations ranked in Tables 5 and 6 share several common occupations. However, occupations ranked by number of new jobs also include passenger vehicle drivers, except bus drivers, transit and intercity. These include common transportation occupations including Lyft and Uber, a passenger transportation trend which has grown in recent years.

Table 7: Trending occupations for Idaho job seekers

Job Seeker Rank	Occupation title	ID Employment per 1,000	U.S. employment per 1,000	ID median annual wage	U.S. median annual wage
1	Registered Nurses	17.15	20.77	\$77,940	\$81,224
2	Computer and Information Systems Managers	1.674	3.60	\$120,650	\$164,070
3	Medical Secretaries	2.69	4.61	\$36,770	\$38,501
4	Licensed Practical and Licensed Vocational Nurses	2.53	4.27	\$50,850	\$54,621
5	Administrative Services and Facilities Managers	0.82	2.39	\$103,010	\$101,878
6	Network and	1.59	2.20	\$76,750	\$90,522

Job Seeker Rank	Occupation title	ID Employment per 1,000	U.S. employment per 1,000	ID median annual wage	U.S. median annual wage
	Computer Systems Administrators				
7	First Line Supervisors of Transportation & Material Moving Workers	3.51	4.00	\$54,980	\$57,866
8	Cargo and Freight Agents	0.1	0.63	\$48,580	\$46,862
9	Industrial Engineers	1.73	2.17	\$79,997	\$96,346
10	Computer Hardware Engineers	0.09	0.50	\$110,090	\$132,371
11	Healthcare Social Workers	0.84	1.23	\$62,630	\$60,278
12	Mechanical Engineers	1.49	1.87	\$79,061	\$96,325
13	Medical Scientists, Except Epidemiologists	0.36	0.74	\$75,330	\$99,923
14	Sales Reps, Wholesale and Manufacturing, Technical and Scientific Products	1.58	1.96	\$55,980	\$97,698
15	Respiratory Therapists	0.59	0.87	\$64,200	\$70,533
16	Nurse Practitioners	1.46	1.74	\$116,710	\$121,618
17	Computer Systems Analysts	3.14	3.41	\$85,560	\$102,232
18	Sales Engineers	0.13	0.40	\$122,890	\$108,534
19	Machinists	1.91	2.14	\$46,730	\$48,506
20	Pharmacists	1.97	2.20	\$133,540	\$131,706

Sources: U.S. Bureau of Labor Statistics: Occupations, Employment and Wage Statistics, Lightcast

Table 7 features trending occupations for Idaho job seekers based upon number of openings, wages, and employer demand. The positions in health care and technology also map to training opportunities available through the Idaho LAUNCH Program and the Idaho Opportunity Scholarship. The data indicate that for these occupations the national concentration, as measured by employment per 1000 is higher than for those same positions in Idaho, indicating that these positions could be in demand for some time. Idaho does have a wage advantage for several of these occupations in relation to the national average. Those occupations include administrative and facilities managers, cargo and freight agents, computer hardware engineers, sales engineers, and pharmacists.

Table 8: Top job postings, 2022

Occupation (SOC)	Total Postings (Jan 2022 - Dec 2022)	Unique Postings (Jan 2022 - Dec 2022)	Median Posting Duration
Registered Nurses	35,851	9,100	29
Software Developers	14,859	8,077	29
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	17,863	6,503	31
Retail Salespersons	24,906	6,166	31
Managers, All Other	11,947	5,767	29
Computer Occupations, All Other	11,708	5,677	30
Customer Service Representatives	29,444	5,538	29
First-Line Supervisors of Retail Sales Workers	14,731	4,799	28
Laborers and Freight, Stock, and Material Movers, Hand	24,653	3,701	33
Marketing Managers	7,447	3,642	30

Source: Lightcast

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.”

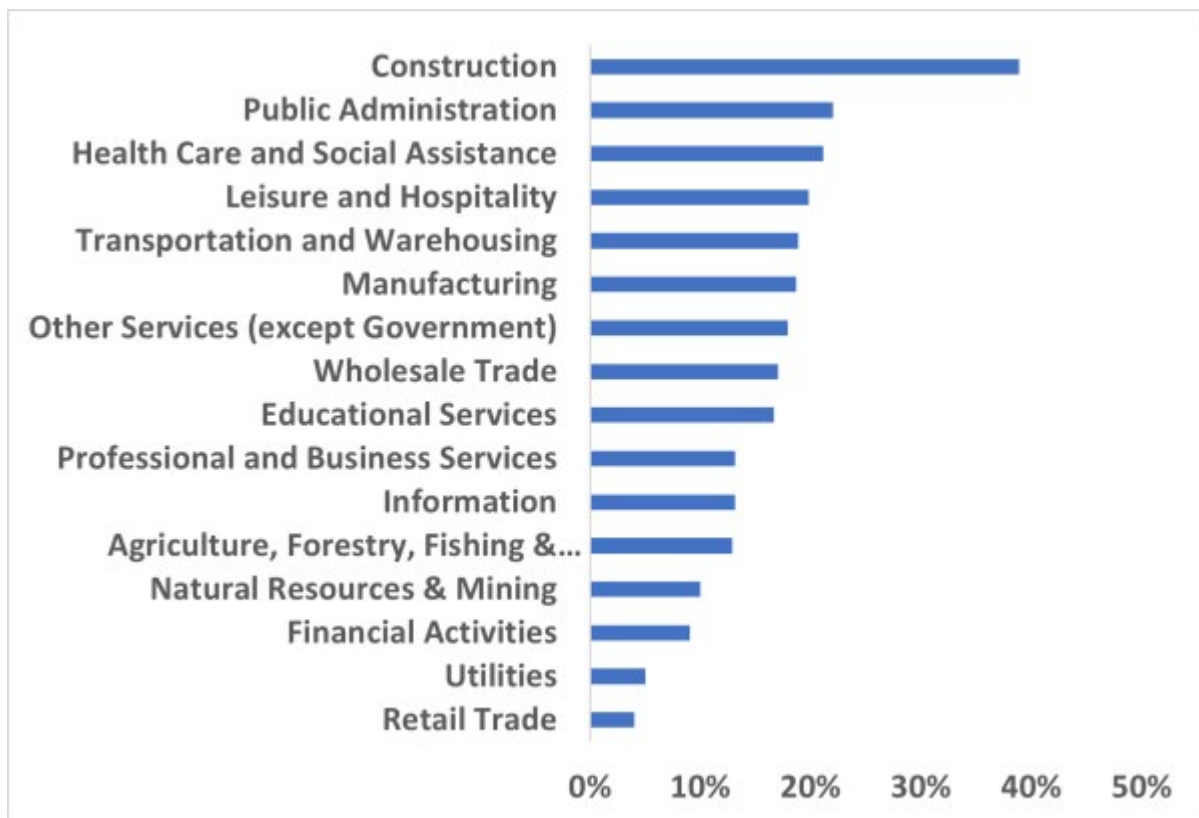
Growth Industries

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 – 23,156
- Construction – 21,132
- Manufacturing – 12,647
- Accommodation and Food Services – 11,364
- Educational Services (include private and government jobs) – 9,947
- Wholesale Trade – 2,250

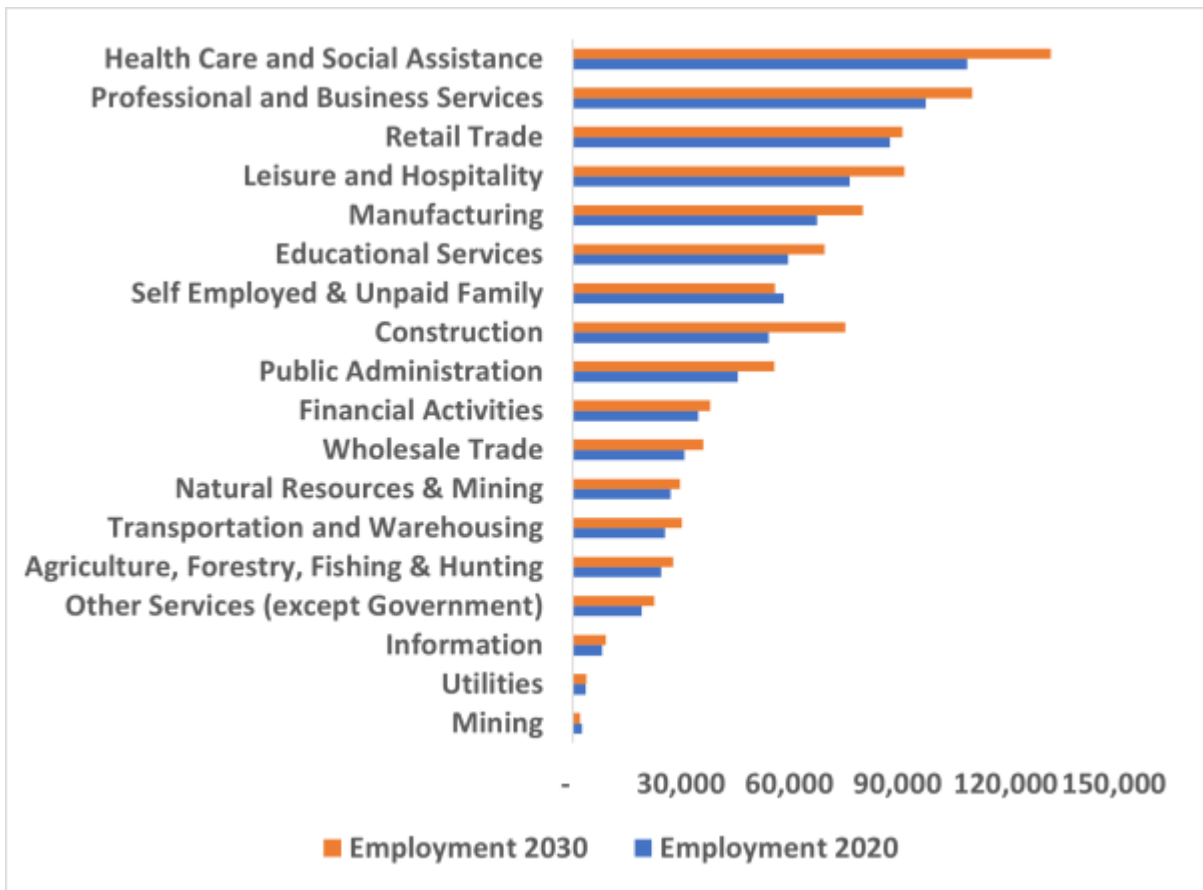
The graphs in Figures 1 and 2 present data on both the net growth and relative growth of the industries listed above, as well as several other industries. Specific information for these and other high-growth industries is provided the following graphs.

Figure 1: 2020-2030 projected growth by industry



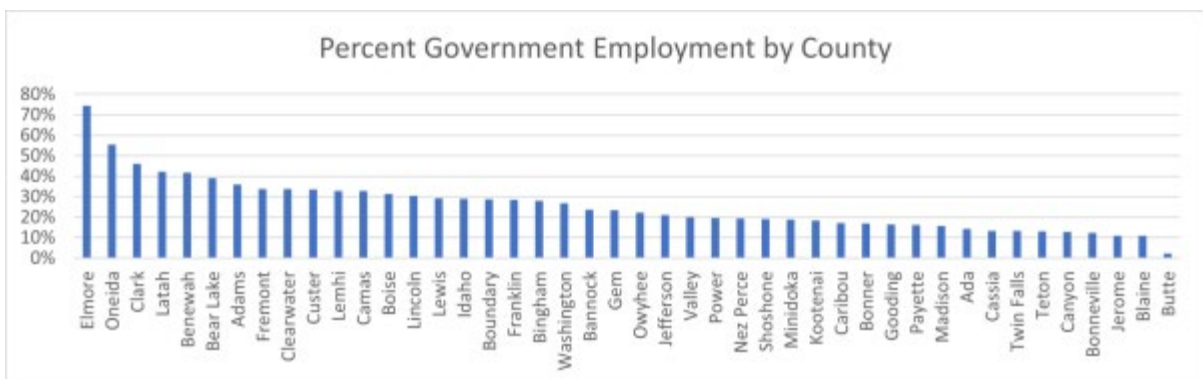
Source: Idaho Department of Labor, 2020-2030 long-term industry and occupational projections

Figure 2: 2020-2030 Employment project by industry



Source: Idaho Department of Labor, 2020-2030 long-term industry and occupational projections

Figure 3: Idaho Government Employment by County



Source: https://www.bls.gov/regions/west/news-release/countyemploymentandwages_idaho.htm

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 38.9 percent, resulting in the addition of 21,132 new jobs. Most of the new jobs created are in

carpentry and general construction labor, while most of the losses in this category occur in mining and extraction. Construction employment in 2030 is projected to be 75,469. In 2021, the research and labor division conducted a survey for a major nuclear construction project in eastern Idaho, working in conjunction with the Idaho Workforce Development Council to coordinate efforts for training the thousands of construction workers projected to be needed for this project over the next 10 years.

Arts, Entertainment & Recreation: Employment in the Arts, Entertainment & Recreation industry is projected to add 1,482 new jobs by 2030. This industry includes amusement, gambling, recreation, performing arts, spectator sports, and museums/historical sites. Coaches and scouts, media and communications equipment workers, and photographers comprise the bulk of the growth in this category. As media continues to consolidate and digitize this category will continue seeing losses among news analysts, radio and television announcers, and broadcast technicians.

Health Care and Social Assistance: Over the long-term, the health care and social assistance sector is projected to add the newest jobs at 23,156. However, it ranks third in percentage growth at 21.2 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 1,422 jobs by 2030. Social assistance is projected to add 2,639 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 18.8 percent but ninth in numeric growth, projected to add just over 4,794 jobs. Most of the growth will come from the transit and ground passenger transport.

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 80,328, an increase of 12,647 jobs, ranking it fifth in percentage growth. Food processing will account for 12 percent of the growth, while the computer industry's employment is projected to increase by 21.6 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 11,364 jobs between 2020 and 2030. Jobs in the food services industry will account for 82.5 percent of this growth. It is estimated 9,379 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 5,250 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 – are projected to total 5,786 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 9,947 jobs, 16.7 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. Of the 20 fastest growing in-demand occupations, four have more than 100 new job openings and ten require more than a high school education. The four occupations with more than 100 new job openings include: carpenters, first-line supervisors of construction trades, electricians and HVAC and refrigeration mechanic and installers.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—

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

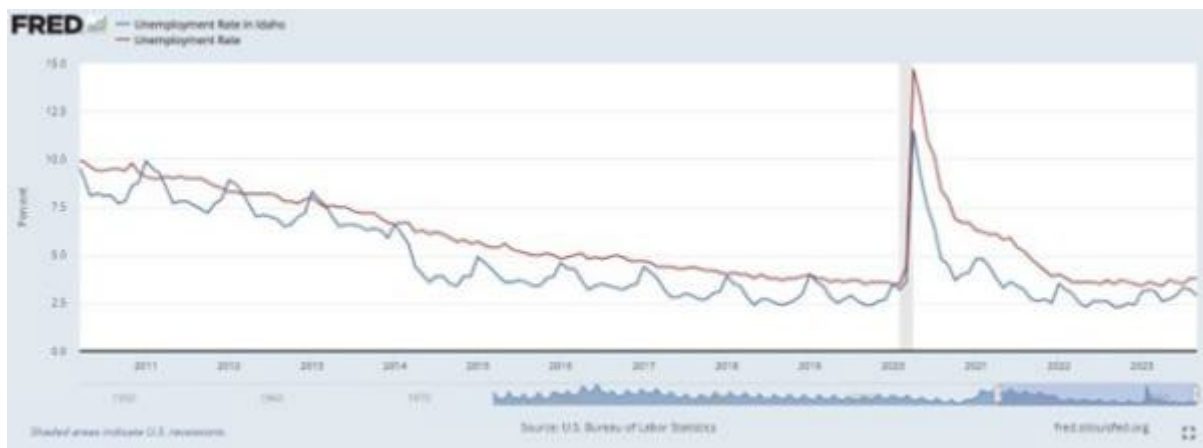
Provide an analysis of the educational and skill levels of the workforce.

(i) Employment and Unemployment 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 of 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 4 (below) shows the comparison of Idaho's seasonally adjusted unemployment rate to the national average.

Figure 4. 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 included 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.

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 or work—in 2022 was 62.4 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 63.1percent. 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 2022 estimates, ages 25-54 had the highest labor participation rate at 80.9 percent. The next highest was ages 16-24 at 66.7 percent. Men had a participation rate of 83.5 percent and women 71.6 percent. Table 9 shows the labor participation rate by age and gender.

Table 9: 2022 Labor Force Participation Rates by Age and Gender

Age/Gender	2022 Civilian Population	2022 Civilian Labor Force	2022 Labor Force Participation Rate
Population 16 years and over	1,530,729	955,175	62.4%
16-24	250,551	167,167	66.7%
25-54	867,292	701,383	80.9%
55-64	224,544	145,967	65.0%
65 and older	329,530	54,182	16.4%
Population 20 to 64 years	1,091,836	847,265	77.6%

Age/Gender	2022 Civilian Population	2022 Civilian Labor Force	2022 Labor Force Participation Rate
Male	556,443	464,630	83.5%
Female	535,393	383,341	71.6%

Source: American Community Survey dataset ACSST1Y2022, Table ID S2301

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) one-year estimates for 2022. Information provides insight into whether specific groups may face barriers to employment. Specific trends are discussed following Table 10.

Table 10: Idaho Labor Force by Age, and Gender

AGE/Gender	Total	Civilian Labor Force	Employed	Unemployed	Unemployment rate
Population 16 years and over	1,530,729	955,175	909,253	45,922	3.0%
16 to 19 years	109,363	53,369	42,105	11,264	10.3%
20 to 24 years	141,188	113,798	105,891	7,907	5.6%
25 to 29 years	122,506	101,557	97,760	3,798	3.1%
30 to 34 years	127,837	101,758	99,202	2,557	2.0%
35 to 44 years	256,103	204,370	198,736	5,634	2.2%
45 to 54 years	219,658	179,900	176,166	3,734	1.7%
55 to 59 years	108,296	79,706	77,323	2,383	2.2%
60 to 64 years	116,248	66,261	64,285	1,976	1.7%
65 to 74 years	200,204	45,647	42,043	3,604	1.8%
75 years and over	129,326	8,536	4,914	3,621	2.8%
Population 20 to 64 years	1,091,836	847,265	818,877	28,388	2.6%
SEX	-	-	-	-	-
Male	556,443	464,630	447,380	17,250	3.1%
Female	535,393	383,341	373,169	10,172	1.9%

Source: American Community Survey dataset ACSST1Y2022, Table ID S2301

As Table 10 shows, the largest age cohort for Idaho workers is those 25 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 45 to 54 years old, and those 60 - 64. 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.

In the one-year 2022 data, Men in the workforce were unemployed at a rate of 3.1 percent compared to 1.9 percent for women.

Table 11: Labor force participation by ethnicity

RACE AND HISPANIC OR LATINO ORIGIN	Total	Labor Force Participation Rate	Employment to Population Ratio	Unemployment rate
White alone	1,231,457	63%	60%	3.9%
Black or African American alone	9,024	67%	60%	6.7%
American Indian and Alaska Native alone	17,957	62%	56%	9.1%
Asian alone	20,092	65%	62%	3.2%
Native Hawaiian and Other Pacific Islander alone	2,524	64%	53%	15.8%
Some other race alone	57,093	71%	68%	3.0%
Two or more races	67,098	69%	64%	5.7%
Hispanic or Latino origin (of any race)	157,760	72%	69%	4.0%
White alone, not Hispanic or Latino	1,161,485	62%	59%	3.8%

Source: American Community Survey dataset ACSST5Y2021, Table ID S2301

During the five-year 2021 estimate, 63% of those in the labor force reported their ethnicity as white alone and this group has an unemployment rate of 3.9 percent. The lowest unemployment rate was among Asian alone at 3.2 percent. Native Hawaiians in Idaho experienced the highest

unemployment rate of 15.8%, with the next highest rate among American Indian and Alaska Natives at 9.1%.

Native American Employment

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.

Table 12: Labor force participation among veterans

	Estimate	Percent
Total:	1,139,073	
Veteran:	58,769	5%
In labor force:	45,591	78%
Employed	44,007	97%
Unemployed	1,584	3%
Not in labor force	13,178	22%

Source: American Community Survey Dataset ACSDT1Y2022, Table ID C21005

Veterans, another important demographic group in Idaho, totaled 58,679 according to the American Community Survey 2022 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 averaged 5 percent in 2022.

Employment by Poverty Status

In 2023, the federal poverty guideline is \$14,580 for a 1-person household and increases by \$5,140 for each additional household member. In Idaho, the 1-year 2022 ACS estimates reveal that slightly more than half (47.8 percent) of persons living below the poverty threshold were in the labor force — 91 percent of whom were actively employed and the remaining 9 percent unemployed but looking for work. Table 13 outlines the labor force participation of persons by poverty status.

Table 13: Labor Force by Poverty Status

POVERTY STATUS IN THE PAST 12 MONTHS	Total	Labor Force Participation Rate	Employment/Population Ratio	Unemployment rate
Below poverty level	107,380	47.8%	43.4%	9.1%
At or above the poverty level	957,388	82.1%	79.9%	2.1%

Source: American Community Survey dataset ACSDT1Y2022

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 2022 one-year estimates of individuals with disabilities in Idaho increased from 241,391 in 2019, to 299,502 representing an increase of 24 percent over three 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 2022 American Community Survey, 16 percent of Idaho civilians living in the community report having a disability, including 14 percent of residents of working age (20-64). Estimates from 2022 indicate Idaho’s percent of population with a disability is three percentage points higher than the for the U.S. as a whole.

Table 14: Civilians Living in the Community by Age and Disability Status

Civilian population	Total	Population with disability	Percent	Population without disability	Percent
U.S. population	328,309,810	44,146,764	13%	284,163,046	<87%
Idaho population	1,911,951	299,502	16%	1,612,449	84%

Source: American Community Survey dataset: ACSDT1Y2022, Table ID B18101

Table 14a: Civilians Living in the Community by Age and Disability Status

Civilian Population	Total	Population with disability	Percent	Population without disability	Percent

Civilian Population	Total	Population with disability	Percent	Population without disability	Percent
Under 5 years	111,816	605	1%	111,211	99%
5 to 17 years	352,461	23,473	7%	328,988<	93%
18 to 34 years	434,756	43,170	10%	391,586	90%
35 to 64 years	691,263	97,600	14%	593,663	86%
65 to 74 years	197,939	48,533	25%	149,406	75%
75 years and over	123,716	86,121	70%	37,595	30%

Source: American Community Survey dataset: ACSDT1Y2022, Table ID B18101

The tables 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 14a above, with only seven percent of individuals aged 5 to 17 experiencing disability compared to 14 percent for those aged 35 to 64.

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.

Tables 15 and 16 provide 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 15: Civilians Aged 18 to 64, Living in the Community by Disability Type

Disability category	Number Idahoans reporting a disability	Percent of Idaho's total population 18-64

Disability category	Number Idahoans reporting a disability	Percent of Idaho's total population 18-64
Hearing	31,665	2.8%
Vision	27,200	2.4%
Cognitive	68,579	6.1%
Ambulatory	52,424	4.7%
Self-care	21,320	1.9%
Independent living	50,883	4.5%

Source: American Community Survey dataset ACSDT1Y2022, Table B18120

Table 16: 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 the labor force	Number not in labor force	Percent not in labor force
Hearing	31,665	19,627	767	3.9%	11,271	35.6%
Vision	27,200	15,708	1,694	10.8%	9,798	36.0%
Cognitive	68,579	29,867	2,694	9.0%	36,018	52.5%
Ambulatory	52,424	18,320	870	4.7%	33,234	63.4%
Self-care	21,320	4,767	404	8.5%	16,149	75.7%
Independent living	50,883	16,679	1,519	9.1%	32,685	64.2%

Source: American Community Survey, Dataset ACSDT1Y2022, Table B18120

Table 16 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 and of those only 3.9 percent are unemployed. Whereas those with a cognitive disability have an unemployment rate of 9 percent. 75.7 percent of those unable to perform self-care do not participate in the labor force, representing the most impactful form of disability on the ability to participate in the labor force.

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 aged 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.

(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 2022 census population estimate of 1,911,951 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 2019 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 38th among the states in overall population, up two compared to the 40th most populous ranking in 2010.

In-Migration

Idaho’s net migration during 2022 was 34,719. This much growth from immigration sets the state as the one of the fastest-growing recipients of population from the surrounding states and California.

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 2022. 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 17: Idaho Net Migration, July 2010 through June 2022

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

Time Period	Net Migration	Domestic	International
July 2021	49289	48876	413
July 2022	30483	28639	1844

SOURCE: Idaho Department of Labor, population estimates

Demographic Trends

According to Idaho Department of Labor, Idaho’s population is expected to grow by 12.1 percent from 2021 to 2031 (Table 18). In the same period, Hispanics, the state’s largest minority, will grow much faster at 33 percent (Table 19).

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 aged 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 increase by 2.4 percent while age groups 65 and older will all increase by 15 percent or more. The largest growth will be in the 80 to 84 group and is predicted to increase by 73.9 percent. The smallest growth rates will be in the 10 to 14-year-old at 1.3 percent, and the second smallest growth being 5 to 9-year-old at 1.4 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 18: Projected Population by Age for Idaho, 2021-2031

AGE	2021	2031	Percent Change
Total Population	1,888,533	2,116,413	12.1%
Under 5 years	117,956	123,828	5%
5 to 9 years	128,222	130,053	1.4%
10 to 14 years	135,469	137,232	1.3%
15 to 19 years	131,454	136,971	4.2%
20 to 24 years	122,972	134,018	9.0%
25 to 29 years	125,090	136,057	8.8%
30 to 34 years	124,765	136,562	9.5%
35 to 39 years	123,504	139,461	12.9%

AGE	2021	2031	Percent Change
40 to 44 years	120,104	136,203	13.4%
45 to 49 years	106,219	127,192	19.7%
50 to 54 years	105,432	118,215	13.7%
55 to 59 years	108,556	118,150	8%
60 to 64 years	115,437	118,215	2.4%
65 to 69 years	107,181	117,189	9.3%
70 to 74 years	89,868	107,818	20%
75 to 79 years	58,712	84,217	43.4%
80 to 84 years	36,146	58,714	83%
85 years and over	31,446	54,700	73.9%

SOURCE: Lightcast

Table 19: Projected Population by Age for Idaho, 2020-2030

ETHNICITY	2020	2030	Percent Change
Total	1,826,913	2,148,168	18%
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%
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%

ETHNICITY	2020	2030	Percent Change
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: Lightcast

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. The Bureau of Economic Analysis (BEA) defines personal income as "the income that people get from wages and salaries, social security and other government benefits, dividends and interest, business ownership, and other sources." As indicated in Table 20, 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. The BEA notes that this sharp increase in personal income from 2019 to 2020 reflects the additional income received through CARES Act pandemic relief payments.

Table 20: Idaho Gross Product and Personal Income 2008-2022 (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%
2016	\$69,029	4.6%	\$68,445	4.0%

Year	Gross Domestic Product	Percent Change from Previous Year	Total Personal Income	Percent Change from Previous Year
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%
2021	\$87,992	5.0%	\$94,097	5.6%
2022	\$91,683	4.2%	N/A	N/A

Source: U.S. Bureau of Economic Analysis, Regional Economic Accounts, SASUMMARY_ID_1998_2022

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 the 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.

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, heavy and tractor trailer truck drivers is the hardest job to fill in Idaho - with 3,511 openings in 2022 with an average time to fill of 36 days. Conversely, the easiest jobs to fill in 2022 were data scientists, computer user support specialists, and project management specialists, all at 27 days. Retail salespersons were high on both the annual listings and hard-to-fill lists.

(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 one-year 2022 estimates.

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 bachelor’s or higher. In other words, the majority of Idaho’s youth graduate from high school, while just over half (51 percent) of young adults aged 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 about 12% 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, 55 percent hold a bachelor’s degree, compared to the next highest group at 34 percent (White alone).

Table 21: Educational attainment by race

Race	Race Population	% of State Population	% of Race with High School Diploma or Higher	% of Race with bachelor’s or higher
Total State Population 25 and Over	1,280,178	67%		
White alone	1,080,405	57%	94%	34%
Black or African American alone	7,133	0.4%	90%	25%
American Indian and Alaska Native alone	15,152	1%	80%	14%
Asian alone	18,594	1%	92%	55%
Native Hawaiian and Other Pacific	N/A	N/A	N/A	N/A

Race	Race Population	% of State Population	% of Race with High School Diploma or Higher	% of Race with bachelor's or higher
Islander alone				
Some other race alone	58,176	3%	68%	12%
Hispanic or Latino origin	137,932	7%	70%	15%

Source: American Community Survey, dataset ACSST1Y2022, Table ID S1501

Educational Attainment

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.

Educational attainment in Idaho remains consistent among various age groups with all age groups within 3-5 percentage points among high school graduates and those earning bachelor's degrees. Educational attainment for those 25 years and older shows that 32% of this group holds a bachelor's degree or higher and 92% graduated high school and has completed some college.

Table 22: Age by educational attainment population 18-24 years

AGE BY EDUCATIONAL ATTAINMENT	Total	Percent
Population 18 to 24 years	194,235	
Less than high school graduate	25,593	13%
High school graduate (includes equivalency)	71,675	37%
Some college or associate degree	80,888	42%
Bachelor's degree or higher	16,079	8%

Source: American Community Survey, dataset ACSST1Y2022, Table ID S1501

Table 23: Percent of population graduating high school, or earning bachelor's degree by age

Education Attainment Levels by Age	25-34	35-44	45-64	65+
High school graduate or higher	94%	92%	91%	93%

Education Attainment Levels by Age	25-34	35-44	45-64	65+
Bachelor's degree or higher	34%	36%	31%	31%

Source: American Community Survey, dataset ACSST1Y2022, Table ID S1501

Table 24: Educational attainment population 25 and older

Population 25 years and over	1,280,178	
Less than 9th grade	44,365	4%
9th to 12th grade, no diploma	57,919	5%
High school graduate (includes equivalency)	333,105	26%
Some college, no degree	305,642	24%
Associate degree	125,979	10%
Bachelor's degree	274,409	21%
Graduate or professional degree	138,759	11%
High school graduate or higher	1,177,894	92%
Bachelor's degree or higher	413,168	32%

Source: American Community Survey, dataset ACSST1Y2022, Table ID S1501

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. These data reinforce 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.

Table 25: Poverty status and educational attainment

POVERTY RATE FOR THE POPULATION 25 YEARS AND OVER FOR WHOM POVERTY STATUS IS DETERMINED BY EDUCATIONAL ATTAINMENT LEVEL	2019	2022
Less than high school graduate	21%	20%
High school graduate (includes equivalency)	10%	12%

POVERTY RATE FOR THE POPULATION 25 YEARS AND OVER FOR WHOM POVERTY STATUS IS DETERMINED BY EDUCATIONAL ATTAINMENT LEVEL	2019	2022
Some college or associate degree	8%	8%
Bachelor's degree or higher	4%	5%

Source: American Community Survey, dataset ACSST1Y2022, Table ID S1501

Educational Attainment - English Language Barriers

A significant number of individuals who have less than a high school education and speak only Spanish at home are not in the labor force. However, it's important to note that this data is only a snapshot and may not fully capture the complexities of labor force participation. Factors such as age, health, and caregiving responsibilities, can also influence whether someone is in the labor force. Additionally, language skills can be a significant factor in employment opportunities.

Those individuals who have not completed high school is made up of 102,284 people. Among them, 52,223 are active in the labor force. English is the predominant language among this working population, with 26,871 individuals identifying it as their primary language. Spanish follows closely behind, spoken by 24,377 individuals. However, not everyone in this group is part of the labor force. There are 50,061 individuals who are not currently working. The majority of these individuals speak English (37,602), while a smaller portion speaks Spanish (10,365).

Those who have completed high school or an equivalent level of education is significantly larger, encompassing 333,105 individuals. Of these, 191,317 are part of the labor force. English remains the dominant language among these working individuals, spoken by 164,583 people. Spanish is the second most common language, spoken by 19,632 workers. Similar to the first group, there are those who are not in the labor force, totaling 141,788 individuals. The majority of these individuals speak English (131,160), with a smaller number speaking Spanish (7,035).

Table 26 Educational Attainment by Language Spoken at Home for those in the Workforce

Language Spoken	Less than high school graduate	%	High school graduate (includes equivalency)	%	Some college or associate degree	%	Bachelor's degree or higher	%
	102,284		333,105		431,621		413,168	
In labor force:	52,223		191,317		261,432		282,991	
Speak only English	26,871	51%	164,583	13%	240,345	19%	256,248	20%

Language Spoken	Less than high school graduate	%	High school graduate (includes equivalency)	%	Some college or associate degree	%	Bachelor's degree or higher	%
Speak Spanish	24,377	47%	19,632	2%	16,773	1%	13,808	1%
Speak other Indo-European languages	489	1%	3,355	0.3%	2,659	0.2%	6,341	0.5%
Speak Asian and Pacific Island languages	234	0.4%	1,659	0.1%	1,159	0.1%	5,724	0.4%
Speak other languages	252	0.5%	2,088	0.2%	496	0.0%	870	0.1%

Source: American Community Survey dataset: ACSDT1Y2022, Table ID, B16010

C. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.

Idaho’s Efforts to Meet Skill Gaps

Many of Idaho’s in-demand jobs are considered “entry-level,” requiring comparatively little education for attainment. In fact, out of the top ten in-demand jobs, only two require education beyond a high school diploma. Work-based learning, credentialing, and training remain important to secure employment in these in-demand jobs and industry supersectors (for instance, for Electricians and Light Truck or Delivery Services Drivers), as credentials are often necessary. Additionally, many of these jobs also lack clear opportunities for advancement, making ongoing education and training essential for workers’ economic mobility.

Idaho’s cost of living has kept pace with or outstripped wage growth in many areas of the state. Miscellaneous Assemblers and Fabricators make the lowest median hourly wage of Idaho’s in-demand jobs, at \$14.77 hourly. Meanwhile General and Operations Managers make the highest wage of any in-demand job at \$33.49 hourly.

To prioritize training efforts around industries and occupations that balance good wages with current or projected demand for workers, Idaho’s workforce development system uses information, access, and worker choice to support individuals’ entry into quality jobs through programs such as Idaho LAUNCH.

Access

Facing a need for education and training coupled with the high cost and limited capacity of training programs in Idaho, the Workforce Development Council created Idaho LAUNCH. LAUNCH is a grant program that pays for workers' short-term education or training for approved in-demand careers, reducing or eliminating the barrier between Idaho's workers and a quality job. This program is designed to simultaneously meet employers' and job seekers' needs and aids in creating a skilled workforce.

The correlation between higher levels of education and lower levels of poverty reinforces the state's commitment to increase educational attainment beyond high school via LAUNCH and other programs.

Information

The in-demand careers list that powers LAUNCH is generated and regularly updated by the Idaho Department of Labor and is visible to the public. This list provides information about the educational requirements and wage prospects of a given job, allowing members of the public to make informed career decisions.

Additionally, Combined Plan Partners leverage unemployment data from the Economic and Workforce Analysis to identify sectors of the population in need of more targeted support. These groups include:

- Youth aged 16-19 (10.3% unemployment)
- Youth aged 20-24 (5.6%)
- Black or African American individuals (6.7%)
- American Indian and Alaska Native individuals (9.1%)
- Native Hawaiian and Other Pacific Islander individuals (15.8%)
- Individuals of two or more races (5.7%)
- Individuals living below the poverty line (9.1%)
- Individuals with vision disabilities (10.8%)
- Individuals with cognitive disabilities (9.0%)
- Individuals with self-care disabilities (8.5%)
- Individuals with independent living disabilities (9.1%)

In response to this information, Combined Plan Partners created new focus areas to adapt our services to be more accessible and useful for individuals in the identified groups. Focus areas include (1) developing career pathways, (2) providing quality service to youth – particularly youth in underserved, underrepresented, and marginalized groups, (3) improving public awareness and access to the workforce system, and (4) building the workforce system's capacity to serve participants with more significant barriers to employment. These goals are described in full in Section (II)(C)(b)(2).

Combined Plan Partners are actively leveraging several strategies to close identified skill gaps. First, the WDC has funded, trained, and placed Talent Pipeline Management specialists across

the state, who will leverage their roles to build sector partnerships for in-demand careers and industry supersectors. Next, the WDC will continue to support Idaho LAUNCH, which promotes a “no wrong door” approach to education and training, allowing workers to upskill and retrain at any point in their careers. Finally, partners are actively seeking additional funding to support these goals and increase the capacity of each organization to effectively reduce the skills gap and serve the State of Idaho.

Customer Choice

Improving Idahoans’ knowledge and access to employment and training opportunities supports customer choice, helping to improve the system as Idahoans move freely to the best opportunities available. Customer choice has been a successful component of Idaho’s model already, with Idahoans aligning their career training and goals to the state’s top six industry sectors projected to have the largest net job growth between 2020 and 2030. 13 of the top 20 trending occupations for Idaho job seekers fall directly into Idaho’s growth industries, with the remaining seven peripherally related.

The Workforce Development Council and Combined Plan Partners will take on efforts to increase the accessibility of training for in-demand careers, leveraging our services alongside germane data, information, and customer choice.

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 ⁶ and optional one-stop delivery system partners.⁷

[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.

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-B - 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.

Unless specifically directed by the Idaho Workforce Development Council to do otherwise, 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-based learning opportunities through job shadowing, work experiences 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.

Title I-B - Adult and Dislocated Worker Programs (Administered by the Idaho Department of Labor, operated by Equus Workforce Solutions)

The Adult and Dislocated Worker programs provide access to the same array of service categories as the state's Title I Youth program: basic and individualized 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. Equus Workforce Solutions began providing these services in Idaho in October 2021.

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.

Both Idaho Department of Labor and Equus staff provide these program services in the state's eight American Job Centers. The Idaho Department of Labor staffs various mobile locations, providing access to 38 additional communities across the state .

Title II - Adult Education and Family Literacy (AEFLA) (Idaho Division of Career Technical Education)

Through a variety of services leading to post-secondary schooling, workforce training, and employment, Idaho's Adult education program supports adults with academic skills below the 12th grade level attain basic reading, writing, math, English language and digital literacy skills necessary to thrive in the state's economy and to engage in civic participation.

Eligible participants are aged 16 or older and not currently enrolled in secondary education. Participants must be seeking to complete a high school equivalency, to increase literacy and numeracy skills needed to succeed in post-secondary education and training or to improve English language proficiency.

Under the direction of Idaho Division of Career and Technical Education (IDCTE), adult education services include literacy and numeracy instruction, preparation for high school equivalency testing, workplace literacy, English language instruction, integrated education and training, and digital skills instruction. Adult education programs also assist participants with transitions to career pathways through post-secondary education and workforce training. Services are delivered through a combination of in-person and remote learning options, often in combination with other post-secondary, business and industry, or WIOA partners.

Adult education services are carried out by local providers servicing all Idaho counties. Local providers include Idaho's technical colleges and universities and the Department of Corrections. Local programs provide intake, orientation, initial and follow-up skills assessments, goal making, study plans, and transition services to students in their service areas. Local programs are accountable to the state office for outcomes reporting and grant compliance. The state office supports local programs through program monitoring, grant guidance, professional development, technical assistance, and federal reporting.

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, 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 in-person or virtual job fairs. The Idaho Department of Labor provides these services in the same locations presented earlier as its Title I-B offerings.

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 be 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 several staff collocated in several state program offices, such as the Idaho Department of Correction. The Commission provides services through a central office in Boise, ID and five regional offices.

Combined Plan Partner - Jobs for Veterans State Grant Program (JVSG) (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 searching, 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. The program currently operates under the Trade Act 2015 Sunset provision that went into effect on July 1, 2022. Under this provision, all states continue to serve Trade Adjustment Assistance workers who qualify for benefits and services under petitions that certified prior to July 1, 2022.

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

Trade program services 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 is delivered by the Idaho Department of Labor in the American Job Centers and Idaho Department of Labor mobile locations. The program co-location 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 in the state's AJCs. 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) 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 monthly on an EBT card.

Families must live in Idaho, be U.S. citizens or meet specific criteria for lawful residency, have income at or below 130% of the Federal Poverty Limit for family size, and meet resource limits. Adult participants must participate in a work program, unless they are exempt.

All eligibility requirements are verified through electronic interfaces or documentation provided by the family. Approved families must participate in a six-month or 12-month recertification. SNAP benefit amounts are determined based on family size, income and expenses. In June 2023, the average SNAP allotment per person in Idaho was \$167, or about \$1.86 per meal.

Households may use SNAP benefits to purchase foods such as breads, cereals, fruits, vegetables, meats, and dairy products.

SNAP enrollment is responsive to economic conditions, expanding during recessions and contracting during improved economic times. Recently, during SFY 2023 (Idaho's state Fiscal Year mirrors the federal Program Year),

the number of individuals receiving SNAP benefits increased from 123,300 in June 2022 to 125,600 in June 2023. In 2023, most eligible Idaho families received benefits within four days of applying, with 75% of families receiving benefits the same day they applied.

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 under the age of 18. The program serves an average of 1,500 households and about 2,100 individuals.

Approximately 96% of households in the program are child-only cases. The remaining 4% are single or two-parent households. Child-only cases are usually relatives caring for a child whose parents cannot care for them.

Idaho 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, however, this time limit does not apply to child-only cases. To qualify for TAFI cash assistance, a family must meet the following eligibility requirements:

- Be an Idaho resident who is either a U.S. citizen or meets specific lawful residency criteria;
- 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 comply with a treatment plan if determined to need treatment; and
- Participate in the Enhanced Work Services program and meet strict participation requirements.

Idaho's TAFI cash assistance program requires participation in work and education preparation activities that build or enhance the skills needed to increase participants' income so they become self-sufficient. They are required to participate in 20-40 hours per week (depending on family composition) in approved activities, including, but not limited to: searching for a job, education directly related to employment, work experience opportunities, and treatment for substance use disorders. Failure to meet these required activities results in closure of the TAFI assistance and an additional penalty period during which the family is not eligible to receive TAFI cash. Child-only cases are not subject to work participation requirements.

(B) The Strengths and Weaknesses of Workforce Development Activities.

Strengths

The most significant strengths identified in our analysis of listening session feedback were the strong relationships between entities in the workforce development system, the adaptability of these entities, the practical programs that are run or being developed by the state, and the federal investments being leveraged to support the workforce system. Additionally, the Economic and Workforce Analysis illustrated the positive association between available education and training opportunities in Idaho and subsequent employment outcomes.

Professional Relationships

With regard to relationships, the Idaho Department of Labor, Idaho Career Technical Education, state Vocational Rehabilitation programs, the Council on Aging, and the Workforce Development Council enjoy strong and constructive professional ties which have contributed to the State Planning process. These relationships have been relied upon in bi-weekly meetings to discuss and refine State Plan deliverables from each program, and were essential when analyzing listening session information and collaboratively developing focus areas to improve Idaho's workforce system.

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

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 across the state. Annual partnership meetings are held the first quarter in the calendar year, and regional quarterly meetings are held thereafter.

Adaptability

The central operation of programs in a small number of agencies also reduces barriers to change and adaptation when beneficial. For example, all the WIOA Title I-B programs, as well as the UI, Trade Adjustment Assistance, and Jobs for Veterans State Grant 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 the Idaho Division of Career Technical Education (IDCTE). Both IDCTE and the Idaho Division of Vocational Rehabilitation are under the administrative umbrella of the State Board of Education. Idaho's State Board also offers a unique advantage as one of only two states in the nation with K-20 governance under a single board. The Idaho Commission for the Blind and Visually Impaired (ICBVI) and the Idaho Workforce Development Council (WDC) exist under the Office of the Governor, with the WDC operating as a coordinating body between Combined Plan Partners and allied organizations.

Having the core WIOA programs—as well as several of the optional partners—clustered within a small number of agencies makes it easier to streamline planning and policy alignment and promote robust referral processes at the state level.

Practical Programs

The Economic and Workforce Analysis identified good alignment between Idaho's available education and training and employment outcomes, a result of ongoing coordination between business, education, and the workforce system. There is still much more to do to support these connections, but Idaho has developed a number of strategies that provide practical bridges between workers and employment.

First, Idaho LAUNCH was deployed in late 2020 to fund short-term training opportunities that prepare Idahoans for in-demand careers. The program provides grants covering 80% of training costs up to \$5,000 for select careers and has seen profound positive results for many participants.

Due to the program's success, LAUNCH was expanded by the Idaho Legislature during the 2023 session, and now has a youth branch that offers grants of up to \$8,000, or 80% of a student's education costs when they enter training for an in-demand career out of high school. Open to all graduating high school seniors beginning with the Class of 2024, this program has been received with enormous excitement from students, families, schools, local government officials, and economic development agencies.

The WDC will continue to operate, monitor, collect data on, and refine the LAUNCH programs for the foreseeable future. LAUNCH funds are available for many educational pathways, including college, community college, short-term training and certifications, and Registered Apprenticeship Programs.

Idaho's apprenticeship environment is another practical and impactful component in the workforce system. Through deep collaboration between various state agencies and community-based organizations, the Apprenticeship Idaho Coalition has yielded positive results for employers and job seekers alike. This has included collaboration between the Idaho Department of Corrections, Vocational Rehabilitation, the Idaho Department of Labor, the Council of State Governments, the Workforce Development Council, and others as necessary.

Additionally, The Idaho Commission for Libraries has been an active facilitator for promoting and expanding the One-Stop system across the state through Idaho's library network. Libraries partner locally with a variety of agencies within the workforce ecosystem to support the educational and employment needs of their communities. The Idaho Department of Labor partners with libraries throughout Idaho as part of their mobile service delivery model. IDOL staff visit these libraries on a set day each month to assist clients with job searches, unemployment claims, labor market information, and community referrals. Additionally, several libraries throughout the state serve as outreach locations for Title II adult education providers and meeting locations for Vocational Rehabilitation counselors and clients, with the potential to expand to more locations.

Federal Investments

The state's Libraries continue to expand their implementation of private digitally-enabled meeting spaces which provide improved access to services such as virtual meetings with caseworkers, telehealth services, training, testing, and job interviews. Additionally, the Libraries' work on the Digital Access for All Idahoans Plan strives to secure this access for all Idahoans, across all regions. The Digital Access for All Idahoans effort is funded through Title III of the IIJA.

Aided by Federal investments such as the CHIPS and Science Act, Micron (a chip/semiconductor manufacturer headquartered in Boise) has announced a significant expansion in Idaho, working collaboratively with the WDC to support the state's childcare, construction, and STEM workforce that will be necessary for a thriving semiconductor industry. This partnership has also been working collaboratively to identify opportunities for workforce training and STEM education, funded by \$15,000,000 in American Rescue Plan Act funds. These projects include mechatronics programs at the College of Western Idaho, College of Eastern Idaho, and College of Southern Idaho, plus a variety of youth STEM projects funded through Idaho's Workforce Development Training Fund grants. Additionally, Idaho now boasts two federally-designated Tech Hubs, with representation mainly located in North Idaho and Eastern Idaho, working on

projects to support the aerospace and nuclear industries, respectively. The WDC along with education, government, industry, and community partners have come together to support the multistate projects impacting Washington, Idaho, and Wyoming.

To further support improved infrastructure and broadband accessibility, the WDC and IDOL are actively applying for federal funds via the BIL that will help cultivate a workforce to implement significant transportation investments and new and expanded technologies. Fortunately, we have the infrastructure in our agencies to receive and leverage federal grant funds. However, improvement is always possible, and Combined Plan Partners will therefore continue our work to increase system capacity to both leverage federal funds and respond to a more active economy as a result of these funds.

Weaknesses/Challenges-

We have identified four major weaknesses/challenges for Idaho's Workforce Development System. The first is in regard to staffing, the second involves quality service to youth, and the third is the awareness by individuals and employers of agencies' services and supports, and the fourth is the need for education, training, and career pathways, which were consistently mentioned in listening sessions.

Workforce System Staffing

Several of our core and partner programs identified staff turnover, staff training, and staff retention as issues, a situation that has intensified as Idaho's ongoing workforce shortage has met with a burgeoning cost of living and strong competition for talent. Those programs which provide direct services like education and counseling have seen the heaviest shortages.

Attracting, training, and retaining qualified staff can be difficult in a competitive wage environment with an increased cost of living, particularly in a state like Idaho where public sector 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 cost of housing in communities like Coeur d'Alene has made it so difficult to fill vacancies that the local Vocational Rehabilitation office was operating at approximately half staff as of late 2023.

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.

Staffing shortages can be especially difficult in rural communities, where housing stock is even more limited and the pool of local applicants is smaller, with many qualified candidates seeking employment elsewhere. The pay is often less competitive and may be insufficient to bring in qualified labor from outside the community.

Youth Services

Youth aged 16-19 face the single highest unemployment rate (10.3% as of November 2023) of any age group in the state, and one of the highest unemployment rates of any demographic group analyzed in the economic and workforce analysis. Youth aged 20-24 have the second highest age group unemployment rate at 5.6%. In an environment where employers are struggling to find qualified staff to fill critical positions, consistently high unemployment

numbers for any demographic group clearly indicate an area for improvement in the workforce system.

In the strategic planning session, Combined Plan Partners admitted significant difficulty in reaching out to youth and determined that a comprehensive effort to map the services and supports available to youth in Idaho had not yet been undertaken. Additionally, it can be inferred that most of Idaho's youth exist within intersectional demographic groups, and therefore may also be female, in a racial or ethnic minority, learning English, living in a low-income household, involved in or aged out of the foster care system, have a disability, or live in a rural community. Several of these intersectional groups also experienced higher than average unemployment within the time period measured, indicating a need to improve service in several demographic areas simultaneously.

Youth, who may not have a personal vehicle or a computer, experience unique structural disadvantages related to their age and the resources available to them. Young people were also affected profoundly by the COVID-19 pandemic, as is evidenced by the mental health crisis affecting many Americans – youth in particular. The CDC Youth Risk Behavior Survey indicated that the number of US high school students who “experienced persistent feelings of sadness or hopelessness” rose from 28% in 2011 to 42% in 2021. In fact, all but one long-term measure of youth mental health and suicidality worsened during the decade leading up to 2021. Mental wellbeing, access to resources, education, and job opportunities are realistically inextricable in the modern work environment, meaning that specialized services to youth from Combined Plan Partners will likely be necessary to alleviate employment disparities indicated in the analysis.

Awareness

Through the listening sessions discussed in the Strengths section and fully outlined in Section IV, Combined Plan Partners identified that awareness remains a key need in the workforce system. This need is a multifaceted one; partners expressed a desire to better understand each other's services, local government leaders wanted school counselors to know more about career opportunities and supports for young people, and economic development agencies indicated that individuals and businesses need to understand the workforce system's opportunities.

While Idaho's programs are operated by a comparatively small number of agencies, each agency has significant depth in the number and type of programs, making it difficult for outside individuals – even allied agencies – to understand or navigate their services effectively. With multiple agencies, nonprofits, and community-based partners collaborating in the workforce system, this issue compounds in scale.

Limited funding for school counselors has also constrained outreach and collaboration efforts with K-12 education in the past. The workforce system has also lacked the bandwidth to create outreach collateral with mutually agreed-upon language and contact information, which would improve our ability to inform the public about our services.

Education, Training, and Career Pathways

Education and training was the number one topic brought up by participants in the listening sessions, often in conjunction with career pathways (the fifth most common topic). Local government representatives and economic development agencies were often pleased with the dedication and tireless efforts of K-12 educators but stressed the importance of connecting

education to careers. The lack of awareness of career pathways, real-world skills, post-secondary education and training programs, and options outside the traditional college path was concerning to most participants in the listening sessions.

This issue ties in closely with awareness, but also indicates a need for a more concerted effort not just to push education to do more, but to support educators and students more fully.

(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 27 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 formula funds. The table does not include local funding, employer contributions, user fees, or entitlement payments such as Social Security reimbursements.

Table 27: Workforce Program Capacity - Funding Levels and Participants Served by Program

*Numbers are based on most recent annual-reporting data available for Program Year 2022 (July 1, 2022, through June 30, 2023). Those programs noted by an * show data by federal Fiscal Year 2023 (September 2020 through October 2023)*

Program	Federal Funding	State Funding	Number Served
Title I – Youth	\$2,580,180	\$0	748
Title I – Adult	\$2,309,760	\$0	561
Title I – Dislocated Worker	\$1,847,221	\$0	142
Title II – Adult Education	\$2,757,056	\$1,273,613	4,156
Title III – Wagner-Peyser	\$6,052,395	\$0	17,943 (jobseekers) 8,337 (employers)
Title IV – Vocational Rehabilitation (IDVR)	\$16,274,257	\$4,404,595	4,323
Title IV – Idaho Commission for Blind and Visually Impaired (ICBVI, The Commission)	\$2,632,771	\$958,456	420

Program	Federal Funding	State Funding	Number Served
OAA Title V - Senior Community Service Employment Program (SCSEP)	\$425,207	\$0	42
Trade Adjustment Assistance (TAA)*	\$400,000	\$0	10
Jobs for Veterans State Grant (JVSG)*	\$877,644	\$0	436
Carl D. Perkins	\$8,371,565 (includes both Secondary & Post-Secondary programs)	\$418,578	107,551 (Secondary programs) 5,192 (Post-secondary programs)
Temporary Assistance for Needy Families (TANF/TAFI) Supplemental Nutrition Assistance Program (SNAP)	TAFI - \$5.7 Million SNAP - \$220.6 Million;		TAFI -2,235 monthly avg. SNAP - 123,947 monthly avg.
Unemployment Insurance (UI)*	\$14,547,992	\$0	45,652

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 employment⁸ and other populations.⁹

(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, which may include evaluation findings, 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

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. During the December 8th, 2023, joint meeting of One-Stop and WIOA Advisory Group partners, these strategies were affirmed as relevant and useful, and were therefore maintained.

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 together can promote information and resources in a way that effectively reaches their market/membership/locale.

- · Promote awareness of workforce services, education services, and information to the diverse current and potential workforce.

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* – Create a baseline to allow for measurement of success in the future.
- *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* – Identify gaps and opportunities in the workforce system and initiate or support policy and/or allocate resources to meet them.
- *Strategy* – Identify opportunities for alignment across projects and resources to enhance results across all stakeholder groups.

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 five public listening sessions conducted with the Council, local governments, and economic development agencies show several opportunities for system improvement. First, this includes actionable messaging of the services and benefits available to both jobseekers and employers, leveraging technology where appropriate to support implementation. Combined plan partners have agreed to build communication materials that are accessible and appropriately targeted to all Idahoans, with a focus on older populations, underserved groups, and individuals with significant barriers to employment. Specific goals for implementation during this state plan period include:

- **Create and implement a communications strategy targeted to specific audiences**
 - Identify audiences in need of targeted messaging

- Collaboratively develop a communication strategy and messaging
- **Collaboratively identify key communication points**
 - Identify key audiences and messaging to ensure all materials are accessible to all audiences
 - Leverage listening session feedback to inform messaging
 - Identify teams and resources needed for development and implementation of the communication plan
- **Leverage partnerships with high-utilization resources to distribute information**
 - This may include libraries, adult education centers, food banks, service providers, and others.
- **Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions**
 - Clearly identify the services each program has to offer
 - Develop regional goals and performance metrics
 - Implement targeted, coordinated business visits via regional teams

Build workforce system capacity to receive participants with more significant barriers to employment – With effective outreach as identified in Focus Area 1, Idaho’s service providers may see an uptick in the number of individuals with higher barriers to employment accessing services across the state. Building the capacity of each provider and the system as a whole to serve these individuals is a key goal identified by Combined Plan Partners. Specific goals for implementation during this state plan period include:

- **Leverage data to prepare staff and services**
 - Train frontline staff to be welcoming to all customers
 - Train frontline staff to use all available resources
 - Collaboratively develop an inter-agency resource hub
 - Develop and share trainings on the resource hub
 - Communicate expectations and rationale
 - Request meaningful engagement; interactive webinars that follow up with questions about the relevance/usefulness of information provided
- **Leverage technology to fill gaps for participants.**
 - Collaboratively identify gaps that could be filled by AI or other technology
 - Leverage technology to cover routine tasks and improve service quality to participants
- **Aligning with Digital Access for all Idahoans plan**

- Identify funding sources
- Include state employees in the Libraries' Digital Access for All Idahoans Plan to build employee technological capacity
- Build the capacity of participants, specifically older populations and individuals with limited technology proficiency, to effectively use the technology we're leveraging.

Service to Youth - Providing services sensitive to the needs of young people in diverse demographic groups who fall between the ages of 16 and 24. With an unemployment rate for 16- to 19-year-olds at 10.3% and 20- to 24-year-olds at 5.6%, these two groups make up two of the highest unemployment rates in the state and indicate a clear opportunity for employers in a tight labor market. In order to adequately serve youth, Combined Plan Partners have indicated that service sensitive to the needs of intersectional groups will be essential. Specific goals for implementation during this state plan period include:

- **Service to youth within, but not limited to, the following groups:**
 - Youth with disabilities
 - Justice-involved youth
 - Hispanic youth
 - Youth within racial and ethnic minorities
 - Youth who are English language learners
 - Tribal youth
 - LGBTQ+ youth
 - Youth residing in rural or remote communities
- **Create a matrix of all the services available to youth (via agencies; additional nonprofit services to be identified as needed)**
 - Leverage high-utilization resources to conduct youth outreach and identify needs
 - Work with employers to identify barriers to youth employment

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:

- **Develop career pathways via Talent Pipeline Management (TPM)**
 - Identify target industries for TPM, prioritizing those expected to see job growth due to the IIJA, CHIPS and Science act, and the BIL

- Identify which occupations will be created and when, related to federal investments indicated above
- Identify the necessary credentials, training, and timeline to deliver qualified individuals when they are needed
- Train Combined Plan Partners on TPM
 - Connect TPM hosts to Combined Plan Partners
 - Provide “elevator pitch” for state plan partners to discuss TPM with their employer participants³.

3. **Performance Goals**

Sub-regulatory guidance addressing the four-year submission requirements for WIOA Combined State Plans for PY 2024-2027 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 described 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 be evaluated against the performance targets negotiated by each program with their applicable federal agencies.

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:B *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 obtainment 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 objectives with an employer focus: *Career Pathways/Sector Partnerships*.

These WIOA indicators will be used to measure and evaluate the effectiveness of individual programs, as well as the workforce development system as a whole. By comparing performance between core programs, we can potentially identify both gaps and opportunities in the services provided. 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 suggesting 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. Additionally, now that longitudinal performance data is available for programs across the nation, Idaho’s workforce development system can compare performance to states with similar economic and demographic characteristics. These indicators 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 methods to improve continued poor performance will be determined by each agency, as authorized under each Title and outlined within the respective program-specific requirements 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 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 and access to the workforce system
- Build workforce system capacity to receive participants with more significant barriers to employment
- Service to youth
- 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

Weathering significant instability during and after the COVID-19 pandemic, Idaho's economic analysis appears to indicate a return to "normal." Unemployment remained under 3% throughout 2022, rising to a high of 3.3% by November of 2023, according to labor market information from the Idaho Department of Labor. Construction has added over 24,000 jobs since 2010 and is now one of the state's five fastest-growing private supersectors, along with education and health services, professional and business services, leisure and hospitality, and financial activities.

While jobs in leisure and hospitality lean towards lower wages, they play an important role in the development of workplace skills for Idahoans with the highest barriers to employment. An opportunity exists to establish career pathways leading to higher skilled jobs or leverage entry-level employment in these industries to lead to development of workplace skills necessary for continued sector growth.

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 and develop the workforce of the future.

Sector Strategies

As noted earlier, the Idaho Workforce Development Council, in partnership with the Idaho Association of Commerce & Industry, launched the Talent Pipeline Management Initiative (TPM), and awarded state Workforce Development Training Fund dollars to train an initial cohort of 30 industry and educational professionals in the methodology. The TPM facilitators

work with local industry cohorts (collaboratives have included food processing, health care, and construction, with industries such as transportation, technology, and manufacturing expected to be added in the coming year) and education providers (K-career) to align talent pipelines 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

The state's Workforce Development Training Fund has also supported sector strategies by providing state-funded grants to partnerships of industry and education groups to develop or promote training in high-demand occupations. In recent years, the Workforce Development Council has shifted its investment strategy by emphasizing Industry Sector and Innovation grants, plus direct training to individuals through Idaho LAUNCH, a grant program that pays for Idahoans' short-term training and covers 80% of training costs up to \$5,000. Since the program's inception in late 2020, the WDC has invested nearly \$23.5 million in LAUNCH to help see this through, including over \$6.5 million in FY24 alone. The program has served a total of 7,268 individuals, largely providing pathways into careers in transportation, construction, and the medical field.

Career Pathways

The following strategies were designed to mitigate the state's identified weakness regarding 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 *Apprenticeship Idaho* have moved the state forward significantly. In early PY20, USDOL announced a Youth Apprenticeship Readiness Grant (YARG) award to the Idaho Workforce Development Council that has provided resources via a public-private partnership with Idaho Business for Education. With this award, it became imperative to connect IDOL's apprenticeship grants, the WDC's YARG grant and the State Board of Education's Closing the Skills Gap grant through the Apprenticeship Idaho coalition to ensure that employers and apprentices experience a seamless approach to services. This coalition has since expanded, and a funding committee now meets regularly to support the braiding of funds and success of funding recipients.

The Council's Work-Based Learning Committee group continues to work on the following priorities in support of career pathways:

- Develop a list of high-quality degree and non-degree credentials. Processes used by Education Strategy Group, Texas CTE, Ohio's TechCred programs, and Colorado's Talent FOUND are informing our approach.
- Develop career pathways specific to rural Idaho to be housed in the Next Steps website.
- Invest in ongoing and sustainable efforts to scale Registered Apprenticeship as federal resources decline.

Idaho Division of Career Technical Education (IDCTE) continues to be the lead in researching and developing career pathways. IDCTE houses both adult education and Perkins V programs. IDCTE oversees over 1,110 secondary career technical education (CTE) programs in Idaho's high schools, and over 200 CTE programs at six technical colleges housed within Idaho's public higher education institutions. IDCTE launched an initiative in 2016 to create statewide alignment between secondary and postsecondary CTE programs of study. A statewide articulation is in place for 100 percent of programs that have gone through program alignment. As new programs are created, they will also go through program alignment which will allow secondary students to articulate seamlessly into any Idaho institution that offers their program of study.

To support the statewide articulation framework, IDCTE developed Idaho SkillStack® - a microcredentialing /badging platform that communicates the competencies/skills Idaho high school and postsecondary students demonstrate. The microcredentials/badges are stacked and can lead to postsecondary credit for prior learning (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. Over 115,000 badges have been awarded to more than 32,000 unique learners since the system was implemented in the 15/16 school year.

Taking this effort to the next level, IDCTE developed career ladders for the most in-demand jobs in Idaho (where secondary and postsecondary 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 SkillStack® and the Next Steps Idaho website to provide an interactive solution for students, parents, teachers, and counselors. The technology platform will allow Idaho to add additional pathways as they are mapped and to continuously update the data so that the tool stays relevant.

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 the Title I-B, Trade, veterans, and Unemployment Insurance programs are administered by 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 SCSEP, 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 has served (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.

The WDC 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 five public listening sessions conducted with the Council, local governments, and economic development agencies show several opportunities for system improvement. First, this includes actionable messaging of the services and benefits available to both jobseekers and employers, leveraging technology where appropriate to support implementation. Combined plan partners have agreed to build communication materials that are accessible and appropriately targeted to all Idahoans, with a focus on older populations, underserved groups, and individuals with significant barriers to employment.
- **Build workforce system capacity to receive participants with more significant barriers to employment** – With effective outreach as identified in the previous focus area, Idaho's service providers may see an uptick in the number of individuals with higher barriers to employment accessing services across the state. Building the capacity of each provider and the system as a whole to serve these individuals is a key goal identified by Combined Plan Partners.
- **Service to youth** - Providing services sensitive to the needs of young people in diverse demographic groups who fall between the ages of 16 and 24 emerged as another high-priority goal. With an unemployment rate for 16- to 19-year-olds at 10.3% and 20- to 24-year-olds at 5.6%, these two groups make up two of the highest unemployment rates in the state and indicate a clear opportunity for employers in a tight labor market. In order to adequately serve youth, Combined Plan Partners have indicated that service which meets the needs of intersectional groups will be essential.

- **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 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:

- Youth
- Individuals with disabilities
- Older workers
- Formerly incarcerated individuals
- Members of racial and ethnic minorities
- Individuals living below the poverty line

Strategies to support these populations are intertwined throughout this plan, but specific efforts are described below.

- Youth - The economic and workforce analysis revealed that youth ages 16-24 are more likely to be unemployed than other age groups. Youth comprise a broad and intersectional group which by nature overlaps with other demographic groups, such as individuals with disabilities or those living below the poverty line. This group also includes students who are engaged in secondary education (ages 16-21), and those who are engaged in post-secondary education (through age 24), who are employed or seeking employment. Scaling a youth apprenticeship initiative in the state will support connections between these youth and quality careers before they leave high school. As the initiative grows, it 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 bachelor's or advanced degree. In addition to the postsecondary credential, the initiative is designed to reduce youth unemployment.
- Individuals with Disabilities - Idaho's population of persons with disabilities is increasing at a rate faster than the general population. Idahoans with disabilities participated in the labor force at a rate of 45.4%, compared to 62.4% for people without disabilities. The unemployment rate for individuals with disabilities was higher than the state's average unemployment rate across every type of disability. Unemployment rates ranged from 3.9% for individuals who are Deaf or hard of hearing, to 10.8% for individuals with a vision disability. Additionally, the Disability Compendium's *2023 Idaho Report for County-Level Data: Poverty* indicates that 21.9% of individuals with disabilities live below the poverty line. The same report shows that the poverty rate for

individuals without disabilities was 10% during the same time.

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. Both Title IV programs are working to expand work-based learning opportunities for youth and adults with disabilities who could benefit from this type of training opportunity. Business engagement services delivered throughout the state provide technical assistance to local businesses, in addition to a) training specific to disability-related accommodations for employees on the job, b) disability etiquette, and c) connections to an untapped and diverse labor pool, and d) education on job modification and retention of employees. Agency staff continue to improve their use of regional labor market information and the various career pathways to better inform individuals with disabilities of emerging high-demand, high growth industry sectors and occupations.

- Older Workers - As noted in the economic and workforce analysis, Idaho's population and economy are expected to see continued growth, and many of those moving to the state are over the age of 65. The workforce participation rate of this group is just 17.7%, providing an opportunity for employers to leverage these individuals for unfilled jobs. However, employers may need to modify their work environments or address cultural and accessibility 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.
- Members of racial or ethnic minorities - The majority of racial demographics in Idaho who do not identify as White alone face substantially higher rates of unemployment, ranging from 3.2% for people who are Asian alone, to 3.9% for White individuals, to 9.1% for American Indian and Alaska Native people, and 15.8% for individuals who are Native Hawaiian and Other Pacific Islanders alone. While there was not a substantial gap in employment rates for White and Hispanic or Latino individuals, educational attainment differs widely. Individuals who are White had the highest high school graduation rate of any racial demographic, while individuals from "some other race alone" had both the lowest high school (68%) and college (12%) graduation rates. 34% of White individuals have bachelor's degrees or higher, while only 15% of Hispanic or Latino individuals do. Differences in education and unemployment indicate an opportunity to improve education and training leading to careers for individuals of all races, a goal that will require workforce system support to achieve equitable results.
- Justice Involved Individuals - A successful economy and society must by necessity offer career and training pathways to individuals who have been involved in the justice system, reducing recidivism rates, lowering the cost of incarceration to the State, and supporting each individual to achieve the most they can. Additionally, given Idaho's low unemployment rates, employers cannot afford to overlook this talent pool. The Idaho Department of Corrections applied for, and received, a grant from the Lumina Foundation to create better pathways for justice involved individuals - 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. In addition, WIOA Title IB Youth funds are allocated to support a position within the Idaho Department of Corrections to meet with youth aged 18-24, who are being released to ensure they connect with career planners in the workforce system.

- Individuals Living Below the Poverty Line – The poverty line represented a substantial divergence for workers’ unemployment rates; people living at or above the poverty level experienced only 2.1% unemployment, while people living below that threshold experienced unemployment at 9.1%, a rate well over four times greater. Individuals with higher levels of education were much less likely to live below the poverty line. Individuals without a GED or high school diploma represented 20% of those in poverty in Idaho during 2022. These people, who often face multifaceted barriers to education and employment, merit special attention and support in the workforce system.

Other populations of special consideration:

- Veterans – Those who have served our country deserve additional support from the state’s workforce system. Efforts to build relationships and opportunities under the Department of Defense’s SkillBridge program have been successful yet delays from the Department of Defense have hampered expansion. In addition, the state’s Division of Veteran Services has been a key partner in aligning with the *Apprenticeship Idaho* 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. Idaho continues to work with the Department of Defense to receive information from servicemembers who indicate they are relocating to Idaho before they separate, however that has also seen delays from the DoD. 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.

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).

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:

1. Increases public awareness of and access to career education and training opportunities;
2. Improves the effectiveness, quality and coordination of programs and services designed to maintain a highly skilled workforce; and;
3. 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.

Since that time, the Idaho Workforce Development Council has been tapped to provide additional workforce supports to facilitate economic growth in the state. Fifty million in ARPA funds were directed to the Council to invest in workforce training. An additional \$30 million in ARPA funds were provided to establish a grant program to expand childcare in Idaho.

Implementation of State Board Functions

The Workforce Development Council 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 for Idaho's two workforce areas.

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, along with the state's Townhall 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 Work-Based Learning Committee, the Workforce Development Policy Committee, the Grant Review Committee, the One-Stop Committee, and the Outreach Committee. There are three ad-hoc committees operating at this time - the Child Care Expansion Grant Committee, the CNA Advisory Committee, and the LAUNCH Key Performance Indicator 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:

Work-Based Learning Committee

The Work-Based Learning Committee leads the development of replicable and sustainable work-based learning opportunities. The Committee is charged with cultivating a nimble system under the Idaho Leader framework (Learn About Work. Learn Through Work. Learn At Work) to ensure that high-quality programs are available throughout the state. They also help promote the opportunities and benefits of work-based learning to employers, individuals and influencers.

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 also charged with developing an annual projection of needs for state investment into workforce development activities.

Grant Review Committee

The Workforce Development Council is responsible for approving expenditures (i.e. awards) of the state-funded Workforce Development Training Fund. 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 makes recommendations to the Council. The Grant Review Committee is chaired by a member of the Executive Committee.

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.

Outreach Committee

The Outreach Committee is responsible for increasing public awareness of, and access to, career education, work-based learning, training opportunities, and supporting knowledge of workforce development training fund programs. The committee drives the coordination across state agencies, education and the private sector to meet these objectives.

Child Care Expansion Grant Committee

The Child Care Expansion Grant Committee exists to make recommendations on the Child Care Expansion Grant Policy to the Council, and also to accept and adjudicate childcare grant applications.

CNA Advisory Committee

The CNA Advisory Committee is tasked with recommending a statutory framework for the governance of nursing assistants in Idaho; including talent pipeline development, education of CNAs, and a uniform disciplinary process.

LAUNCH Key Performance Indicator Committee

The LAUNCH KPI Committee is a temporary committee created to set performance measures that help to determine the effectiveness of Idaho LAUNCH.

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. When the Council is meeting virtually, or when a member feels the action item has the support of the Council, the member can request unanimous consent. The Chair still requires a second and provides an opportunity for discussion. The Chair then offers members the ability to object and if an objection is made, a roll call vote is taken. If no objections are made, the motion passes. In order for a decision to be binding, a quorum of members must be present at the time the vote takes place. Recommendations 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 28, 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, Jobs for Veterans State Grant, 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, Jobs for Veterans State Grant, 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 Division of Career Technical Education (IDCTE). IDCTE, 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 28: Core Program Activities Aligned with Strategy Implementation

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
Idaho Department of Labor-WP,WIOA Title I-B, TAA, JVSG, & UI	Continue to promote the department’s 38 mobile locations across the state, which can reach more Idaho residents than through simply the states’ 8 AJCs.	As the One-Stop Operator, coordinate outreach among local One-Stop partners to connect with underserved populations across the .state. Work with State Board of	As the state’s WIOA Youth service provider, lead the state’s effort to meet the needs of its youth by providing the services they need to achieve success.	Utilize the state’s updated WIOA ETP policy which was developed to ensure the availability of training in the state for occupations with established career pathways.

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
	<ul style="list-style-type: none"> -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. -Present employers a series of webinars to provide an overview of programs and services, including tax compliance, unemployment insurance, apprenticeships, wage and hour and labor market information. 	<ul style="list-style-type: none"> Education to ensure WIOA Eligible Training provides offer high quality education experiences. -Open appropriate work-based learning opportunities for eligible participants in each Title I-B program. -Established a monthly provider call to provide AJC and WIOA staff with valuable tools, resources, and information to help support current and potential customers. These meetings encourage creativity, communication, and collaboration. Guest speakers include staff from veteran services, the Work Opportunity tax credit and the Idaho Council for the Deaf and Hard of Hearing to discuss their services and collaborative options. 	<ul style="list-style-type: none"> -Target justice-involved youth in or recently released from the Idaho Department of Corrections to help them achieve a self-sustaining means and avoid any chance of recidivism. -Through its 38 mobile service locations, ensure that One-Stop services are available; to youth customers in rural communities across Idaho. 	<ul style="list-style-type: none"> -Expand currently successful efforts working with employers to develop registered apprenticeships for their in-demand occupations. -Focus on sector priorities established by the Workforce Development Council aligned with regional labor needs. -Reach out and consult with businesses in targeted industries to better understand their workforce needs and help provide solutions by coordinating education and workforce resources.
Idaho Division of Career Technical Education- Adult Education	<ul style="list-style-type: none"> -Coordinate with other WIOA partners in marketing of career services to current and prospective adult education populations -Coordinate training of Title II subgrantees on services provided by other WIOA partners -Facilitate embedding of WIOA partner services at adult education locations and within adult education programming. 	<ul style="list-style-type: none"> -Train Title II subgrantees in the use of the statewide MIS to find and interpret data related to barriers to employment; train subgrantees on leveraging this data to better serve individuals with barriers to employment; -Provide evidence-based training and technical assistance related to unique barriers, goals, and workforce system resources for high barrier individuals. 	<ul style="list-style-type: none"> -Fund training which focuses on evidence-based practices for serving adult education students aged 16 to 24; deliver this training to Title II subgrantees; -Enhance career services and training resources and delivery within adult education programs, particularly for integrated education and training (IET) participants who are aged 16 to 24; -Research and address barriers to GED attainment 	<ul style="list-style-type: none"> Invest in training and technical assistance to support development of integrated education and training (IET) in partnership with business and industry, post-secondary education, apprenticeships, and WIOA partners. IET is an evidence-based adult education delivery model for early career pathway technical skills development and is an ideal strategy for adult education participants aged 16 to 24, especially considering Idaho Launch opportunities

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
			for participants who are aged 16-24.	for this same demographic.
Vocational Rehabilitation Programs- Idaho Division of Vocational Rehabilitation & Idaho Commission of The Blind and Visually Impaired	-Improve program visibility including improved marketing tools for both employers and people with disabilities with core Programs, including materials for coordinating business services. -Continue to work with One-Stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities. -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.	-Work with WIOA Combined Plan Partners on best practices when working with individuals with disabilities by providing Title-IV expertise through the provision of customized training and technical assistance to better improve co-enrollment experiences and reduce barriers to employment for this population. -Title-IV programs have specifically committed to outreach to unserved and underserved populations and is seeking to work closely with combined plan partners and others outside the workforce development system to identify impactful and tailored methods of outreach to best promote appropriate referral. Title-IV programs will leverage specific program expertise (e.g., Title-I WIOA Youth/refugee assistance organizations) where appropriate to identify and inform populations on available services.	-Title-IV programs have specifically committed to outreach to unserved and underserved populations with a special focus on youth and is seeking to work closely with combined plan partners and others outside the workforce development system to identify impactful and tailored methods of outreach to best promote appropriate referral at the intersection of youth and populations with significant barriers to employment. Title-IV programs will leverage specific program expertise (e.g., Title-I WIOA Youth/community youth organizations) where appropriate to identify and inform populations on available services.	-Work with Combined Program Partners to provide customized training and technical assistance on working with individuals with disabilities to better improve co-enrollment experiences. -Contribute to the sector approach established by the WDC. -IDVR will Implement Key Performance Indicators by Position strategy which ties individual staff performance to employment rate, successful rehabilitation volume, and quality of LMI outcome across various indicators. This strategy contains KPIs at multiple organizational levels with the ultimate outcome of placing more Title-IV customers in Idaho in-demand positions. -Continue to focus on and train staff to use IDOL or other quality sources of local area LMI (e.g., Career Index Plus,) to better inform customers' employment goal selection using a career pathways strategy to identify in-demand quality jobs, including use of DOLs in-demand and quality jobs list, that are a match for the customer. -Track business services

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
				<p>provided/delivered by staff and report this information to WDC monthly. Use data on a regular basis to iterate strategy.</p> <ul style="list-style-type: none"> ·Participate in state level quarterly meetings of the core program business service teams for an aligned coordinated business outreach approach to include a focus on local area improvements. ·Business outreach team (BOOST) for each region has been established by IDVR and the Commission to strategize and coordinate regional services and to participate in WIOA regional employment teams. ·Working with combined plan partners to advance quality and appropriate referral and outreach utilizing regional BOOST teams for ongoing communication and collaboration. ·Leveraging IDOLs local area economists and LMI data to create Hub specific labor market information sheets to support informed counseling and guidance around quality vocational outcomes specific to the local area. ·Leveraging IDOLs local area economists to educate and inform IDVR staff about the labor market conditions that exist in their community, and

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
				<p>projections that indicate which jobs will be there in the future.</p> <ul style="list-style-type: none"> -Identification of businesses for outreach which align with Title-IV quality job characteristics (quality employers). -Title-IV programs can provide graduate training to Idahoans with disabilities. Combined plan partners are encouraged to refer individuals with disabilities who are seeking graduate or higher-level education to best promote a career pathways strategy for Idahoans with disabilities. -Title-IV programs will continue to explore similar tools for pathways common to quality VR outcomes and those that have seen promise from other combined plan partners. -Increase utilization of Idaho Launch and Next Steps Idaho initiatives of Idaho's WDC. These tools and resources are intended to skill-up Idaho's workforce and serve as comparative benefits to IDVR customers seeking a wide array of career pathways. -Work with IDOL as sub awardee of their apprenticeship grant (SAEEL) opportunity to expand apprenticeship career pathway opportunities to

Core Program Activities Agency/ Program	* Improving Public Awareness and Access to the Workforce System	Build workforce system capacity to receive participants with more significant barriers to employment	Service to Youth	*Career Pathways/ Sector Approach
				Idahoans with disabilities.
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 29, which follows:

- Idaho Department of Labor Programs - includes WIOA Title I-B and Title III, and Combined Partner programs of Trade Adjustment Assistance, Jobs for Veterans State Grant, and Unemployment Insurance
- Title II - Adult Education
- Title IV - Vocational Rehabilitation Programs
- Combined State Plan Partner - OAA Title V - Senior Community Service Employment Programs

State plan partners continually seek ways to establish partnerships with entities outside WIOA to expand programs' reach to areas where they may have a limited presence. The state's library system has served as prime example of this effort. The Idaho Department of Labor, Idaho Division of Vocational Rehabilitation, and adult education have all utilized the state's library

system to serve as alternative locations where outreach staff can provide services outside American Job Centers or their own program offices.

Informal agreements have also been established with other entities, such as non-profit organizations, cities, and counties across Idaho which have also served to fill this need. Many individuals seeking their specific services have also demonstrated a need for One-Stop services which partners can help meet while visiting these locations.

Table 29: Core Program Activities Aligned with Strategy Implementation

Activities Outside Plan Agency/ Program	* Improving Public Awareness and Access to the Workforce System	*Build workforce system capacity to receive participants with more significant barriers to employment	*Service to Youth	*Career Pathways/ Sector Approach
Idaho Department of Labor-WP,WIOA Title I-B, TAA, JVSG, UI	<ul style="list-style-type: none"> ·The department’s JobScope career and educational training search tool provides users information about occupations, wages, worker demand, employment levels, training, and certifications and degrees. ·The department provides information about the programs it administers through a variety of media, including publications, its website, and social media to ensure that job seekers and employers across the state have access to the information necessary to meet their workforce needs. ·Present small- to medium-sized businesses on the topics of harassment prevention, respectful workplace and disability accommodations, including ethics and workplace conduct training with IDVR. 	<ul style="list-style-type: none"> ·Promote the registered apprenticeship model across the state to help reach underserved populations across the state in an effort to address this opportunity gap that many with employment barriers face. These opportunities are available not only through various grant recipients such as the IDOL, but also the WDC. Many of their subrecipients, such as the Idaho Department of Corrections and Idaho Division of Vocational Rehabilitation, can help not only those needing employment assistance but also employers willing to pursue these efforts to meet their workforce needs. 	<ul style="list-style-type: none"> Although Idaho’s WIOA Youth program exclusively targets Out-of-School youth, AJC staff use an already robust referral system to provide career services for any in-school job seeker. 	<ul style="list-style-type: none"> ·With the department’s JobScope, users can choose which career pathway to follow, based on the data it provides so one can make an informed decision about careers and education. ·The Idaho Department of Labor’s Research and Analysis Bureau. is responsible for developing and publishing labor market information and. industry scans for the targeted sectors. Designed 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 the high-demand occupations within them.
Idaho Division of Career Technical Education-Adult Education	WIOA Title II subgrantees operate in multiple off-site location in rural and	The State Office of Adult Education and its subgrantee partners participate in the	Adult education programs in Idaho, based in community colleges and correctional	Adult education is working with community colleges and Idaho Department of

Activities Outside Plan Agency/ Program	* Improving Public Awareness and Access to the Workforce System	*Build workforce system capacity to receive participants with more significant barriers to employment	*Service to Youth	*Career Pathways/ Sector Approach
	underserved areas of Idaho. These include in local libraries, community centers, and other outreach locations. Additionally, programs have, and will continue, to expand online program services.	development of integrated education and training (IET) and integrated English language and civics education programming with business, industry, and post-secondary partners across the State, including within the corrections system.	facilities, partner with post-secondary institutions to assist youth in transitions to college or workforce training programs. Programs also partner with juvenile detention facilities to provide adult education services, coordinate with Trio.	Corrections to expand development of integrated education and training. Employer partners for the development of these career pathway programs include Micron, Bureau of Land Management, Apple, Idaho OnRamp, and several agricultural employers.
Vocational Rehabilitation Programs - Idaho Division of Vocational Rehabilitation & Idaho Commission of the Blind and Visually Impaired	<ul style="list-style-type: none"> •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. •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. 	<ul style="list-style-type: none"> •Work with community partners, businesses, and others to provide customized training and technical assistance on working with individuals with disabilities (e.g., IDVR's WinCo Wins and Create Common Good projects). •IDVR specifically has committed to outreach to unserved and underserved populations and is seeking to work closely with community partners and others outside the workforce development system to identify impactful and tailored methods of outreach to best promote appropriate referral. These priorities will be informed by field management, Idaho's SRC, Commission, and other stakeholders. •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 (e.g., virtual) to expand 	<ul style="list-style-type: none"> •Targeted outreach to community youth organizations: Engage with community partners connected with students and youth with a focus on youth with barriers to employment (e.g., foster care, homeless, IDJC/justice involved) to inform programs on Title-IV services and promote meaningful referral of youth. •Continue to leverage Pre-ETS connection strategy to establish early and career long relationships with Idaho's students. •Expand WBLE to youth and students via business partnership, use BET to help improve outreach and quality of summer WBLEs. 	<ul style="list-style-type: none"> •Continued support of career advancement services (2-yr, 4-yr, apprenticeship and graduate training to advance participants career pathways. •Continue to focus on and train staff to use quality sources of local area LMI (e.g., Career Index Plus,) to better inform customers' employment goal selection. •Collaborate closely with IDOC as the other sub-awardee of IDOL's apprenticeship grant (SAEEI) to expand apprenticeship opportunities to Idahoans with disabilities including significant barrier population to employment (justice-involved). •Working to develop Title-IV specific pre-apprenticeship project collaborating with businesses to inform the

Activities Outside Plan Agency/ Program	* Improving Public Awareness and Access to the Workforce System	*Build workforce system capacity to receive participants with more significant barriers to employment	*Service to Youth	*Career Pathways/ Sector Approach
		<p>options in Idaho's rural, remote, and underserved communities.</p> <ul style="list-style-type: none"> •Continued rural/statewide outreach to all LEAs additionally this focus should help to capture more of Idaho's young but growing Hispanic population. •Monitor impact of expansion of CRP certification pathways to encourage establishment of new CRPs in remote, rural, and underserved areas. •Title-IV BOOST teams will conduct outreach with businesses and business groups to provide customized training and technical assistance on working with individuals with disabilities (e.g., reasonable accommodations, disability etiquette, and other specific training as requested by employers). •Educating businesses in on-the-job training opportunities which may meet business needs and increase relevant pathways to employment for Title-IV customers. 		<p>project.</p> <ul style="list-style-type: none"> •Piloting a project with Nampa school district and North Idaho College to develop pre-apprenticeship training for individuals with disabilities. •IDVR will Implement Key Performance Indicators by Position strategy which ties individual staff performance to employment rate, successful rehabilitation volume, and quality of LMI outcome across various indicators. This strategy contains KPIs at multiple organizational levels with the ultimate outcome of placing more Title-IV customers in Idaho in-demand positions. •Continue to explore similar tools for pathways common to quality VR outcomes. •Working with businesses to advance quality and appropriate referral and outreach utilizing regional BOOST teams for ongoing communication and collaboration. •Strategic targeting of businesses for outreach which align with Title-IV quality job characteristics (quality employers).
Idaho Commission on	•Provide referral information to outside organizations that		Continue providing servicing in rural counties as identified	

Activities Outside Plan Agency/ Program	* Improving Public Awareness and Access to the Workforce System	*Build workforce system capacity to receive participants with more significant barriers to employment	*Service to Youth	*Career Pathways/ Sector Approach
Aging - SCSEP	provide information and assistance, such as, Centers for Independent Living and the Area Agencies on Aging.		by U.S.DOLUSDOL in the SCSEP equitable distribution (ED) report	

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.

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 One-Stop Committee, 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), Jobs for Veterans State Grant (JVSG), 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 and 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 and 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 Homeless Veterans Reintegration 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.

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 Division of Career Technical Education) ensures policy alignment with other partner programs at the state level through participation on the WIOA Advisory Group. IDCTE 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 collocated 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 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.

Collectively, Title IV programs are available to provide technical assistance to WIOA program partners, Idaho’s employers, and other stakeholders on diverse aspects of disability employment.

Idaho Division of Vocational Rehabilitation

Coordination of service provision takes place at the local area level. Local agreements are established among One-Stop partners that facilitate cross-program communication and include arrangements for cost sharing to maximize utilization and impact. The Division supports informational training on programs. The Division continues to support coordination and co-location with the Idaho Department of Correction.

Additionally, for those that are eligible for the program, IDVR can provide supportive time-limited services, such as transportation for individuals or through vendors to provide services in rural and underserved areas identified and approved by the Division.

IDVR continues to work on the promotion of co-enrollment (where indicated) within the agency with the goal of developing plans and infrastructure to promote proper, appropriate, impactful, and frictionless co-enrollment and referral.

Idaho Commission for the Blind and Visually Impaired

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

- Work collaboratively with the Idaho Educational Services for the Deaf and Blind (IESDB) to identify students with blindness or visual impairments at an early age for Pre-Employment Transition Services.
- Provide Rehabilitation Technology services and training throughout the state via a state-wide assistive technologist
- Provide alternative skills of blindness training via regional Instructors of the Blind and the Assessment and Training Center (ATC) in Boise.
- 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.

In addition to the agency-specific activities outlined later in this section, the Combined State Plan programs, via the One-Stop Committee, have been working towards a coordinated approach to visit/serve employers, and utilize a continuous improvement approach at the local and regional level. Regional business development teams have met and are working towards establishing action plans. 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 regarding 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, Jobs for Veterans State Grant 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 WIOA 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, via Idaho LAUNCH, is administered by the Workforce Development Council and designed 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 Division of Career & Technical Education, which employs a Communications Manager. This position coordinates major initiatives with the public and with Idaho employers on behalf of IDCTE. The IDCTE administrator also sits on the Workforce Development Council, which facilitates major statewide employer outreach initiatives.

The State Director attends Council meetings and collaborates with IDCTE and Department of Labor staff to identify and understand the high-level needs of employers across the state. The State Director, in conjunction with IDCTE, uses this information, including current economic indicators provided by the Idaho Department of Labor, to prioritize services authorized under Title II. IDCTE 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’s Business Relations Coordinator leads business engagement activities for IDVR with WIOA combined plan partners.

The Division is continuing to develop strategies internally to advance the unified approach for coordinating business engagement activities with outside agencies and partners. IDVR staff completed the Technical Assistance Training for Unified Business Services with the identified Idaho business services partners that was hosted by Idaho Department of Labor (IDOL). Through this training, IDVR staff gained information on the value and importance of coordinated efforts for business services, and information to help with identifying when to partner and how to discuss the supports of the workforce partners with businesses.

Additionally, IDVR is participating in the One-Stop teams across the state with our WIOA partners and assuring a presence within these groups. Furthermore, the Division will be coordinating with the apprenticeship program grant under Idaho Department of Labor which seeks to increase access to and the quality, and quantity of referrals to apprenticeship programs for customers with disabilities. As part of this collaboration, the project will fund an Apprenticeship Coordinator demonstration position housed at IDVR. This position will serve as a liaison between IDVR and IDOL’s Apprenticeship Team and will bring expertise on how employers can support individuals with disabilities to be successful in their apprenticeship programs. Furthermore, the Division alongside WIOA plan partners will be moving forward with utilizing a common data HubSpot for business services data. HubSpot helps to assure that the Division can understand the efforts of partners with business, share relevant information, and to collaborate more effectively to meet business needs through the unified services strategy employed across Idaho WIOA plan partners.

Idaho Commission for the Blind and Visually Impaired

The Commission participates in all of the regional One-Stop activities. The Commission also provides on the job assistive technology assessment and training services for employers who have employees participating in the VR program at the Commission. The Commission also conducts regional trainings about blindness and visual impairments periodically throughout the year that employers can participate in.

In Fall 2021, the Commission entered into an agreement with the VR Technical Assistance Center (VRTAC-QE) for intensive technical assistance with Business Engagement. The Commission is committed to improving and strengthening services to businesses in Idaho. In addition, the Commission works collaboratively with the Idaho Division of Vocational Rehabilitation to ensure a unified Title IV approach to state-wide business engagement activities.

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 AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

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: the Idaho Workforce Development Council, Idaho Division of 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 Idaho 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 Workforce Development Board, the Idaho 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. These Council members directly connect the Council to Idaho's education institutions, supporting the creation of job-driven education.

The Workforce Development Council has also directed the investment of Industry Sector Grants, Employer Grants, Innovation Grants, and Idaho LAUNCH 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 identify and meet gaps in the workforce. 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. 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 LAUNCH began in November 2020 to provide an opportunity for any Idahoan to access short-term workforce training, aligned to employer needs. LAUNCH pays for 80% of the cost of the training, up to \$5,000. The only requirement is that the individual plan to work in Idaho after completion of training. Employer grants provide customized training for expanding Idaho businesses.

Idaho Division of Career Technical Education

Idaho Division of Career Technical Education (IDCTE), which administers both the WIOA Title II and Perkins V programs, is essential in connecting workforce programs with career and technical education (CTE), engaging the State's technical colleges, and guiding the development of meaningful career pathways. IDCTE also coordinates with the state's Workforce Training Centers, which includes the directors of the Workforce Training Centers located at Idaho's six technical colleges. The Workforce Training Centers leverage best practices and develop statewide solutions to meet the talent needs of Idaho's employers.

IDCTE supports CTE programs at Idaho's technical colleges through both state and federal funds. For the past four years, IDCTE 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 wait lists existed to access these programs. Based on this request, the Governor supported the request to have the Idaho State legislature provide an additional \$4.75 million for adult education during FY21.

At the secondary level, IDCTE expanded 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. IDCTE is providing professional development for CTE faculty on creating high-impact TACs and created a mechanism to allow for state-level review of the activities of local TACs to inform its strategic planning.

Idaho Commission for the Blind and Visually Impaired

The Commission participates in all of the regional One-Stop activities. The Commission also provides on the job assistive technology assessment and training services for employers who have employees participating in the VR program at the Commission. The Commission also

conducts regional trainings about blindness and visual impairments periodically throughout the year that employers can participate in.

In Fall 2021, the Commission entered into an agreement with the VR Technical Assistance Center (VRTAC-QE) for intensive technical assistance with Business Engagement. The Commission is committed to improving and strengthening services to businesses in Idaho. In addition, the Commission works collaboratively with the Idaho Division of Vocational Rehabilitation to ensure a unified Title IV approach to state-wide business engagement activities.

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 IDCTE, private and proprietary schools, and the Workforce Training Network collaborated to develop WIOA ETP 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 requirement.

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.

Multi-Agency Coordination

Earlier this year, the Workforce Development Council and Administrative Entity staff within the Idaho Department of Labor updated and finalized ETP criteria. These criteria are to be implemented in January 2024, and serve to ensure that providers are WIOA compliant to meet the needs of Idaho residents seeking training through Title I-B services.

Currently, 88.8% of the state's WIOA eligible training provider programs are provided through Idaho's community colleges and technical education schools. As noted earlier, these programs are well integrated into the workforce development system. The remaining programs listed are offered by state universities, out-of-state providers, approved in-state providers, and Registered Apprenticeship Programs.

The Workforce Development Council, 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 consistent with the public institutions. The result is 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. Union-based apprenticeship programs are available on the WIOA Title IB Eligible Training Provider list and the Idaho AFL-CIO's president is represented on the Workforce Development Council. In addition, the state has three federally-funded apprenticeship grants under the umbrella of *Apprenticeship Idaho*, including the State Apprenticeship Expansion, Equity, and Innovation grant; the Youth Apprenticeship Readiness Grant; and the Closing the Skills Gap grant. Each one involves employers, unions and many other stakeholders, including traditional and nontraditional training providers, including online training opportunities.

As a 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.

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, Employer, 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, launching the BSU Cyber Operations and Resilience program (available as an undergraduate certificate, and undergraduate degree, a graduate certificate, and a graduate degree), providing state of the art medical equipment to Idaho State University, supporting hybrid training opportunities for water systems operators, 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.

F. 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. These strategies include (1) improving public awareness of and access to the workforce system, (2) service to youth, (3) refining career pathways/sector partnerships, and (4) building workforce system capacity to serve individuals with high barriers to employment.

Each item above is closely related. With an already low unemployment rate, efforts to improve public awareness of and access to the workforce system may result in an opportunity to serve individuals who have higher barriers to employment than those we have typically served in the past. Enhancing our ability to provide that service in advance will improve outcomes for the public. Youth, including youth in intersectional demographics, are one specific group with higher barriers to employment that Combined Plan Partners have determined to provide more targeted support for. Given Idaho's low go-on rate (37% in 2021), this focus is expected to yield improved connections to college and career training, therefore improving access to postsecondary credentials.

Additionally, program participants of all ages can benefit from career pathways and sector partnerships, which support both their entrance and success in a given career. These career pathways will include Registered Apprenticeship Programs and are likely to involve Quality Pre-Apprenticeships as a method to simultaneously meet the needs of employers and individuals.

As outlined in Section (II)(c)(1), the State's strategy for implementing well-aligned career pathways relies collaboratively on efforts of Talent Pipeline Management specialists and work by the Idaho Division of Career Technical Education (IDCTE). These efforts include articulation between secondary and postsecondary technical programs across the state, including pre-apprenticeship and Registered Apprenticeship training opportunities, as well as the ongoing support of SkillStack®, IDCTE's microcredentialing/badging platform. Information about these projects is reiterated below, for ease of reference:

IDCTE oversees over 1,110 secondary career technical education (CTE) programs in Idaho's high schools, and the six technical colleges housed within Idaho's public higher education institutions. A statewide articulation is in place for 100 percent of programs, allowing secondary students to articulate seamlessly into any Idaho institution that offers their program of study.

To support the statewide articulation framework, IDCTE developed Idaho SkillStack® - a microcredentialing/badging platform that communicates the competencies/skills that Idaho high school and postsecondary students demonstrate. The micro credentials/badges are stacked and can lead to postsecondary credit for prior learning (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.

TANF/SNAP recipients have the opportunity to receive postsecondary training and education to obtain necessary credentials for employment. Once an individual is determined eligible for TANF or SNAP benefits, they referred to the E&T program. The E&T program will then refer

eligible individuals to community-based organization, providers, and state and local college partners who offer specialized training and education programs.

IDVR Title IV continues to adapt approaches to increase access to postsecondary credential opportunities including providing up to full support for tuition and books for two-year, four-year, and graduate degree programs. Furthermore, the Division is advancing its approach to postsecondary credentialing through:

- IDVR is involved with SAEEI to further apprenticeship opportunities and is also working on a Pre-Apprenticeship program to demonstrate the benefits of apprenticeship pathway to students.
- Continued evaluation and collaboration with multiple school districts and the IDVR Transition Team in conjunction with Title II CTE to improve access and utilization of CTE tools and services (including those leading to postsecondary credentials). Districts involved in contracted CTE agreements include Blackfoot School District, Boise School District, College of Eastern Idaho, Madison School District, Nampa School District, Snake River School District, and Sugar Salem School District.

The Idaho Commission for Libraries continues to be a valuable partner toward expanding options for workforce participants, especially in rural communities, across the state. Libraries continue to invest in building digital access spaces to provide even greater access to those residents working to fulfill their education requirements, trying to ensure that all Idahoans have the skills, equipment, and support to participate fully in the digital economy.

G. 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.

To better understand and support the needs of Idaho's diverse regions while also leveraging the integral involvement of economic development agencies, four of the five listening sessions conducted in 2023 were held with regional economic development agencies. These include the Clearwater Economic Development Association, the Region IV Economic Development Association, the Southeast Idaho Council of Governments, and the East-Central Idaho Planning and Development Association dba Altura. Additionally, representatives of local and state government who often engage with economic development were involved in listening sessions via the Workforce Development Council itself. To ensure ongoing collaboration between the workforce system and economic development, the Director of Idaho Commerce is involved as a council member.

Improving Public Awareness and Access to the Workforce System

Partners plan to collaboratively create an outreach package with mutually agreed upon messaging and contact information. Afterward, each partner will deploy the collateral using the channels most appropriate to the individuals and employers they serve. These packages will be shared with economic development agencies to distribute locally relevant information with each region. Two-way communication from economic development agencies that clarifies the needs of each region will be used to refine outreach methods and identify gaps in service.

Outreach via high-utilization resources such as food banks and libraries across the state may also be used to improve reach.

Further, the WDC has placed eight Talent Pipeline Management (TPM) professionals across the state's six regions, with two additional managers providing statewide support. These individuals coach employers through the TPM process and have already begun work with over a dozen companies in the food processing, health care, and construction industries.

Service to Youth

Young people and their career readiness were the sixth most mentioned topic in the listening sessions, coming in above both housing and wages, and Idaho's youth aged 16-19 presently face one of the highest unemployment rates of any demographic group in the state. With an ongoing worker shortage that is only expected to grow as Idaho's largest generation of workers retires, economic development has a vested interest in the upskilling and employment of youth. Service to youth will be coordinated with economic development agencies using Idaho LAUNCH, the in-demand careers list, regionally based education and training through the community colleges, and through inter-agency collaboration with Combined Plan Partners.

Now that Idaho LAUNCH has been expanded to fund education and training for graduating high school seniors pursuing an in-demand career, the program is prepared to serve Idaho's youth directly. Local government representatives and economic development agencies have expressed a strong interest in the program, as it has the potential to improve Idaho's go-on rate, keep youth in their local communities, and prepare a workforce ready for Idaho's jobs. The WDC will continue to administer the program and actively collect data to support program improvement.

LAUNCH relies on the in-demand careers list, which is updated regularly by the Idaho Department of Labor to identify which educational pathways are covered under the program. This list is designed to ensure that students and trainees receive training for jobs that actually exist, meeting the needs of Idaho's employers. Finally, through grants and professional collaborations with Idaho's colleges and universities, region-specific education and training will be developed.

Partnerships with training providers and educational institutions will become even more important as Idaho begins training individuals to fill jobs created by Idaho's two Tech Hubs in nuclear energy and aerospace technology, plus the jobs created by CHIPS funding and other recent federal investments.

Finally, service to youth in intersectional demographics (for instance, a sixteen-year-old English language learner or a nineteen-year-old with a disability) will be supported by ongoing collaboration between combined plan partners, by identifying and better coordinating all services and supports relevant to youth.

Career Pathways

Education and training came up frequently in listening sessions with economic development groups, often in conjunction with career pathways. To satisfy Idaho's dual need for skilled workers and quality jobs, Talent Pipeline Management will be leveraged to better connect education with employment to create career pathways in top industry sectors in health care, technology, and construction.

Grants through the Workforce Development Training Fund continues to connect employers, job seekers, education, and economic development. Grants from the WDTF are available in four categories:

- Employer Grants – 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 within the community’s workforce.
- Outreach Projects – these grants fund proposals that provide public information and outreach on career education and workforce training opportunities, including opportunities not funded by the Workforce Development Training Fund.
- LAUNCH grants – Idaho LAUNCH has been deployed to connect workers to in-demand careers by paying for short term training that yields the skills and credentials employers need. Members of local governments and economic development agencies expressed enthusiasm and support for the program in several listening sessions.

Build workforce system capacity to receive participants with more significant barriers to employment

Recognizing that Idaho has experienced consistently low unemployment during our recovery from the COVID-19 pandemic, Combined Plan Partners have determined a need to improve outreach to marginalized, underrepresented, and underserved individuals who may not have accessed or had access to the workforce system in the past, and who may have more significant barriers to employment. Partners will actively collaborate to provide quality service that meets the needs of both individuals and employers.

This effort is particularly important as the workforce shortage was the second most mentioned challenge in the listening sessions, largely by economic development agencies. A shortage of skilled workers has begun to impact businesses’ capacity and hours of operation, therefore affecting their bottom line.

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 Division of Career Technical Education, continues to invest in IDCTE Digital through, online career-and-technical education courses to serve rural students who don’t have access to live IDCTE programs.

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—

1. THE STATE OPERATING SYSTEMS THAT WILL 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 state's workforce development system, and to guide implementation of the Combined State Plan strategies and goals, the Idaho Workforce Development Council utilizes numerous subcommittees and working groups that meet regularly 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 WIOA. 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 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, and engages 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 align policy and planning with the WDC's goals, all while meeting the regulatory requirements of WIOA. Advisory group members also help to promote the alignment of programs with the overall goals and strategies found in the Common Elements portion of Idaho's 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. Additionally, a Project Coordinator has been added to the WDC's staff to increase capacity to support and lead collaborative efforts to achieve the goals identified in the Combined State Plan. Members of both the WIOA Advisory Group and the One-Stop Committee participated in an all-day State Plan strategic planning session, where results from the five listening sessions and the Economic and Workforce Analysis were presented and discussed. This group then developed focus areas under each goal based on this collaborative sharing and analysis of information.

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 an earlier Workforce Data Quality Initiative (WDQI) grant, the state rallied its core WIOA programs to coalesce various data sets for the purposes of program evaluations, outcomes reporting, and predictive analysis. Building upon the existing SLDS, WDQI allows for data exchange between disparate MISs while maintaining appropriate data security and compliance requirements. Core program partners came together to establish a shared data validation policy, incorporating procedures unique to each agency's program design. This project concentrated on two fronts –interagency policy development and technical development – to assist Idaho's core partners under WIOA in the exchange of limited data. With core partners working together, Idaho leverages resources to enhance performance outcomes, improve federal reporting, and ensure timely communication of achievements.

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), Registered Apprenticeship], and Trade Adjustment Assistance (TAA)), and employment and wage records (inclusive of Unemployment Insurance (UI) wage and benefits data). Also included is LAUNCH, the Workforce Development Council's grant program for short-term training opportunities. *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 (the Commission) utilizes their own customized case management system (ORION). In an effort to streamline service, the Commission is requesting funds from Idaho's Joint Finance and Appropriations Committee to begin using Aware as well; this will be determined in spring of 2024. Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Division of Career Technical Education (IDCTE), 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. This approach incorporates these concerns, as Idaho's One Stop system works within the federated structure rather than against it, ensuring a better fit for the state.

The state’s education and wage record data feeds 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, including 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.

Along with Jobscape, Idahoans can also tap into Next Steps, a comprehensive clearinghouse of information and resources for college and careers. A product of Idaho’s Office of the State Board of Education, it offers career assessments, college and career planning, and financial aid resources. Next Steps is designed to support and guide Idahoans at different stages of life as they seek education, training, career changes or advancement, and pursue their “dream job.”

Each WIOA core program utilizes its own Management Information System (MIS) to collect and report data for program management, case management, and federal reporting purposes. Listed on the following table are these various MISs and the respective agencies and programs that use them:

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). Note: the Commission may transition to Aware in spring of 2024, depending on funding decisions by Idaho’s Joint Finance and Appropriations Committee.	Primary case and information management system
LACES (Literacy, Adult, and Community Education System)	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 management information 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

MIS	Agency (WIOA Title)	Function
		determine eligibility and file claims, and by staff to process and track claims.
<i>SPARQ & 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.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (FOR EXAMPLE, 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 AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

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, alignment with the strategies identified in this Combined Plan, and to 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 such policies 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.

Since the development of the 2020 State Plan, the State of Idaho, along with several other states, was selected to participate in Georgetown University's *DataLabs: Roadmap to Recovery* program. Idaho sought to obtain technical assistance to explore available solutions to address its struggles in implementing a universal or common intake process for participants in the workforce ecosystem. Along with this, it also sought to discover data sharing and co-enrollment options which other states had implemented, solidifying Idaho's commitment to a solution to make the referral process more efficient and customer-focused. The project lasted from the fall of 2021 through the late spring of 2022. By the program's end, one participating state found success; but, as the remaining states' projects did not succeed, Idaho's work group came to realize they had to completely reevaluate the starting point in the pursuit of a common intake process. They determined that the successful state's intake process was not financially feasible for Idaho's One-Stop Partners. The partners, instead, continue to focus on staff training, quality

referrals, efficient use of available resources, and data sharing agreements and processes. By improving the existing coordination between partners to better facilitate referrals, the state's partners can continue to provide excellent service with fewer resources.

Idaho has several co-enrollment policies in place, primarily for programs housed with the Idaho Department of Labor (Title I-B, Title III, TAA, JVSG, Registered Apprenticeship). 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 JVSG programs. Unemployment Insurance has a policy that job-seeking UI claimants must enroll in the Wagner-Peyser labor exchange. IDVR and the Commission address Title IV co-enrollment through an MOU, but this understanding is currently only between the two programs.

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, utilizing WIOA as a foundation for policy development in combination with specific program regulations to ensure partners have a thorough understanding of any potential impacts. The committee developed the following policies, approved by the Council, to facilitate WIOA implementation across the state.

- a new statewide One-Stop MOU ([link](#)) that outlines the expected policies and standards for service delivery.
- Provided an Eastern Idaho One-Stop MOU ([link](#)) and a North Central Idaho One-Stop MOU ([link](#)) which together contain infrastructure funding guidelines.
- Developed a policy for One-Stop certification and assessments ([link](#))
- Maintained the policy for selecting service providers under WIOA Title 1-B ([link](#)), including the One-Stop Operator.
- Updating and Implementing Idaho's One-Stop branding requirements: ([link](#)).
- Updated the policy for the state's Eligible Training Provider list ([link](#)). as approved by the state Workforce Development Council.

Through the statewide One-Stop MOU, the Workforce Development Council provides the following guidance for state-administered One-Stop partner programs' contributions to a One-Stop delivery system:

Cost sharing for the Idaho American Job Center Network will be negotiated at the service delivery area level. Partners at comprehensive AJC (and affiliate AJCs as appropriate) agree to enter into a cost sharing agreement on an annual basis to support the cost of shared services and jointly occupied facilities. All parties to this MOU recognize infrastructure costs are applicable to all required One-Stop partners, whether they are physically located in the AJC or not. Each partner's contributions to these costs, however, may vary, as these contributions are based on the proportionate use and relative benefit received, consistent with the Partner programs' authorizing laws and regulations and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR Part 200, state rules and policy guidelines and any local program policies regarding cost sharing.

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.

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 – Jobs for Veterans State Grant
 - 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 federal funding stakeholders, 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:

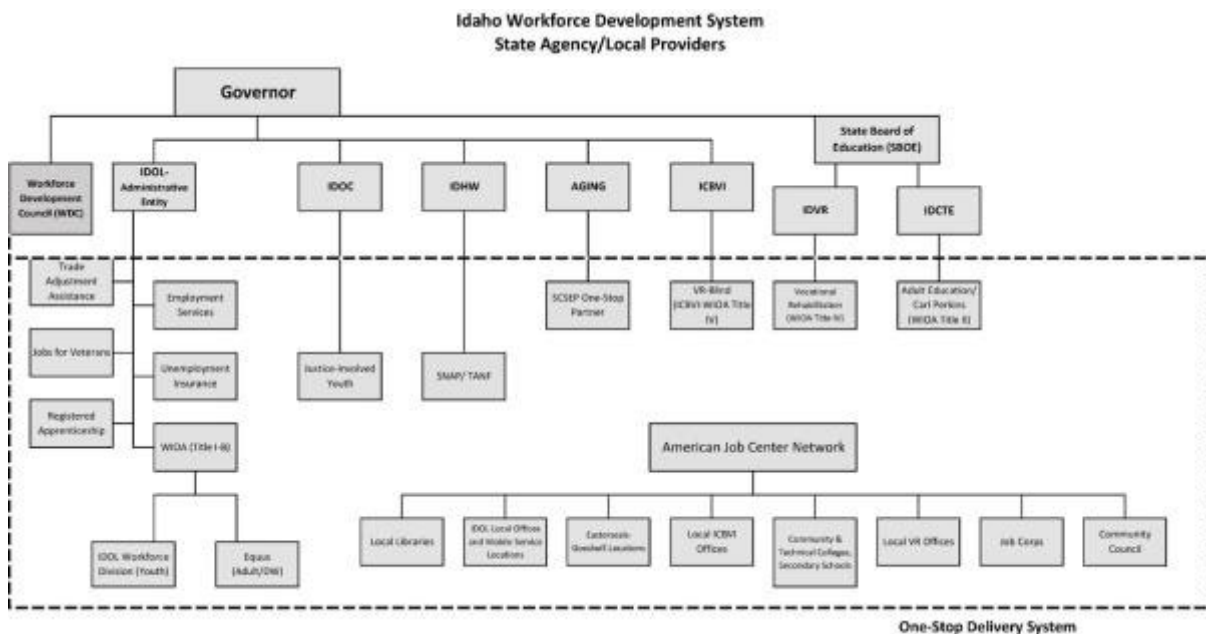
- **Title I-B, III, Trade, Veterans, and UI:** WIOA Title I-B and other programs administered by the Idaho Department of Labor are provided through the American Job Centers. Although Unemployment Insurance is centralized at the State office via an online application system, in-person staff assistance is available in the state's comprehensive One-Stop 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 (the Commission). The IDVR provides services through eight regional offices and a series of sub-offices. Through cooperative agreements, IDVR has staff collocated with the Idaho Department of Correction. 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 follows in Figure 4 below.

Figure 4: IDAHO WORKFORCE DEVELOPMENT SYSTEM - STATE AGENCY ORGANIZATION, All programs



B. STATE BOARD

Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members’ organizational affiliations and position titles.

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, except for one position representing a labor union. 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/who-we-are/#councilmembers>.

IDAHO WORKFORCE DEVELOPMENT COUNCIL MEMBERSHIP

First Name	Last Name	Agency/ Business/ Organization	City	Region	Category
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Representing the Governor

Russ	Barron	ID Division of Occupational & Professional Licenses	Emmett	Region 3	Governor’s Representative
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Representing the State Legislature

Carrie	Semmelroth	Idaho State Legislature – Senate	Boise	Region 3	Legislature
Lori	McCann	Idaho State Legislature –	Lewiston	Region 2	Legislature

Carrie	Semmelroth	Idaho State Legislature – Senate	Boise	Region 3	Legislature
		House			

Members appointed by the Governor, representing Business

Deni	Hoehne	WinCo Foods	Eagle	Region 3	Industry, Chair
John	Young	Young Construction	Coeur d'Alene	Region 1	Industry, <i>Vice Chair</i>
Kelly	Kolb	Vista Outdoor	Lewiston	Region 2	Industry, <i>Executive Committee</i>
Sarah	Griffin	Idaho Power	Boise	Region 3	Industry, <i>Executive Committee</i>
Bill	Reagan	Coeur d'Alene Resort	Coeur d'Alene	Region 1	Industry
Brian	Cox	Collective Data Solutions	Sandpoint	Region 1	Industry
Daniel	Puga	In Time Tec	Nampa	Region 3	Industry
Jeff	Greene	Trinity Health	Boise	Region 3	Industry
Scott	Bedke	Cattle Rancher	Oakley	Region 4	Industry
Sergio	Mendoza	The Liquidation Center	Jerome	Region 4	Industry
Ben	Davidson	Idaho Central Credit Union	Chubbuck	Region 5	Industry
Amanda	Logan	Ball Ventures	Idaho Falls	Region 6	Industry
Hope	Morrow	Idaho National Lab	Boise	Region 3	Industry
Todd	Putren	Northwest Specialty Hospital	Dalton Gardens	Region 1	Industry
Stephanie	Pfiefer	Nightforce Optics	Cottonwood	Region 2	Industry
<i>Two Vacancies</i>		<i>Private Sector/Business Representatives</i>			<i>Industry</i>

Members appointed by the Governor, representing Workforce

Anna	Almerico	Idaho Out-of-School Network	Boise	Region 3	Workforce serving out-of-school youth
Donna	Butler	Dawn Enterprises	Blackfoot	Region 5	Workforce serving individuals w/ disabilities
Joe	Maloney	Idaho State AFL-CIO	Boise	Region 3	Workforce – labor organization, <i>Executive Committee</i>
Marie	Price	Idaho Forest Group	Dalton Gardens	Region 1	Workforce – Registered Apprenticeships
James	Smith	Idaho Falls Power	Iona	Region 6	Workforce – labor organization
<i>Vacant</i>					Workforce serving veterans
<i>Vacant</i>					Workforce – Joint Apprenticeship Training Center

Representatives of Government

Linda	Clark	ID State Board of Education	Boise	Region 3	Government – higher education
Jane	Donnellan	ID Division of Vocational Rehabilitation	Boise	Region 3	Government – WIOA Title IV
Tom	Kealey	ID Department of Commerce	Boise	Region 3	Government – economic development
Clay	Long	ID Division of Career and Technical Education	Boise	Region 3	Government – WIOA Title II
Jani	Revier	ID Department of Labor	Boise	Region 3	Government – WIOA Titles I and III
Lori	Barber	College of Eastern Idaho	Idaho Falls	Region 6	Government – community colleges
Jeff	Hough	Bannock County	Pocatello	Region 5	Government – elected County

Linda	Clark	ID State Board of Education	Boise	Region 3	Government – higher education official
Debbie	Critchfield	Superintendent of Public Instruction	Oakley	Region 4	Government – K-12 Education
Sean	Coletti	Mayor – City of Ammon	Ammon	Region 6	Government – elected City official
Jennifer	Palagi	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 Division of Career & Technical Education,
- WIOA Title IV (Vocational Rehabilitation) - Jane Donnellan, Administrator, Idaho Division of Vocational Rehabilitation

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. This group also contributes to the development and execution of the State Plan.

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.

The 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 AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. 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. 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.

Core Partner Assessment

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) has established a process to monitor performance levels across the core programs. 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.

One-Stop Partner Assessment

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 for each local area. 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 listening sessions in four of the six service delivery areas; economic development entities in North Idaho and the Treasure Valley did not respond to attempts to schedule a listening session. These sessions were used to establish the service delivery design that are outlined in the One-Stop

Memorandums of Understanding (MOUs) and may be reinstated and/or provide additional goals as determined by the service delivery area stakeholders.

B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, 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), in accordance with methods described in 4(A). 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 in an effort to build programmatic capacity should lead to higher levels of participation, retention, and outcomes for participants. Similarly, targeting youth and youth in marginalized, underrepresented, and underserved groups may initially decrease certain aspects of program performance, as individuals in these communities likely face multiple barriers to employment and education. However, over the long-term, this strategy should improve outcomes as Combined Plan Partners and Idaho's communities build the capacity to support each other through continued economic growth.

During WIOA's initial implementation, 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. 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. Due to unforeseen circumstances impacting the natural flow of operations, Title II and IV programs have been extended transitional delay in the imposition of sanctions on existing PY data when available baselines are not sufficient to produce reliable estimates using the Statistical Adjustment Model (RSA-FAQ-22-01 & RSA-TAC-20-02). 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.

Table 30: Previous Assessment Results for Title I-B Youth Programs

WIOA Indicator/ Measure	PY20 Negotiated	PY20 Actual	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	76.50%	72.20%	76.5%	81.4%	75.0%	80.7%
ER Q4	78%	77.60%	78.0%	80.9%	78.6%	83.0%
ME Q2	\$3,991	\$4,274	\$3,991	\$4,277	\$4,350	\$5,862
CAR	58%	46.90%	58.00%	32.1%	51.5%	42.1%
MSG	50%	49.60%	50.0%	72.0%	50.0%	80.7%

Table 31: Previous Assessment Results for Title I-B Adult Programs

WIOA Indicator/ Measure	PY20 Negotiated	PY20 Actual	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	81.50%	73.60%	81.5%	75.4%	81.4%	73.1%
ER Q4	82.00%	76.90%	82.0%	71.9%	80.4%%	73.5%
ME Q2	\$6,900	\$6,716	\$6,900	\$7,449	\$7,025	\$7,803
CAR	70.00%	73.30%	70.00%	62.4%	72.2%	49.8%
MSG	50.00%	64.30%	50.0	59.5%	57.9%	78.5%

Table 32: Previous Assessment Results for Title I-B Dislocated Worker

WIOA Indicator/ Measure	PY20 Negotiated	PY20 Actual	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	80.30%	81.20%	80.3%	79.8%	80.1%	80.3%
ER Q4	81.00%	76.20%	81.0%	82.7%	81.00%	77.6%

WIOA Indicator/ Measure	PY20 Negotiated	PY20 Actual	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ME Q2	\$8,016	\$7,876	\$8,016	\$8,749	\$8,016	\$8,866
CAR	65.50%	73.80%	65.5%	67.4%	72.0%	41.9%
MSG	50.00%	61.20%	50.0	67.1%	60.4%	81.8%

Title II - Adult Education and Family Literacy

The Agency administering Title II Program (Idaho Division of 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 following table shows target and actual Measurable Skill Gains (MSG) for PY21 and PY22.

Table 33: Previous Assessment Results for Title II, Adult Education Programs

Educational Functioning Level	PY 21 Target	PY 21 Actual	PY 22 Target	PY 22 Actual
ABE Level 1	42.00%	24.59%	30.00%	20.00%
ABE Level 2	41.00%	35.14%	38.00%	29.55%
ABE Level 3	44.00%	35.55%	29.00%	36.35%
ABE Level 4	44.00%	39.14%	28.50%	47.09%
ABE Level 5	47.0%	40.97%	12.00%	46.33%
ABE Level 6	16.00%	36.56%	36.00%	54.36%
ESL Level 1	51.00%	23.85%	35.00%	46.36%
ESL Level 2	52.00%	34.53%	37.00%	43.56%
ESL Level 3	48.00%	31.01%	36.00%	43.04%
ESL Level 4	43.00%	21.46%	30.00%	28.30%
ESL Level 5	42.00%	23.23%	35.00%	31.68%
ESL Level 6	24.00%	15.02%	15.00%	11.85%

Measurable Skill Gain Assessment

The overall Measurable Skill Gain (MSG) gain rate for Idaho’s adult education programs was 32.89% for PY21 and 33.43% for PY22. Both years are an improvement over the PY19 rate of 29% and the PY20 rate of 22%, indicating a positive trend after the impact of the pandemic in 2020. Comparisons between PY21 and PY22 also indicate a rebound from the impact of the pandemic, particularly in ABE levels 3 through 6 and ESL Levels 1 through 3. Idaho’s adult education State leadership has identified trends and performance improvement strategies related to MSG rates:

- The low unemployment rate in Idaho continues to be a challenge for retaining adult education students. 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. In addition, some employers are accepting applicants with less than a high school diploma or GED, and this contributed to lower outcomes.
- Two of the largest adult education programs in Idaho experienced an influx of English language learners from Ukraine and Afghanistan in PY22. The demographic shift affected program priorities and required rapid adjustments to course offerings, curriculum and instruction, and intake capacity. High persistence rates, as measured through student contact hours, had a positive impact on ESL Levels in PY22.
- Since 2020, there has been an increase in demand for remote learning, particularly from students in rural areas and from students who lack transportation in urban areas. The pandemic fast-tracked local programs' capacity and expertise for remote adult education instruction, which has been a positive development. In order to capitalize on the momentum of remote program development, the state will provide robust leadership and professional development to ensure quality instruction and to improve MSGs, which can be more challenging to achieve through remote learning. The state will continue to provide professional development for high quality instruction, technical support for remote and in-person learning, and best practices for retention and engagement of remote adult learners. The state will leverage Digital Access for All Idahoans to help achieve these objectives.

Table 34: Previous Post-Exit Outcomes for WIOA Title II Adult Education

WIOA Indicator/Measure	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	60%	31.73%	35%	35.55%
ER Q4	45%	40.43%	36%	41.03%
ME Q2	\$4,600	\$5,456.65	\$4,900	\$5751.37
CAR	40%	41.46%	43%	56.73%
MSG	43%	32.89%	29%	37.83%

Idaho adult education post-exit outcomes for PY22 exceed negotiated performance levels for all indicators and increased over PY21.

Title III - Wagner-Peyser

The performance reports for the previous program years for the Wagner-Peyser program are included below. Under the Workforce Innovation and Opportunity Act, Title III programs are considered to have met the performance goals if the actual results are at least 90% 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 35: Previous Assessment Results for WIOA Title III, Wagner Peyser Program

WIOA Indicator/Measure	PY20 Negotiated	PY20 Actual	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	70.1%	64.4%	70.1%	62.2%	65.7%	69.7%
ER Q4	70.0%	65.3%	70.0%	63.9%	66.2%	67.2%
ME Q2	\$5,800	\$6,135	\$5,800	\$6,922	\$6,175	\$8,319

Title IV - Vocational Rehabilitation

Title IV Vocational Rehabilitation programs set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-20-2 released May 10, 2023, provided guidance on the requirements for these indicators for PYs 2024 and 2025.

All performance indicators, except MSG were baseline for PY 2021. For the first time in PY 2022, RSA negotiated targets for all PPIs. Title IV programs exceeded all negotiated targets for PYs 2021 and 2022. Performance across all indicators continues to be strong.

Table 36: Previous Assessment Results for WIOA Title IV VR Programs

WIOA Indicator/Measure	PY21 Negotiated	PY21 Actual	PY22 Negotiated	PY22 Actual
ER Q2	NA	63.1%	59.5%	64.9%
ER Q4	NA	57.2%	57.8%	62.7%
ME Q2	NA	\$4,523	\$4,400	\$4,950
CAR	NA	53.3%	42.8%	62.1%
MSG	41.0%	58.3%	55.1%	56.1%

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. SCSEP performance is measured by seven core performance measures, subject to goal setting and corrective action. These performance measures, along with a description of each, are listed below.

1. **Service Level:** The number of participants who are active on the last day of the reporting period or who exited during the reporting period divided by the number of modified community service positions
2. **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.
3. **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.

4. **Employment Rate – 2nd Quarter after Exit:** The number of participants employed in the second quarter after the exit quarter divided by the number of participants who exited two quarters earlier.
5. **Employment Rate – 4th Quarter after Exit:** The number of participants employed in the fourth quarter after the exit quarter divided by the number of participants who exited four quarters earlier.
6. **Median Earnings:** Of those participants who are employed in the second quarter after the quarter of program exit, the median value of earnings in the second quarter after the exit quarter.
7. **Effectiveness in serving 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.

Table 37: Previous Assessment Results for the SCSEP Program

Performance Measure	PY 20 Goal	PY 20 Actual	PY 20 % Met	PY 21 Goal	PY 21 Actual	PY 21 % Met
Service Level	N/A	N/A	N/A	123.4%	N/A	N/A
Community Service	N/A	N/A	N/A	73.9%	N/A	N/A
Service to Most in Need	2.9	3.66	126.2%	2.9	3.32	114.4%
Employment Rate - Q2	25.5%	27.8%	109.0%	25.5%	26.3%	103.1%
Employment Rate - Q4	19.8%	26.3%	132.8%	19.8%	21.4%	108.1%
Median Earnings	2047	3656	178.6%	2047	3700	180.8%
Employer, Participant, & Host Agency Effectiveness	•	•	•	•	•	•
Employers	***	***	***	***	***	***
Participants	79.5	82.5	103.8%	80.5	76.8	95.4%

Performance Measure	PY 20 Goal	PY 20 Actual	PY 20 % Met	PY 21 Goal	PY 21 Actual	PY 21 % Met
Host Agencies	79.7	74.7	93.7%	80.7	84.6	104.8%

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 PY22 with the newly revised performance measures:

Table 38: Previous Assessment Results for SCSEP Program – WIOA Basis

Performance Measure	PY 22 Goal	PY 22 Actual	PY 22 % Met
Service Level*	125.2%	97.7%	78.0%
Community Service*	70.0%	53.6%	76.6%
Service to Most in Need	3.1	3.86	124.5%
Employment Rate – Q2	30.2%	22.2%	73.5%
Employment Rate – Q4	22.8%	13.6%	59.6%
Median Earnings	3274	0	0%
Employers	***	***	***
Participants	86.0%	N/A	N/A
Host Agencies	81.7%	N/A	N/A

*Because of the pandemic, USDOL determined that *Service Level* and *Community Service* measures would not be tracked due to host agency shutdowns.

Note: the SCSEP employer surveys are administered throughout the year. However, there are very few placements taking place now, and those employers that are hiring have many more urgent issues to attend to than responding to surveys. Also, because the current approach to the employer survey does not yield sufficient replies to generate ACSI scores for each grantee, the SCSEP National Office intends to pilot a new approach to these surveys that will include employers that do not receive a substantial service in connection with the placement and host agencies that hire SCSEP participants into unsubsidized employment. The pilot project will be conducted centrally through a mail house, using a process similar to the one Idaho SCSEP uses for the participant and host agency surveys. For these reasons, effective immediately and until further notice, Idaho SCSEP has discontinued delivering the employer survey.

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, positions may get modified. The assessment results above show that the performance measures for “Service Level” and “Community Service” were not taken into account due to the effect that the COVID-19 pandemic had on SCSEP participation.

The **employment rate after 2nd quarter** measure did not meet the project goal of 30.2% (actual: 22.2%); The **employment rate after 4th quarter** (goal: 22.8%) was not achieved (actual: 13.6%).

The median earnings goal (goal: \$3274) for PY 22 was not met (actual: \$0). ICOA’s subrecipient, Easterseals-Goodwill, will continue working with participants in searching for and securing employment that compensates adequately to maintain this goal.

The **service to most in need** performance measure (goal: 3.1) exceeded the PY goal (actual: 3.86). 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 in involved in SCSEP efforts (i.e., participants and host agencies). Easterseals-Goodwill and ICOA are communicating the purpose of the survey to respondents and ensuring that they are 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.

The TAA performance measure period is based on federal fiscal year (FY), which ranges from October through September. The outcomes listed in the table below reflect the state’s program performance during each respective federal fiscal year.

Table 39: Previous Assessment Results for TAA Program

Measure	FY20 Actual	FY21 Actual	FY22 Actual
ER Q2	73.7%	82.1%	86.0%
ER Q4	81.7%	78.2%	77.4%
ME Q2	\$9,629	\$8,437	\$8,457
CAR	82.4%	79.0%	68.4%
MSG	25.8%	48.2%	79.3%

Since the U.S. Department of Labor tabulates states’ FY TAA performance and has not yet provided FY23 data, Idaho is not able to present its performance during that period.

Veterans' Employment

JVSG did not initially require states to report on all five WIOA measures since it did not collect all the data necessary to complete reporting on each measure. However, since then, it began data collection for all five which are shown in the table below. This now mirrors reporting for most WIOA Title I-B and TAA programs.

Table 40: Previous Assessment Results for JVSG Program

Measure	PY21 Goals	PY21 Actual	PY22 Goals	PY22 Actual
ER Q2	63.0%	59.4%	63.0%	62.1%
ER Q4	61.0%	54.1%	61.0%	60.8%
ME Q2	\$5,500	\$6,924	\$5,500	\$7,035

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.

Table 41: Previous Assessment Results for Unemployment Insurance-First Payments within 14 Days

Federal Fiscal Year	First Payments within 14 days	Rank
FFY 2013	90.5%	10 th
FFY 2014	87.2%	25 th
FFY 2015	96.5%	2 nd
FFY 2016	96.5%	1 st
FFY 2017	97.0%	2 nd
FFY 2018	97.1%	2 nd
FFY 2019	93.1%	8 th
FFY 2020	64.7%	38 th

Federal Fiscal Year	First Payments within 14 days	Rank
FFY 2021	70.6%	16 th
FFY 2022	93.8%	3 rd
FFY 2023	92.6%	3 rd

Table 42: Previous Assessment Results for Unemployment Insurance-Nonmonetary Determinations within 21 Days

Federal Fiscal Year	Determinations within 21 days	Rank
FFY 2013	69.8%	28 th
FFY 2014	68.5%	35 th
FFY 2015	75.4%	35 th
FFY 2016	79.6%	28 th
FFY 2017	79.5%	27 th
FFY 2018	80.9%	27 th
FFY 2019	78.9%	32 nd
FFY 2020	76.2%	7 th
FFY 2021	65.4%	9 th
FFY 2022	81.7%	11 th
FFY 2023	81.7%	17 th

Performance went down substantially during the COVID-19 pandemic for all states due to the immense increase in claims volume and implementation of prevention techniques to thwart coordinated attempts by fraudsters and fraud rings to obtain benefits. Most states have returned to regular workloads and have sufficient fraud prevention techniques in place, while also allowing legitimate claimants to still file and access the claims process.

Approximately ten 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 ten UI navigators located in the Comprehensive One Stop Centers. Three of these navigators also visit our mobile sites, to provide assistance to rural Idahoans.

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

Given that each program has expertise in its own operations, Idaho's Combined Plan Partners will use individual evaluations shared and analyzed as a group. These evaluations will be presented and discussed on a quarterly basis by the WIOA Advisory Committee, which monitors WIOA performance measures across programs. Challenges, interesting results, and promising opportunities can be effectively shared using this method that relies on each program's strengths and knowledge. This method was used during the development of the 2024 State Plan and showed tremendous promise in its efficiency and collaborative potential.

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

Additional evaluations may be developed as necessary under the direction of the Idaho Workforce Development Council. In this process, the One-Stop Committee will create evaluation strategies and processes per Section 116e 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. These additional evaluations, if created, 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.

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.

Below is a summary of an example individual evaluation conducted by the Idaho Department of Labor to assess potential impacts on the WIOA Title I-B program and the establishment of its new mobile locations.

PY22-23 Evaluation - Idaho Department of Labor Service Delivery Model Transition

The Idaho Department of Labor (IDOL) began a transition in its service delivery model near the end of 2019 that resulted in the closing of many brick-and-mortar offices in the state in favor of a "multiple hub-and-spoke" model. Whereas the older model had offices maintaining regular business hours throughout the week in major urban areas as well as more rural areas, the new model has one or more regional offices serving as the regional hub(s) and a network of "mobile offices" propagating to the more rural localities on a less frequent basis, typically sharing office space with local governments, school districts, libraries, or chambers of commerce. These mobile offices would provide similar services to area residents including employment services like assisting job seekers and employers with labor needs as well as enroll eligible individuals into IDOL programs including the Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, and Youth programs. If individuals could not make it to their local mobile

office the days IDOL staff were available, they could contact staff over the phone or online to get information, apply for benefits, enroll into eligible programs, etc.

For the state's most recent effort, IDOL's Research and Analysis division conducted an evaluation that sought to answer whether the change in service delivery model affected which individuals would enroll into the WIOA Adult program based on their area of residence. While the final report is still being compiled for publication, a summary of methodology and findings is below:

The roll-out of the new model began near the end of calendar year 2019 and took full effect in 2020, so January 2020 was selected as the beginning of the post-change period. Due to small enrollments in many parts of the state, six months was chosen for each pre- and post-change period to ensure a sample size large enough to permit a chi-squared test based upon its asymptotic properties. Two post-change periods were considered: the first half of 2020, which would have captured the brief period after the change in service delivery but before the disruptions of COVID-19, as well as the second half of 2020 to help account for potential seasonality effects in WIOA enrollment.

The data used for the analysis was obtained from a registry of all IDOL services and program enrollments in the state between 2019 and 2023, WIOA Adult enrollments being a sample of this universe. The dataset contains anonymized person-level data on program enrollment, residence down to the county and zip code, where services were delivered down to the county and local IDOL office (or mobile office), labor market area, and program enrollment date.

As seen in the tests conducted during the evaluation, the closure of brick-and-mortar offices in some of the lesser populated and more rural areas of Idaho did not appear to shift enrollment in the WIOA Adult program away from these areas towards the regional hubs that kept their brick-and-mortar offices (region two, North Central Idaho, being one notable exception). However, the distribution of enrollments across regions did shift in a significant way with all regions except for three (Southwestern Idaho) and six (Eastern Idaho) either maintaining their enrollment shares or gaining a larger share.

The explanation for these observed changes can boil down to three broad types: changes owing to the policy change, changes owing to the COVID-19 pandemic, and changes owing to longer structural shifts in the Idaho labor market and economy. At present, it is impossible to disentangle these competing hypotheses from one another given the paucity of data and credible identification strategy for each one. However, we may briefly speculate about each and how much it may be contributing to these observed regional shifts.

Given the data limitations, it is difficult to say with any certainty what accounts for the observed regional shifts in WIOA Adult enrollment, but accounts based upon the effects of the COVID-19 pandemic and more long-run structural shifts in the Idaho economy seem much more plausible than changes by IDOL in how services are delivered.

Upon completion, the final report will be published on the Publications page of Idaho Department of Labor's website.

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)

All Idaho WIOA Title I-B 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 I-B Formula Funds, Recapture and Reallocation". It was approved by the Council's One-Stop Committee and approved by the full Council on October 13, 2021. 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 : ID Workforce Development Council Funds Distribution, Recapture, and Reallocation Policy ([link](#))

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

All Idaho WIOA Title I-B 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.

See Section III (b)(5)(A)(i) Youth Activities for information about and link to Idaho's policy on fund distribution.

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 includes 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.

See Section III (b)(5)(A)(i) Youth Activities for information about and link to Idaho's policy on fund distribution.

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

The Eligible Agency administering Title II programs is the Idaho Division of 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 2025. IDCTE 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; scores will be a major consideration in awarding the final contracts, in addition to the review and input of the Idaho Workforce Development Council (serving as Idaho's local board).

Applicants will be notified of IDCTE's decision and awarded funds on July 1, 2025. 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 geographic 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 skills of eligible individuals in order to be considered in the grant application process. Idaho scored first for demonstrated effectiveness and only those that passed the criteria were forwarded to the review committee. All applications that passed the screening for demonstrated effectiveness were sent to the Idaho Workforce Development Council to provide feedback on alignment to the State Plan. This feedback will be used by the review committee in making final decisions.

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.

The Eligible Agency administering Title II programs in Idaho is Idaho Division of Career Technical Education. IDCTE 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 Integrated English Language and Civics Education and Integrated Education and Training components to ensure compliance with the requirements set forth in Section 243 and related regulations.

IDCTE 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 IDCTE 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 IDCTE for a complete grant application packet or packets, including an electronic copy of the application in Word or another 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 (the Commission). 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 43: Funding Distribution for Idaho Vocational Rehabilitation Agencies

Funds	Portion to IDVR	Portion to the Commission
General VR Program	86.0%	14%
Supported Employment	100% - TBD (will determine prior to March 1)	0%
Independent Living	79% (All IL funds are reallocated to Centers for Independent Living (CILs) and the State Independent Living Council (SILC))	21%

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. The Commission and IDVR work together on cases where SE and co-enrollment are indicated.

[Note: IDVR will determine if it will accept SE funds before March 1, 2024]

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.

Describe data-collection and reporting processes used for all programs and activities, including the State’s process to collect and report data on co-enrollment, and for those present in the one-stop centers.

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 (SLDS) 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.

The results of Idaho’s recently completed Workforce Data Quality Initiative grant allows WIOA core 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 SLDS, data exchange between disparate MISs while maintaining appropriate data security and compliance requirements can now take place.

With the implementation of WIOA, Idaho's core programs have been working to update data elements within each agency's MIS, consistent with 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 such as WIOA Titles I and III, Trade Adjustment Assistance (TAA), with employment and wage records originating from Unemployment Insurance (UI) wage 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 (the Commission). Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Division of Career Technical Education (IDCTE), 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 was the access to comprehensive Eligible Training Provider data, another federal reporting requirement of WIOA. The project's platform extends the automation of data exchange and reporting to address both public and private providers, which contrasted with the SLDS' limitation to only 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 I-B, 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. In an effort to update data collection processes, the state's core program partners conducted an analysis of 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.

Through late 2020 and all through late spring of 2022, the WIOA Advisory Group convened a working group for data integration, consisting of program staff, IT staff, and vendors for existing systems. They conducted an analysis of applicable intake processes across the system with a goal of creating a framework to connect to each individual MIS. This included participating in the *Data Labs: Roadmap to Recovery* program, as noted in Sec. III (b)(2), along with exploring several other proposed concepts for a common intake system. The WIOA partners concluded that a third party secure, web-based portal for common WIOA joint intake which networked individual MISs and performance reporting was not a financially feasible option for Idaho.

Having determined the various solutions researched were not cost-effective for Idaho's workforce development system, One-Stop partners have instead focused on staff training, ongoing partner meetings, quality referrals, and efficient use of available resources. Each program continues to collect data via their unique MIS, utilizing an ad-hoc data sharing process for exporting, sharing, matching, and importing data, all while allowing core programs to report required elements under WIOA. This cost effective and secure means of data transfer is designed to meet Idaho's most pressing needs through the use of Secure File Transfer Protocol site (SFTP – a network protocol for securely accessing, transferring and managing large files and sensitive data).

Use of the SFTP ad-hoc data sharing process remains predominantly a manual process and relies on the work and knowledge of collaborating partners. Idaho persists in its commitment to pursue and evaluate applications or systems that will address the state's changing needs. Idaho's goals for data-integration, whether via the current process or a new streamlined, single intake and service tracking application, include:

- Identifying low-cost solutions
- Enhancing the quality of existing data sharing
 - Eventually improving the quality of referrals, and
- Improving the value of relationships used to create and implement solutions

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.

As noted earlier, the state's previous efforts to implement a common intake system via a single technological solution have stalled. Through these investigative efforts, the state came to realize that it sought quality referrals and understood that this was also affected its reporting outcomes. Qualitative data from Idaho One-Stop partners indicates that it has excellent relationships between each; however, the differing metrics for each program partner adds to the difficulty in counting any program "completions" as co-enrollments within the state's One Stop 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.

Idaho acknowledges that quality referrals are taking place within the system, as partners continually interact with each other to ensure participants are able to receive the full complement of services necessary to achieve successful results from the efforts of the multiple programs involved. Idaho does not track partner referrals, concentrating its efforts on capturing program outcomes. As described in the previous response, this may be a consideration for the state when it comes to selecting a One-Stop system application.

IV. DESCRIBE THE STATE'S DATA SYSTEMS AND PROCEDURES TO PRODUCE THE REPORTS REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2)).

Idaho's core programs are presently able to report all primary performance indicators required under Section 116 of WIOA. Individual reports meet FERPA, education, and wage data reporting requirements. Through the processes developed from the state's recently completed WDQI grant, core program partners work together by using SLDS database processes to address the requirements under the Family Educational Rights and Privacy Act (FERPA), which incorporate education, state wage, and WIOA cases management data into the PIRL file schema to exchange, merge and report on behalf of all Idaho WIOA Title IB, II, III and IV grantees.

The state's SWIS data sharing Memorandum of Understanding between combined plan partners, incorporates unemployment insurance data for performance reporting and allows for additional options to collect, exchange and report required data. This process involves individual programs sending their performance information to the Idaho Department of Labor, which compiles and submits the State Annual Report to the US Department of Labor.

As noted earlier, the processes developed as a result of the WDQI grant help to facilitate partners' abilities to meet WIOA quarterly and year-end reporting requirements through its automated data exchange process.

The agencies administering core programs are 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 primarily measures 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 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 administers 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 established data sharing agreements allow core programs to share and report measures' progress 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 administers both WIOA Title I-B and Title III programs, as well as the Unemployment Insurance program for Idaho. All of the core partners currently have an 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, as well as other federally funded opportunities, including IJJA, CHIPS, and IRA. 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.

The Idaho Data Management Council (DMC) was established with oversight and approval of development of the federated Idaho K-20 SLDS (Education Analytics System of Idaho [EASI]) and oversees the enhancements, maintenance and usage of said system. EASI—the Educational Analytics System of Idaho—is a collaborative tool that can be used to match information from the K-12 SLDS – Idaho System for Education Excellence (ISEE), the Idaho State Board of Education – Postsecondary Measures of Academic Performance (PMAP), and the Idaho Department of Labor’s SLDS. This important resource provides data about Idaho schools as well as what experiences Idahoans have as they transition from K-12 into postsecondary education/training and, ultimately, the workforce.

The Idaho Department of Labor maintains the Labor portion of EASI , following Council and agency policies and procedures for secure data sharing.

The purpose of EASI is to allow longitudinal tracking of students from kindergarten through all levels of the public education system (elementary, middle schools, and high schools, college and graduate school) and into the workforce. To reflect this scope, EASI is referred to as a K-20W system.

The privacy of all student level data that is covered by EASI is protected. A list of all data fields (but not the data within the field) is publicly available. Only student identifiable data that is required by law is shared with the federal government.

In order to advise and make recommendations to the Board on the implementation of EASI, the DMC will report to the Board through the Planning, Policy and Governmental Affairs Committee. The scope of responsibilities of the DMC includes the following:

1. Data Standards and Quality
 - a. Ensure that all data elements within EASI are clearly and unambiguously defined and used consistently throughout the system.
 - b. Ensure that the data within the EASI framework is as complete and accurate as possible and complies with the agreed upon definitions.
2. Access and Security
 - a. Establish parameters for security and encryption of data uploads, data storage, user roles and access, privacy protection, and appropriate use of data.

- b. Review and approve mechanisms (technical and procedural) for implementing the required security and access rights.
 - c. Establish guidelines for responding to requests for data access by various stakeholders, including school, district and college/university staff, education researchers, and the public.
3. Change Management and Prioritization
- a. Propose enhancements to EASI, review enhancements proposed by other groups, and set priorities for the development of those enhancements.
 - b. Review and approve or deny any proposed changes to existing functionality, data definitions, access and security policies, etc.
4. Training and Communication
- a. Establish guidelines for training of EASI users, and review and approve specific training plans.
 - b. Ensure adequate communication concerning EASI.

In each of these areas, the DMC shall develop policies and procedures for Board approval as appropriate.

Members of the Data Management Council include representatives from the Office of the State Board of Education, the Idaho Department of Labor, the Division of Career Technical Education, the Idaho Department of Education, public school districts, and public postsecondary institutions.

7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS 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.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

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.

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. These staff are able to share this information with partners within AJCs to ensure they have an understanding of the priority veteran customers reserve.

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. As part of its front desk process, AJCs have incorporated a questionnaire which is given to covered persons to help staff determine the appropriate service and service provider they may need.

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 in the Priority of Service policy as mentioned earlier.

The State Veterans' Coordinator (SVC) provides quality control and ensures that Priority of Service processes and procedures are implemented. The SVC reviews the entire AJC office veterans' operations, analyzing data on services and outcomes for veterans. The SVC provides a written report to Idaho management staff that evaluates the office's 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 periodically reviewed. When an eligible person is identified, a 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 contacts 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) and the Consolidated Positions 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 (JVSG)-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 JVSG. 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.
- Recently separated veterans are the first priority in the referral of UI claimants for the RESEA program.

IDVR has a cooperative agreement with the U.S. Department of Veterans Affairs (VA) Veterans Readiness and Employment (VR&E) Program, the purpose of which is to ensure 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.

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.) regarding 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 other 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 I-B 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 of service within Idaho's youth programs.

Through an earlier and very successful 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 and practices for continuous improvement of services to and employment outcomes of individuals with disabilities. Through information and materials gathered from expert local and national sources, these efforts are sustained through publications such as the comprehensive job search handbook, *Willing and Able: A Job Hunting Guide for Idahoans with Disabilities* ([link](#)) and its subsequent companion handbook, *Willing and Able: A Job Hunting Guide for Idaho Veterans with Disabilities* ([link](#)). Disability etiquette guides, local resource flyers, referral information and other materials remain available to Idaho Department of Labor staff and are shared with other American Job Center program staff and other WIOA One Stop partners.

Despite the DEI grant's end, the knowledge imparted through various trainings 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. This has 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. In addition, each AJC 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 ([link](#)) provides resources on accessibility to meet requirements of Section 508 (accessible electronic and information technology for federal agencies) of the Rehabilitation Act of 1973.
- The ADA National Network Centers made up of 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](#).([link](#))
- 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-link](#)) 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.

Accessibility and Accommodations

All of Idaho's eight 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 the Commission 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 the Commission 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 the Commission 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 IDVR'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 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.

Through the Ticket to Work program, core WIOA partners have certified Work Incentives Benefits Practitioners to offer benefits counseling to participant ticketholders on how employment affects Social Security benefits.

To ensure appropriately service levels to those who need them, Idaho's Governor requires all state agencies work to employ accessible web products and publications wherever possible. As a result, One-Stop programs administered by state agencies include alternative text capability to ensure clear communications regardless of the process utilized by the customer. The state EO officer coordinates with WIOA core partners to ensure alternative text and other appropriate information are included and in effect on electronic publications.

The State Workforce Development Council's One-Stop certification policy includes annual physical and programmatic accessibility for individuals with disabilities. The certification criteria reference the ADA Checklist for Existing Facilities as recommended by the Northwest ADA Center. The full checklist is located here ([link](#)). The state's EO office developed a checklist for programmatic accessibility along with an updated EO Survey. All WIOA funded programs are required to report annually to the state EO Officer the results of their physical and programmatic assessments and survey results which will better inform WIOA programs where accessibility improvements need to be made.

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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

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. In addition, the Idaho Department of Labor's website offers a Translate feature, in which users can select a language from up to nine options. All of the department's webpages are then translated to that language while the user accesses the information.

The Idaho Department of Labor is the primary 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, but it also 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 *LanguageLink* 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 2024 State Planning Process

For the 2024 WIOA Combined State Plan, the WDC convened several series of meetings and listening sessions across the state with goals to a) understand the effectiveness of the workforce system as it presently exists and b) collaborate with partners to identify gaps and plan strategic improvements. The effort began with five listening sessions that took place between June and September of 2023. The WIOA Advisory Group then pivoted from its usual advisory role and intensified its meeting schedule to twice monthly, where partners refined deliverables and developed the collaborative elements of the plan.

The WDC also hosted a joint meeting with both the WIOA Advisory Group and the One-Stop Committee on December 8th, 2023, to discuss the Economic and Workforce Analysis and the results from the listening sessions, as well as to develop focus areas based on that data. Partners discussed progress towards implementation of the 2020 WIOA Combined State Plan focus areas and noted successes, challenges, and changes.

Contents of this plan derive from findings by the WIOA Advisory Group and One-Stop Committee, along with ongoing input from employers, workforce partners, state agencies, and others. Core and partner program staff will continue to meet after the completion of the State Plan to implement the plan and explore and enhance best practices for connecting job seekers to employment and employers to well-trained candidates.

Meetings of the WIOA Advisory Group were posted in accordance with Idaho Open Meeting Law on Idaho's Townhall website. The agendas specified which sections of the plan were going to be reviewed and updated.

The 2024 Combined WIOA State Plan was created through coordination and collaboration of all the strategic and core partners and the programs each partner represents (see section on initial state plan process below): Idaho Workforce Development Council, Idaho Commission on Aging, Idaho Commission for the Blind and Visually Impaired, Idaho Department of Labor, Idaho Division of Career Technical Education, and Idaho Division of Vocational Rehabilitation. It also includes input and contributions from: Idaho Department of Health and Welfare, Idaho Commission for Libraries, Easterseals-Goodwill, East Central Idaho Planning and Development Association dba Altura, and the Idaho Data Management Council.

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 February 1, 2024, through February 22, 2024. The plan was housed on the Idaho Workforce Development Council's website, with core and One-Stop partners including links to the plan on their own websites. Three reminder posts regarding the state plan which linked to the plan location and identified how to comment were posted on the WDC's social media pages on Facebook and LinkedIn. The information was also shared statewide through both the Idaho Association of Counties and the Idaho Association of Cities and their respective membership. The State Workforce Development Council's Executive Committee approved Idaho's WIOA Combined State Plan on February 22, 2024, with plans for the full Council to review the plan during its March 6, 2024, meeting. Meetings for both groups are announced and open to the public via a variety of means across the state.

Inter-Agency Coordination

The WIOA State Plan partners (known as the WIOA Advisory Group) developed the WIOA 2024 Combined State Plan between June 2023 and January 2024, with a public comment period held in February 2024. The Workforce Development Council's executive director Wendi Secrist led the plan development process through a series of public meetings. This includes five listening sessions that were held in:

- Region II – Clearwater Economic Development Association
- Region VI – East-Central Idaho Planning and Development Association dba Altura
- Region IV – Region IV Development Association
- Various Regions – Workforce Development Council Members
- Region V – Southeast Idaho Council of Governments

Following the listening sessions, an all-day strategy session was held on December 8th, 2023, 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 14, 2021. Over 20 representatives of the workforce system partners attended and contributed to the WDC-facilitated session.

The following individuals, representing the partners participating in the WIOA Combined State Plan contributed to and were responsible for its program-specific content.

- **Idaho Workforce Development Council** – Wendi Secrist, Executive Director; Elaine Zabriskie, Project Coordinator; Matthew Thomsen, Business Partnership Manager. Council staff represented the State Workforce Board. Elaine coordinated meetings and

provided editing support for group sections of the plan. Denise Hill, Management Assistant ensured that plan development complied with Idaho's Open Meetings Law.

- **Idaho Commission on Aging** – Admir Selimovic, Senior Community Service Employment Program (SCSEP) Specialist. Admir represented SCSEP as a Combined Partner program.
- **Idaho Commission for the Blind and Visually Impaired** - Mike Walsh, Rehabilitation Services Chief. Mike represented Title IV programs administered by the Commission. Nick Jorgensen, Business Analyst, edited ICBVI's individual portions of the plan.
- **Idaho Department of Labor** – Kristyn Carr, Workforce & Commissions Administrator; Danilo Cabrera, Workforce Programs Administration, Bureau Chief; Rico Barrera, Workforce Programs Administration, Grants/Contracts Officer; Craig Shaul, Communications & Research, Research Analyst Supervisor; Summer MacDonald, Workforce Programs Administration, Program Manager; Joshua McKenna, Unemployment Insurance/Benefits, Bureau Chief; and JoAnna Henry, Unemployment Insurance/Compliance, Bureau Chief. Kristyn and Rico represented all core and partner programs (except for Unemployment Insurance) administered by the Department, including Title I-B, Title III, Jobs for Veterans State Grant, and Trade Adjustment Assistance as the administrative entity and fiscal agent. Summer represented the Title I-B programs as a service provider. Craig provided all of the updated labor market information in the economic and workforce analysis section of the plan. Joshua and JoAnna represented input from the Unemployment Insurance program.
- **Idaho Career & Technical Education (IDCTE)** – Trevi Hardy, State Director for adult education and GED Administrator. Trevi serves as the State Plan Lead, represented Title II programs, and also provided a link to Perkins V 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** – Jane Donnellan, Administrator of 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 Division of Career & Technical Education representing Perkins,
- the Idaho Commission for Libraries,
- Easterseals-Goodwill as state and federal service providers, respectively, for the Senior Community Service Employment Program, and
- East- Central Idaho Planning and Development Association dba Altura as a local workforce development board.

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 administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes

The State Plan must include	Include
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 AND POLICY 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

The state’s policy criteria for local area designation and appointment of local board members have undergone several changes since WIOA’s inception. The table below shows the breakdown of this policy’s initial development, modification, and eventual approval by the state’s Workforce Development Council. The local area designation policy has remained the same since its 2022 revision.

Policy/ Modification	Action	Public Comment Period	Local Officials notified	Final Approval
Initial Policy	Presented to WDC in July 2015, later modified and approved by Governor.	Posted from Aug-Sept. 2015. No comments received.	County clerks & local mayors contacted via ID Assoc. of Cities; ID Assoc. of Counties	Approved by WDC in Oct. 2015.
Policy Modification	Reviewed by WDC early in 2020.	Posted March 2020. No comments received	See above	Approved by WDC on April 2020

Policy/ Modification	Action	Public Comment Period	Local Officials notified	Final Approval
Policy Modification	State staff revised to incorporate newly required changes imposed by USDOL.	Posted February 2022. No comments received	See above	Approved by WDC in June 2022.

The state’s local areas have each 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 and has not failed any individual measure during the same period.

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 misspent 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.

Local Area Designation and Policy

Region Identification and Policy(Currently being updated)

C. PROVIDE THE APPEALS PROCESS AND POLICY 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.

a. 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
 514 W. Jefferson Street, Ste. 131
 Boise, Idaho 83702

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.

b. Appeal to U.S.DOL

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 (30) days 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
Attention: ASET
200 Constitution Ave NW
Washington, DC 20210

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development Council
514 W. Jefferson Street, Ste. 131
Boise, Idaho 83702

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision.

D. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING

A One-Stop partner may appeal its portion of funds required for One-Stop infrastructure costs after determination by the Governor under the State infrastructure funding mechanism, consistent with §361.705(b).

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 and local operational policies for use by all WIOA service providers and they may be found on the Council's web site. Statewide policies for Governance, WIOA Title I-B, and One-Stop System reside on the Council's website via the following link - Idaho WIOA Resources & Policies.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

GOVERNOR'S FUND 15% SET-ASIDE PLANS

WIOA Title I-B 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 in providing 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 in 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 funds to serve high concentrations of eligible youth needing assistance

throughout the state. Funds are distributed based on areas demonstrating a need for additional monies. From PY22 through PY23, these funds have since been directed to target services to justice-involved youth across the state.

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. The state's management information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Title I-B programs, National Dislocated Worker Grants (NDWG), Wagner-Peyser activities, and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

Evaluations

The State implements evaluations to determine impacts upon the program when changes may potentially affect participation or performance outcomes. This past year, the state conducted an evaluation that sought to answer whether the change in the state's service delivery model affected individuals' potential enrollment in the WIOA Adult program. A summary of these results were included in the state's PY22 WIOA Annual Narrative Report.

C. 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.

The Idaho Department of Labor's Workforce Program Administration Bureau 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 funded activities involve and are closely coordinated with the Workforce Services Division, Benefits Bureau, Research and Analysis Bureau, Equus (the state's WIOA DW service provider), 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 Programs 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, dba Altura Community Consulting, in 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 and Title I-B provider staff are 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 administrators and state agencies participating in the One-Stop system. The Workforce Administration Bureau, local AJC management, or program 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 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 allowable 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 and Rapid Response staff take every opportunity to promote the full range of business services at each contact 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*.

D. 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 Programs Administration Bureau 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 various program staff from the local American 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 staff 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 staff will consult the Rapid Response team for a recommendation to apply for a National Dislocated Worker Emergency Grant.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE 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 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 AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued with 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. This state-local team communicates with the employer and employee representatives, determines if the event is 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. Delivery options of Rapid Response information are dependent upon on employers' and affected workers' needs. Rapid Response events may be held in-person and onsite, or via on-line media platforms such as Zoom or Teams meeting. The variation in the means of delivery makes for a more effective distribution of information, reaching more workers across a broad spectrum of (virtual) locations. Hard copy or electronic informational packets may be distributed to the impacted workers and may include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant. 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, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. Like the federal program, the state requires co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

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 and 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 (including discretionary grants) and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who can 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 promote demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals, 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., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Idaho’s apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to support strategies to integrate apprenticeship into statewide workforce systems. The state’s efforts towards advancing Registered Apprenticeship (RA) in Idaho have shown significant positive results since beginning a concerted effort to do so in 2015. The American Institutes for Research (AIR) and Social Policy Research Associates (SPR) have both recognized the state’s significant efforts. Here is their joint statement acknowledging Idaho’s work:

Idaho has shown a 116% increase in all apprentices, a 120% increase in new apprentices, and a 463% increase in new programs from 2015 to 2021. Under the State Apprenticeship Expansion Grant investments, Idaho has seen substantial performance on their grants with 452% of their target goal on their ASE grant and 72.67% of their SAEEI grant (y-t-d). AIR and SPR have found through a state analysis that Idaho has developed innovations across three of the five expansion elements, including State Leadership and Policy; Outreach and Business Engagement; and Capacity to Develop, Register, and Support Programs.

The Idaho Department of Labor’s (IDOL) Registered Apprenticeship Unit is the state’s primary organization which develops, writes, and submits RA standards for registration with U.S.DOL-Office of Apprenticeship. IDOL’s RA team guides sponsors through the Registered Apprenticeship Program (RAP) development process and serves as the only program providing technical assistance to sponsors through the sponsorship life-cycle and RAP expansion. Technical assistance offerings include Registered Apprenticeship Partners Information

Database System (RAPIDS, for RA reporting), *IdahoWorks* (the state's workforce management information system), job postings, mentor training, and EEOC. Supporting these efforts are the internally developed resources such as the online Apprenticeship Idaho Sponsor Success Guide, online Apprentice Orientation Training System, and the innovative Sponsor Journey Map, a nationally recognized best practice by U.S.DOL/American Institutes for Research for state apprenticeship agencies which guides partners through the RAP development process.

Partnership and Alignment to Support Workforce System Integration

IDOLS's alignment with the Apprenticeship Idaho Coalition and other key partners underscores our commitment to integrating apprenticeship with regional and statewide workforce development plans. This coalition facilitates training events and technical assistance, fostering growth and diversification of RAPs. Together with the state's Workforce Development Council, Idaho Division of Career Technical Education, AFL-CIO, Idaho Business for Education, Idaho Division of Vocational Rehabilitation, and Idaho Department of Corrections, the coalition connects across individual grants to support overall system expansion. Coalition leaders work collaboratively to achieve increased growth, development, modernization, and diversification of RAPs across Idaho. Meeting biweekly, the coalition hosts training and technical assistance events for employers, sponsors, and related-training instruction (RTI) providers across the state.

As recipients of several distinct apprenticeship grants, IDOL plans to continue the state's focus on innovating and modernizing its RAP systems through expansion and development of the following projects:

- **Increase Career Ladders** in the Most In-Demand Occupations in Need of Skilled Labor –Challenged with needing additional support in creating RAPs for the lowest skilled workers, Apprenticeship Idaho plans to create pre-set and customizable career ladder/career lattice models to help employers with the most in-demand occupations.
- Develop a quality **framework for Pre-Apprenticeship Programs** leading to RAPs. – Research and design of a Pre-Apprenticeship Program, including curriculum development in areas of highest industry need, development a directory of Pre-Apprenticeship Programs and providers, and the potential development of a certification process.
- **Diversity, Equity, Inclusion & Accessibility** – A designated team placed strategically throughout the community, working alongside, and embedded within organizations and state agencies representing under-represented populations. The team will liaise with employers to expand RAP opportunities and create Individualized Resource Teams (IRTs) to facilitate talent pipeline connections and supportive wrap around services. Notable apprenticeship increases from FY22 to FY23 include:
 - Females – 221 to 425, a more than 92 percent increase over the year.
 - Hispanic/Latinos – 125 to 229, a more than 83 percent increase.
 - Vets – 56 to 103, a just under 84 percent increase, and
 - Persons with disabilities – 18 to 39, an over 116 percent increase over the previous year.

- **Public Sector Apprenticeships** – A team of public agency representatives dedicated to the development of Registered Apprenticeship programs across state agencies.
- **“Ready to Grow” RAPs with Online Customization System** – An online system will allow employers to choose the work process and RTI provider/outline per RAP, providing for customization when necessary.
- **Career Pathway Match-Making System** – This helps users create a pathway of existing options, from job shadowing, internship, pre-apprenticeship, and leading to RA within that career choice.
- **Third Party Credential Search** – A data system to house all apprentice certifications as they progress through related certifications, pre-apprenticeship, and RA certifications.
- **K-12 Awareness and National Apprenticeship Week curriculum** – A three-phased initiative to build awareness of apprenticeship as a viable career pathway begun in 2022, saw the successful completion of phases 1 and 2. Phase 1, entitled *Booper Dreams Big: An Almost True Story of Apprenticeship*, is a colorful children’s book about Booper the dog and his dream of having a career in space exploration. It was released during National Apprenticeship Week 2022 and continues to be distributed for free to elementary schools and libraries. For Phase 2, Apprenticeship Idaho partnered with the Idaho Digital Learning Alliance to contribute to the state mandated career planning coursework by collaborating on the creation of an apprenticeship module for the online course. Phase 3 of the initiative will be released in 2024 and targets 9-12 graders with social media activities to expand awareness and a dedicated apprenticeship coordinator embedded in the Career Technical Education system to bring apprenticeship program employers and students together.
- Automate current **Talent Pipeline Referral System** to reduce lag time for apprentices qualified for inter-agency supportive services.
- **Unify Information Technology (IT) Systems** - Unify all state agencies working on RA projects under one single CRM system that monitors interactions with employers and allows partners to track the progress of RAPs throughout the development process. Integrating the current talent-pipeline referral system and providing more real-time follow-through with automated data triggering is also a proposed project outcome.
- **Apprenticeship Idaho Funding Committee** - Represents seven different funds that offer support to apprenticeship training programs and the committee members collaborate on referrals to provide maximum benefit available to sponsors.
- In partnership with the USDOL Women's Bureau, Apprenticeship Idaho hosted the state’s first **Idaho Women in Transportation & Trades event**.

Idaho moved beyond a siloed approach and committed to integrating apprenticeship programs with business outreach and partner collaboration, thereby enhancing its workforce development system and supporting key industries. Through the cross training of workforce, education, community and business sectors, *Apprenticeship Idaho* partners serve to improve the state’s RA capacity, with many individual and employer customers benefitting from this “tag-teaming” of resources, which spur its continued success.

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).

Idaho's Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures underwent a policy revision to incorporate guidance from TEGL 08-19 and TEGL 08-19, Change 1 to ensure the state's compliance with federal mandates. The state's policy implements the ETP processes and requirements as laid out in this state plan. The revised policy is included below and outlines the process as it relates to the eligible training providers in Idaho. The updated policy shares these processes with the Idaho Launch program, the Workforce Development Council's state training program, to help WIOA staff and prospective customers in their training choice. This was done to ensure the maximum possibility of leveraging both resources to assist customers in achieving their training goal. This lengthy policy may be found on the Workforce Development Council's website [here](#) (link).

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

Idaho's Integrated WIOA Priority of Service Policy includes the specific program requirements for the Adult program. 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:
 - a. Displaced Homemakers

- b. English Language Learners, Low Levels of Literacy, Cultural Barriers
 - c. Exhausting TANF within 2 years
 - d. Ex-offenders/justice-involved
 - e. Homeless individuals/runaway youth
 - f. Long-term unemployed (unemployed 27 weeks or longer)
 - g. Migrant and Seasonal Farmworkers
 - h. Persons with Disabilities (including youth)
 - i. Single Parents (Including single pregnant women)
 - j. Youth in foster care or aged out of system
 - k. Individuals within an under-represented demographic, such as sex, race, or ethnicity; (Native Americans/Indians, Alaska Natives, Native Hawaiian, African-American, Latino/Hispanic, etc.)
5. Other individuals within these recognized groups:
- a. Individuals referred by other One-Stop partner programs.
 - b. 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 data to ensure program and state compliance for WIOA priority of service of Title I-B enrollments.

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

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.

The WDC reserves the right to adjust the funds distributed to Service Delivery Areas, within a single Local Area, in or around December and March of each program year. Adjustments will be made based on an SDA's enrollment and expenditure levels compared to the planned levels within their annual agreement. Enrollment or expenditures 10 percent under planned levels will trigger the WDC to consider adjustments. The WDC will consult with the Administrative Entity and service provider to address participant needs and prevent underspending before shifting funds.

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

Co-enrollment with the WIOA Dislocated Worker program is required for all TAA and RTAA/ATAA participants approved for any one or a combination of the following Trade Act services: employment and case management, training, job search allowance, relocation allowances, and wage subsidy for older workers (RTAA/ATAA). A worker enrolled in TAA and/or RTAA/ATAA is eligible for enrollment in the WIOA Dislocated Worker program regardless of when the TAA qualifying layoff took place, (20 CFR 618.325 (a)(1)). This means there is no time limit from when the trade affected employment ended until the DW co-enrollment with the TAA program takes place. The only exception for not co-enrolling with the WIOA DW program is if the DW participant does not meet Selective Service registration requirements. The state provides program and partner staff with a list of allowable dislocated worker documentation and guidance on the selective service verification requirement.

Idaho's policy **only** applies to individuals co-enrolled in the DW and TAA programs. All other individuals must follow the state WIOA Dislocated Worker eligibility policy. The state provides monthly calls with providers and partner programs to review various topics, including policies. Approved by the state One-Stop Committee and shared with the Workforce Development Council, the state Administrative Entity has presented the policy during the provider calls as well as during other trainings throughout the year.

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued with 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. This state-local team communicates with the employer and employee representatives, determines if the event is 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. Delivery options of Rapid Response information are dependent upon on employers' and affected workers' needs. Rapid Response events may be held in-person and onsite, or via on-line media platforms such as Zoom or Teams meeting. The variation in the means of delivery makes for a more effective distribution of information, reaching more workers across a broad spectrum of (virtual) locations.

Hard copy or electronic informational packets may be distributed to the impacted workers and may include a survey to determine workers' interests to use towards the development of a National Dislocated Worker Grant. 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, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. Like the federal program, the state requires co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

One-Stop 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 and 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.

C. YOUTH PROGRAM REQUIREMENTS.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

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.¹¹ FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

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 and is supported by the Workforce Development Council in its role as the state's local board.

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.

1. Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the project.
2. Percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the project.
3. Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.
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.
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.
6. Effectiveness in serving employers.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING
EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING
PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE
STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH
IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Despite the economy's resurgence since the peak of the pandemic, 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. However, in 2021, the Idaho Workforce Development Council revised its policy directing program funding. It continues to direct 100% of Youth program funds towards serving out of-school Youth; but it allows for an exception of Council-approved special projects. These approved special projects may include in-school-youth, utilizing program and/or recaptured funds. All program and special project expenditures will adhere to the 75% minimum for OSY unless the state receives a waiver from USDOL to increase the percentage for ISY.

With this policy in place, the council allowed the six Service Delivery Areas across the state to enroll in-school youth in their individual Summer Youth Work Experience projects designed to boost youth employment opportunities. The project ran from the last quarter of PY21 through the end of PY22's first quarter. WIOA Youth program staff underwent training on how to work with in-school youth so as not to miss any opportunities to serve youth who may benefit from this project. WIOA-eligible in-school youth were only allowed to participate in this project – the

state's emphasis on serving out-of-school youth was not altered with this slight modification. Approximately five percent of project participants were in-school youth.

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:

1. Create, align, and sustain partnerships with stakeholders to implement workforce development programs.
2. Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.
3. Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.
4. 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 alignment of WIOA core programs to maximize service through limited resources continues to improve outcomes for both in-school and out-of-school youth throughout the state. In addition, the Workforce Development Council has continued the efforts with the state's implementation of an incentives policy to encourage overall participant achievement, especially for youth. The council reviewed and updated its policy, allowing the Idaho Department of Labor to determine the additional incentives necessary to incorporate as part of the state's offerings to improve program outcomes. As the state administrative entity, the department has the insight to assess not only the feasibility of the incentives, but also their potential success. After an in-depth review of multiple options, the department finalized the policy which is posted here.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

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 which 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 (which includes access to apprenticeship prospects and multiple options for work experience) ; 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 which ensures 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, including their 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.

The state Workforce Development Council approved the following criteria for 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:

1. Has been treated by a professional for mental health issues including traumatic events, depression, or substance abuse related problems. OR
2. Has been or is a victim of abuse, or resides in an abusive environment as documented by a licensed professional; OR
3. Has been unemployed for at least three of the last six months (not necessarily consecutive); OR
4. Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed); OR
5. Limited English speaking or cultural displacement. i.e., refugees.

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. The state received one comment during the February 2024 public comment period. It was specific as to how the state plan was presented on the Workforce Development Council's website and not directly related to the plan's contents. However, the state has reviewed the comment and plans to incorporate some of the suggestions in future postings. The comment is on file and available for review.

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. Also, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where these services are provided by the grant recipient/fiscal agent. 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 Disability Employment Initiative 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 requirements for infrastructure cost sharing contributions are applicable to WIOA local areas. Idaho officially consists of two local areas under WIOA – East Central Idaho, also known as Service Delivery Area 6 or Region 6, and the Balance of State, consisting of Regions 1-5. The Workforce Development Council, as the WIOA State Board, provides the policies to the local areas and the Council, acting as the local board for the two areas, is also responsible for implementing these requirements. In compliance with WIOA Sec. 121(b)(1)(A), 20 CFR 678.420, and 678.510, detailed One-Stop partner roles and resource contributions are outlined in the MOUs for each local area of the state with a Comprehensive One-Stop Center and may be found here:

- North Central Idaho
- Eastern Idaho

In accordance with the Statewide Idaho One-Stop/American Job Center Network MOU, Idaho One-Stop partners will be responsible to provide available career services in a non-discriminatory and universally accessible manner, provide referrals to system partners, serve populations with multiple barriers to employment, support the cross training of partner agency staff to ensure familiarity with and representation of all programs, participate as a member of the WIOA Advisory Group, and share in the equitable and proportionate share of their respective American Job Center operational costs that benefit their program(s) participants.

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 2022-2023 WIOA Combined State Plan (modification) and authorized in WIOA Sec. 107(c)(4). Thusly, the Workforce Development Council is responsible for the selection of Title I-B providers, including the competitive procurement of the One-Stop Operator. The Workforce Development Council adopted a policy ([link](#)) 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 programs offer training opportunities to eligible participants in the Adult, Dislocated Worker, and 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 – Section 9: Occupation Skills Training/OJT.

Idaho maintains an extensive Eligible Training Provider List 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 which 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 and recently submitted the required PY22 ETP reporting data.

WIOA Title I-B program staff 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 will carry out a review of local applications submitted under Title II in the spring of 2024 for the upcoming FY2025. 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. With this coming year's funding cycle (FY2025) 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 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 – Executed Idaho AJC Network MOU.

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 MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

1. 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. 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. 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 WIOA 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 eight Idaho Department of Labor offices serve as the state's American Job Centers offering the full range of workforce development services, and dozens of mobile locations across the state expand access into rural areas to connect citizens far from the AJCs to workforce services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

4. 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. This waiver allowing a single statewide regional planning structure has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and has helped the state to maintain service levels despite funding cuts over the years.

6. 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. The strengthened administrative structure

under the waiver has assisted Idaho to minimize disallowed costs, further enabling the redirection of funds from service provider and administration to direct participant training and support.

As noted earlier in this section of Idaho's Combined State Plan, Idaho is comprised of two local areas – the Balance of State and eastern Idaho – a structure established since 2005. Under this waiver, the state Workforce Development Council serves as a statewide local board for both local areas, functioning as the planning structure outlined earlier. Prior to submission of this plan modification and previous versions, the state and the council reached out to the East Central Idaho Elected Official Consortium and its WIOA representatives, East Central Idaho Planning and Development Association, dba ALTURA, to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ALTURA and those it represents have unanimously supported this waiver and its objectives. The MOU between ALTURA and the Workforce Development Council outlines the roles each have in the statewide and local governance of Idaho's workforce development system.

In addition, the Workforce Development Council itself includes several elected officials as part of its membership. Two serve as local elected officials, and two others are state representatives – one representing state House and the other the state Senate. Each member represents a different area of the state and bring a local perspective to the issues affecting workforce matters across the state. Currently, the local elected official representing cities is from the eastern Idaho local area.

Funds to the local areas are distributed based on the state's WIOA Title I-B Formula Funds Distribution Policy, which outlines how the state allots funds to each local area.

Idaho's waiver request was posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was personally extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review not only this waiver, but the entire Combined State plan. 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 Idaho's PY2024-2027 WIOA Combined State Plan. The State Workforce Development Council's Executive Committee approved Idaho's Combined State Plan and this waiver on February 22, 2024, with plans for the full Council to review these items during its March 6, 2024, meeting. Meetings for both groups are announced and open to the public via a variety of means across the state.

The state received one comment during the February 2024 public comment period. It was specific as to how the state plan was presented on the Workforce Development Council's website and not directly related to the plan's contents. The comment is on file and available for review. The impact of this waiver on the state's performance will be addressed in the state's WIOA Annual Report.

7. 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	Yes

The State Plan must include	Include
State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	80.1%		80.1%	
Employment (Fourth Quarter After Exit)	79.8%		79.8%	
Median Earnings (Second Quarter After Exit)	\$7,175		\$7,175	
Credential Attainment Rate	70.0%		70.0%	
Measurable Skill Gains	58.2%		58.2%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	80.1%		80.1%	
Employment (Fourth Quarter After Exit)	80.1%		80.1%	
Median Earnings (Second Quarter After Exit)	\$8,236		\$8,236	
Credential Attainment Rate	69.8%		69.8%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Measurable Skill Gains	61.1%		61.1%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	76.4%		76.4%	
Employment (Fourth Quarter After Exit)	79.8%		79.8%	
Median Earnings (Second Quarter After Exit)	\$4,765		\$4,765	
Credential Attainment Rate	51.9%		51.9%	
Measurable Skill Gains	52.9%		52.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 (IDOL) utilize state merit staff to implement required services, including labor exchange services, under the Wagner-Peyser Act.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

IDOL is committed to investing in professional development activities for ES staff. The central office team that supports the ES program includes an ES Program Specialist to focus on best practices in ES program design, and develop training to assure consistent, high-quality services around the state. The ES Program Specialist works with a team of local office supervisors to improve onboarding processes and identify gaps in training as well as identify priorities and resources for ongoing professional development. With the multitude of webinars, resources, and toolkits available through Workforce GPS, IDOL leverages these and other online tools to standardize ES staff training using quality sources, and supplement with classroom training, peer-learning and regional program meetings.

Additional Ongoing Professional Development for ES Staff:

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

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

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

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

- ES staff also provide RESEA services in Idaho, and they receive annual training from UI program staff specific to the requirements of the RESEA program
- Fully trained unemployment insurance staff are available by phone and via online chat, during business hours, to answer any questions from staff or claimants regarding UI issues
- UI Navigators are stationed within eight AJCs located throughout the state as well as scheduled at certain mobile locations to provide UI claimants with in-person help such as filing UI claims, resolving basic non-monetary issues, and helping them with other unemployment insurance functions.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

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

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

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

Reemployment assistance is available to anyone in Idaho through the ES program, including UI claimants, unemployed individuals, and employed individuals. All job seekers who register in IdahoWorks receive an email to welcome them to the system and inform them of services available to assist with reemployment. All UI claimants receive information by email after filing their claim that directs them to register in IdahoWorks, informs them of assistance available through the AJCs, and provides links to the IDOL website where they can find information on available assistance and contact information for the AJC or mobile location nearest them.

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

The RESEA program focuses on UCX claimants and those profiled as most likely to exhaust their benefits. RESEA services are provided for each claimant at an average of two and a half hours.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

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

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

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

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

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

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Idaho's WIOA Title IB programs (Adult, Dislocated Worker, and Youth) reflect high service levels for UI claimants. IDOL's ES staff are co-located with WIOA Title IB staff, and they also participate in One-Stop partner and community meetings on a regular basis to remain up to date on training, education, and resources. ES staff are often the first point of contact for new job seekers coming into the AJCs, whether in person or virtually, and one of their primary functions is to assess basic needs and eligibility and provide services and/or refer appropriately to WIOA Title IB or other One-Stop and community partner training programs and resources.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE.

SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

In 2022, there were 24,400 Idaho farms and ranches producing 185 commodities. Idaho's crop farming is integrating technology and automation as labor force shortages have been a reality in agriculture for decades. Round-up ready sugar beet seeds have freed up hand hoeing and thinning. Precision agriculture has improved and sped up the drilling/planting of seeds utilizing the Global Positioning System to keep rows straight and alleviate human error. Precision agriculture also refers to tracking the amount of water in the soil to enhance efficiency in irrigation. Programmable pivots have reduced some of the labor needed to move irrigation lines.

Idaho's top five labor-intensive crops are potatoes, sugar beets, hay/grain, onions, and corn, primarily because many workers are still needed for irrigation and harvest. In addition to these, there is large production of peas and lentils in north-central Idaho, and hops production has increased dramatically across the U.S. and Idaho, driven by the popular craft beer industry. Since 2000, hops acreage harvested across the U.S. increased by 50% (Source: NASS) while Idaho's hops acreage harvested grew three times faster at 160% over the same time. The northern and southwestern regions of the state have witnessed growth in hops that require hand-stringing, mowing, and pruning.

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

The dairy industry, concentrated in south central Idaho, has skyrocketed since the 1980's when California enacted environmental laws causing dairy operators to relocate operations to states with less onerous oversight. Many large dairy operations grow their own hay and forage, needing both seasonal workers for irrigation, equipment operation and harvest. Dairies need year-round milking, herding, and feeding workers as the cows are milked three times a day-- relief milkers are employed to ensure reliability. Idaho inventories report 652,000 milk cows in 2022 with 350,000 milk cow replacements, ranking third in the number of dairy cows nationally.

In 2022, Idaho led the nation in the production of potatoes, barley, food-size trout, hay/alfalfa, and peppermint oil. Idaho's hops were ranked second nationally, while sugar beets, cheese and milk were ranked third. Dry onions, winter wheat, all hay, dry, edible peas, and lentils were ranked fourth nationally. Spring wheat, wheat/all, and dry, edible beans ranked fifth nationally.

Idaho's need for an agricultural labor force has remained steady and has been a high-demand industry for decades but lacks labor supply due to its seasonality, hard physicality of the job requiring overtime during growing season, lower wages, and dismal benefit packages. The projections provided by Idaho Department of Labor's (IDOL) Research & Analysis Bureau show the peak demand for agricultural workers was estimated at 63,612 during October 2023

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

Agricultural employers hire foreign workers primarily utilizing the H2A Visa program which reported 7,270 visas certified for Idaho in 2023. Producers are heavily dependent on foreign labor guaranteeing workers as crops must be planted, irrigated and harvested in a timely manner.

Idaho's H2A Adverse Effect Wage Rate (AEWR) for 2024 was established at \$16.54 an hour. Transportation, housing and kitchen availability or food costs must be also factored into program costs. An increasing amount of employers believe the program provides the most reliable labor source, with many producers requesting the same workers each year--reducing the cost of training new workers.

The hourly AEWR applies when the job opportunity requires workers to perform agricultural labor or services covering one or more of the following SOCs:

- 45-2041 - Graders and Sorters, Agricultural Products.
- 45-2091 - Agricultural Equipment Operators.
- 45-2092 - Farmworkers and Laborers, Crop, Nursery, and Greenhouse.
- 45-2093 - Farmworkers, Farm, Ranch, and Aquacultural Animals.
- 53-7064 - Packers and Packagers, Hand.
- 45-2099 - Agricultural Workers, All Other.

Sheep herders fall under a different wage structure due to their 24/7 schedule and remote assignments. All range occupations are earning \$1,986.76 monthly in 2024. Many sheepherders are from Peru and return to Idaho each year to work. To standardize the wage makes sense considering many herds with its herders are shipped across state borders, accessing better weather and grazing opportunities seasonally.

In northern and north central 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 4,062 for 2023 and 4,110 in 2022. North central Idaho's average estimate of ag workers is 3,921 for 2023 and 3,818 for 2022.

In Southeastern and Eastern Idaho, the predominant crops are barley, beans, grain, hay, potatoes, and sugar beets. The hiring season begins in April for irrigation activities. The harvest for potatoes and sugar beets is in October and November, respectively, occurring later in the fall

due to the later start of the growing season in the spring. In addition to farmworkers, there is a requirement for truck drivers, equipment operators from May to November, along with sorters and testers during harvest. In 2023, southeastern Idaho showed an estimate of 8,941 for farmworkers while eastern Idaho had approximately 8,328. 2022 reported slightly lower amounts of agricultural employment with southeastern estimated at 8,885 and eastern at 8,167.

Southwestern Idaho has greater diversity of significant crop activity: seeds, barley, beans, corn, fruits (cherries, apples, and peaches primarily), grain, hay, hops, mint, oats, onions, potatoes, sugar beets, and wheat. Workers are needed for irrigation, hoeing, topping, and harvest in the months of heavy activity. Apples and other fruits require pruning and thinning from January to March. The first cutting of hay occurs in April and can end as late as October. The number of farmworkers in southwestern Idaho was 15,626 in 2023 and 15,457 in 2022.

The traditional South-Central Idaho crops are barley, dry beans, corn, grain, hay, potatoes, sugar beets, forage crops, and wheat. There is also high demand for farm equipment operators and truck drivers. Greenhouse and nursery workers are needed for seedling and plant cultivation. South central Idaho pulls shepherders from Peru with the caveat that the Department of Homeland Security approves countries for H2A visas with a new list for each year. South central Idaho has four of the top five statewide agricultural production by market receipts:

1. Cassia \$937M,
2. Gooding \$783M,
3. Twin Falls County \$680M,
4. Jerome \$640M, and
5. Canyon in southwestern Idaho \$575M

Source: 2017 Ag Census.

South central Idaho estimated an average of 17,400 farmworkers in 2023 and 17,649 in 2022.

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 the southern United States (e.g., Texas, Arizona) or Mexico.

The popularity of the H2A visa program has replaced the diminishing pool of domestic migrant seasonal farmworkers, many of which found jobs in construction, manufacturing, or agricultural jobs closer to home. In 2023, the number of certified H2A visas rose to 7,270, according to the

performance data provided by the Employment and Training Administration. In 2023, the estimated number of MSFWs range from an average in the winter months of 1,600 to a peak of 11,720 in October. Much of the work is seasonal, reflecting on the workforce for this industry.

Due to the difficulty in estimating farm employment monthly, IDOL staff utilize data from a variety of sources to establish MSFW population projections for the state. These include the U.S. Department of Agriculture's Census of Agriculture, U.S. Census Bureau and the Idaho Department of Labor's Quarterly Census of Employment and Wages (QCEW) data.

Challenges to the agricultural industry are many. One challenge that is impacting operations, and consequently labor demand, is the encroachment of housing across Idaho. Prime farmland and grazing acres are being supplanted by either single homes on larger plots or full-scale subdivisions. Idaho continues to be in the top five states for population growth rates, threatening the availability of acres for production going forward. In addition, the aging and succession of the producers has seen some retirees sell land and equipment when there isn't a family member to carry on the legacy. According to the 2017 Census of Ag, one out of every three producers is 65 years of age and over. There are ongoing efforts to create agricultural land trusts that retain land for the purpose of farming or ranching. This allows a producer to sell land to the trust and retire with the cash proceeds; however, competing with developers can be problematic for the trust.

Idaho's need for agricultural workers is projected to be flat, remaining around 63,000 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:

To address the unique regional challenges that Idaho's workforce development system faced, primarily with service accessibility in rural and remote areas and reductions in federal funds, the Idaho Department of Labor (IDOL) implemented a new service delivery model. Face-to-face service can now be found in approximately 38 communities around the state, an increase from the agency's previous brick and mortar offerings. The mobile model modernizes how the department delivers services, focusing on increasing IDOL's presence in rural Idaho 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 southernmost service delivery areas of the State. IDOL will provide appropriate outreach from the American Job Centers (AJC) identified by U.S.DOL as Significant MSFW One-Stop Centers in the following agricultural communities located throughout the state:

- **Caldwell AJC** - Located in city of Caldwell, provides services to Canyon County
- **Burley AJC** - Located in the city of Burley, provides services to Minidoka and Cassia counties.

- **Pocatello AJC** - Provides services to Bingham, Power, Franklin, Caribou, Bear Lake, Oneida, and Bannock counties.
- **Idaho Falls AJC** - Provides services to Jefferson, Butte, and Bonneville counties.

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

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

Migrant and/or Seasonal Farmworker (MSFW) outreach staff are located in the AJCs 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 to language line tools through the state’s one stop system. All AJC staff participating in the outreach effort will receive training on the use of language line tools, including mobile location staff who may assist in the effort where there may be no AJC located in a specific community and may resort to use language line tools to assist in communication efforts.

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

Idaho PY2024 Outreach Goals

	Estimated Total Farmworker Population*	Outreach Goals-ES Staff	Outreach Goals in Conjunction with Other Agencies
<i><NORTH IDAHO – PLANNED STAFFING: .15FTE/year W-P</i>			
<i>Post Falls AJC/Bonnors Ferry mobile</i>	879	53	35

	Estimated Total Farmworker Population*	Outreach Goals-ES Staff	Outreach Goals in Conjunction with Other Agencies
SOUTHWEST IDAHO – PLANNED STAFFING: 1 FTE/year W-P; .03/year Cooperating Agency			
<i>Caldwell AJC/Payette mobile</i>	2,630	157	105
<i>Caldwell AJC</i>	6,115	367	244
<i>Caldwell AJC/Mtn. Home mobile</i>	3,026	181	121
SOUTH-CENTRAL IDAHO – PLANNED STAFFING: 1 FTE/year W-P; .06/year Cooperating Agency			
<i>Twin Falls AJC**</i>	10,966	324	222
<i>Burley AJC</i>	5,888	352	229
SOUTHEAST IDAHO – PLANNED STAFFING: 1.5 FTE/year W-P; .06/year Cooperating Agency			
<i>Idaho Falls AJC/Rexburg mobile</i>	7,321	438	292
<i>Pocatello AJC/Blackfoot mobile</i>	9,101	546	364
Total	45,926	2,418	1,612

Idaho Department of Labor: Estimated Agricultural Employment-*November 2023*

**Farmworker population based on counties which make up the AJC regions and 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 have expressed creativity in seeking out opportunities to contact farmworkers who may not be reached through the normal intake activities conducted at the AJCs. ES staff target Idaho farmworkers through different types of media outlets, such as the

multitude of radio stations in the state with Spanish programming that regularly air public service announcements from IDOL. These announcements provide notice of the workforce development system's services and are used to inform and educate farmworkers and their families about the services and protection available in the state of Idaho.

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

In addition, MSFWs and Idahoans across the state have seen, heard, and read about accessing IDOL services in the service delivery model described earlier, and will continue to do so through various mediums, including publications and social media. The Idaho Department of Labor prints bilingual brochures, posters, and flyers for dissemination at and beyond the AJCs. One example is an easy-to-carry bilingual rack card, which outlines the state's complaints process which provides MSFWs guidance on how to file a complaint or wage claim.

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

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

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

The AJCs have outreach staff who are bilingual in Spanish to conduct outreach.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM ("COMPLAINT SYSTEM" DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWs IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

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

The State Monitor Advocate assists the department by providing training and technical assistance to One Stop Staff, especially dedicated MSFW outreach personnel, concerning the MSFW special service requirements and best practices, much of it on a one-on-one basis. The topics presented during trainings include outreach practices, labor law updates, H-2A/Foreign Labor Certification, the Employment Service Complaint System, and labor market information.

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. However, the Monitor Advocate continues to prioritize the provision of one-on-one training and technical assistance to newly hired outreach personnel. The Monitor Advocate makes this practice a priority when assisting with the onboarding of new outreach staff. As new outreach staff begin their work at an AJC, the SMAs individualized technical assistance continues as a program mainstay. In-person training and technical assistance presentations, especially in a group setting, may resume as necessary or as time permits.

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 state's One-Stop system, the outreach workers are also responsible for providing information regarding ES services, farmworker rights, Unemployment Insurance, the complaint system, WIOA Title I-B employment and training services for Adults, Dislocated Workers, and Youth, WIOA Title II Adult Education services, WIOA Title IV Vocational Rehabilitation services, SNAP and TANF benefits, along with other community services that may be available.

The MSFW page in the department's internal website, EPIC, keeps updated program information available for outreach workers. Not only are outreach workers aware of the WIOA core program services, but they are also active collaborators in advocating for and recruiting participants. Previously, Governor's Reserve/state funds have been set aside to provide additional assistance to MSFW youth at the behest of outreach staff. American Job Center staff, including outreach workers, continue to work together to find eligible individuals in the MSFW communities to connect them to Title I-B services. This included the department's implementation of a media outreach campaign targeting MSFW and Hispanic youth to encourage their enrollment in the Title I-B youth program, triggering an increase in these youth expressing an interest in the program seen by AJCs all along the Snake River plain. The infusion of Governor's Reserve funds also helped the state address the WIOA requirement to provide additional assistance to local areas with high concentrations of eligible youth which, for several years, directed a portion of these funds to specifically recruit these targeted youth in areas of the state with extensive agricultural activity.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

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

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

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEE AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

In a cooperative agreement with the Community Council of Idaho and other partner agencies, IDOL serves as the lead organization in coordinating outreach efforts at both the state and local levels. All partners are dedicated to increasing MSFW customers' awareness and access to education, training, and other services. As Idaho's NFJP grantee, CCI is not considered a Wagner-Peyser subrecipient required to conduct outreach, but rather as an active, collaborative participant 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 IDOL and the Community Council of Idaho is in the process of being reviewed and renewed.
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system.
- Partners are collaborating on developing and sharing outreach materials among all entities.
- Coordination of community information and staffing efforts at the local level to enhance outreach.
- The administrative entities have reached data sharing agreements, facilitating reporting and data analysis which improves partnership and service delivery, along with opportunity assessment and process enhancement to streamline co-enrollment.

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

Program service information is presented verbally and/or in writing in both English and Spanish. In many instances, these efforts are coordinated with other agencies, such as Idaho

Legal Aid, the Community Council of Idaho, and others 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

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

With the recent transition of WIOA service providers, the state looks to maintain a sustained level of service to MSFWs visiting AJCs across Idaho in search of appropriate workforce services. Aware of this change, State outreach workers make referrals to MSFWs who may be in need of training services to the appropriate WIOA Title 1 B provider, IDOL for Youth and Equus Workforce Solutions for Adult or Dislocated Workers.

(ii) Agricultural-related job listings have increased over the years, primarily due to the rapidly increasing demand for foreign workers through the Foreign Labor Certification programs, initiated through the Agricultural Clearance Order process. As noted earlier, this activity has increased significantly in the state over the past several years. Many of the employers utilizing this program are members of the Snake River Farmers' Association (SRFA), Western Range Association (WRA) and Mountain Plains Agricultural Services (MPAS), which act as a recruitment agency for Idaho agricultural employers. The state experienced a more than 5.87 percent increase in the number of federal H-2A temporary labor certification program applications during PY22. This surge accounted for 902 applications which was an additional 52 applications over PY21's activity. A total of 607 Idaho employers requested more than 7,186 foreign workers, or 12.77 percent above the previous year, all to facilitate Idaho's production of its agricultural crops. And, as directed by U.S.DOL, Idaho also assisted neighboring states with

an additional 209 applications with interstate clearance orders as they searched for an additional 5,169 workers to meet their own needs. 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 with labor needs, the department reviews prior year job orders and request input from grower organizations and local employer committees. Direct outreach activities, specialized surveys, and other labor market information available through IDOL and One Stop system will also be used to identify agricultural employer needs. Information from other agencies or organizations that represent or serve the agricultural community will also be solicited to identify areas of needed services.

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

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

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

The state has multiple resources available to provide information regarding the complaint system. Outreach workers and one stop partners encourage MSFWs to come to their local AJC or mobile location to register for all available services. For those who choose not to or cannot visit

the AJC, the outreach worker provides on-site assistance for services including the preparation and acceptance of complaints or apparent violations.

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

For the last decade, a Spanish radio station in the city of Burley collaborated with its local AJC to reach out to the Spanish-speaking community. When originally aired, the employment-related segments generated more calls than usually received during the previously scheduled broadcast for that hour timeslot. Because of its popularity, the radio station established a regular Friday morning, hour-long show that continues to provide information to the public on a multitude of issues revolving around the area of employment. Since it began in 2013, the segments addressing the complaints system and worker's compensation that have been periodically presented are likely to elicit more calls from the listening audience.

The efforts to inform Wagner-Peyser program users of these services found some success, as the Idaho Department of Labor processed a total of 525 Employment Services complaints, only three of which were MSFW complaints, accompanied by five apparent violations. Over 805 issues were identified among the processed complaints. Wages remain the number one issue cited by program customers, as the state's Wage and Hour Section addressed 54 MSFW wage claims of a total of 96 claims filed during PY21. For PY22, those numbers total 47 and 108, respectively, which is an over 12 percent increase in the total number of claims from the previous year, but an equal percentage reduction in MSFW claims during the same period. The AJC in Caldwell had most of the claims during the two years highlighted, comprising almost 28 percent of PY21's total MSFW wage claims, and an astounding 53 percent of claims for PY22.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

Agricultural jobs, both temporary and permanent, continue to be important to local economies throughout the state. The increased interest by agricultural employers in having a reliable workforce at the "right" time has been gaining steam in terms of importance, compared to other considerations such as costs. This situation presents a phenomenal opportunity for the IDOL and the One-Stop System to demonstrate to employers, workers and the public that AJCs and their partners can be the first and 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 in-state 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

As mentioned before, IDOL maintains several agreements and partnerships with other WIOA Core programs and partners throughout the state, each which have a significant impact on MSFWs across the state. These include:

- The Community Council of Idaho -The Community Council of Idaho, for example, sits on the state's Workforce Development Council's (Idaho's WIOA state board) One Stop Committee. Both the state monitor advocate and the Community Council also entered into an agreement outlining the outreach and increased number of services that the SWA and NFJP will provide to MSFWs across the state.
- HEP/CAMP - In addition, IDOL 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.
- U.S.DOL Wage and Hour - 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 (MOU) 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.

In addition to the relationships cited above, the Monitor Advocate continues to strengthen and expand collaborative relationships with various organizations. These include close collaborations with Idaho Legal Aid, Idaho Immigrant Alliance, the Idaho Food Bank, and many of the enforcement agencies across the state. This year, the SMA established new collaborations with Idaho's Mexican Consulate and Poder of Idaho. Along with a representative from the Idaho Wage and Hour Division and the Idaho Human Rights Commission, the SMA presented on services to farmworkers at the Second Annual Latinos Unidos Conference.

Statewide MSFW Training and Conference

Plans are currently underway for a statewide training to take place in May 2024, targeting state outreach and H-2a program staff. Training highlights include the state's complaint system,

USDOL's required changes for implementation for the MSFW outreach program, the changes taking place with the H-2a program, and the challenges and obligations faced by Idaho's agricultural employers relating to program participation. With the successful implementation of this event, it is believed that the state could have this become an annual occurrence, to ensure staff maintain an awareness of the importance of this program.

In addition to this event, the state is exploring the possibility of hosting a statewide MSFW Training Conference, which would be open to not only One-Stop partners, but other relevant stakeholders throughout the state. In coordination with the State Monitor Advocate, partners such as the College of Idaho, the Community Council of Idaho, the state's HEP/CAMP programs, include AJC and NFJP staff, have previously worked in concert to present MSFW, H-2a, and other relevant MSFW information to all those attending this event. Should funding be available to support this effort, the department hopes to commit enough fiscal resources to ensure this conference takes place. Tentative plans are for this to occur in May 2025, which would also include an IDOL statewide training for department staff.

See section (4)(E) above for a list of collaboratives and coordinated activities will occur during the upcoming agricultural seasons.

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 adjust 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.

At this time, the State Monitor Advocate will be reviewing this plan but will have direct contributions in drafting this agricultural plan, with consideration given to the annual summary developed under 20 CFR 653.108(g)(4).

Electronic copies of this plan have been provided to Idaho's WIOA 167 grantee- National Farmworker Jobs Program, Community Council of Idaho, with a request to submit written comments beginning January 19, 2024, through February 22, 2024. A draft of this 2024-2027 Agricultural Outreach Plan and a request for comments have also been sent out the same day to the following agencies/service providers with instructions to provide comments:

- Erik Johnson, Director Migrant Unit Idaho Legal Aid erikjohnson@idaholegalaid.org
- Jane Donnellan, Administrator Idaho Division of Vocational Rehabilitation jane.donnellan@vr.idaho.gov
- Michelle Kelley, HEP/CAMP Recruiter Boise State University mkelley@boisestate.edu
- 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
- 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
- *Poder of Idaho*, poder@poderofidaho.org

A draft of this plan will be incorporated as part of Idaho's WIOA Combined State Plan-PY24-PY27, which will undergo a public comment period beginning January 19, 2024, through February 22, 2024. Any comments received from the stakeholders during this specific period will be incorporated as part of the final 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 the full implementation of WIOA, the state struggled to achieve *Attained* status for all three of the MSFW Compliance Indicators. Since then, the state has seen improvement with few measures lacking. However, this may be attributed to several issues, mostly due to the reporting requirements under WIOA. Many of these measures are based on wage-related data. The lag time in reporting wages, which relies on automated reporting from employers, can cause a delay. In addition, because of WIOA's requirements, an individual that is considered active in any of the partner programs, despite obtaining employment, is not considered as exited from a program and therefore not immediately counted in the measures. As a result of both reporting issues, some placements may not be counted if one continues their active status in a program such as Wagner-Peyser (Labor Exchange).

With regards to the MSFW Equity Indicators, IDOL notes that a comparison of these over the years shows that the state is consistently meeting most of these numbers. Unfortunately, the overall number of applications has decreased which subsequently affects the indicators. The pandemic played a significant role in the establishment of these annual universes, in which MSFWs had no location to visit to receive any of the services they sought through AJC. This also includes little to no visits to the multiple mobile locations across the state. As a result, the state and its AJCs are trying to ameliorate the situation via its collaborative efforts and distinct outreach plan. This can be seen in this past year's results as Idaho was shown to have achieved four of the Equity Indicators, improving its performance over the previous year's outcomes.

Despite only achieving one of three Compliance Indicators, PY22's outcomes highlight a significant improve over PY21's results, as the earnings and job placements. This most recent year indicates MSFWs had an 11.82 percent increase over the median earnings of PY21, and a 5.15 percent increase the long term, non-ag placements over the same time frame. This progress is not where the state would like to see it, but it is showing steps in the right direction.

Corrective Action - Wagner-Peyser management and outreach staff will make a concerted effort to inform AJC staff about the need to properly identify MSFW participants. This is especially true of staff stationed in mobile locations across the state, where any participant may meet with staff. W-P program staff will continue to assess data collection processes to better document MSFW placements. Sharing best practices about outreach efforts to agricultural employers should lead to an increase in recording WIOA services to employers across the state. The state's AJCs remain as the focal for MSFWs to fully accessing the state's labor exchange system to receive assistance in their workforce endeavors, whether it be help with a job search or a referral to a WIOA Title I-B program for training or other intensive career service. One-Stop partners are continually reminded and encouraged to refer MSFWs to these eight sites and their nearest mobile location. The

department has planned for a statewide MSFW training to take place in 2024 to address these and other issues, in the anticipation of improving Idaho's performance in these areas.

PY2019

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	219	100%	17006	100%	
Referred to Employment	49	22.37%	1918	11.28%	Yes
Received Staff Assisted Services	215	98.17%	9916	58.31%	Yes
Referred to Support Service	0	0.00%	0	0.00%	Yes
Career Guidance	33	15.07%	2371	13.94%	Yes
Job Development Contact	146	66.67%	10210	60.04%	Yes
<u>Compliance Indicators*</u>	<u># of MSFWs</u>	<u>% of MSFWs</u>	<u># of Non-MSFWs</u>	<u>% of Non-MSFWs</u>	<u>Compliance</u>
Placed in Job	150	75.76%	9,049	69.50%	Yes
Placed \$.50 above min Wage	NA	NA	NA	NA	NA
Placed in Long Term non-ag Job	98	86.73%	6,947	88.54%	No

PY 2020*

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Wagner-Peyser Participant MSFW	109	100%	13,173	100%	
Received Basic Career Services (Staff-Assisted)	109	100%	13,116	99.57%	Yes
Received Staff-Assisted Job Search Activities	68	62.39%	7,733	58.70%	Yes
Received Staff-Assisted Career	12	11.01%	1,247	9.47%	Yes

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Guidance Services					
Received Unemployment Insurance (UI) Claim Assistance	0	0.00%	0	0.00%	Yes
Referred to Employment	9	8.26%	759	5.76%	Yes
Referred to Federal Training	19	17.43%	2,305	17.50%	No
Referred to Other Federal /State Assistance	0	0.00%	0	0.00%	Yes
Received Individualized Career Services	77	70.64%	9,581	72.73%	No
Compliance Indicators	# of MSFWs		# of Non-MSFWs		Compliance
Individuals Placed in a Job Rate	71.04%		64.28%		Yes
Median Earnings of Individuals in Unsubsidized Employment	\$6,292.70		\$6,134.96		Yes
Individuals Placed Long Term in Non-Agricultural Jobs Rate	61.60%		67.97%		No

**USDOL changed how MSFW equity was demonstrated within the program in 2020.*

PY 2021

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Wagner-Peyser Participant MSFW	161	100%	13,079	100%	
Received Basic Career Services	116	72.05%	9,877	75.52%	No

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
(Staff-Assisted)					
Received Staff-Assisted Job Search Activities	63	39.13%	6,790	51.92%	No
Received Staff-Assisted Career Guidance Services	19	11.80%	1,783	13.63%	No
Received Unemployment Insurance (UI) Claim Assistance	0	0.00%	0	0.00%	Yes
Referred to Employment	29	18.01%	2,940	22.48%	No
Referred to Federal Training	27	16.77%	1,362	10.41%	Yes
Referred to Other Federal /State Assistance	0	0.00%	0	0.00%	Yes
Received Individualized Career Services	152	94.41%	12,398	94.79%	No
Compliance Indicators	# of MSFWs		# of Non-MSFWs		Compliance
Individuals Placed in a Job Rate	67.21%		62.29%		Yes
Median Earnings of Individuals in Unsubsidized Employment	\$6,685.88		\$6,922.47		No
Individuals Placed Long Term in Non-Agricultural Jobs Rate	58.44%		69.43%		No

PY2022

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Wagner-Peyser Participant MSFW	182	100%	17,789	100%	
Received Basic Career Services (Staff-Assisted)	148	81.32%	14,368	80.77%	Yes
Received Staff-Assisted Job Search Activities	69	37.91%	7,864	44.21%	No
Received Staff-Assisted Career Guidance Services	14	7.69%	1,941	10.91%	No
Received Unemployment Insurance (UI) Claim Assistance	0	0.00%	0	0.00%	Yes
Referred to Employment	40	21.98%	3,043	17.11%	Yes
Referred to Federal Training	18	9.89%	1,895	10.65%	No
Referred to Other Federal /State Assistance	2	1.10%	231	1.30%	No
Received Individualized Career Services	152	83.52%	14,782	83.10%	Yes
Compliance Indicators	# of MSFWs		# of Non-MSFWs		Compliance
Individuals Placed in a Job Rate	76.62%		69.65%		Yes
Median Earnings of Individuals in Unsubsidized Employment	\$7,475.94		\$8,325.90		No
Individuals Placed Long Term in Non-Agricultural Jobs	61.45%		70.04%		No

MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Rate					

D. ASSESSMENT OF PROGRESS

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

Year after year, the state continually exceeds its overall planned outreach objectives for the season, achieving its outreach-contact goal of contacting 10% of MSFWs throughout the state. For PY22, state outreach workers contacted 6,364 MSFWs across Idaho, providing them information about the multiple services cited earlier. The state will strive to reach its goals of exceeding its planned outcomes for the year.

As noted earlier, the number of actual MSFW applications for the state had previously declined over the last several years. This result coincided with the department’s initial implementation of its automated *IdahoWorks* management information system in combination with the changes in WIOA’s MSFW reporting requirements. Both these situations contributed to the reduction in the state’s MSFW applications. In addition, the state has found that MSFWs are among those who have been somewhat apprehensive about returning to the utilize Idaho’s workforce development system via its AJCs and mobile locations. Despite this, the changes to the questions posed to *IdahoWorks* users now allows MSFWs to identify themselves more easily, along with the extensive outreach efforts should lead to an increase in the state’s MSFW applications. The state will continue to review MSFW registrations at various times throughout the year to ensure these applicants are appropriately coded so they may be properly served and counted for state and federal reporting purposes.

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

On January 10, 2024, the state Monitor Advocate reviewed the state’s final draft of its Agricultural Outreach Plan, and offered suggestions and commentary to ensure the state can appropriately meet the needs of MSFWs across Idaho. The AOP was included as part of the overall WIOA Combined State Plan and made available for public comment - no comments were received.

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: <ul style="list-style-type: none"> 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing. 	Yes
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct	Yes

The State Plan must include	Include
deficiencies in performance (20 CFR 658.601).	

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	66.0		66.0	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	67.0		67.0	
Median Earnings (Second Quarter After Exit)	\$7,125		\$7,125	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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. 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 eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, 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.

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 organization who has ‘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))

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 State's monthly newsletter, press releases, 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 English Language and Civics Education (IELCE) and Integrated Education and Training (IET) programs are delivered in collaboration with community partners; local programs are encouraged to build and sustain business, industry, and workforce systems 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)

The state of Idaho will select a committee to screen each application to determine if the applicant is an eligible provider of demonstrated effectiveness before the application is reviewed, scored, and considered for funding. Only applicants proving demonstrated effectiveness in providing adult education and literacy services are eligible to apply for AEFLA funds. The State will notify applicants ineligible for funding due to lack of demonstrated effectiveness.

Demonstrated effectiveness is established when:

1. An eligible provider that has been funded under Title II of the Act provides performance data required under section 116 to demonstrate past effectiveness. This data must illustrate its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the state's application for funds, and;
2. An eligible provider provides information regarding its outcomes for participants related to: employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Eligibility will be based upon a 'yes'/'no' determination where:

- *Yes* Indicates the applicant has submitted the previous two years' worth of data demonstrating effectiveness in the areas shown below and met a minimum 15% achievement on Measurable Skill Gains:
 - Academic level gains in the content areas of reading, writing, mathematics, and English as a Second Language;
 - Employment outcomes;
 - Attainment of a secondary school diploma or its recognized equivalent,
 - Transitions to post-secondary education/training.
- *No* Indicates the applicant has not demonstrated effectiveness in serving eligible individuals. Grant applications not meeting demonstrated effectiveness will not be forwarded to committees for considerations in funding.

Applications that meet the demonstrated effectiveness requirement will be reviewed, scored, and considered for funding.

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 grant 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 eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- 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.

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.

Programs provide activities which are appropriate to meet the needs of the populations in their facility. For example, short-term facilities (such as county jails) 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) 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 eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

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 serve students through the support of operational expenses of local IELCE programs, including teacher salaries and benefits, classroom supplies, textbooks, and other items and activities necessary to carry out instruction. The State collaborates with eligible local providers to reinforce existing best practices while developing or expanding IELCE offerings. The State also supports local program providers' participation in Office of Career, Technical and Adult Education (OCTAE) sponsored technical assistance on IELCE development.

The State requires that IELCE is offered in combination with Integrated Education and Training (IET). Local programs delivering IELCE programming must connect IELCE to an IET through a career pathway. For example, an English for healthcare careers IELCE could connect to an IET for Certified Nurse Assistants; an IELCE focusing on digital skills in the U.S. workplace could connect to a software development IET. Each IELCE offering must provide a career-specific connection to a related IET.

The State requires that IELCE must include instruction in literacy, English language acquisition, and instruction on the rights and responsibilities of citizenship and civic participation. Literacy and English language acquisition are integrated with and contextualized to the IELCE career pathway and the IET to which the IELCE connects. Likewise, instruction on the rights and responsibilities of citizenship and civic participation connects explicitly to workforce preparation and community membership in context of the connected career pathway.

IELCE programming is designed to prepare for and place English language learners into unsubsidized employment by delivering literacy, English language acquisition, and civics education concurrently and contextually with workplace preparation. IELCE may also provide workforce training. IELCE delivery integrates with the State's workforce system and functions to provide career service support, access to training, and career transition support. Local workforce systems integrate with IELCE in the State include Idaho's One-Stop system, Workforce Training Centers, and Vocational Rehabilitation.

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 section 223 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.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Permissible activities supported with Section 223 Leadership funds include the following:

- Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such components 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 to 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. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

The State assesses the quality of providers of adult education and literacy activities under title II and takes 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 IDCTE Adult Education policy. The State assesses the effectiveness and quality of local providers through 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.

The State will assess program quality through:

1. Quarterly desk audits;
2. Regularly scheduled program monitoring visits; each visit to evaluate one or more of the following program areas:
 - a. Data, intake, and assessment;
 - b. Instruction, programming, and performance;
 - c. Fiscal;
3. Data verification and validation in the IDCTE’s adult education management information system (MIS).

The State will take the following actions to improve program quality:

1. Biweekly director meetings that include technical assistance and training,
2. Bi-annual regional directors’ trainings,
3. Site visits,
4. Monitoring visits,
5. Data quality training,
6. LACES training,
7. Technical assistance,
8. Program improvement plans, when indicated.

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
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes

The State Plan must include	Include
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

The State Plan must include	Include
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 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>)

APPLICANT'S ORGANIZATION	Enter information in this column
Applicant's Organization	Idaho Division of Career Technical Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Trevilyn
Last Name	Hardy
Title	Director, Adult Education
Email	trevi.hardy@cte.idaho.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or

- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The State of Idaho requires all AEFLA funded programs 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.

The Idaho AEFLA State Office will take necessary steps to ensure equitable access to, and participation in, all activities funded through federal dollars including professional development and technical assistance. To do so, the state office will identify any special needs of its target audience and provide accessible formats of written documents and provide options for virtual and in-person events to ensure full participation of attendees. In addition, the State will ensure all opportunities for employment and participation in programs is open to anyone, regardless of gender, race, national origin, color, disability, or age. The goal of Idaho is to ensure equitable access to resources so that staff, local providers, and students can reach their full potential. Professional development and trainings for local providers and their staff will be recorded and archived for those who otherwise could not attend an event.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

One barrier for students and educators in the State is access to adult education professional development or programming in remote parts of the state, particularly in areas where challenges of digital access also exist. Linguistic accessibility to marketing and intake materials is also a barrier for Idaho's immigrant and refugee population.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

The state of Idaho will develop, and deliver statewide, training for local programs on best practices for supporting the enrollment and retention English language learners within adult education programs, particularly within IELCE and IET programs, in Idaho. This training will include an emphasis on linguistic accessibility of marketing and intake materials and strategies for contextualized English language instruction in the multilingual classroom. In order to reduce

barriers to the training opportunity, the training will be delivered in multiple formats to ensure equal access for remote participants and will be recorded with captioning and transcribed for additional accessibility.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The State will design and deliver this professional development series during the 2023 and 2024 program years. The first and third trainings will take place a regional director's meetings to be held in the spring and fall of 2024. The State will deliver two additional trainings, via webinar in the summer and winter of 2024.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	37.0	37.0	39.0	
Employment (Fourth Quarter After Exit)	37.0		39.0	
Median Earnings (Second Quarter After Exit)	5200.0		5400.0	
Credential Attainment Rate	45.0		47.0	
Measurable Skill Gains	31.0		33.0	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

**PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION
(COMBINED OR GENERAL)**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	10/21
Parent Training and Information Center	1	7/21
Client Assistance Program	1	12/22
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	12/23
Community Rehabilitation Program Service Provider	1	7/21
Business, Industry, and Labor	1	12/22
Business, Industry, and Labor	2	12/23
Business, Industry, and Labor	1	6/21
Business, Industry, and Labor	1	12/23

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Disability Advocacy Groups	2	8/21 & 6/22
Current or Former Applicants for, or Recipients of, VR services	2	12/22 & 8/21
Section 121 Project Directors in the State (as applicable)	1	12/13
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	10/23
State Workforce Development Board	1	7/21
VR Agency Director (Ex Officio)	1	6/14

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

IDVR's SRC is meeting both the composition and quarterly basis meeting requirements of Section 105.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

The State Rehabilitation Council provides input and feedback to the Idaho Division of Vocational Rehabilitation through various methods including the SRC quarterly meetings, Annual Report development, committee work, participation in the Strategic Planning and Goal Setting activities, and other structured activities designed to leverage the strategic composition of the SRC.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

CSNA

SRC Input:

The SRC reviewed and made recommendations for the surveys used in the CSNA. They participated in focus groups and supported the dissemination of the surveys. The SRC

responded to the findings in the initial data results during an SRC meeting and then reviewed/responded to the draft report.

IDVR Response:

The Division appreciates the time SRC members took to review the draft CSNA. This CSNA was a more comprehensive report than in prior years. The input, questions, and recommendations provided by the SRC were addressed and incorporated into the final report.

State Plan

SRC Input:

SRC members reviewed and provided input into the 2024 VR Portion of the State Plan. This was done by reviewing data and information from the draft State Plan during SRC meetings and by sending members a copy of the draft State Plan with guidance on the specific areas required for the SRC to review. A designated SRC member collects and summarizes the responses for the IDVR staff.

IDVR Response:

The accepted the corrections identified in the State Plan sections reviewed by the SRC. Most corrections were grammatical and formatting recommendations.

SRC Annual Report

SRC Input:

The SRC has worked each year with IDVR to produce a combined annual report. This process begins with a designated subcommittee that reviews the prior year's report and provides input on what type of changes should be implemented for the upcoming year. The entire SRC then reviews the proposed report in the October quarterly SRC meeting and provides additional feedback. Traditionally, the SRC Chair develops opening remarks for the report by providing an overview of the SRC's work for the year.

IDVR Response:

The Division responded to the SRC's requests to the Combined Annual Report, including the addition of more data points, adding more QR Codes for easier access to the report and IDVR website.

By-laws Changes

SRC Input:

In fulfilling the federal requirement to review the council by-laws every three years, the SRC proposed and passed two changes to the by-laws in 2023: 1) addressing "meaningful break" to be defined as having a break from serving on the council for twelve (12) months before being re-nominated to serve another term; and, 2) clarifying that an employee under the State Board of Education cannot serve as the Chair or Vice Chair of the SRC. The bylaws also reflect changes to the committee restructure.

IDVR Response:

The Division supports the SRC's committee restructure and has reflected these updates in the bylaws.

Committee Restructure

SRC Input:

The SRC motioned and passed to restructure their committees through consolidation. The two committees include an Executive Committee and a Planning, Policy, and Program Effectiveness Committee. The latter includes two chairs, who would also chair two subcommittees within the overarching Planning, Policy, and Program Effectiveness Committee. The SRC members will serve on at least one subcommittee in addition to serving on a committee.

IDVR Response:

The Division supports the SRC's committee restructure and reflected these updates in the bylaws.

Fair Hearing Officers

SRC Input:

The Code of Federal Regulations 361.57 (f) ii, specifies that the SRC responsibility includes involvement in the process for selection of fair hearing officers. In 2022, the Idaho State Legislature passed HB629, which created the Office of Administrative Hearing to have consistency among state agencies on how fair hearings are conducted. The SRC motioned and passed to select the Office of Administrative Hearing for the agency's fair hearing process.

IDVR Response:

IDVR appreciates the councils support to follow Idaho State laws and rules regarding the selection of hearing officers.

New Members

SRC Input:

The SRC motioned and passed the recommendation that a former VR applicant or recipient, be added to the SRC pending the approval and sign-off from the Governor. Additionally, the SRC motioned and passed the recommendation that a new Business, Labor and Industry member be added to the SRC pending the approval and sign-off from the Governor.

The SRC in November of 2023 voted in four new members pending approval and sign-off from the Governor:

Three new Business, Labor and Industry members, including a former SRC member, a former recipient of VR Services and who is also an accomplished professional in one of Idaho's largest employers, JR Simplot, and member of an organization that hires VR clients in the culinary trade, her company, Create Common Good provides opportunities for VR customers and underprivileged or under-employed individuals learn the culinary trade and careers in the field. A new VR Counselor joins the council with the unique perspective of Pre-EST work.

IDVR Response:

IDVR continues to meet the federal composition requirements of the council and consistently meets on a quarterly basis.

NCRSC

SRC Input:

SRC members have attended the NCRSC and CSAVR meetings in DC, Texas, and Georgia. The attending members reminded the SRC of their essential roles and responsibilities, including participation in the CSNA, customer satisfaction surveys, and annual report preparation.

IDVR Response:

IDVR is pleased to have the support of the SRC and for them to continue to understand their roles and responsibilities as members of the council.

Customer Satisfaction Surveys (CSS)

SRC Input:

The SRC Chairperson indicated that qualitative comments would be useful in the SRC review of the CSS and should be included for future meetings.

IDVR Response:

The Division accepted this recommendation and is now including qualitative comments in the CSS quarterly report to the SRC.

Policy Review

SRC Input:

The SRC provided input and feedback on several new or revised agency policies: Competitive Integrated Employment, Post Employment Services, and Informed Choice. The majority of the comments included grammatical corrections and spell out acronyms. The Client Assistance Program recommended several additions to or clarification of statements in the Informed Choice policy.

IDVR Response:

IDVR appreciates and accepted all of the SRC's input and feedback related to the new or revised policies.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

IDVR responses to the State Rehabilitation Council's input and recommendations are addressed alongside this input in the prior section (a.4). No SRC input was rejected.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

IDVR's CSNA which began late summer of 2022 and was finalized in December 2023 includes Section Two: Needs of Individuals with the Most Significant Disabilities, Including their Need for Supported Employment. These results are used to inform this section of IDVR's State Plan for Program Years (PY) 2024 and 2025. IDVR management and the State Rehabilitation Council met in January 2024 for a strategic planning and prioritization session to establish goals for this state plan based substantially upon these CSNA results. This section synthesizes the major CSNA recommendations relating to MSD and SE needs.

The Division should expect an increasing need for MSD to accompany Idaho's increasing population. Idaho's overall population growth from 2010 to 2020 was 17.3 percent, or second overall, which is roughly 10 percentage points higher than the Nation's population growth rate of 7.4 percent between 2010 and 2020. Idaho's current population is just under 2,000,000 residents.

The estimated average for the number of people with disabilities, ages 18 to 64, residing in the Nation in 2021 is 10.7 percent. Idaho's percentage is higher than the National average by 1 percent, averaging 11.7 percent.

Individuals with disabilities in the United States earn approximately \$12,510 per year less than individuals without a disability. In the State of Idaho, people with disabilities earn roughly \$10,048 less than individuals without disabilities, and individuals with an MSD who utilize SE experience worse quality vocational outcomes than those with disabilities in general.

At the end of December 2022, the National non-adjusted unemployment rate was 3.6 percent, while Idaho's annual non-adjusted unemployment rate was 2.7 percent. Idaho's civilian, seasonally adjusted, unemployment rate has steadily been climbing over the past year, as of December 2023 the unemployment rate is 3.3 percent (an annual increase of 0.5 percent).

Supported Employment (SE) is a necessary service for people with the most significant disabilities and needs. Primary concerns include changes due to WIOA and the pandemic which continue to present challenges in implementing new practices (e.g., Customized Employment) and maintaining trained, effective providers across all areas of the state.

The following CSNA themes emerged under the needs of individuals with the most significant disabilities including their need for supported employment:

Supported Employment (SE) 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 and the pandemic have created some challenges in implementing new practices and maintaining trained, effective providers.

- Supported Employment is considered an effective practice, but there is a need for training to improve the understanding of IDVR staff on CRP services. The State of Idaho legislature moved EES from IDVR to Health and Human Services which should provide better alignment of Idaho's external ES funders.

- Participants expressed a need to improve the quality of employment outcomes for individuals with the most significant disabilities.
- Customized Employment (CE) is seen as an important employment strategy for individuals with the most significant disabilities. CE had been attempted but experienced challenges in maintaining providers, fidelity, and outcomes.
- 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, soft skills, and little to no work experience.

The following table outlines select caseload statistics for the Idaho Division of Vocational Rehabilitation for Program Years 2019-2021 relating to significance of disability.

Application, Eligibility, and Significance of Disability PY 2019-2021

	2019	2020	2021
Applications	2,881	2,524	2,464
Percent of apps found eligible	89.80%	92.59%	93.10%
Percent of apps that had a determination made within 60 days	97.29%	96.49%	97.38%
Disabled	980	859	949
% of total	36.73%	37.61%	41.60%
Significant	961	750	732
% of total	36.02%	32.84%	32.09%
Most significant	727	675	600
% of total	27.25%	29.55%	26.30%
Total number of cases served	7,916	6,813	6,340

The data indicates that from 2019 to 2021, there was a significant decrease of individuals that applied for services from IDVR; however, the percentage of applicants determined eligible increased each year. The decrease totaled 417 applicants from 2019 to 2021. Though there was a similar trend in the 2020 CSNA, the decrease is much less than in the previous three years. Noteworthy is more recent internal data suggesting application volume stabilized in PY 2021 and is now increasing with 3,093 applications in PY 2022 (a year-over-year increase of over 25.5 percent).

For PYs 2019-2020 individuals with mental health impairments constituted the largest percentage of applicants, total number of cases served, and the total number of plans developed for IDVR, which is consistent with what the data reflected in the 2020 CSNA. Over the three-year

period, the number of applicants across categories increased and decreased over time, but mental health impairment is the only category with an increase from 2020 to 2021. Individuals with either 'mental health impairments or cognitive impairments combined' comprised between 68-72 percent of the total number of cases served over the three-year period. The employment rate for each group increased from 2020-2021.

The data indicates that Presumptively Eligible applicants (SSA beneficiaries), which are regulatorily assigned at least SD, but often MSD, declined by 199 individuals from 2019 to 2021, while the rate of those who were determined eligible remained between 93.41-96.25 percent over the three-year period. In the 2020 CSNA, there was a significant decrease in the employment rate for SSA beneficiaries; however, during this three-year period, there was an increase of over four percent from 2020 to 2021.

Supported Employment for IDVR by Significance of Disability

	2019	2020	2021
Disabled	0	0	0
% of total	0.00%	0.00%	0.00%
Significant	0	0	0
% of total	0.00%	0.00%	0.00%
Most significant	249	226	196
% of total	100.00%	100.00%	100.00%
Number of cases closed rehabilitated	131	137	140
Employment rate at exit	46.45%	49.82%	53.44%
Median wages of all exited participants	\$962.46	\$895.25	\$1,659.84
Total number of cases served	868	812	725

Customers must have a most significant disability to receive SE services. IDVR experienced variations across funds expended on SE over the three-year period, however increased the funds to over \$1 million in 2021. Funds were only spent on customized employment in 2019 where the total number of MSD has decreased from 249 in 2019 to 196 in 2021. A positive trend is the number of SE cases that were closed successfully rehabilitated and the employment rate. Both increased in each of the three years ending at 140 cases and 53.44 percent rate by 2021. A seemingly anomalous but confirmed spike of 85.4 percent year over year median earnings between PY 2020 and PY 2021 may be due to an increase in wages and hours worked by IDVR SE participants over the period, and potential greater job retention over time.

Individual survey results from the CSNA indicated that at least 47 percent of respondents receive SSI/SSDI or some other type of payment from SSA but were unsure of which benefit they received. Three percent of respondents indicated that they had received SSA benefits in the

past but no longer did. An additional three percent were unsure of their benefit status. Almost half of SSA beneficiary recipients were categorized as MSD across the three-years of the CSNA. All respondents were asked a series of questions on barriers to employment and to accessing IDVR services.

Respondents were presented with a list and were asked to identify the top three barriers that they have faced specifically toward getting a job. A total of 472 respondents answered the question. The following table contains a summary of the responses to the question in order of frequency:

Top Three Barriers to Getting a Job – Individual Survey Results:

	Times identified as a barrier	Percent of respondents
Employer concerns about my ability to do the job due to my disability	152	32.2%
Lack of job skills	151	32.0%
Mental health concerns	151	32.0%
Lack of training	146	30.9%
Lack of education	141	29.9%
Lack of available jobs	98	20.8%
Criminal Record	93	19.7%
Concern over loss of Social Security benefits due to working	71	15.0%
Lack of job search skills	69	14.6%
Lack of reliable transportation	53	11.2%
Substance abuse	43	9.1%
Lack of assistive technology	37	7.8%
Lack of housing	26	5.5%
Lack of attendant care	15	3.2%
Lack of childcare	14	3.0%
Lack of reliable internet access	14	3.0%
Limited English skills	3	0.6%
Total	1,277	

Employer concerns about my ability to do the job due to my disability was the most frequently selected barrier to getting a job, selected by 32.2 percent of respondents. Additional responses

to identifying barriers to employment at or above 30 percent included employer concerns about their ability to do the job due to disability, lack of job skills, mental health concerns, lack of training, and lack of education. Many of these concerns could indicate a need for Supported Employment. The Community Rehabilitation Program section of the CSNA included a theme to improve training on natural supports for individuals in Supported Employment.

Community Rehabilitation Program Section of the CSNA and Supported Employment

The 2023 CSNA explores the need to establish, develop, or improve, community rehabilitation programs in Idaho with several themes potentially impacting individuals with MSD and their need for SE services. This section notes: The pandemic had a drastic impact on CRP's businesses and ability to hire, train and retrain staff to meet the need of IDVR customers when communities were back in working order. Many opinions were that CRP's have still not fully recovered.

Most responses (36 of 50) from the 2023 CSNA Partner Survey indicated they served individuals who need supported employment. The CSNA Partner Survey notes 88.9 percent of respondents (40 partners) felt job training services including job coaching was a readily available service, falling only under perceived job development service availability at 91.1 percent. This was mirrored in partner perceptions of Services Not Readily Available with only three respondents (8.6%) agreeing that job training services were not available (tied for last place with 'other'). Additionally, 86.5 percent of partner respondents reported that CRPs are effective in the provision of SE, placing it first in the list of most effective services provided.

However internal staff interviews suggest that SE is not always readily available in their region, and maintaining trained and effective providers is an ongoing challenge statewide. Additionally extended services issues continue to impact IDVR customers: while EES was moved out from under IDVR so both major sources of extended services are housed under Health and Welfare, disparities in service rates across those programs continue to have a negative impact on the transition of SE to extended services for IDVR customers. CRP services including SE have been included in this state plan as an innovation and expansion activity and the need to improve CRPs is further explored in section 2 below.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The identification and service estimates for minority populations in Idaho are derived from population estimates and internal agency data on customers.

The Hispanic or Latino population is Idaho's largest minority group comprising 13.5% of the population. Eleven percent of all Hispanic/Latino Idahoans reported a Mexican origin with all other Hispanic/Latino origin categories falling below 0.5% (2022 ACS Demographic and Housing 1-Year Estimate). Internal agency data suggests this population remains underserved representing 8.41 percent of total applications in PY 2019 and 8.76 percent in PY 2020. While the Division is aware of the sustained gap in both applications and plans for this population, it is worth noting that the age distribution for this population skews substantially younger (40 percent of Idaho Hispanics were under age 20, compared to 26 percent of non-Hispanics as of 2019) which may explain some of the discrepancy in applications counts: "As in the United States as a whole, a relatively large share of the Hispanic population in Idaho is made up of children and young adults, with few older individuals. This is in contrast to the non-Hispanic

population, which is more evenly distributed across age groups” (Hispanic Profile Data Book for Idaho – 5th Edition, 2021). This lower average age may also explain why Idaho’s rate of disability for Hispanics at 10.3 percent is significantly lower than the statewide average of 13.7 percent. The population pyramid in Idaho’s Hispanic Profile Data Book 5th edition (2021) illustrates the extreme skew toward youth in this population. Consequently, IDVR should expect an increasing proportion of Hispanic youth, students, and customers as these cohorts age, but should also anticipate underservice rates for the population in the short to intermediate terms as a greater proportion of Hispanic/Latino Idahoans age into the range for IDVR Pre-ETS services and begin seeking employment.

Further analysis of outreach and service delivery by race is problematic due to low population percentages in remaining categories, however the following table presents data for Race alone or in combination with one or more other races from latest available ACS Demographic and Housing Estimates (DP05) which best aligns with IDVR’s internally available data:

Race and Ethnicity Service Rate Comparison of Idaho with IDVR Customers

	Percent of all served by IDVR 2021	Percent in Idaho ACS 1-Year 2022	Difference (negative notes underserved)
White	94.0%	91.4%	2.6%
Black or African American	2.0%	1.5%	0.5%
American Indian and Alaska Native	4.0%	3.2%	0.8%
Native Hawaiian or Pacific Islander	1.0%	0.4%	0.6%
Asian	2.0%	2.6%	-0.6%
Ethnicity			
Hispanic/Latino	9.00%	13.5%	-4.50%

Idaho’s demographics are changing, and Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the prior decade (US Census Bureau, 2020). This trend continues, as Idaho was the second fastest growing state by percentage in the last year, growing 1.8 percent (US Census Bureau, 2022).

While Idaho is traditionally a major state for resettlement in Regions 3, 4, 7 and 8, net international migration has slowed significantly under the COVID-19 pandemic (with the primary driver of Idaho’s recent population increase coming from net domestic migration).

The data indicates that the rate of Hispanic/Latino customers served by IDVR is lower than Idaho’s rate within the population by 4.5 percent, indicating the largest disparity of any minority population listed and a growing concern for IDVR. However, it is worth noting that Idaho’s Hispanic population is heavily weighted toward youth, and this distribution accounts for the disparity in service rates: the largest segment of Idaho’s Hispanic population has yet to age into IDVR services with 37.78 percent under the age of 20 but will be increasingly aging into formal IDVR services each year. This is contrasted with an overall state rate of 26.7 percent

Idahoans under age 20 which is skewed itself through inclusion of the Hispanic population. Consequently, IDVR will be closely monitoring Hispanic service rates in coming years to ensure outreach strategies are capturing proportionately more referrals for this population.

Additionally, service rates for white customers indicates an overservice of 2.6 percent. Overall, the rest of the categories are within one percent of expectations, mirroring Idaho's population, but all indicating slight overservice except for Asian at 0.6 percent underservice. Note that the sum served for IDVR and the ACS data are in excess of 100 percent due to rounding and the inclusion of two or more races. The CSNA notes that it will be important for IDVR to regularly review the diversity composition of their customers and consider strategies to increase access and service to diverse populations, especially during times of growth that Idaho is experiencing.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

The 2023 CSNA raised significant concerns with the current state of partnerships within the workforce development system, particularly around effectiveness and helpfulness of other combined plan partners when serving individuals with disabilities. Additionally, improvements within local area collaboration were indicated. These considerations were in part confirmed during the Winter 2023 coordination meeting between the WIOA Advisory Group and Idaho's One-Stop Committee where additional training on working with individuals with disabilities was requested by multiple combined plan partners (at the request of their staff). Partners report that internal turnover is in part responsible of the loss of institutional memory in serving these customers. These major issues are summarized in the list below and detailed further in this section.

IDVR has included strategies in this state plan which are in part designed to meet the challenges identified in the latest CSNA and by WIOA core partners, including Goal 3, Priorities 2 and 3 aimed at improving local area and statewide business team collaboration. Additionally, Idaho's WIOA Combined Plan Partners have included serving individuals with barriers to employment, including individuals with disabilities, as a primary collective focus for this state plan.

CSNA Section Five addressed the needs of individuals with disabilities served through other components of the Statewide Workforce Development System. Recurring themes from the CSNA in this area include the following:

- Partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level, but local level collaboration could be improved.
- There was concern about the closing of multiple workforce offices across the State. At the administrative level, this was viewed as a positive move for being able to access more individuals across the State, yet local level staff were very concerned with the scale of this change for the workforce agency, especially access for individuals with disabilities.
- The primary consensus was that the Idaho AJCs lack the knowledge and ability to effectively provide services to individuals with disabilities. Training, compassion, updated resources, and better collaboration with IDVR were among many suggestions for improvement.

- The CSNA indicates IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing customers, and developing youth program partnerships.
- The WIOA Advisory Group, in collaboration with the Workforce Development Council's One-stop Committee continue to engage in a series of ongoing meetings to identify common and unique issues which could benefit from strategic improvement at the statewide level. The Division engaged in the third biennial WIOA strategic planning meeting with all WIOA Advisory Group and One-Stop Subcommittee members in late 2023. The purpose of the meeting was to identify the shared goals, priorities, and strategies for this Combined State Plan. During this collaborative planning meeting, the Combined plan partners highlighted Hispanic youth as a share priority population at the combined state level.
- 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. IDVR's recent organizational realignment should help in part to improve coordination through the specialist positions created to improve our umbrella approach to business relations, especially at the local level as indicated by the CSNA. Additionally, the Division welcomes the opportunity to provide training on working with individuals with disabilities to partners as requested.

Individual Survey: AJC- Helpfulness and Effectiveness

The concepts of helpfulness and effectiveness were evaluated in the CSNA with respect to the AJC Centers' services. Overall, the individual survey ratings of American Job Centers indicate that there are mixed reviews on the helpfulness and effectiveness of the services.

Individual Survey: AJC- Helpfulness

One-hundred forty-one respondents answered the question regarding helpfulness in the 2023 individual survey:

Individual Survey: Helpfulness of AJC Centers' Staff

	Number	Percent
Yes, they were very helpful	76	53.9%
They were somewhat helpful	44	31.2%
No, they were not helpful	21	14.9%
Total	141	100.0%

Individual Survey: Effectiveness of AJCs' Services

	Number	Percent
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	Number	Percent
Yes, the services were very effective	49	35.3%
The services were somewhat effective	54	38.9%
No, the services were not effective	36	25.9%
Total	139	100.0%

When asked, "What recommendations do you have for the AJCs to improve service to individuals with disabilities in Idaho?", individual survey respondents were given an opportunity to provide a narrative response. Narrative comments included recommendations for improving the application process; hire more staff; have staff that are knowledgeable about available jobs; provide more job opportunities and jobs that pay more than minimum wage; hire/train staff to understand people with disabilities and show kindness; improving staff skills to include hands on assistance; improve the computer system; and open up the closed offices/increase hours of operation.

Staff Survey: American Job Centers

Staff respondents were asked a series of questions regarding their opinion and use of the American Job Centers through the Idaho Department of Labor.

The following tables summarize the staff choices regarding interaction and accessibility of the AJCs.

Staff Survey: Frequency of Interaction with AJCs

	Number	Percent
Often	8	15.7%
Sometimes	18	35.3%
Rarely	18	35.3%
Never	7	13.7%
Total	51	100.0%

Staff Survey: Physical Accessibility of the American Job Centers

	Number	Percent
Fully accessible	17	33.3%
Somewhat accessible	16	31.4%
Not accessible	1	2.0%

	Number	Percent
I do not know	17	33.3%
Total	51	100.0%

Staff Survey: Programmatic Accessibility of the American Job Centers

	Number	Percent
Fully accessible	7	13.7%
Somewhat accessible	20	39.2%
Not accessible	3	5.9%
I do not know	21	41.2%
Total	51	100.0%

Staff Survey: Effectiveness of the American Job Centers

	Number	Percent
Very effectively	3	6.4%
Effectively	25	53.2%
Not effectively	18	38.3%
They do not serve individuals with disabilities	1	2.1%
Total	47	100.0%

Staff respondents were asked what the AJCs could do to improve services for people with disabilities. Staff respondents were given a list of five items and asked to select all that apply.

Staff and partner respondent results are somewhat similar regarding this question. Staff and partners matched the top item in rank, and the remaining items differ in rank order and vary in percentage points. Narrative comments received from staff in the category "other (please describe)" differed from the partners' suggestions.

Staff Survey: Improving Service of the American Job Centers to Effectively Serve PWD

	Number	Percent
Train their staff on how to work with individuals with disabilities	30	65.2%
Improve programmatic accessibility	18	39.1%
Include individuals with disabilities when purchasing	16	34.8%

	Number	Percent
training for their clients		
Improve physical accessibility	10	21.7%
Other (please describe)	9	19.6%
Total	83	

In the final survey question related to the American Job Centers of Idaho, the staff respondents were asked, "How can the American Job Centers through the Idaho Department of Labor partner more effectively with IDVR?" Thirty-three respondents answered the question.

Communication and collaboration were key words found in the narrative comments and comments were both positive and negative. Other items cited building relationships at the field level; provide more one-to-one service and trainings for customers; AJC staff recognizing what IDVR is and what IDVR provides; eliminate duplication of services, increase outreach; increased partnerships for youth; streamlined processes; and provide a "soft, warm handoff" versus website/random extension contact.

Key Informant and Focus Group Interviews

The following information was gathered from the individuals interviewed for this assessment in the area of the needs of individuals with disabilities served through other components of the Statewide Workforce Development System:

1. Overall, partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level.
2. Positive collaboration and partnership aspects include the following:
 - a. Amendments of the State plan.
 - b. IDVR administrator chairing the one-stop committee.
 - c. IDVR on WIOA Advisory Committee; and
 - d. IDVR's seat on the Workforce Development Council.
3. There was much concern with the closing of multiple workforce offices across the State. At the administrative level, this was viewed as a positive move for being able to access more individuals across the State, yet local level staff were very concerned with the scale of this change for the workforce agency.
4. 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 like co-enrollment was of no concern as this is a natural practice in small communities. Others felt as though there was no active level of co-enrollment where customers would be served by multiple agencies through strategic partnerships.
5. There was concern that the AJCs did not understand how to work with individuals with disabilities so they either do not get help or get referred elsewhere (i.e., IDVR).

6. IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing customers, and developing youth program partnerships.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

Students with Disabilities (SWD) Served Data for IDVR

	2019	2020	2021
Potentially Eligible SWD	750	1622	1665
VR Applicant SWD	503	433	356
Total	1253	2055	2492

IDVR consistently increased the number of students with disabilities who were potentially eligible for VR services over the three-year period. The total number of students who applied for VR services decreased over the three-year period from 503 in 2019 down to 356 in 2021. However, the total number of students with disabilities, overall, significantly increased. The Division notes that procedure modifications are primarily responsible for fewer formal VR applicants as the agency has more appropriately calibrated when a formal VR case should be opened for a potentially eligible customer.

Pre-ETS Provided by IDVR

	2019	2020	2021
Pre-ETS Job Exploration Counseling	174	415	891
Pre-ETS Work-Based Learning Experiences	750	871	1,208
Pre-ETS Counseling on Enrollment Opportunities	182	250	499
Pre-ETS Workplace Readiness Training	659	921	1,324
Pre-ETS Instruction in Self-Advocacy	255	136	410
Total Pre-ETS	2,020	2,593	4,332

The total number of Pre-ETS provided to students with disabilities increased considerably (more than doubling) from 2019 to 2021.

Transition-Age Youth Survey: A total of 456 responses were received.

Youth Survey: Primary Disability

Youth survey respondents were presented with a list of 11 choice options and asked to identify their primary disabling condition.

Developmental Disability (25.9%) was the most frequently indicated disability type by youth respondents, followed by Learning Disability (19.3%). The diagnosis of Autism was cited 40 times in the narrative responses received in the category of "other." The following table details the disabling conditions reported by youth survey respondents.

Youth Survey: Primary Disability

	Number	Percent
Developmental disability	113	25.9%
Learning disability	84	19.3%
Intellectual disability	73	16.7%
Mental health disability	46	10.6%
Autism write-in response	40	9.2%
Physical/mobility	24	5.5%
Other (please describe)	22	5.0%
Deaf or hard of hearing	15	3.4%
Unsure	11	2.5%
Communication	6	1.4%
Substance abuse disability	1	0.2%
Blind or visually impaired	1	0.2%
Total	436	100.0%

Pre-Employment Transition Services

Youth survey respondents were asked a series of questions regarding their participation in and the quality of the Idaho Department of Vocational Rehabilitation's Pre-ETS. Services include job exploration counseling, work-based learning experiences, postsecondary education counseling, social skills and independent living training, and self-advocacy instruction.

Youth Survey: Job Exploration Counseling

Youth respondents were asked three questions regarding pre-employment job exploration counseling.

The first question presented to respondents was in a yes-no format asking them to identify whether or not they received job exploration counseling through IDVR transition services:

Youth Survey: Received Job Exploration Counseling

	Number	Percent
Yes	157	56.5%
No	121	43.5%
Total	278	100.0%

Respondents who received job exploration counseling from IDVR transition services were presented a subsequent question asking them to rate the quality of the job exploration counseling services they received using a four-point scale (excellent/good/average/poor).

Most respondents rated the job exploration counseling services received as "good" and the rate is 1.8 percentage points higher than the 2020 survey results in response to the question. With the increase of the sample size in 2023, the rating of "excellent" dropped 3.6 points from the 2020 rate of 33.1%:

Youth Survey: Quality of Job Exploration Counseling Services

	2023 Number	2023 Percent	2020 Number	2020 Percent
Excellent	46	29.5%	49	33.1%
Good	65	41.7%	59	39.9%
Average	35	22.4%	29	19.6%
Poor	10	6.4%	11	7.4%
Total	156	100.0%	148	100.0%

Content analysis of the remaining responses indicated that respondents offer the following recommendations:

- Increase the variety and number of employment options, increase the number of hands-on experiences and job shadowing options with "chores" to complete (x13)
- Improve counselor quality (x11)
- Better communication and follow-through by VR counselor in addition to improving the appointment setting process, and increasing time counselor spends with youth (x9)
- Provide personality tests and interest checklists (x3)
- Include parents (x3)

Youth Survey: Work-Based Learning Experiences

Transition-age youth survey respondents were asked a series of three questions that addressed work-based learning experiences. Respondents were asked to identify if they had participated in work-based learning experiences through IDVR transition services. A total of 271 respondents answered the question.

Youth Survey: Participate in Work-Based Learning Experiences

	Number	Percent
Yes	187	69.0%
No	84	31.0%
Total	271	100.0%

Respondents who indicated that they had participated were presented with a question that asked them to rate the quality of their work-based learning experiences.

Youth Survey: Quality of Work-Based Learning Experiences

	2023 Number	2023 Percent	2020 Number	2020 Percent
Excellent	64	34.2%	52	35.9%
Good	83	44.4%	59	40.7%
Average	27	14.4%	24	16.6%
Poor	13	7.0%	10	6.9%
Total	187	100.0%	145	100.0%

Content analysis of the responses indicated that respondents recommend the following:

- Increase the number of work-based learning options that include a variety of trades and job types (x17)
- Improve the professionalism and quality of the business' management and staff who interact and train the students with disabilities; monitor the workplaces and ensure they are adequately staffed for training (x10)
- Improve communication: 1) pre-experience (allow for job shadowing prior to experience; expected guidelines), during and after; 2) Staff and IDVR communicate with parents so that they can support student; 3) detailed feedback of student progress (x10)
- Allow students to engage in work-related tasks, not classroom learning; provide realistic and formal job experiences that allow students to learn marketable skills that lead to careers, avoiding boring and "cleaning" jobs (x8)
- Improve job coach services and communication due to inconsistent attendance; too hands-off or too hands-on; and lack of professionalism (x8)

Youth Survey: Postsecondary Education Counseling

Youth respondents were asked three questions regarding postsecondary education counseling provided by IDVR.

The first question asked respondents to indicate whether they received postsecondary education counseling from the Idaho Department of Vocational Rehabilitation.

Youth Survey: Received Postsecondary Education Counseling

	Number	Percent
No	155	57.6%
Yes	114	42.4%
Total	269	100.0%

Of the 114 respondents who indicated "yes" to receiving postsecondary education services, 112 rated the quality of the postsecondary education using a four-point scale.

Youth Survey: Quality of Postsecondary Education Counseling

	2023 N	2023 %	2020 N	2020 %
Excellent	41	36.60%	24	27.90%
Good	46	41.10%	45	52.30%
Average	18	16.10%	14	16.30%
Poor	7	6.30%	3	3.50%
Total	112	100.00%	86	100.00%

Youth Survey: Social Skills or Independent Living Training

Youth survey respondents were asked a set of questions related to social skills training and independent living training.

Respondents were presented a yes-no question and asked to identify whether they received social skills or independent living training through IDVR:

Youth Survey: Received Social Skills or Independent Living Training

	Number	Percent
Yes	71	26.9%
No	193	73.1%
Total	264	100.0%

Respondents who answered "yes" were presented with a question asking them to rate the quality of the social skills or independent living services they had received:

Youth Survey: Quality of Social Skills or Independent Living Training

	2023 Number	2023 Percent	2020 Number	2020 Percent
Excellent	24	35.3%	13	28.9%
Good	27	39.7%	24	53.3%
Average	13	19.1%	8	17.8%

	2023 Number	2023 Percent	2020 Number	2020 Percent
Poor	4	5.9%	0	0.0%
Total	68	100.0%	45	100.0%

Youth Survey: Self-Advocacy Instruction

The last set of questions related to Pre-ETS addressed instruction in self-advocacy, including peer mentoring.

Youth Survey: Received Self Advocacy Instruction

	Number	Percent
Yes	94	35.6%
No	170	64.4%
Total	264	100.0%

Respondents who answered "yes" were presented with a question asking them to rate the quality of the instruction in self-advocacy:

Youth Survey: Quality of Self-Advocacy Instruction

	2023 Number	2023 Percent	2020 Number	2020 Percent
Excellent	33	35.5%	15	29.4%
Good	37	39.8%	27	52.9%
Average	22	23.7%	9	17.7%
Poor	1	1.1%	0	0.0%
Total	93	100.0%	51	100.0%

Obtaining and Keeping a Job

Individual survey respondents were asked a series of questions regarding services they need from IDVR to get and/or keep a job.

Youth Survey: IDVR Services for Obtaining and Keeping a Job

Youth survey respondents were provided a list of 12 IDVR services and asked to identify the services they needed to help obtain and/or keep a job. There was no limit to the number of services respondents could choose.

Compared to the 2020 survey, a significant change is noted in 2023 in response to this question. Help finding a job was cited most frequently by respondents in 2023 which is different from the 2020 CSNA survey. College education was cited most frequently by respondents in 2020 and dropped to the seventh position on the 2023 results list. Support on the job like a job coach was selected by over one-half of the respondents in 2023, ranking in the second position on the results list, which matches the 2020 survey results.

Youth Survey: Top Services Needed from IDVR

	Number of times chosen	Percent of number of respondents
Help finding a job	224	61.2%
Support on the job like a job coach	192	52.5%
Help with employment preparation activities like writing a resume, completing an application, and interviewing.	191	52.2%
Vocational training	174	47.5%
Transportation	158	43.2%
College education	109	29.8%
Affordable housing	75	20.5%
Mental health counseling	72	19.7%

Partner Survey: Barriers to Employment – Youth in Transition

Partner survey respondents were asked to indicate the barriers to achieving employment goals for youth in transition from a list of 20 barriers. There was no limit to the number of barriers that a partner respondent could choose. A total of 36 respondents answered the question.

Partner Survey: Top Barriers to Achieving Employment Goals – Youth in Transition

	N	Percent of respondents
Little or no work experience	26	72.2%
Not having job skills	25	69.4%
Poor social skills	25	69.4%
Not having job search skills	22	61.1%
Lack of reliable transportation	22	61.1%
Not having education or training	18	50.0%
Employers' perceptions about employing individuals with disabilities	17	47.2%

Staff Survey: Barriers to Employment Goals – Youth in Transition

Staff were provided a list of 20 barriers and asked to identify the barriers to achieving employment goals for customers who are youth in transition.

Staff Survey: Top Reported Barriers to Achieving Employment Goals – Youth in Transition

	N	Percent of respondents
Lack of reliable transportation	35	77.8%
Little or no work experience	35	77.8%
Not having job skills	34	75.6%
Poor social skills	30	66.7%
Not having job search skills	29	64.4%
Not having education or training	24	53.3%
Mental health issues	17	37.8%
Employers' perceptions about employing individuals with disabilities	15	33.3%
Disability-related transportation issues	15	33.3%

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

The following 2023 CSNA themes emerged regarding the need to establish, develop, or improve community rehabilitation programs serving individuals with disabilities in Idaho:

- Overall, IDVR has strong partnerships and access to CRPs in the more populous areas of the State. These partnerships are longstanding and appear to be based on mutual respect despite the challenges brought about by WIOA.
- CRPs are generally viewed as caring with the desire to provide high quality services to VR customers. There were concerns about the quality and quantity of employment outcomes for IDVR customers that receive CRP services.
- 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.
- CRP evaluations, the effective use of labor market information in the job exploration and placement process, and consistency of CRP services across the State were areas in need of improvement, according to the participants in this assessment.
- CRP pay and service support, transportation, and IDVR’s process were some of the common barriers listed as to why CRPs struggle with serving customers and getting better outcomes.
- The pandemic had a drastic impact on CRP’s businesses and ability to hire, train and retrain staff to meet the need of IDVR customers when communities were back in working order. Many opinions were that CRP’s have still not fully recovered.

The need to improve or develop CRPs is supported by the CSNA which detailed responses from the following groups, each of which provided suggested areas for improvement in access and quality of services:

1. Individuals with disabilities
2. WIOA partner survey
3. Internal IDVR staff survey

Individual Survey Results

Individual Survey: Quality of Service - Service Provider

	Number	Percent
Excellent	52	54.2%
Good	20	20.8%
Fair	14	14.6%
Poor	10	10.4%
Total	96	100.0%

Individual Survey: Effectiveness of Service - Service Provider

Individuals were asked to rate the effectiveness of the services from the service provider. The majority rated the services from the service provider as effective or very effective and almost 14.5 percent of respondents rated the effectiveness of service providers as ineffective.

Individual Survey: Effectiveness of Service - Service Provider

	Number	Percent
Very effective	43	44.3%
Effective	32	33.0%
Somewhat ineffective	8	8.3%
Ineffective	14	14.4%
Total	97	100.0%

Individual Survey: Responsiveness of Service - Service Provider

	Number	Percent
Excellent	54	55.7%
Good	19	19.6%
Fair	18	18.6%
Poor	6	6.2%

	Number	Percent
Total	97	100.0%

Individual Survey: Recommend Service Provider

The final question asked of individuals regarding service providers was "Would you recommend your service provider to others served by IDVR?" Slightly more than 73 percent of the respondents indicated that they would recommend their service provider to others. This is in exact alignment with CRP customer satisfaction survey items which all range between 73-74 percent, again suggesting room for improvement.

Individual Survey: Recommend Service Provider

	Number	Percent
Yes	71	73.2%
No	16	16.5%
Not sure	10	10.3%
Total	97	100.0%

Partner Survey Results

Partner Survey: Services that Providers Are Most Effective in Providing IDVR Customers

Partners were provided a list of 15 items and asked to identify the services that service providers were most effective in providing to IDVR customers. There was no limit to the number of services that could be chosen.

Partner Survey: Top Services that Service Providers Are Most Effective in Providing

	Number	Percent
Job training services (Job Coaching, OJT, etc.)	32	86.5%
Job development services	29	78.4%
Postsecondary education	13	35.1%
Assistive technology	10	27.0%
Mental health treatment	9	24.3%
Personal care attendants	9	24.3%
Benefit planning assistance	7	18.9%

Partner Survey: Primary Reasons Providers are Unable to Meet Customer Needs

	Number	Percent
Not enough service providers	24	68.6%

	Number	Percent
available in area		
Low rates paid for services	21	60.0%
Customer barriers prevent successful interactions with service providers	13	37.1%
Low levels of accountability for poor performance by service providers	10	28.6%
Other (please describe)	9	25.7%
Low quality of service provider services	5	14.3%
Total	82	

Partner Survey: Top Three Changes to Help Better Serve IDVR Customers

Partner survey respondents were presented a list and asked to identify the top three changes that would help them better serve IDVR customers.

More streamlined processes, higher rates paid by IDVR for services, and reduced documentation requirements ranked as the top three changes that would help partners better serve IDVR customers.

Staff Survey Results

Staff Survey: Top Services Readily Available to IDVR Customers

	Number	Percent
Benefit planning assistance	52	91.2%
Postsecondary education	52	91.2%
Job development services	51	89.5%
Job training services (Job Coaching, OJT, etc.)	50	87.7%

Staff Survey: Frequency of Service Providers Meeting Needs

	Number	Percent
All of the time	2	3.6%
Some of the time	53	96.4%
None of the time	0	0.0%

	Number	Percent
Total	55	100.0%

Staff Survey: Service Needs that Community Rehabilitation Providers are Unable to Meet

The following table contains the staff choices of service needs that rehabilitation service providers are unable to meet. While two of these items are traditionally difficult areas for VR to address (transportation and housing), staff perception of service availability for job training, SE job coaching, and job development services indicates a significant gap in availability and a growing concern for IDVR. Of note, job development and job training were reported as most available service but also services that rehabilitation providers were unable to consistently meet.

Staff Survey: Top Service Needs that Rehab Providers are Unable to Meet

	Number	Percent
Transportation assistance	22	59.5%
Job training services (Job Coaching, OJT, etc.)	18	48.6%
Housing	18	48.6%
Job development services	13	35.1%

Staff Survey: Primary Reasons Providers are Unable to Meet Customer Needs

	Number	Percent
Not enough service providers available in area	39	79.6%
Low quality of service provider services	35	71.4%
Low levels of accountability for poor performance by service providers	31	63.3%
Low rates paid for services	23	46.9%
Customer barriers prevent successful interactions with service providers	10	20.4%
Other (please describe)	9	18.4%
Total	147	

Staff Survey: Most Important Change Service Providers Could Make to Support Customer Efforts to Achieve Employment Goals

Twenty of the 34 narrative comments suggested hiring quality staff, train the staff, hire more staff, and pay better wages.

Key Informant and Focus Group Interviews

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. These partnerships are longstanding and appear to be based on mutual respect despite the challenges brought about by WIOA, the pandemic, and continuous turnover.
2. CRPs are generally viewed as caring with the desire to provide high quality services to IDVR customers. However, there were concerns about the quality and quantity of employment outcomes for IDVR customers 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 vs. fee-for-service resulting in 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, the following:
 - a. Partners of IDVR are not generally pleased with the outcomes or services provided through CRPs.
 - b. There is a need for improved consistency across IDVR regions related to policy, forms, and expectations of CRPs.
 - c. 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.
 - d. 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. CRPs need training on working with individuals with complex needs and comorbid conditions.
7. CRP's need required training, individual qualifications, and standards in order to improve effectiveness and customer outcomes.

Recommendations

The following recommendations from the 2023 CSNA were provided to IDVR based on the results of the research in the Need to Establish, Develop or Improve Community Rehabilitation Programs in IDVR:

1. IDVR should consider statewide training opportunities (regularly) to increase the skills of CRPs and understanding of WIOA and policy changes within IDVR.
2. IDVR is encouraged to consult and partner with CRP staff to engage in a collaborative process to revise policies and fees for service that are agreed upon by both groups.
3. IDVR is encouraged to reinstate/continue regional cross-training with IDVR staff and CRPs to encourage and enhance high level, skills type employment (not just minimum wage jobs and entry level work), as well as effective communication and expectations across teams. Example of trainings include Labor Market Information, current employment opportunities and job development strategies, basic disability etiquette for different disability types, and/or building natural supports for individuals in supported employment.

IDVR Response:

Due to CSNA data and recommendations, along with reports from the field, reports from other partners, and customer satisfaction data from individuals who were served by CRPs, the Division is including the need to improve the quality of CRP service provision as a priority in this state plan (under goal 1, priority 3: Improve CRP Service Provision quality and quantity (including SE) for Idahoans with the Most Significant Disabilities). Furthermore, the Division is classifying this goal as an innovation and expansion activity for this state plan and will be a major focus for this state plan. These and other goals and priorities for the program are covered in the next section.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State’s performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

Review and modification of the goals and priorities for the Division was achieved following a joint review of the Comprehensive Statewide Needs Assessment (including major findings and recommendations) by the SRC and IDVR executive leadership, and a joint in-person goal setting and risk assessment session. This full meeting of the SRC included IDVR executive leadership, and all field management, with a focus on identification, suggested modification, and agreement on the goals, priorities, and strategies for the state plan. This process was completed in January 2024.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

These are the goals, priorities, and strategies proposed by Idaho Division of Vocational Rehabilitation (IDVR) and agreed to by Idaho's State Rehabilitation Council to be accomplished PYs 2024-2025. The Division uses RSA Primary Performance Indicators, Other Measures that Matter, and other internally developed measures to determine progress toward goals.

Goal 1: Maximize the career potential of Idahoans with disabilities engaged with the Division.

Priority 1: Improve the quality of VR outcomes for IDVR customers.

1. Strategy: Improve access to and utilization of relevant local area labor market information (LMI) and Career Pathways to inform customer career choice and promote successful outcomes.
2. Strategy: Ensure customers have better job-ready/hire-ready skills through staff training and accessing Idaho Department of Labor workshops, tools, and resources.
3. Strategy: Increase access to relevant educational opportunities (vocational/technical/2-year/4-year/apprenticeships and other pathways to quality employment).
4. Strategy: Expand the provision of relevant Assistive Technology (AT) services and devices to IDVR customers through collaboration with Idaho Assistive Technology Project.
5. Strategy: Leverage technology to streamline processes, reduce staff burden and allow for enhanced engagement with IDVR customers.

Priority 2: Strategically expand outreach, especially to underserved and growing populations.

1. Strategy: Increase customized outreach through community organizations, WIOA partners, and professionals that serve underserved, growing, and prioritized populations identified by the SRC and IDVR management (i.e., out-of-school youth, mental health, justice-involved, Hispanic)

Priority 3: Improve Community Rehabilitation Program (CRP) Service provision quality and quantity (including Supported Employment) for Idahoans with the Most Significant Disabilities.

1. Strategy: Complete rate methodology/recalibration. This is a part of a greater Innovation and Expansion strategy the Division is engaged in. The new rates proposed are designed to be rates that support quality Community Rehabilitation Program Services and may include the need to support a limited period of subsidized training for Idaho's CRPs, or other mechanisms of compensation for strategic initiatives above and beyond typical expenses for CRP services. The Division anticipates it may utilize Innovation and Expansion funds for CRP improvement within this 2-year state plan cycle.
2. Strategy: Implement newly revised CRP Monitoring Protocol designed to promote two-way data-driven continuous improvement conversations/increase feedback, relevance, and understanding between IDVR and Idaho's CRPs.

Priority 4: Improve customer engagement throughout the VR process.

1. Strategy: Leverage technology to improve initial and sustained customer engagement

Priority 5: Hire and retain qualified employees to deliver quality vocational rehabilitation services.

1. Strategy: Continued efforts to expand FTE, maximize compensation, and other innovative approaches to increase employee satisfaction and retention.
2. Strategy: Leverage technology to streamline processes, reduce employee burden and allow for enhanced engagement with IDVR customers.

Goal 2: Expand utilization and improve quality of Pre-Employment Transition Services (Pre-ETS) and similar services for youth.

Priority 1: Increase utilization of Pre-ETS services and similar services to youth to priority populations identified by the SRC and IDVR Management (504, students and youth with less significant disabilities, Hispanic youth population)

1. Strategy 1: Increase outreach with schools, community organizations, and professionals that serve student, youth, and families (e.g., State Department of Education, Idaho Parents Unlimited, Idaho Council on Developmental Disabilities, school nurses, pediatric professionals, and others with connection to in-and-out of school youth).
2. Strategy 2: Increase outreach through WIOA umbrella partners that serve students and youth (i.e., Title-I WIOA Youth, and Title-II adult education and literacy for youth under 24).

Priority 2: Improve the quality of Pre-employment Transition Services (Pre-ETS) and similar services to youth.

1. Strategy: Work with schools, businesses, students/youth, and families to understand and improve Work Based Learning Experiences (WBLEs) for students and youth.
2. Strategy: Continue efforts to establish a comprehensive and complimentary Pre-ETS evaluation and monitoring strategy.

Goal 3: Improve outreach and engagement through individualized services to Idaho businesses.

Priority 1: Work with the business community to improve understanding and utilization of IDVR business services.

1. Strategy: Identify business groups (i.e., Chamber, Workforce Development groups, Society for Human Resource Management (SHRM)) that could benefit from networking with IDVR.
2. Strategy: Identify opportunities to provide education and training on the scope and availability of IDVR business services to provide customized business solutions.
3. Strategy: Expand business spotlights to each IDVR Center.
4. Strategy: Continue to improve IDVR website business page for useability and improved business content.

Priority 2: Evaluation of new Business Relations Team to determine effectiveness and promote the continuous improvement of business outreach activities.

1. Strategy: Continue efforts to align IDVR BOOST team activities with the workforce development system, including at the local level as indicated by the CSNA.

Priority 3: Improved utilization of business engagement partnerships with the local workforce system.

2. Strategy: Continue efforts to align IDVR activities with the workforce development system, including aligned business engagement strategy at the state and local level.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

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. This priority has been moved under a separate Pre-ETS goal within the updated goals for IDVR in this state plan.

The expansion of Pre-ETS services has been achieved with IDVR substantially increasing the number of students receiving Pre-ETS from 1968 in PY 2021 to 2784 in PY 2022 an increase of 41 percent year-over-year. The Division is now exceeding the 15 percent reserve requirement with a substantial buffer and can further shift focus from expansion to quality of services being delivered under the Pre-ETS banner. Regardless of this success, the Division is committed in expanding engagement to targeted populations as identified by the SRC, Idaho’s WIOA Advisor Group, and Idaho’s One-Stop Committee, including youth in new Goal 2 Priority 1 Strategy 2.

These efforts are due in no small part to agency realignment efforts creating four Area Transition Counselor (ATC) positions with a focus on building relationships and improving the quality of Pre-ETS within their areas. Local areas have established approaches which vary but are customized to the needs of their regions which is having a reinforcing effect on service expansion.

Performance Measure 1.1: Number of students receiving Pre-employment Transition Services (Pre-ETS)

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
885	1012	1210	1968	2784	2784

Performance Measure 1.2: Number of youth applications for program participants under the age of 25.

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
738	586	496	496	646	646

- Beginning in July 2022, the Business Services team collaborated with the Pre-ETS teams to expand Work Based Learning Experiences (WBLEs) for students. New flyers were developed for outreach to employers specifically marketing WBLE opportunities.
- Beginning in October 2022, one IDVR Center piloted the utilization of a VR team member for a high percentage of their work time to specifically support the Pre-ETS counselors in their region by meeting with employers to explain the benefits of partnering with IDVR and the benefits to the students that can complete the WBLE’s with host employer sites. Through this, an increase in WBLE’s for students was seen in this region as prior to this pilot, no employer-based work-based learning experiences had been provided to students.

- In October 2022, IDVR piloted more intensive employer outreach to specifically increase WBLE opportunities for students. This strategy successfully increased WBLEs in this region and will be replicated across the IDVR in the future.
- In November 2022, IDVR joined the Rural Youth Apprenticeship Development (RYAD) grant efforts to assist with developing a pre-apprenticeship framework to support Pre-ETS and youth with disabilities to gain the necessary skills to meet the requirements of various apprenticeship programs. IDVR is in the preliminary stages of adapting this pre-apprenticeship framework to educate students. The goal is to implement this pilot in summer of 2024.

Priority 2 - Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD). This goal has been retained but modified within this state plan. The agency is shifting to a focus on CRP improvement with an innovation and expansion related goal under new Goal 1 Priority 3 to accompany a rate methodology currently in progress under a contract with a third-party vendor.

Performance Measure 2.1: For all successful Supported Employment closures: the percentage of customers employed in the 2nd quarter after exit.

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
81.67%	81.67%	77.77%	86.55%	89.15%	89.15%

Performance Measure 2.4: Of those cases using CRP employment services (non-assessment), the percentage which contributed to successful case closure.

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
42.5%	43.13%	44.35%	51.1%	51.64%	51.64%

- The WinCo Wins program is a customized training program focusing on soft skill development, workplace communication, time management, self-advocacy, and teamwork. The curriculum was created to support IDVR customers with job preparation, including the development of interviewing skills, resume preparation, and job application skills. Additionally, each customer was able to complete an interview with the WinCo hiring team through a competitive hiring process during the last week of the program. The first cohort began in Spring of 2023 and ran through May. IDVR will adapt the program based on outcomes of the first cohort, with the goal a second cohort launching in Summer of 2024.
- IDVR collaborated with Create Common Good to develop a paid WBLE for adult customers focused on increasing soft and hard skills of individuals with barriers to employment. IDVR customers were first referred in 2022. The WBLE combines classroom instruction and work experience in the Create Common Good commercial kitchen. In addition, the customers obtain assistance with resume development, practice applying for positions, and honing their interview skills. Finally, all customers that complete this program receive their ServSafe certificate required for work in Idaho food service employment. Through this agreement, IDVR can refer customers to this program on an ongoing basis.

Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.

Performance Measure 1.3: Percentage of counselors who meet Comprehensive System of Personnel Development (CSPD) compliance.

The Division has experienced significant turnover and will continue to develop and modify strategies designed to recruit and retain counselors who meet CSPD requirements. Additionally, IDVR is hopeful changes to the organizational structure and additional field efficiencies initiative (in progress) will have a positive impact on the overall CSPD rate.

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
68%	70.5%	70.8%	74.00%	66.67%	85%

Priority 4 - Improve access to quality Career Pathways tools to inform customer career choice. Improve appropriate utilization of Labor Market Information in concert with these tools. The Division has included a modified version of this priority under Goal 1 and Goal 3 of this state plan. The Division uses 2nd and 4th quarter employment after exit and median wage primary performance indicators as proxy indicators for outcome quality for this priority (already reported in this section). As noted earlier, Title-IV programs exceeded all negotiated targets for PY 2022.

Priority 5 - Improve overall quality of CRP services.

The Division uses an exclusive MSD SE subset of 2nd and 4th quarter employment after exit and median wage primary performance indicators as proxy indicators for outcome quality for this priority. The Division also collects Customer Satisfaction data for individuals who had services provided by CRPs. Additionally, the rate re-evaluation should complete and new rate structure in effect in PY 2024. The agency’s approach to stand-up rural/small providers is now in effect which allows a path to becoming a vendor for either ACRE or CESP holders. Additional quantitative outcomes for this priority can be found under goal one priority two above within this section.

IDVR includes specific customer satisfaction items for customers who used CRP services. Currently the four dimensions of CRP services satisfaction (recommend provider, services helpful, satisfied with communication/interaction, and had a choice when picking a provider) are all between 73-74 percent further indicating the need to focus on this area in this state plan.

The Division saw a significant increase in employment rate after exit and median wages for SE customers rose over 85 percent from PY 2021. IDVR will continue to monitor this exceptional trend to determine how persistent SE wage and hour gains are in Idaho’s labor market:

Supported Employment for IDVR

	2020	2021	2022
Significance of Disability % of total	100.00%	100.00%	100.00%
Number of cases closed rehabilitated	131	137	140

	2020	2021	2022
Employment rate at exit	46.45%	49.82%	53.44%
Median wages of all exited participants	\$962.46	\$895.25	\$1,659.84
Total number of cases served	868	812	725

Goal 2 - Improve VR program efficiency through continuous quality improvement activities.

Objective 1: Meet or exceed targets for the Primary Performance Indicators established by the US Department of Education, Rehabilitation Services Administration (RSA).

Performance Measure 2.1: Meet or exceed negotiated targets on the following five Primary Performance Indicators (PPIs).

	SY2019	SY2020	SY2021	SY2022	SY2023	Target
1. Employment Rate - 2 nd Qtr after Exit	60.4%	60.4%	60.2%	63.2%	64.9%	59.5%
2. Employment Rate - 4 th Qtr after Exit	58.2%	57.4%	58.2%	57.3%	62.7%	57.8%
3. Median Earnings - 2 nd Qtr after Exit (per quarter)	\$4,075	\$4,025	\$4,125	\$4,456	\$4,950	\$4,400
4. Credential Attainment	33.1%	30.4%	41.9%	56.9%	62.1%	42.8%
5. Measurable Skill Gains	35.3%	51.2%	55.7%	58.6%	56.1%	55.1%

Note: Benchmarks for SYs 23 & 24 were negotiated in April 2022 and are reflected in this plan. Idaho Title-IV programs collectively exceeded all negotiated targets for PY 2022 prior to SAM adjustment.

Priority 2 - Continue to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate.

Objective 2.2: Evaluate the satisfaction of customer's vocational rehabilitation experience and service delivery.

Performance Measure 2.2: Customer satisfaction rate (overall).

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
80.1%	80.3%	80.7%	82.86%	80%	90%

The instrument developed by IDVR in collaboration with the SRC collects several dimensions of overall customer satisfaction of which “Satisfied with my experience” is utilized as an overall measure of customer satisfaction. While many dimensions of customer satisfaction do exceed 90 percent, performance on overall satisfaction remains lower than acceptable for the Division. The SRC has requested additional qualitative comments from the CSS in order to better understand the current quantitative survey results which the Division will now include in SRC Quarterly Reports.

The Division looks at three primary areas and at least 11 dimensions when considering customer satisfaction:

1. General Customer Satisfaction, five dimensions (87.8 percent average).
2. Individual Plan for Employment (IPE) Satisfaction, three dimensions (90.33 percent average).
3. Services Provided by Community Rehabilitation Providers (CRPs) Satisfaction, four dimensions (74.5 percent average).

Priority 3 - Maximize the utilization and documentation of comparable benefits.

- While IDVR will continue to monitor the documentation of comparable benefits as a part of internal monitoring, the January 2024 meeting of the SRC agreed to modified goals and priorities which no longer include comparable benefits documentation as a top-level priority. The PY 2022 Case File Review indicates that 82.3 percent of cases are documenting comparable benefits correctly, a reduction of five percent over the prior PY, indicating the need to continue monitoring this item.

Priority 4 – Continue efforts to align IDVR activities with the workforce development system.

- The addition of four dedicated business relations team members has been completed and should provide a better conduit for center based local-area approaches to business outreach. Business relations priorities are retained but have been re-written for this state plan. Future reports of progress will include increases to services to businesses as a measure and are also included within this section under Goal 1 Priority 3 (business customer outreach).

Priority 5 - Evaluate IDVR assessment utilization.

- The evaluation of assessment utilization was indicated by a prior CSNA and resulted in a modification of IDVR policy balancing timeliness of service delivery and loosening restrictions around the level of assessment required to achieve program eligibility (streamlined/expedited eligibility). The Division has resolved this priority following an off-season examination of assessment utilization (including of Community Based Work Evaluations) and the implementation of new training allowing a greater range of existing assessments to be utilized for the purposes of program eligibility.

Priority 6 – Continue to monitor and adapt the internal control system of the agency to strengthen program compliance and improve program outcomes.

- While the agency is still committed to the strengthening of internal controls, the Division has decided to remove this priority for the state plan as it is a mandatory function of the planning and evaluation unit.
- The Division along with ICBVI substantially strengthened reporting controls for the RSA-17 due to an RSA monitoring finding on that report. The current process is under corrective action through satisfactory resolution. The Division will be expanding its analysis of reporting controls in the coming two years regardless of the formal inclusion of this priority.
- The Division is committed to evolving the monitoring protocol around Pre-ETS documentation during this plan. An initial statewide review was conducted in PY 2023 on PY 2022 data, and a work group has been established to articulate risk and responsibilities for complimentary field-based and statewide reviews. This is occurring alongside regular improvements to the overall monitoring strategy of the agency including ongoing evolution of the case file review approach.

Goal 3 – Improve outreach and services to IDVR business customers.

Priority 1 – Increase business utilization of IDVR expertise and services:

- IDVR continues to increase the number and quality of services provided to business customers with PY 2022 data indicating 1452 services were provided to 762 businesses. The Division expects to expand on this growth due to the addition of four new business services specialist positions with a focus on developing stronger relationships with businesses. An encouraging trend is that IDVR is seeing more businesses contacting the Division for training and support for the business. Historically, IDVR has not provided substantial training to employers on disability related topics. The Division expects to continue this trend in the future.

Priority 2 – Evaluate and realign agency structure to meet the needs of business customers:

- The Division conducted a comprehensive re-evaluation of agency structure, FTE availability, and agency need including meeting the needs of Idaho business customers. The re-evaluation indicated the need for additional personnel dedicated to business services and included the allocation of four FTE for business services specialist positions to increase business outreach and the quality of IDVR and business interactions. The Division will monitor the impact of this new structure now that this priority has been met.

Performance Measure 3.1.1: Retention Rate with the Same Employer the 4th quarter after exit.

SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	Target
68.8%	71.2%	69.1%	70.6%	72.3%	72.3%

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

Program Year 2022 Performance for Idaho Title IV (IDVR and ICBVI)

	Negotiated Level	Actual Level	Adjusted Performance
*Measurable Skill Gains Rate	*55.1%	*56.1%	-
Employment Rate - 2nd Quarter After Exit	59.5%	64.9%	98.3%
Median Earnings - 2nd Quarter After Exit	\$4,400	\$4,950	119.4%
Employment Rate - 4th Quarter After Exit	57.8%	62.7%	103.4%
Credential Attainment Rate	42.8%	62.1%	153.8%

Idaho Title-IV programs collectively exceeded all negotiated targets in PY 2022. Following adjustment by the Statistical Adjustment Model, Idaho Title-IV programs exceeded all targets with the exception of Employment Rate – 2nd Quarter After Exit, however the discrepancy between Idaho’s performance and the adjusted target was 1.7 percent (64.9 percent actual against an adjusted target of 66 percent). Measurable Skill Gains/overall state program score is not currently assessed per RSA FAQ 23-01, therefore adjustments for this measure have been omitted here.

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

While IDVR anticipated I&E funding may be needed for CRP improvement within the last state plan iteration, the Division did not yet reach this point. We are currently engaged in a rate re-evaluation project which provide recommendations for rates for quality service provision by CRPs. The Division envisions a quality lift initiative in conjunction with the issuance of the new rate structure which will likely be an innovation and expansion activity beginning PY 2024.

The Division used innovation and expansion funds exclusively to support the activities of the SRC and SILC. These figures are reported on the RSA-17.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

IDVR receives 100 percent of the Title VI grant funds allotted to WIOA Title IV and works with ICBVI on co-enrollment when SE services are indicated for their customers. The Division utilizes an auto budgeting feature within the Aware case management system to prioritize Title VI grant funds and automatically draw from the appropriate fund stream depending on the age of the individual engaging in SE services (youth or general). For example, controls exist where both youth and SE conditions must be valid for the auto budget to draw from the youth SE pool. If the youth pool is exhausted the system will search for funds in the adult Title VI fund before defaulting to Title I funds which are then used to support all additional SE and youth extended services (when required). Currently Idaho has extended service providers who can fund these services and YES funds are not needed. IDVR will use 100 percent of grant funds on Job Coaching services for SE customers, and will subsequently use Title I funds to meet the remaining expected need for SE Job Coaching (which has traditionally far outstripped the grant itself).

Goal 1 Priority 3: Improve Community Rehabilitation Program (CRP) Service provision quality and quantity (including Supported Employment) for Idahoans with the Most Significant Disabilities.

1. Strategy: Complete rate methodology/recalibration (to include SE rate). This is a part of a greater Innovation and Expansion strategy the Division is engaged in. The new rates proposed are designed to be rates that support quality Community Rehabilitation Program Services and may include the need to support a limited period of subsidized training for Idaho's CRPs, or other mechanisms of compensation for strategic initiatives beyond typical expenses for CRP services. The Division anticipates it may utilize Innovation and Expansion funds for CRP improvement within this 2-year state plan cycle.
2. Strategy: Implement newly revised CRP Monitoring Protocol designed to promote two-way data-driven continuous improvement conversations/increase feedback, relevance, and understanding between IDVR and Idaho's CRPs (to include SE specific quality data-driven conversations built into the CRP monitoring process).

Supported employment services may be provided with title I or title VI funds following placement of individuals with the most significant disabilities in employment.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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;
AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

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 services are restricted to those customers assigned to the Most Significant Disability (MSD) category. The Disability Priority Page in the Aware case management system 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; **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.

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 who meet the criteria to become CRPs for the Division under Idaho Administrative Procedure Act (IDAPA) 47.01.01.402: Provision of Community Rehabilitation Program Services:

The Division will purchase vocational services from the community rehabilitation programs that are accredited by the Commission on Accreditation of Rehabilitation Facilities, the Rehabilitation Services Accreditation System or from individuals who have employment related certificates from the Association of Community Rehabilitation Educators or who are Certified Employment Support Professional.

IDVR is committed to the advancement of opportunities for eligible individuals, including youth with the most significant disabilities, and encourages employment in the 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 which has moved from under IDVR to IDH&W, eliminating any potential conflicts or perceived conflicts for serving individuals seeking non-CIE employment. This program is funded

through State appropriations only. The primary service providers for long term supports (extended supports) under the three main funding sources are Idaho's CRPs.

The Division will continue to work closely with each program overseeing these resources to provide appropriate referral and utilization of these external sources 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 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.

The 2023 CSNA addresses the needs of individuals with the most significant disabilities in Idaho. Individuals survey results identified barriers to getting a job: Lack of training, lack of job skills, mental health concerns, and employer disability concerns were each cited by over 50 percent of respondents. Lack of job search skills was also a noted barrier for 38.7 percent of respondents. Concerns over loss of benefits was cited by 28.9 percent of respondents.

To address these needs, the Division has engaged in substantial quality improvement initiatives to impact Supported Employment services:

Job Ready Process:

IDVR developed the Job Ready process, which represents a significant update in our approach to ensuring VR customers are truly ready to seek employment, prior to engaging a CRP for services. The Job Ready process ensures individuals possess the necessary skills and qualities

sought by employers to seamlessly transition into a job with appropriate support. It involves evaluating a customer's capabilities against job requirements, articulating job preferences, and understanding logistical needs. The primary aim is to enhance successful job outcomes by thoroughly preparing customers for their job search endeavors. This process engages VR customers ready for employment before initiating job searches. It begins by identifying prepared customers and documenting their readiness throughout the Job Ready process. Once the counselor determines the VR customer is "Job Ready," customers commence their job search activities. Adaptations may be necessary, such as when vocational goals change significantly, prompting a re-initiation of the Job Ready process for the new goal. Personal changes impacting readiness require evaluation and potential restart of the Job Ready process to ensure readiness before proceeding with job-related activities.

Enhanced CRP Monitoring Protocol (Launching in PY 2023/24):

IDVR has developed a revised CRP monitoring protocol and included it in the updated CRP Manual. The CRP monitoring process by IDVR will occur every two years and comprises two key elements: an off-site field-based review and an on-site discussion and data review. The off-site review involves examining CRP data in the IDVR's case record system. The CRP Manager initiates this review, requesting customer lists and developing case review samples. Center Managers (CMs) schedule staff time for the review, aiming to complete cases and address missing data by collaborating with CRPs. Results are discussed between CMs and the CRP Manager, shaping findings, recommendations, and observations for the monitoring report. The report quantitatively details findings, recommendations, and observations. Findings necessitate corrective action plans (CAPs) from CRPs within 90 days, addressing non-compliance issues. Recommendations suggest improvements, while observations note points of interest. Subsequently, discussions between the CRP Manager and CRPs ensue to address findings and CAP development. The on-site component occurs biennially, addressing the off-site report, CRP-specific data, customer satisfaction, service access, communication, and business issues. This meeting involves CRP representatives, the CRP Manager, and local CMs, facilitating virtual participation for CMs from distant regions if multiple centers are reviewed.

New Rate Methodology Study (Ongoing through 2024):

IDVR has contracted with Public Consulting Group (PCG) to complete a comprehensive rate study to assess service compensation and complexity, aiming to establish a rate methodology, incorporate innovative practices from other state VR agencies to redefine rates based on rehabilitation needs' complexity.

CRP WebEx Meetings:

IDVR hosts regular statewide CRP meetings via WebEx every odd number month to foster ongoing dialogue and information sharing between IDVR and CRPs. These sessions facilitate collaborative updates, feedback exchange, and dissemination of best practices, aligning with the evolving needs of the vocational rehabilitation landscape.

Updates to the CRP Manual (updated PY 2022):

CRPs were given the opportunity to provide feedback to the CRP Manual. Later, a workgroup of various IDVR staff worked to update the CRP Manual over several month. The updated CRP

Manual was released in October 2024 and included numerous updates that aligned with current IDVR policy and procedures as well as updated the fee schedule.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

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 substantially revised in PY 2022 and incorporates significant input solicited from CRPs and the field. The CRP Manual contains information on (but not limited to):

- 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.

The manual is intended to serve as a living document which will be updated over time, as needed, with input from CRP stakeholders. An updated version of the CRP Manual is slated for released July 2024. Highlights of the latest iteration 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 and the CRP quality improvement initiative.
- CRP onboarding requirements (accreditation, insurance, and prerequisites to ensure a baseline of quality and accountability) including updated Idaho Code allowing for alternative pathways to becoming a CRP.
- Updated fee schedule to better align service compensation and service complexity (dependent on finalization of fee schedule recommendations, may be released PY 2024 or PY 2025).

- Miscellaneous improvements across the guide provided by the CRP Guide Revision Workgroup

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) or follow the alternative pathway through the Association of Community Rehabilitation Educators (ACRE) or Community Employment Support Professional (CESP) completion (added to Idaho rule in the prior state planning period). Additionally, CRPs must follow the process and procedures articulated in this manual and undergo successful 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 continues working with CRPs to strengthen understanding of documented progress toward SE stability and to meet SE reporting requirements. The Division will issue improved guidance in the July 2024 release of the Manual.

IDVR is in the process of evaluating the CRP fee schedule for allowable costs using a third-party contractor to provide informed, impartial, and fair rates for services to accompany a quality initiative which is targeted at improving overall CRP customer satisfaction (including SE services).

IDVR issues an annual report of CRP performance, the Community Rehabilitation Partner Employment Report (CRP-ER) 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 Community Rehabilitation Program Employment Report (CRP-ER) is disseminated to CRPs annually and used by VR staff to assist with informed choice of CRP when selecting a provider for planned services. Reports are issued for general CRP services, and for Supported Employment (only) service paths to better identify performance across these groups. This allows an exclusive discussion of SE service issues and is formally incorporated into IDVR’s new CRP monitoring strategy coming online this year.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	6,440	6,440	\$6,782,725	0

IDVR expended \$6,469,263 in Title I funds on services across 6133 eligible individuals in FFY 2023. The Division utilizes a 103% and 105% approach to account for increases in eligible individuals due to population growth, outreach, and increases in costs of services. The State Plan requires a one-year estimate for FFY 2025 which utilizes the 105% adjustment included in the VR Program table above for an estimated total projection of \$6,792,725. The Division is currently operating a carryover year and current projections do not indicate a need for Order of Selection within this planning period.

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

1. Estimates for next Federal fiscal year—

According to 2022 ACS 1-year estimates (Table S1810: Disability Characteristics) there are 270,483 Idahoans living with a disability. Of this total 189,303 are between 18 and 74 years of age with 24 percent of Idahoans with disabilities age 75 or older. 2022 annual averages for employment status by disability status indicates a labor force participation rate of 62.2 percent overall and 23.1 percent for Americans with a disability (BLS.gov). Using age stratified data published by BLS and the ACS allows a rough estimate of Idahoans who are in the labor market but are unemployed while accounting for varying unemployment rates and participation rates across age categories. This estimate provides a conservatively high figure to utilize for those Idahoans who may be eligible for Title-IV programs and are unemployed. This number does not include Idahoans with disabilities who may be seeking advancement or maintenance of employment.

Estimated Eligible Idahoans in Labor Market

ACS 2022 1-year Age	ACS 2022 Idaho Population	Idahoans with a Disability	Percent of Idahoans with a Disability	BLS 2022 Age	BLS 2022 Unemployed in Labor Force with a Disability (US)	Estimated Eligible Idahoans in Labor Market
18 to 34	434,756	43,170	9.9%	16 to 34	14.53%	6,273
35 to 64	691,263	97,600	14.1%	35 to 64	6.53%	6,373
65 to 74	197,939	48,533	24.5%	65+	4.90%	2,378
75+	123,716	57,102	46.2%	65+	4.90%	2,798
Total:						17,822

Additional perspective can be gained by looking at recent service trends within the Division which provide a more accurate ongoing foundation to conduct projections for program expenditures.

B. SUPPORTED EMPLOYMENT PROGRAM.

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Projected Utilization of Title I and Title VI Funds

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
*MSD	414	93	\$1,334,146	0

*The Division restricts Title-VI funds to Job Coaching services for those on an SE Plan (which by definition restricts the utilization to MSD only), the Division anticipates being able to serve all SE customers and is not anticipating an Order of Selection this plan.

The Division provided Supported Employment (SE) services to 394 individuals in PY 2022 at a total cost of \$1,271,568 with an average cost of \$3,227.33 per case. The Division receives \$300,000 in supplemental funds for the SE program, half of which are reserved for youth SE. IDVR first exhausts Title VI SE funds within each category (youth/adult) prior to continuing SE provision with Title I general program funds.

Roughly 93 participants can be supported under the SE grant under PY 2022 conditions. PY 2024 estimates for SE indicate 414 SE participants using 105% projections from PY 2022 actuals with the additional estimated 321 participants SE services supported under Title I general funds. This increases the estimated cost for PY 2024 SE services using both Title I and Title VI funds to \$1,334,146. Title VI funds will be exclusively utilized for Job Coaching services for SE customers.

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

N/A

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

N/A

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

N/A

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

N/A

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State; however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

IDVR is requesting waivers of statewideness for cooperative agreements with:

1. Various Local Education Agencies (LEAs) across Idaho and
2. Idaho Department of Correction (IDOC).

All funds made available to IDVR across these agreements are certified non-federal funds.

Local Educational Agency Agreements:

IDVR currently has nine School to Work Transition (SWT) cooperative agreements serving 52 of the LEAs across Idaho. These 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 need these services in accordance with 34 CFR 361.48.

Each signed individual agreement with participating LEAs provides for certified non-federal matching funds and further stipulates that IDVR will not provide pre-employment transition services that the school customarily provides under IDEA.

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 (e.g. all services provided under these agreements are available statewide for all students, regardless of the presence of an LEA agreement). 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, apply to all services provided under these cooperative agreements.

Data for each of these nine 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 utilizes the last completed PY actual totals for projection estimates.

LEA Agreement Expenditures for SFY 2023

Agreement	Expenditures SFY 2023/PY 2022 Actual	Non-Federal Funds Captured	Students SFY 2023/PY 2022 Actual
Center 1 Agreement with LEAs: #271, #273	\$181,158.55	\$18,522	69
Center 1 Agreement with LEAs: #83, #84, #101, #272	\$60,266.83	\$18,522	89
Center 1 Agreement with LEA: Lewiston Independent School Dist.	\$78,244.29	\$18,522	35

Agreement	Expenditures SFY 2023/PY 2022 Actual	Non-Federal Funds Captured	Students SFY 2023/PY 2022 Actual
#340			
Center 2 Agreement #1 with LEA: Boise Independent School Dist. # 1	\$117,275.17	\$18,522	132
Center 2 Agreement #3 with LEA: Nampa School Dist. #131	\$121,363.97	\$18,522	108
Center 2 Agreement #4 with LEAs: #133-137, #221, #363, #370, #372, #373	\$91,366.44	\$18,522	102
Center 3 Agreement with LEAs: #61, #121, #151, #231, #232, #233, #234, #261, #312, #314, #316, #331, #418, #465	\$246,682.15	\$18,522	225
Center 4 Agreement #1 with LEAs: #21, #25, #33, #52, #55, #58, #148, #149, #150, #201, #202, #351, #381	\$485,513.01	\$18,522	314
Center 4 Agreement with LEAs: #59, #60, #91, #93, #251, #252	\$259,402.28	\$18,522	192

Idaho Department of Correction (IDOC) agreements:

IDVR has combined our two prior agreements with the Idaho Department of Correction (IDOC) into one which continues to cover six of the seven IDOC Districts in Idaho, excluding IDOC District 2 (IDOC's smallest population district). The purpose of these agreements is to provide comprehensive Vocational Rehabilitation (VR) services to eligible offenders with disabilities leaving the prison system that have been identified as at risk for recidivism, thus needing more intensive reentry services to promote post-incarceration stability including stable employment. This strategy is supported by the SRC's recommendation to connect with justice-involved potential customers.

This agreement promotes better understanding and convenient access to VR staff and services to promote the re-entry 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 IDOC agreements are certified non-federal funds.

The signed agreement provides this assurance:

1. IDOC Agreement 1 \$187,125 (Serving IDOC Region 1, 3, 4, 5, 6, and 7)

The total receipt of certified non-federal funds from IDOC is anticipated to be \$187,125 for PY 2023 with a 1.5 percent increase in PY 2024. The total number of individuals served in PY 2022 under IDOC agreements was 964 justice-involved individuals with disabilities. The Division expended \$173,199 VR 110 grant funds on VR services for these individuals (not including the above listed match funds). The Division anticipates similar projections in SY2023/PY2024 per these agreements. The Division expended \$360,324 in total for this population in PY 2022.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency’s comprehensive system of personnel development, which

shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—
 - A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND
 - B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;
 - C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

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Personnel Projections: Idaho Division of Vocational Rehabilitation

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Qualified Rehabilitation Professionals - Vocational Rehabilitation Counselors and Assistant Regional Managers	39	3	21
Vocational Rehabilitation Specialists	23	1	10
Vocational Rehabilitation Assistants	33	2	7
Field Management Staff (Center Managers, Pre-ETS & General Supervisors)	16	1	3
Human Resources (reassigned to DHR)	0	0	0

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Fiscal	4	2	2
Staff Trainers	4	1	2
Planning and Evaluation	3	1	2
Business Services Staff	5	1	1
Administrative Assistance (Central Office Support)	2.5	0	1
Pre-ETS Manager	1	0	0
Chief of Field Services	1	0	0
Deputy Administrator	1	0	0
Administrator	1	0	0
Business Operations Specialist	1	0	0
Community Rehabilitation Program Manager	1	0	0
Full-Time positions = 141.5, numerous positions are due to part-time employment.			

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

Approximately 1:112

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

IDVR served 6,440 eligible individuals in PY 2022. The Division assuming a three percent annual growth rate, projects serving 7,466 eligible individuals in PY 2027. (PY23/6,633, PY24/6,832, PY25/7,037, PY26/7,248, PY27/7,466).

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

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.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Idaho State University	MA in Clinical Rehabilitation Counseling	20	5

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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.

The Division has implemented several strategies in an effort to improve recruitment and retention of all Division team members.

The Division implemented formal Remote Work and Alternate Work Week policies to offer greater flexibility in work schedules in an effort to improve team member recruitment and retention. Approximately 25 percent of employees are taking advantage of remote work, and a greater number are taking advantage of alternate work schedule flexibilities, which directly impacts their job satisfaction.

IDVR will continue to recruit qualified applicants from Rehabilitation Counselor Education programs. The Division maintains numerous institutions such as: 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 attends the National Council on Rehabilitation Education (NCRE) conferences for recruitment (when feasible).

IDVR continues to face challenges in recruiting qualified applicants. The entry-level wage for a Qualified Rehabilitation Professional (QRP) is lower than comparable state and private positions. IDVR has recently increased wages, through an approved equity adjustment, for those

employees in the counseling career ladder who fell below the new hire rate for each job classification. This increased impacted a significant portion of our counseling professionals.

To increase IDVR's effectiveness in hiring and retaining qualified staff especially for the QRP positions the following strategies continue to be supported:

- Flexibilities in work schedules
- Tuition and allowed work time for schooling requirements for staff working to achieve CSPD standard.
- IDVR supports paid and unpaid internships for master's level students in Rehabilitation Counseling programs.
- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive.
- Improved Job Announcements
- Merit-based bonuses, in accordance with Division of Human Resource policy

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. Idaho has a low unemployment rate, wages in the private sector continue to outpace public sector employment.

Employee turnover rate for the past program year for the rehabilitation counselor position was 23 percent.

The Division implemented a major structure reorganization in the summer of 2023 to improve the VR service delivery system and to improve customer and employee satisfaction. Additionally, the Division has launched an aggressive efficiencies initiative to reduce the administrative burden on all employees, including the suspension of the Financial Participation Assessment, leveraging technology solutions, and the purchase of SARA. Once SARA is fully implemented it will have a significant impact on the reduction of many administrative tasks allowing employees to focus more on customer engagement and counseling and guidance related activities.

Another recruitment initiative the Division has implemented to attract more applicants for counseling positions is the inclusion of seven additional educational degrees which will satisfy CSPD requirements.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

IDVR maintains a statewide policy on employee training and development to foster ongoing professional development for all professional and paraprofessional staff. Individualized training requests are evaluated and approved based on course content focused on core vocational rehabilitation services. IDVR's statewide in-service for PY 2022 focused on staff training in the following areas: rehabilitation technology, assessments for career exploration, state labor market trends, ethical service delivery, and counseling techniques.

IDVR conducts an annual training needs assessment to gather information for the Agency on staff training needs. The Agency uses this information to provide trainings to staff and to inform annual in-service training. The Agency collects objective information on training needs through an annual case file review process, which identifies specific areas of for improvement.

Statewide training provided to staff in PY 2022 beyond annual in-service training included the following areas: Job Ready, Comprehensive Assessment, and Intake and Eligibility training including rapid engagement strategies. Course evaluations are provided at the end of all Agency sponsored trainings to evaluate the effectiveness of the training and identify successful training delivery methods. The Agency maintains its status as a pre-approved entity to provide CRCC CEUs for agency-sponsored trainings.

As mentioned above, IDVR underwent a significant organizational restructure at the end of PY 2022. Additional training positions were added to specifically address the increased need to provide consistent onboarding for new employees. The restructure established a new training department. Trainers are now embedded in the four geographical customer service centers throughout the state. These additional specialists have increased the Agency's capacity to provide timely, consistent, and relevant onboarding training to new staff, provide targeted individual and regional trainings based on identified needs, and maintain consistent training methods and develop a more responsive and thorough curriculum. Trainers work directly with field supervisors and team members to identify and develop trainings specific to the needs of field employees.

IDVR continues to work with RSA grant-funding programs in the areas of Quality Management, Quality Employment, Pre-ETS programs, and Vocational Rehabilitation Counseling. Trainings are offered as available to IDVR staff from these partners to support skill acquisition and job competency. In PY2022, IDVR purchased course content from YesLMS to allow staff access to high-quality trainings specific to the state-federal VR program under WIOA.

The Agency continues to support succession planning and leadership development. Three new management staff participated in the Emerging Leaders program and three Operations Support Center staff participated in the Certified Rehabilitation Leader program. The latter program led to the development of an agency values initiative and included staff from across IDVR.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO

ENSURE THAT VR AGENCY 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

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.

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;

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). The Division has a three-pronged counselor career ladder which includes, Vocational Rehabilitation Specialist (under fill position), Vocational Rehabilitation Counselor and Counselor Senior.

IDVR has two Qualified Rehabilitation Professional (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 described below.

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) and two years of satisfactory work experience.

The Division's current minimum educational qualifications to satisfy qualified rehabilitation professionals (QRP) include:

- Current Certified Rehabilitation counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC); or
- Graduation from a program accredited by the Council for Accreditation of Counseling and Related Education Programs (CACREP) or the Commission on Rehabilitation Education (CORE) with a master's degree in Rehabilitation counseling; or
- Holds a current license as a Licensed Professional Counselor (LPC), or Licensed Clinical Professional Counselor (LCPC), or Licensed Clinical Social Worker (LCSW), or Licensed Masters Social Worker (LMSW)* issued by the State of Idaho Division of Occupational Licensing; or
- A Doctorate degree in Philosophy*, Psychology*, Counseling* or Social Work* plus a minimum of two years of relevant work experience; or
- Master of Social Work (MSW)* degree plus a minimum of two years of relevant work experience; or

- Master of Special Education (MSpEd)* plus a minimum of two years of relevant work experience.
- Master of Forensic Psychology **plus** a minimum of 2 years of relevant work experience.

(* = recent additions)

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 Center Manager (CM), will develop a CSPD Plan within six-months of hire date to be reviewed for approval by Human Resources. Each CSPD 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 Center 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 Center 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.

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.

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 by the agency.

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 section 3(a) above), but requirements which are specifically outlined to meet the conditions of the 21st 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 local labor market relevance and employer needs. IDVR will establish ongoing requirements to participate in continuing education around a 21st century understanding of the workforce including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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 program services. The Agency continues to work 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.

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 either refers or jointly serves customers who require braille to the Idaho Commission for the Blind and Visually Impaired.

5. 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 Manager will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Manager has 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 Manager 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. The Transition Manager is assigned as a co-lead on the Idaho Transition Team to work with agency partners to promote transition with educators, vocational rehabilitation professionals, and agency partners.

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 2023, IDVR brought together public educators and VR Pre-employment Transition Services staff at the Transition Institute. The Transition Manager facilitates monthly Transition Leadership team meetings and then monthly statewide Pre-ETS meetings to provide training and direction to the entire team statewide. The Transition Manager conducts specific training for Pre-ETS for those employees primarily responsible for working with students with disabilities. Finally, the Transition Manager participates in Special Education Advisory Panel for the State Department of Education.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The following section outlines how IDVR meets the requirements of 34 CFR 361.22:

Coordination with education officials.

The Division has developed and maintains policies and procedures for IDVR staff in Section 9 of the Field Manual: Pre-Employment Transition. This section contains comprehensive field guidance on Pre-ETS.

IDVR maintains multiple documents for the purposes of Pre-ETS planning including:

1. the Formal interagency agreement,
2. Statewide Transition Plan (STP),
3. Local Education Transition Plans, and
4. Other relevant transition plans (as needed).

1. The Formal interagency agreement was developed by the SDE, IDVR, and ICBVI. This agreement which meets the requirements of 34 CFR 361.22(b) by addressing eligibility criteria, collaborative service provision, consultation, and technical assistance, including the programmatic and fiscal responsibilities for each agency, as well as procedures for outreach, application (when required) and early engagement. The latest amended agreement is in effect as of March 2023. The agreement contains the following:

1. Details that the IPE must be developed within the timeframes required, agreed to, and signed by the student, or the student's representative, and the VR counselor as early as possible in the transition process, but no later than the time the eligible student leaves the school setting.
2. This agreement provides the assurances required for coordination with 34 CFR 397 (Limitations on the use of subminimum wage) for proper notification and documentation requirements when a student becomes known to be seeking less than minimum wage employment. Additionally, the agreement notes SDE and LEA responsibilities to:
 - a. Per 34 CFR 397.31 neither the Idaho State Department of Education nor a local education agency will enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at subminimum wage.
3. Specific criteria are used to determine which agency (IDVR, ICBVI or LEA) has the primary responsibility for providing and paying for transition related services for students with disabilities. These criteria are based on several factors, including the purpose of the service, which entity customarily provides the service, and program eligibility (per 34 CFR 361.22(c)).

2. The Statewide Transition Plans includes the following goals: Increase dissemination methods to families about transition and service provision, using culturally responsive practices and increase awareness of available transition pathways and increase implementation of effective transition practices. Some strategies applied to address these goals are the following:

1. Strategy: Research dissemination
2. Strategy: Development of videos
3. Strategy: Development of culturally responsive resources
4. Strategy: Tools to assist families in understanding continuum of transition planning and inform on transition and other services available at VR
5. Strategy: Development of pathways guidance for in-demand Idaho jobs
6. Strategy: Provide Training on contemporary practices

3. Local Education Plans are used to target technical assistance, professional development, and assistance to building collaboration between the LEA and IDVR. Planning at the local level is a general preference of Idaho's LEAs.

IDVR Policy:

Pre-Employment Transition and Transition Services for Students and Youth outlines Division policy for internal staff and includes sections on Pre-ETS, Service Provision and Collaboration with Schools, Potentially Eligible Students, Pre-ETS services for students, transition services, youth with a disability, student with a disability, IPE development, Pre-ETS services exemption from financial participation, auxiliary aids or services, and guidance for Pre-ETS delivery under Order of Selection (note: IDVR is not currently under OOS and does not anticipate entering OOS according to current projections).

IDVR Policy defines Student with a Disability including age and education requirements within this policy. The earliest a student can engage in Pre-ETS is 14 as agreed to by IDVR and ICBVI. This age was determined through collaboration with our blind agency ICBVI and the state department of education during development of our Interagency Agreement. We determined the start age of 14 to compliment a statewide initiative with CTE that focuses on middle school. The age is documented in our Interagency Agreement. It has been communicated to IDVR staff through the Pre-ETS Guidance Document.

Furthermore, IDVR has currently suspended its Financial Participation Agreement under 34 CFR 361.54 in order to further reduce the burden on students and youth. The Division is formalizing the suspension in rule PY 2024.

IDVR Procedures: Pre-Employment Transition Services:

This document is a guide for IDVR staff outlining Pre-ETS Procedures. This guide outlines some contract processes and guides to help IDVR staff understand the differences in how contracts are framed, but all contract requirements and actual contracts are conducted as a separate formal process. Contracts are either written by the Transition Manager with assistance from the Grants Contract Officer and approved by our AG or following all required policies and rules outlined by the Idaho Division of Purchasing (as outlined in individual contracts and designed to meet the requirements of this section). IDVR staff can only approve and authorize services within the context of their position, approval authority, and as outlined in policies and procedures. Processes include: LEA paid work process (with procedures for LEA and IDVR staff), traditional IPE case Pre-ETS processes, pre-case type processes, LEA summer programs, Occupational Preparation Advocacy Lab, CTE Exploration Program, IESDB (LEA) Summer Work Camp and Paid Work Experience, Idaho Parents Unlimited (IPUL) Work of Art, Institutes of Higher Education (IHE) Programs (Summer and School Year sections), Summer Self-Advocacy classes, Tools for Life, Summer Work Experience, Employer Reimbursed Work Experience (150-hour), 60-Hour individual CRP employer Work Readiness Training and Work Experience, Job Shadows (VR provided and CRP based), vendor travel for remote and underserved areas, Conover Online, The Idaho Transition Institute, and a Pre-Case Checklist guide.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

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 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. The latest amended agreement is in effect as of March 2023. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed and addresses the following sections:

1. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from

school to post-school activities, including pre-employment transition services and other vocational rehabilitation services.

2. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act.
3. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services.
4. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals.
5. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and
6. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

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.
8. IDVR and ICBVI counselors will help students and youth with disabilities develop and participate in Pre-Employment Transition services, including work-based learning opportunities, provide information, support, and guidance to transition students, parents, and schools to promote effective transition services, help eligible students develop an IPE, plan and promote the use of Pre-ETS and transition services, identify and help students and their families access other appropriate resources, help students obtain technology evaluations, recommended assistive technology, and training in the use of purchased equipment, when appropriate.
9. All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

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.

To accomplish the tasks outlined in the formal Interagency Agreement IDVR, ICBVI, the SDE do the following:

- 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.

- IDVR counselors attend hundreds of IEP meetings statewide each year where they discuss Pre-ETS and VR services with students and families. IDVR also created a one-page Request for Pre-Employment Transition Services form that is easy to complete to receive Pre-ETS. This makes the process for receiving Pre-ETS quick and easy for students and families. However, students still meet with a VR counselor when completing the form. During this time, the counselor discusses the VR program and what additional services can be made available to the student when they fully participate in the VR program. Additionally, while receiving Pre-ETS, students are provided information about the VR program and how VR can support students with employment and educational goals.
- IDVR also conducts significant outreach as part of collaboration with LEAs to discuss both Pre-ETS and the VR program. They are also provided information on the VR eligibility process, so they can provide this information to families. The Transition Coordinator attends regional special education directors' meetings to present on Pre-ETS and VR services. IDVR also presented at the 504 coordinators meeting, the superintendents meeting, and the statewide Transition Institute. IDVR provides numerous presentations at Tools for Life, which is a conference that students with disabilities attend. Presentations include information on Pre-ETS, VR services, and the VR eligibility process.
- Lastly, IDVR developed an informational packet for students and families that can be shared by teachers at IEP meetings when the VR counselor is not able to attend. IDVR developed two videos that have been shared with teachers on Pre-ETS and the VR program as well as the eligibility process for VR. These videos are maintained on the VR website. These videos disseminated to LEA staff via the State Department of Education's Transition Coordinator.

As noted in the prior section, the formal interagency agreement provides the assurances required for coordination with 34 CFR 397 (Limitations on the use of subminimum wage) for proper notification and documentation requirements when a student becomes known to be seeking less than minimum wage employment. Additionally, the agreement notes SDE and LEA responsibilities to:

- Per 34 CFR 397.31 neither the Idaho State Department of Education nor a local education agency will enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at subminimum wage.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

IDVR continues to provide coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. IDVR continues to evolve services provided to business and has plans for continued improvement of business services, additional training for IDVR staff, increasing the quality of services provided to business, as well as improving coordination with WIOA plan partners.

Over the last two years, IDVR continued to engage in coordinated business services internally through the Business Engagement Leadership Team (BELT). This team was comprised of at least one IDVR staff representative from each region with the activities of the team directed by the Business Relations Manager. Regional Management representation was present within the team with two of eight Regional Manager or Assistant Regional Managers participating in a supportive role. This team has been supplanted by the implementation of dedicated business services team members within the IDVR customer centers.

In August 2023, IDVR hired its first of four Business Services Specialists that are located within the customer centers and report to the Business Relations Manager to ensure a dedicated focus on establishing and developing quality relationships with businesses across the state. With the new IDVR structure, there will be one dedicated team member in each customer center that will be dedicated to engaging with employers to provide outreach, education, and business services throughout the state. Currently, the agency has three of the four positions filled, and will complete recruitment for these positions in early 2024.

IDVR continues to collaborate with Titles I-IV programs and other combined state plan partners. IDVR's Business Relations Manager is a member of the Statewide One-Stop Business Services Leadership Team. Through participation in this team, goals have been identified for completing more effective business services across partners. IDVR was a leader in the development of regional business outreach One-stop teams (BOOST). Further, IDVR has identified business services leads within these teams to promote comprehensive supports and services to businesses.

With the development of business services specialist positions, IDVR is reevaluating its communication plan for effective communication of business services information with other IDVR team members. IDVR has implemented a change to have the business services specialists in each center to be responsible to have a standing agenda item on each center monthly team meeting to assure that relevant and timely sharing of business services information is able to

happen in these meetings. Additionally, utilizing IDVR's case management system, a system for developing thorough business profiles is being developed to ensure that knowledge on business partners is readily available to all IDVR team members that would be beneficial in ensuring understanding of business partners to assist in meeting the business needs. Furthermore, the Business Relations Manager has completed visits to each region annually to learn more about localized needs and provide support to team members across the state in providing quality business services and has also met on a regular basis with regional management teams to ensure support needs in each of the regions is able to be addressed as needed at the local level.

The Division continues to strive to become a dependable and useful resource for business. The Division continues to host and maintain a 'Jobs in Idaho' page as an employer recruitment resource. Additionally, the Division completed an update to its external website in which the Business Relations Manager was a significant contributor to this project to ensure that the changes to the external website were business friendly and that businesses can gain helpful information and submit inquiries requesting support from IDVR.

Additionally, the Business Relations Manager continues to work to identify ways that the Division can better meet the needs of businesses to include identifying training and education, services, and partnership options that the Division can make available to meet business needs.

The Division has continued to provide Business Spotlight Sessions which allow businesses a platform to share information about their business and their needs in a group setting. Since the implementation of the Business Spotlight sessions in April 2021, IDVR has completed over 30 Business Spotlight sessions with attendees from IDVR, ICBVI, DOL, Department of Veterans Affairs, Oregon Division of Vocational Rehabilitation, Oregon Commission for the Blind, Washington Division of Vocational Rehabilitation, and Utah Division of Vocational Rehabilitation staff. In addition to the Business Spotlight sessions, IDVR also developed and implemented Registered Apprenticeship Spotlights in 2023 where sponsors of registered apprenticeship programs in Idaho are able to share about their programs with team members from IDVR, IDOL, Idaho Business for Education, Workforce Development Council, Office of Apprenticeship, Career and Technical Education, Community Colleges, and other Apprenticeship Idaho Partners that can benefit from learning about the registered apprenticeship opportunities in Idaho.

IDVR is striving to increase customer outcomes through a business apprenticeship strategy. IDVR has hired a dedicated Apprenticeship Coordinator to further develop this service to business as a collaborative pilot in conjunction with the Idaho Department of Labor Apprenticeship team, and the Idaho Department of Correction to ensure these services meet the needs of business, while expanding the quality and scope of career opportunities available to IDVR customers. IDVR has initiated discussions on the apprenticeship development program with businesses and is working to connect interested businesses with an apprenticeship support team.

IDVR continues to develop additional opportunities for customers through our business engagement efforts. WinCo Wins is a collaborative program between WinCo and IDVR adapted to work in Idaho. The program was modified from a short work-based learning program to a program that focused more on skills gains and growth of the individual customer to gain skills and assist them in being successful in employment.

The curriculum was utilized to develop greater soft skills with about a third of the program focusing on the development of soft skills that WinCo identified as critical for the success of participants. Through this program each IDVR customer was able to gain additional skills in workplace communication, time management, self-advocacy, teamwork, and other areas. Curriculum was implemented to support the IDVR customers to prepare for the job search process to include the development of interviewing skills, development of a resume, and increasing their skills with job applications. Each customer was able to complete an interview with the WinCo hiring team through a competitive hiring process. IDVR customers completing the program were able to also complete work tasks within the WinCo Distribution center where they were paid for all hours worked and given feedback to improve their work efficiency. The first cohort ran in Spring 2023. IDVR is looking to evolve aspects of the training program based on results and outcomes of the first cohort, with the goal to run a second cohort to the program in Summer 2024.

IDVR collaborated with Create Common Good to create a paid WBLE for adult customers focused on increasing the soft and hard skills of individuals with barriers to employment with first referrals for this program made in 2022. With this program, IDVR customers are able to practice soft skills gained in the classroom setting by practicing them while completing work in the Create Common Good commercial kitchen.

The Division also specifically addressed the intersection of business and transition services, including pre-employment transition services, for students and youth with disabilities: The Division has created Business Engagement plans for each of the four Customer Service Centers to promote and expand opportunities for students to gain work-based learning experiences (WBLE) prior to high school graduation in PY 2022. IDVR has worked directly with employers to provide students with up to 150 hours of paid WBLE. IDVR is in the process of identifying additional business partners that are willing to host students for informational interviews, job shadows, and WBLE, as well as to support reality town events to assist students in and knowledge of employment and career pathways.

The business services specialists will work closely with the Pre-ETS counselors to understand needs and identify opportunities for students. Subsequently these teams will work with businesses to facilitate services for students.

The Business Spotlights hosted by the business services team have also continued to serve as a platform for Division Pre-ETS staff to connect and learn about opportunities for students and youth with businesses in these sessions. Businesses have increasingly communicated their ability to support services such as informational interviews, job shadows, and work experiences, and answer questions regarding their capabilities to support and host students during these sessions.

IDVR also developed a training video to promote effective communication with businesses. This video provided Pre-ETS team members guidance on how to approach businesses and communicate effectively. This video continues to be utilized as a training tool when onboarding new Pre-ETS team members. Additionally, the business services specialists have received significant training to understand Pre-ETS business engagement. This cross training of business and Pre-ETS personnel is essential to advancing our Pre-ETS WBLE strategy.

The Division has identified and disseminates marketing materials for business that explain the benefits of partnering with IDVR. Marketing flyers for businesses were created and published for IDVR team members to utilize when meeting with businesses in July 2022.

IDVR piloted the utilization of a VR staff member dedicated to support Pre-ETS counselor when meeting with employers to help market the benefits of WBLEs to businesses and students. Consequently, the Division realized an increase in WBLEs through the pilot and is currently expanding this strategy statewide through the business services specialists.

In November 2022, IDVR joined the Rural Youth Apprenticeship Development (RYAD) grant efforts to assist with developing a pre-apprenticeship framework to support Pre-ETS and youth with disabilities to gain the necessary skills to meet the requirements of various apprenticeship programs. IDVR is in the preliminary stages of adapting this pre-apprenticeship framework to educate students. The goal is to implement this pilot in summer of 2024.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

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.

1. State programs (designate lead agency(ies) and implementing entity(ies)) 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. This collaboration has improved access to AT resources which currently includes AT assessments, services, and information about 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 AT services provision but is looking to internally boost assistive technology as a strategy in this state plan and will look at overall provision of AT as a peripheral measure in the future. The formal agreement with IATP was delayed due to COVID related challenges faced by both agencies. Agreement discussions resumed with the IATP Director, and the entities now have a draft scope of work and are finalizing negotiations with an estimated completion date of September 2024

2. 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.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

The Division does not currently have agreements with non-educational agencies serving out-of-school youth.

Out-of-school youth (youth ages 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 Title-I 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.

The Idaho Division of Vocational Rehabilitation's (IDVR) Business Relations Manager has a meeting with the Idaho Apprenticeship Coalition monthly develop strategies for working together to create options for youth to participate in apprenticeships. Youth Apprenticeship Program and IDVR staff both participate in these meetings covering areas they serve to educate all IDVR staff about Youth Apprenticeship opportunities, referral process, and to support IDVR

staff in understanding the youth apprenticeship process for in-school versus out-of-school youth.

Additionally, IDVR staff advise YAP staff on IDVR services and the benefits of co-enrollment. The Youth Apprenticeship Program connects people, ages 16-24, to training and careers in Idaho. Building workforce-ready labor requires a collaborative effort among government, business, and education. Youth Apprenticeship provides education, work experience, and access to postsecondary education, training, and certifications. Additionally, IDVR is engaged with a school district to develop a pre-apprenticeship pilot program to advance efforts in this area.

IDVR was working with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Idaho Job Corp recently went through a major organizational change and subsequently, Area Transition Supervisors are reengaging with Job Corps to understand the new structure and how youth involved with IDVR can benefit.

The Division continues to coordinate with the apprenticeship program under Idaho Department of Labor for the purpose of expanding apprenticeships in the state. As part of this collaboration, the Division hired an Apprenticeship Coordinator that works as a liaison for IDVR customers with the IDOL Apprenticeship team, including the Youth Apprenticeship (YAP) team and brings expertise on how employers can support youth with disabilities to be successful in their apprenticeship programs. This pilot project will continue through June 2025.

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.

4. 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.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

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 July 2020, IDVR has had a formal signed agreement with the Idaho Department of Health and Welfare as it relates to Title XIX of the Social Security Act outlining the following areas:

- Service delivery coordination to maximize customer choice and outcomes.

- Per 34 CFR 361.24 this agreement clarifies the and roles, responsibilities of IDVR and IDH&W concerning common consumers.
- Interagency dispute resolution
- Information to increase interagency collaboration.
- Information identifying the interagency coordination responsibilities for the purposes of promoting the coordination and timely delivery of employment services.
- Authority and funding clarification.
- Outlines points of collaboration.
- Methods of Referral
- Confidentiality of Records
- Agreement termination provisions

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. 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 support the VR staff on Medicaid services and benefits. This training helps IDVR staff support customers and families in identifying how those services can support a successful employment outcome.

The agreement outlines joint responsibilities, eligibility criteria, referrals, financial responsibilities, confidentiality provisions, and accountability and controls for IDH&W and IDVR.

Due to potential issues surrounding the administration of a program which supports non-integrated employment settings, and thanks to RSA assistance and recommendations, IDVR successfully transferred the state-only funded extended employment services (EES) program to the Idaho Department of Health and Welfare. The Division has established procedures for appropriate referral to the EES program which also supports CIE extended services. EES services are utilized when available ahead of IDVR's Youth Extended Services which are allowable when no other source of funding is available. To date both H&W's waiver and EES programs are able to field all extended services requests.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

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. 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.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

The IDVR and Health and Welfare (H&W) Behavioral Health no longer have a formal agreement. Due to the States shift in the delivery of behavioral health services to a community model, IDVR no longer has designated staff to work directly with H&W Behavioral Health. There is IDVR representation on the State Planning Council on Behavioral Health. The purpose of this Council is to:

- "Serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify, or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system. Advise the State Behavioral Health Authority on problems, policies and programs and provide guidance to the State Behavioral Authority in the development and implementation of the State Behavioral Health Systems Plan."

Regionally, IDVR connects with Mental Health and Drug Courts where available. Referrals come to the IDVR regional hub office and sub offices through community behavioral health organizations.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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.

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 entities:

- Idaho Commission for the Blind and Visually Impaired (ICBVI)
- State Independent Living Center (SILC)
- Living Independence Network Corporation (LINC)
- Disability Action Center – Northwest (DAC)
- Living Independently for Everyone (LIFE)

IDVR project distribution of funds based upon percentages agreed to by participating entities and has finished transitioning to the following percentage split which will be utilized for the two-years covered by this state plan:

Federal Award Share by Independent Living Program: FFY 2024 and FFY 2025

	Organization's Percentage of Total Award
SILC	30.0%
ICBVI	21.0%
LINC	24.5%
LIFE	19.5%
DAC	5.0%
Total	100.0%

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer of VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act of 1973 as amended. 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, 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. Up to 12 positions a year are available through this program for IDVR customers.

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): IDVR entered into one collaborative cooperative agreement with all four federally funded Tribal VR programs in the state. The updated cooperative agreement addresses WIOA requirements, specifically to address transition services to students and youth with disabilities.

The intent of the agreement 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 this cooperative agreement. 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. This agreement ensures all customers receive access to a comprehensive array of unduplicated services.

Currently outcomes are not being tracked in the Division's case management system. The Division still needs a better method for evaluating jointly served participants.

U.S. Department of Veterans Affairs (VA) Veterans Readiness and Employment (VR&E) Program and IDVR: This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Veterans Readiness 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. This agreement was last updated in November 2023.

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 a better method to evaluate jointly served participants.

Partnership Plus (PPLUS): IDVR has established PPLUS agreements with five Employment Networks (EN's) in and out of 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 SSI Supplemental Security Income or SSDI Social Security Disability Insurance benefits). This partnership is created once the beneficiary selects an EN, and the EN accepts the referral. A referral to the EN should be made within the first month of stable 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 after closure. The EN will provide continued support on the job, i.e., benefits counseling, reporting earnings to SSA, 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, 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 a Memorandum of Agreement (MOA) 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 MOA 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 for this population.

Justice involved 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 justice involved 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 PY2022, 83 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 all regions of the state but are not present in all LEAs. There are fewer LEAs participating in direct agreements this state plan period. Services are extended to these LEAs regardless of the presence of a formal agreement. There are currently nine School to Work agreements remaining, which is two fewer than last plan, but includes two additional LEAs overall. These agreements cover multiple LEAs under one agreement for smaller LEAs and more detail is included in the waiver of Statewideness section of this plan.

It is worth contrasting the services in the regions of the state covered by the cooperative agreements versus those not covered. IDVR counselors 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. This intersection is also instrumental in initially connecting with Idaho's Hispanic youth population.

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. 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.

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. IDVRs case management system does capture employment outcomes for students who apply for VR services.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

The Division is engaged with over 30 Community Rehabilitation Programs across Idaho, of which less than half are private nonprofit organizations. These entities tend to be the largest most established CRPs in the state, and often serve multiple centers. While formal agreements do not currently exist, the Division is engaged in substantial quality improvement initiatives which are detailed in the Supported Employment goals section of this state plan. The Division is exploring the benefits of formal contracts with these entities alongside the issuance of new rates.

Of note, the Division is currently engaged in a rate calibration study following a competitive bid award process. Additionally, the agency has substantially revised its CRP Manual and CRP Monitoring Protocol to better align expectations and promote the continuous improvement of IDVR’s CRP vendors.

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, 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 VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must 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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The State Plan must include
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. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements 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 as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.

The State Plan must include
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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 sections 101(a)(14) and 511 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.A. strategies to address the needs identified in the assessments; and
4.j.i.B. 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), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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

The State Plan must include
receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
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)(H) and (I) 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:
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 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 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)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

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 TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Idaho Division of Vocational Rehabilitation

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

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, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], 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;

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

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, MA, CRC

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, Idaho Division of Vocational Rehabilitation

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

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Jane Donnellan, MA, CRC
Title of Signatory	Administrator, Idaho Division of Vocational Rehabilitation
Date Signed	02/26/2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to

report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.9%		64.9%	
Employment (Fourth Quarter After Exit)	62.7%		62.7%	
Median Earnings (Second Quarter After Exit)	\$4,951		\$5,075	
Credential Attainment Rate	63.7%		65.2%	
Measurable Skill Gains	57.5%		58.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Idaho Division of Vocational Rehabilitation Mission and Vision Statements:

Mission: To prepare individuals with disabilities for employment and career opportunities while meeting the needs of the employer.

Vision: An Idaho where all individuals with disabilities have the opportunity to participate in the workforce and employers value their contributions.

IDVR Policy: IDVR strives to provide all individuals, regardless of disability, with equal access to its program. If during the course of VR services, the customer needs an accommodation in relation to access to VR services, the customer should submit a request for accommodation to their VRC.

IDVR's mission is fulfilled through the provision of vocational rehabilitation programs and services:

1. Pre-Employment Transitions Services for students ages 14-21 and services to Youth ages 16-24.
2. To prepare individuals for competitive integrated employment in high demand occupations and careers.
3. Vocational Rehabilitation counseling and guidance, career and training services, and job placement supports and services.
4. Adjustment to disability counseling.
5. Resources and education and training services for employers who hire or retain employees with disabilities.
6. Supported and customized employment programs for individuals with the most significant disabilities.
7. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people with disabilities.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER
BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

1. Language barriers - The second most common language spoke in Idaho is Spanish, although IDVR also serves individuals and families from a variety of cultures and linguistic backgrounds. Individuals who are deaf or hard of hearing may also require ASL interpreter services. External IDVR website may not be fully accessible for screen readers.
2. Transportation is one of the most significant barriers for individuals in Idaho, especially for individuals with mobility limitations or individuals who otherwise cannot access public transportation.
3. Rural and low socioeconomic status (SES) - Idaho is primarily a rural state.
4. Access to Wi-Fi or other technologies.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

1. Language barriers –IDVR materials such as application, brochures and other printed materials are provided in English and Spanish. If not readily available, the Division will seek professional translation services for Spanish or any other non-English reader. IDVR will continue to provide translation services via Language Link. The Division contracts with certified ASL Interpreters for individuals who are deaf or hard of hearing who require ASL services. IDVR is actively working to make the external website WCAG 2.2 compliant.
2. Transportation – IDVR supports various types of transportation services for individuals lacking or requiring access to this service. IDVR may assist with Assistive Technology services or devices or vehicle modification. IDVR can also fund gas assistance. Another strategy to assist individuals who lack transportation is to provide counseling and guidance related to securing employment close to the individuals home or consider remote work opportunities.

3. Rural and low socioeconomic status (SES) - IDVR will continue outreach efforts to rural communities and individuals with low SES. Outreach is a major priority in this State Plan for the Division.
4. Access to Wi-Fi or other technologies - Ensure all technology needs are addressed by the counselors in the individual's comprehensive assessment. IDVR can support customers through rehabilitation technology services, as well as costs needed for Wi-Fi or related service. Counselors can also refer customers to any state or federal resources that may be available.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

1. Language barriers
 - Continue to provide translation services and create materials in Spanish or other language. (on-going)
 - Continue to utilize Language Link for translation services. (on-going)
 - Continue to provide ASL interpreter services for individuals who are deaf and hard of hearing. (on-going)
 - Continue to advance the accessibility of the IDVR website. (on-going)
2. Transportation
 - Continue to address transportation needs of customers in the comprehensive assessment. (on-going)
 - Continue to have IDVR representation on transportation council (on-going).
3. Rural and low socioeconomic status (SES)
 - Continue outreach efforts to rural communities and agencies who serve individuals and families of low SES (on-going).
4. Access to Wi-Fi or other technologies
 - Continue to address technology needs of individuals in the comprehensive assessment process (on-going).

- Work with Idaho Assistive Technology Project (IATP) to improve counselor understanding and accessing to technology resources. (within 12 months)

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for the Supported Employment formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT
EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Idaho Division of Vocational Rehabilitation Mission and Vision Statements:

Mission: To prepare individuals with disabilities for employment and career opportunities while meeting the needs of the employer.

Vision: An Idaho where all individuals with disabilities have the opportunity to participate in the workforce and employers value their contributions.

IDVR Policy: IDVR strives to provide all individuals, regardless of disability, with equal access to its program. If during the course of VR services, the customer needs an accommodation in relation to access to VR services, the customer should submit a request for accommodation to their VRC.

IDVR's mission is fulfilled through the provision of vocational rehabilitation programs and services:

1. Pre-Employment Transitions Services for students ages 14-21 and services to youth ages 16-24.
2. To prepare individuals for competitive integrated employment in based upon their unique interests, skills, abilities, and informed choice.

3. Vocational Rehabilitation counseling and guidance, career and training services, and job placement supports and services.
4. Adjustment to disability counseling.
5. Resources and education and training services for employers who hire or retain employees with disabilities.
6. Supported and customized employment programs for individuals with the most significant disabilities.
7. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people with disabilities.

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The existing mission, policies and commitments of the agency are squarely aligned with the equitable participation in the proposed activity (Supported Employment). This core service is designed to maximize the employment potential of individuals with the most significant disabilities and supports are inherently designed to bridge equitable participation in competitive integrated employment for these traditionally underserved population with barriers to employment.

**2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER
BENEFICIARIES?**

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

1. Language barriers - The second most common language spoke in Idaho is Spanish, although IDVR also serves individuals and families from a variety of cultures and linguistic backgrounds. Individuals who are deaf or hard of hearing may also require ASL interpreter services. External IDVR website may not be fully accessible for screen readers.
2. Transportation is one of the most significant barriers for individuals in Idaho, especially for individuals with mobility limitations or individuals who otherwise cannot access public transportation.

3. Rural and low socioeconomic status (SES) - Idaho is primarily a rural state.
4. Access to quality job supports provided through a Community Rehabilitation Program.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

1. Language barriers –IDVR materials such as application, brochures and other printed materials are provided in English and Spanish. If not readily available, the Division will seek professional translation services for Spanish or any other non-English speaker. IDVR will continue to provide translation services via Language Link. The Division contracts with certified ASL Interpreters for individuals who are deaf or hard of hearing who require ASL services. IDVR is actively working to make the external website WCAG 2.2 compliant.
2. Transportation – IDVR supports various types of transportation services for individuals lacking or requiring access to this service. IDVR may assist with Assistive Technology services or devices or vehicle modification. IDVR can also fund gas assistance. Another strategy to assist individuals who lack transportation is to provide counseling and guidance related to securing employment close to the individuals home or consider remote work opportunities.
3. Rural and low socioeconomic status (SES) - IDVR will continue outreach efforts to rural communities and individuals with low SES. Outreach is a major priority in this State Plan for the Division.
4. It is a major priority for IDVR to improve the quality services provided by a Community Rehabilitation Program, as identified in this State Plan.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a

description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

1. Language barriers
 - Continue to provide translation services and create materials in Spanish or other language. (on-going)
 - Continue to utilize Language Link for translation services. (on-going)
 - Continue to provide ASL interpreter services for individuals who are deaf and hard of hearing. (on-going)
 - Continue to advance the accessibility of the IDVR website. (on-going)
2. Transportation
 - Continue to address transportation needs of customers in the comprehensive assessment.
 - Continue to have IDVR representation on transportation council (on-going).
3. Rural and low socioeconomic status (SES)
 - Continue outreach efforts to rural communities and agencies who serve individuals and families of low SES (on-going).
4. Access to quality CRP services
 - IDVR is engaged in a rate methodology study which includes the identification of qualifications of individuals who provide services directly to individuals with disabilities. Results of the study will help identify an innovation and expansion plan for the Division, as mentioned in this State Plan. (12-18 months).
 - Continue to foster and develop individuals interested in providing job support services to individuals with disabilities. (on-going)

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (BLIND)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR

SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(A) is an independent State commission

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)		
Parent Training and Information Center		
Client Assistance Program		
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)		
Community Rehabilitation Program Service Provider		
Business, Industry, and Labor		
Business, Industry, and Labor		
Business, Industry, and Labor		
Business, Industry, and Labor		
Disability Advocacy Groups		
Current or Former Applicants for, or Recipients of, VR services		

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Section 121 Project Directors in the State (as applicable)		
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)		
State Workforce Development Board		
VR Agency Director (Ex Officio)		

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

n/a

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

n/a

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

n/a

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

ICBVI completed a Comprehensive Statewide Needs Assessment (CSNA) in PY 2023 in accordance with Sec. 101.15 of the Rehabilitation Act as amended. Data was collected through a combination of focus groups, key informant interviews, and a survey. Survey participants included ICBVI clients, partners, businesses, and ICBVI staff. A total of 173 individuals were consulted in the data collection process (survey: 151; interviews: 3; focus group: 19).

According to 2019 American Community Survey (ACS) estimates, 2.26% (MOE = 0.28) of the Idaho population reported a visual disability of some kind, which is statistically equal to the percentage reported for the United States as a whole (2.3%). Rates for males were marginally higher for males than females (2.29% vs. 2.22%), but this difference was within the MOE and may represent measurement error. Differences across racial and ethnic groups were modest, with whites reporting a prevalence rate of 2.31% compared to 2.13% for Hispanics (the next largest category) and 2.52% for those identifying as “other.”

Several key themes emerged from the respondents to the 2023 CSNA relating to the rehabilitation and support needs of blind and visually impaired individuals in Idaho. Among the most significant were:

Barriers to employment, including

- employer reluctance to hire persons with visual impairments or blindness (48%);
- employer concerns about respondent’s ability to perform job functions due to disability (46%);
- lack of reliable transportation (44.2%).

Transportation difficulties were mentioned by survey respondents (clients, staff, and partners), focus group participants, and key informant subjects alike. Public transportation options for ICBVI clients are limited in across the state. AllTransit (a public transportation advocacy and research organization) estimated that the Boise area’s public transportation “shed” (defined as the how far an average public transportation user could travel in 30 minutes) was 8 miles (compared to 51 miles for Denver County, a region with a similar population). Boise and the surrounding metro area received an AllTransit Performance score of 2.6, placing it 101st out of 135 urbanized areas in the United States. Given that the fastest growing parts of the Treasure Valley are outlying suburbs such as Nampa and Caldwell, this suggests that new ICBVI clients may continue to face significant transportation challenges. Public transportation options in other regions of the state with ICBVI offices (Pocatello, Lewiston, Twin Falls) are similarly limited.

Barriers to accessing ICBVI services:

- Lack of information about available services;
- Office not on public transportation route;
- Difficulty in reaching staff;
- Hours of operation.

However, it should be noted that the most commonly identified barrier to accessing ICBVI services was “none.”

The number of individuals requiring supported employment (SE) services has been increasing every year since 2016; since the passage of the WIOA in 2014, the Commission has collaborated with IESDB to ensure that the VR program is aware of these individuals. The Idaho Division of Vocational Rehabilitation manages the SE program for the state, so individuals in need of SE services are required to apply for those services at the Division. The ICBVI is responsible for providing service and support relating to clients’ visual disability, while IDVR provides employment-related services as well as service required to address other physical or mental disabilities. All other VR services are negotiated between the two programs.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Data for ethnicity is obtained from 2021 American Community Survey one-year and five-year estimates. The ethnic demographic averages for each area are calculated by adding population totals for each ethnic group and dividing by the total population.

The State averages are below the National averages for ethnic diversity in the categories for Hispanics and Latino, Blacks and African American, and Asian.

Whites comprise over 78% of Idaho's population and the State's average is 20.6% higher than the National average of 58.1%. R4's average for Whites is the lowest in the State (70.4%) and the average is 12.3% higher than the National average. Note that five of R4's eight counties are considered to be over 49.5% urban.

Hispanic and Latinos comprise the second largest ethnic group in the State (13.3%), with an average that is 5.5% lower than the National average. Four regions have over 11.5% of individuals reporting Hispanic and Latino ethnicity. R4's average for individuals of Hispanic/Latino ethnicity exceeds the State average by 5.5%, exceeds the State's urban average by 3.2%; and exceeds the other region averages by up to 20.3%.

The State's average for Asians (1.4%) is significantly lower than the National average by 4.2 percentage points. The region with the highest percentage rate of Asian residents is RTV (1.8%).

The National average for Black or African Americans is almost 12% and the State of Idaho's average is significantly lower than the National average as Blacks comprise less than 1% of Idaho's population. RTV has the highest average of Black Americans in the State (1%).

The following themes emerged in the area of the needs of individuals with disabilities from different ethnic groups, including individuals who may have been unserved or underserved by the ICBVI:

- The groups most commonly cited as potentially underserved include Hispanics, low economic families, and those living in rural areas.
- Limited access to services by some groups is magnified if they live in rural areas.
- Unemployment rates and lack of participation in the workforce for individuals with disabilities continue to be low. This coincides with poverty rates and other needs across Idaho, resulting in the need for ICBVI to consider job-driven training programs and

sustainable employment in Idaho's workforce for individuals with blindness and visual impairments.

- Due to the growth rate in the State of Idaho, ICBVI needs to focus on growth and outreach and continue to assess changes to the population and areas of the State with increased needs.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

The following information was gathered from the individuals interviewed for this assessment in the area of the needs of individuals with disabilities served through other components of the Statewide Workforce Development System (from the 2023 CSNA):

- Overall, access and engagement within AJCs is lacking; therefore, many people did not have much experience accessing their services.
- There was concern that the AJCs did not understand how to work with individuals with blindness and visual impairments, so they either do not get help, or get referred elsewhere (i.e., ICBVI).
- Low incidence disabilities can be challenging for community partners who do not work with them often. ICBVI should be trusted and used as the expert for consultation, strategic planning, and advocacy.
- ICBVI could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing consumers, and developing youth program partnerships.

The following recommendations are offered to ICBVI based on the results of the research in the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System area (from the 2023 CSNA):

- ICBVI should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of consumers with ICBVI and other workforce programs to leverage resources and serve Idahoans together.
- ICBVI is encouraged to identify effective ways to share consumer data and develop joint opportunities to increase the level of partnership at the local level.
- ICBVI should continue efforts to improve services for individuals with blindness and visual impairments in the larger Idaho workforce system by maintaining partnerships and the level of engagements of ICBVI within the WIOA core programs. For example, ICBVI can provide ADA training, disability awareness and etiquette training, community accessibility, blind-specific training, assistive technology, etc., to workforce agencies as well as community partners.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

According to the 2023 CSNA, the most common themes that emerged in this area are:

- ICBVI will need to monitor the increasing demands of students, educators, and families across the State to ensure there are adequate resources available to meet the demand.
- Students and youth need access to transportation and education. These seem to be the most important services and the lack thereof creates barriers faced by youth with blindness and visual impairments.
- Relationships with educators have greatly increased, which has resulted in students having more access to ICBVI and other workforce system partners. However, there seems to be a continued lack of understanding and support by parents, indicating a need for ICBVI to increase direct communication with parents and families of students and youth with disabilities served by the organization.

Recommendations for improving service needs for students and youth with disabilities (from the 2023 CSNA):

- ICBVI is encouraged to continue efforts to identify needs and programs for implementing Pre-ETS. The agency should consider adding some tiered approaches that will enhance the delivery of Pre-ETS to SWD who may have multiple disabilities. In addition, ICBVI is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of Pre-ETS to all areas of the State.
- ICBVI is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to ICBVI through collaboration with special education services. The agency should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and eye/pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, ICBVI is encouraged to tailor services to meet the diverse needs of these individuals.
- ICBVI is encouraged to increase marketing, communication, and expectations directed toward parents and families of youth with disabilities.
- ICBVI should consider assessing the availability of education and training services that could lead to in-demand jobs to increase educational engagement and workforce participation in youth.
- ICBVI is encouraged to assess its ability to support youth in accessing transportation to increase their independence, access to education and training ,and ability to enter into the workforce.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

From the 2023 CSNA, 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:

- Overall, ICBVI seems to struggle with having access to qualified CRPs. Similar concerns were expressed, but one particular description stood out regarding consumers not having enough options or access in order to make informed decisions about CRP services: "Choice is not informed choice."
- CRPs are generally viewed as caring with the desire to provide high quality services; however, they need extensive training and support in order to do this successfully. Implementing qualification standards was suggested; however, it was followed up by fear of that limiting further access and options.
- 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.
- The provision of Pre-ETS has helped vendors grow a better understanding of SWD impairments.
- Training was identified as a need that would increase CRP knowledge of working with individuals with blindness and visual impairments. Cross-training with ICBVI staff, CRPs and others could greatly improve understanding and service delivery.

The following recommendations are offered to ICBVI based on the results of the research in the Need to Establish, Develop or Improve Community Rehabilitation Programs in ICBVI (from the 2023 CSNA):

- ICBVI should consider statewide training opportunities (regularly) to increase the skills of CRPs and understanding of working with individuals with disabilities, particularly those with blindness and visual impairments.
- Develop and implement improved screening protocol that examines the knowledge of the CRP prior to contracting with the provider. This could help identify ongoing needs and supports that could be provided by ICBVI or through continued collaboration. Areas to investigate include the following:
 - Knowledge of disability services/ resources in the local area;
 - Experience advocating for workplace accommodations with employers;
 - Experience working with consumers with blindness and visual impairments;
 - Knowledge and use of American Job Centers;
 - Employers with whom provider has built relationships; and
 - Knowledge and use of medical and community resource organizations in the local area.
- ICBVI is encouraged to consult and partner with CRP staff to engage in a collaborative process to revise policies and fees for service that are agreed upon by both groups, especially if increased qualification standards are set for staff.
- If this does not already exist, consider adding feedback questions related to CRP services to the participant satisfaction surveys sent by ICBVI.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

ICBVI does not have an SRC. The goals and priorities were developed from the 2023 CSNA.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

A. ICBVI is not engaging in any innovation and expansion activities in PY2024.

B. Overcoming Barriers

Goal 1 – Reduce barriers to employment for individuals who are blind or visually impaired.

Narrative: The most significant themes that emerged from the 2023 CSNA include:

- Lack of transportation
- Lack of information about services

- The groups most commonly cited as potentially underserved include Hispanics, low economic families, and those living in rural areas.

Priority 1: Address transportation barriers for individuals who are blind or visually impaired.

Strategies for Priority 1

1. Have all ICBVI regions apply to serve on their regional transportation boards/councils.
2. Develop policies to improve client engagement during the planning process and throughout the IPE to ensure transportation is always addressed.
3. Include in the client satisfaction survey questions relating to transportation.

Performance Measure for Priority 1:

1. Results of the client satisfaction survey: >70% of participants who exit the program satisfied with transportation services provided through their IPE.

Priority 2: Increase outreach to community partners about ICBVI services.

Strategies for Priority 2

1. Ensure materials are up to date, address any improvements to the website.
2. Attend community events, with special focus on rural communities.

Performance Measure for Priority 2

1. Number of new referrals, application, eligibilities, and new IPE's.

Priority 3: Improve outreach to the unserved/underserved.

Strategies for Priority 3:

1. Participate in councils and committees that serve Hispanics, migrants, and low-income individuals.
2. Attend community events that cater to Hispanics, migrants, and low-income populations.

Performance Measures for Priority 3:

1. Increase number of applicants to the VR program who identify as a minority population.
2. Increase applications specifically for the Hispanic population.
3. Increase applications for individuals who identify as low income.

C. Students with Disabilities

Goal 2: Improve transition services for students.

Narrative: The most significant themes that emerged from the 2023 CSNA include:

- Students and youth need access to transportation and education. These seem to be the most important services and the lack thereof creates barriers faced by youth with blindness and visual impairments.

- There seems to be a continued lack of understanding and support by parents, indicating a need for ICBVI to increase direct communication with parents and families of students and youth with disabilities served by the organization.

Priority 1: Increase training around post-secondary education opportunities and transportation.

Strategies for Priority 1:

1. Utilize a tiered approach to delivering Pre-ETS.
2. Increase focus on transportation needs during assessment and workplace readiness training.
3. Develop an annual review with students and families that evaluates satisfaction of training on addressing transportation needs.

Performance Measures for Priority 1:

1. Number of students who become enrolled in post-secondary education.
2. Satisfaction rate of 70% or greater with respect to transportation.

Priority 2: Improve outreach and education of Pre-ETS

Strategies for Priority 2:

1. Develop an annual review process with students and parents that focuses on the delivery and quality of Pre-ETS.
2. Improve outreach to those underserved / unserved LEA's.

Performance Measures for Priority 2:

1. 70% or greater satisfaction rate with Pre-ETS in each annual review.
2. 30% of new referrals each PY from LEA's outside of the city where the regional office resides.
3. Conduct, at minimum, 2 Blindness Seminars (conducted by our ATC staff) across the state each PY.

D. Improve the performance of the VR program

Goal 3: Improve services to businesses and other components of the WDS.

Narrative: Emergent themes from the 2023 CSNA include:

- Business partnerships may not be considered an area of strength for ICBVI; however, it is a focus, and efforts are growing to serve this dual consumer under WIOA.
- Perceptions/stigmas and education for employers related to the skills and abilities of hiring people with disabilities, including dispelling myths still exist with employers.
- The partnerships between ICBVI and the local workforce system appear to be lacking when it comes to partnering with business. There is some perception that workforce has

strong relationships and access to employers, yet ICBVI is not included in these business partnerships at a statewide level.

- Businesses who responded to the survey were open to receiving help in a variety of ways, but the low response rates reveal that ICBVI needs stronger engagement with employers.

Priority 1: Increase outreach to our business partners

Strategies for Priority 1:

1. ICBVI will implement strategies to develop work-based learning experiences for ICBVI consumers to increase awareness and opportunities with employers, focusing adults and other consumers who do not qualify for Pre-ETS.
2. ICBVI will market success stories that include business and ICBVI consumers.
3. ICBVI will utilize state and national strategies to reach out to existing and new business.

Performance Measures for Priority 1:

1. Regional counselors will arrange, at minimum 5 WBLE for participants who are not eligible for Pre-ETS in PY 24.
2. ICBVI will create, at minimum, 3 success stories that include consumers and business partners, and post them on the website.
3. ICBVI will increase, by 20%, employment outcomes over the previous PY.

Priority 2: Increase participation in the Idaho One-Stop System.

Strategy for Priority 2:

1. ICBVI will develop a plan to increase its partnership with IDVR and IDOL in the area of services to employers, and collectively provide services and education to employers in Idaho.

Performance Measure for Priority 2:

1. ICBVI will participate in, at minimum, 2 workplace tours or other educational activities in each region during this PY.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

Goal 1 - Increase independence and employment outcomes through quality rehabilitation services.

- Results of the participant satisfaction survey in PY 22: All clients who exit the program with an IPE are emailed a link to the survey. A total of three surveys were completed in PY 22 with a 100% satisfaction rate.
- Services to Businesses: The Commission completed Intensive Technical Assistance (ITA) with the VRTAC-QE in May of 2022. The Commission has also increased inter-agency collaboration with IDVR and conducted quarterly staff training for both IDVR and ICBVI staff.
- Students with Disabilities: In PY 22, ICBVI provided Pre-employment transition services to 127 students with disabilities.

Performance Measures for Goal 1:

PY 2022

Number of client's who achieved competitive integrated employment- 22

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 86

Pre-Employment Transition Services provided – 185

Average hourly wage at program exit – \$21.03

Goal 2 - Reduce barriers to employment for individuals who are blind or visually impaired.

In PY22, ICBVI engaged in Technical Assistance with the VR-TAC QE in regard to transportation, one of the most significant barriers to employment for clients of the ICBVI VR program. Strategies for addressing transportation will be discussed in the goals and objectives for this plan.

ICBVI continued its practice of engaging employers in educating them around blindness and visual impairments. In PY 2022, a total of 80 outreach visits to employers were made across the state.

Performance Measures for Goal 2:

PY 2022

Total number of referrals to the VR program: 125

Total number of applications: 92

Total number of individuals found eligible for services: 85

Total number of individuals with an approved IPE: 76

Total number of Hispanic individuals served: 37

Outreach performance (defined as substantial information shared about the VR program and services)

Number of contacts to CRP's: 11

Number of contacts to LEA's: 96

Number of contacts to employers: 80

Goal 3 – Improve transition services for students.

During PY22, ICBVI increased its outreach to Local Education Agencies (LEA's), students and parents. Assessment and Training Center (ATC) staff continued their practice traveling around the state to educate parents, teachers, and others who provide services to blind and visually impaired students, to educate them on serving this population. A total of 3 seminars were held across the state. As well, one high school was so impressed with the seminar that they sent several of their staff to the ATC for 3 days for additional training.

In PY22, ICBVI had a record number (18) of students engaged in our summer programs. During this PY, ICBVI piloted some spring outreach activities (virtual meetings and in-person activities) to educate and engage parents and students in pre-employment transition services.

Performance Measures for Goal 3:

PY 2022

Total number of students served: 95

Total number of state-wide training seminars conducted by our ATC: 3

Goal 4: Improve VR program efficiency through continuous quality improvement activities.

Performance Measures for Goal 4:

- In PY 2022, the Idaho legislature approved a new position for ICBVI (Business Analyst). This individual was hired in November 2023, and is responsible for the RSA-911 and program evaluation and quality assurance activities for the VR program.
- The annual VR program audit was revised to focus only on critical case documentation, which includes file evidence required for the primary indicators of performance. Results of the PY 2022 audit have indicated a trend of improvement in this area over the past few years.
- In PY 22, several of the VR policy manuals were combined in to one manual to improve efficiency in accessing information for field staff.
- The VR Payment Policy was updated to reflect current rates of payment. These new rates were based on national, regional and local data sources. The results of doing this was less restriction on the counselors, and improved service delivery for participants.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

Performance Indicators	Negotiated Level	Actual
Employment (Second Quarter After Exit)	59.5%	64.5%
Employment (Fourth Quarter After Exit)	57.8%	62.33%
Median Earnings (Second Quarter After Exit)	\$4,400	\$4,950.03
Credential Attainment Rate	42.8%	60.93%
Measurable Skill Gains	55.1%	55.32%

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

n/a

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(B) VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

n/a

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

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.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

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 throughout 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.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
	457	453	\$655,000	

B. SUPPORTED EMPLOYMENT PROGRAM.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
	8	8	\$14,900	

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

n/a

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

n/a

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

n/a

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

Yes

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State; however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Services provided under the State Plan are available in all political subdivisions of the state.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Administrator	1	0	0
VR Chief	1	0	1
Managers	4	0	0
Counselors	6	1	2
VRA	5	0	0
Data Coordinator	1	0	0
Business Analyst	1	0	0
Financial	2	0	1
BEP	2	0	0
Instructors	13	1	0
Reader/Drivers	4	2	0

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

ICBVI currently serves 420 individuals. With 6 counselors in the state, there is one counselor for 70 clients.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

This estimate is based on the number of individuals in Idaho who have reported a visual disability (including but not limited to blindness) and who are in the potential labor force

(defined here as 18 to 64 years old). Using data and age-adjusted prevalence rates from the 2019 American Community Survey (ACS) combined with current and projected working-age population from the Idaho Department of Labor, it is estimated that there are approximately 22,763 Idahoans with some form of visual disability in the working-age population. If age-adjusted prevalence rates remain stable, it is expected that this number will grow to 23,664 by 2024 and 24,634—approximately 4%--by 2029 based on IDOL’s population growth projections. Ada, Canyon, Kootenai, and Bonneville counties will have the largest populations of blind or visually impaired persons based on the 2019 ACS data.

As of December 2023, ICBVI has 420 clients with an IPE in place. Based on the 4% growth rate noted previously, this gives a projection of:

FFY25 - 453 / FFY26 - 471 / FFY27 - 489 / FFY28 - 508 / FFY29 - 528

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND 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.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Idaho State University	Master’s in clinical Rehabilitation Counseling	20	5
Portland State University	MS in Clinical Rehabilitation Counseling	36	10
Portland State University	Graduate Certificate in Orientation and Mobility	Did not report	19
Western Oregon University	MS in Rehabilitation	47	12 (4 more in

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
	Counseling		12/23)
Western Washington University	MA in Rehabilitation Counseling	36	14

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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 Idaho State University 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, ICBVI employs 13 individuals are blind or visually impaired and 3 individuals are from a minority background.

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.

Current personnel needs for the VR Program: 1 Vocational Rehabilitation Counselor, 1 Instructor for the Blind

Project needs for the VR program due to retirements during the course of this plan: 1 Rehabilitation Services Chief, 2 Vocational Rehabilitation Counselors, 1 Financial Technician.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

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.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY 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

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.

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;

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 14 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.

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 2022, ICBVI started using Next Steps Idaho. Next Steps Idaho is a homegrown, statewide initiative designed to support and guide Idahoans at different stages of life as they seek education, training, career change or advancement, and that "dream job." Sponsored by the Idaho State Board of Education, in partnership with Idaho's employers and the state's Workforce Development Council, this comprehensive clearinghouse of resources and tools pertaining to education, training, and career exploration and development.

As well, in order for staff to have a 21st century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI continues to use the following resources:

- Idaho Labor Market Information
- The Career Index Plus
- Career Pathways

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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 employs a counselor who is fluent in Spanish and assists other counselors in serving the needs of the Hispanic communities located throughout the state.

ICBVI also utilizes Language Link for translation services.

ICBVI purchases 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.

5. 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.

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.

Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. A VR counselor 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 ICBVI which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, every fall, ICBVI in collaboration with IDVR, IESDB and the State Department of Education host a conference (Transition Institute). This conference is attended by educators, VR staff, and other agencies and individuals who service transition age youth. The Transition Coordinator also frequently attends Management Team meetings to share progress and development of pre-employment transition services .

VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

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 - Updated February 2022

Idaho Educational Services for the Deaf and Blind - November 2021 (under current review for update)

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.

Under the direction of the Rehabilitation Services Chief, VR counselors collaborate with LEA's to educate and inform them of Pre-ETS activities. The Rehabilitation Services Chief provides oversight 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.

Under a memorandum of understanding, the Idaho Division of Vocational Rehabilitation provides CCI&R services for the state.

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. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES

THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

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.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

Recurring themes in the 2023 CSNA include the following:

- Through ICBVI's Pre-ETS efforts, transition-age youth have more access to employers than ever before. Work-based learning experiences are showing employers the abilities of students and youth with disabilities, which is increasing the number of employers willing to provide these experiences, particularly in rural areas.
- Business partnerships may not be considered an area of strength for ICBVI; however, it is a focus, and efforts are growing to serve this dual consumer under WIOA.

- Business/Employers were not interviewed; however, ICBVI business needs and employer barriers were discussed by ICBVI staff and partners, which included the following:
 - Perceptions/stigmas and education for employers related to the skills and abilities of hiring people with disabilities, including dispelling myths; and
 - New and updated strategies for serving business.
- The partnerships between ICBVI and the local workforce system appear to be lacking when it comes to partnering with business. There is some perception that workforce has strong relationships and access to employers, yet ICBVI is not included in these business partnerships at a statewide level.
- Businesses who responded to the survey were open to receiving help in a variety of ways, but the low response rates reveal that ICBVI needs stronger engagement with employers.

To address the needs of employers, ICBVI will pursue the following strategies:

- ICBVI will market success stories that include business and ICBVI consumers.
- ICBVI will implement strategies to develop work-based learning experiences for ICBVI consumers to increase awareness and opportunities with employers, focusing adults and other consumers who do not qualify for Pre-ETS.
- ICBVI will develop a plan to increase its partnership with IDVR and IDOL in the area of services to employers, and collectively provide services and education to employers in Idaho.

In addition to the CSNA, the Commission launched a new web site. In this site is a link for employers to request services / contact from ICBVI. As of December 2023, there have been a few requests from employers.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ICBVI provides assistive technology services to participants in the state via regional Instructors of the Blind (Rehab Teachers). As part of the Comprehensive Assessment, all eligible individuals are given an assessment by the Rehab teachers to assess their assistive technology needs and levels of training that they may require. The Commission's statewide Assistive Technologist provides training and support for the regional Rehab Teachers, as well as conducting assessments.

2. 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.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

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.

Out-of-school youth are encouraged to complete their high school education or pursue a formal 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. Idaho Job Corps now maintains a partnership with Idaho Universities to offer a path to a high school diploma or GED for those age 16-24.

ICBVI also connects appropriate youth to The Youth Apprenticeship Program. This program connects people, ages 16-24, to training and careers in Idaho. The Youth Apprenticeship program provides education, work experience, and access to postsecondary education, training, and certifications.

ICBVI also partners with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Job Corps is now housed in regional Universities, which makes the program and other educational opportunities much more accessible for individuals serviced by the Commission.

The Commission collaborates with IDVR for the purpose of expanding apprenticeships in the state. IDVR coordinates apprenticeships for the Title IV programs.

4. STATE USE CONTRACTING PROGRAMS;

ICBVI does not engage in any state use contracting programs.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

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.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

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.

The Commission has also strengthened our collaboration with the Idaho Educational School for the Deaf and Blind, and now serve an increasing number of students with developmental disabilities. These individuals are served by both the general and blind programs, resulting in a more robust model of service delivery for these individuals with the most significant disabilities.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

Under a memorandum of understanding, 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.

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 clients 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.

ICBVI leverages the relationship with IDVR in the provision of services to individuals who are blind and visually impaired and who have significant mental health challenges. In the past two years, IDVR has represented the Title IV programs on the State Planning Council on Behavioral Health. The purpose of this Council is to “serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system.

The partnership has resulted in program participants experiencing more rapid engagement in the program, a broader scope of wrap around services, and leading to more opportunities for competitive integrated employment.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

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 several 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

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, 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 VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must 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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
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. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with

The State Plan must include
section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements 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 as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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

The State Plan must include
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 sections 101(a)(14) and 511 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.A. strategies to address the needs identified in the assessments; and
4.j.i.B. 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), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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.
6. Financial Administration of the Supported Employment Program (Title VI):
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

The State Plan must include
Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) 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:
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 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 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)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

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 TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Idaho Commission for the Blind and Visually Impaired

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE

UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Idaho Division of Vocational Rehabilitation

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], 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;

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

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

Mike Walsh

Rehabilitation Services Chief

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.

[1] PUBLIC LAW 113-128. [2] ALL REFERENCES IN THIS PLAN TO "DESIGNATED STATE AGENCY" OR TO "THE STATE AGENCY" RELATE TO THE AGENCY IDENTIFIED IN THIS PARAGRAPH. [3] 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. [4] 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 AT 34 C.F.R. PART 361. [5] 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. [6] APPLICABLE REGULATIONS, IN PART, INCLUDE THE CITATIONS IN FOOTNOTE 4, AS WELL AS SUPPORTED EMPLOYMENT PROGRAM REGULATIONS AT 34 C.F.R. PART 363.

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Beth Cunningham
Title of Signatory	Administrator
Date Signed	2/26/2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation

factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.9%		64.9%	
Employment (Fourth Quarter After Exit)	62.7%		62.7%	
Median Earnings (Second Quarter After Exit)	\$4,951		\$5,075	
Credential Attainment Rate	63.7%		65.2%	
Measurable Skill Gains	57.5%		58.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of

Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Idaho Commission for the Blind and Visually Impaired Mission Statement:

"The mission is to empower people who are blind or visually impaired by providing vocational rehabilitation, skills training, and educational opportunities to achieve self-fulfillment through quality employment and independent living. "

ICBVI's mission is fulfilled through the provision of vocational rehabilitation programs and services:

1. Pre-Employment Transitions Services for youth ages 14-21.
2. To prepare individuals for competitive integrated employment in high demand occupations and careers.
3. Skills training that enables individuals to be independent in their homes and be engaged in their communities.
4. Vocational guidance and counseling, career and training services, and job placement supports and services.
5. Counseling to address adjustment issues related to vision loss and blindness.
6. Resources for employers who hire or retain employees who are blind or visually impaired.
7. Training in adaptive skills for reading, computer use, transportation, job seeking and other skills that promote independence and increase work readiness.
8. Supported and customized employment programs for individuals with the most significant disabilities.
9. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people who are blind or visually impaired.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

1. Transportation is undoubtedly one of the most significant barriers faced by the blind and visually impaired.
2. Linguistic barriers - Although most of the EL population in Idaho are Spanish speakers, we also serve individuals and families from a variety of cultures and linguistic backgrounds. Resources for parents and families are routinely provided in English and Spanish, but few resources are available in other languages.
3. Rural and low socioeconomic status (SES) - Idaho is primarily a rural state.
4. Access to Wi-Fi or other technologies.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

1. Transportation - Steps we are going to take can be found in the Goals and Priorities section of this plan.
2. Linguistic barriers - ICBVI has a staff member who can provide Spanish translation when needed. ICBVI will continue to provide written materials in Spanish and will also provide translation services via Language Link.

3. Rural and low socioeconomic status (SES) - ICBVI will continue its outreach efforts to rural communities and individuals with low SES. Outreach is addressed in the Goals and Priorities of this plan.
4. Access to Wi-Fi or other technologies - Ensure all technology needs are addressed by the counselors in the individuals comprehensive assessment. ICBVI can support client's through rehabilitation technology services, as well as any start-up costs needed for Wi-Fi or related service. Counselors can also refer client's to any state or federal resources that may be available.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

1. Transportation
 - Continue to address transportation needs of clients in the comprehensive assessment.
 - Ensure all regions have ICBVI representation in their regional transportation council (one year).
 - Develop a resource list for each of the regional offices (one year)
2. Linguistic barriers
 - Continue to provide translation services and materials in Spanish (on-going).
 - Continue to utilize Language Link for translation services (on-going).
3. Rural and low socioeconomic status (SES)
 - a. Continue outreach efforts to rural communities and agencies who serve individuals and families of low SES (on-going).
4. Access to Wi-Fi or other technologies
 - a. Continue to address all technology needs of individuals in the comprehensive assessment (on-going).
 - b. Develop / provide a resource list for each regional office (one year).

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

ICBVI does not receive Supported Employment funds (Title VI).

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

ICBVI does not receive Supported Employment funds (Title VI).

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

ICBVI does not receive Supported Employment funds (Title VI).

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

ICBVI does not receive Supported Employment funds (Title VI).

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.

Has the state incorporated TAA into the sections indicated above?

Yes

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

In order to improve employment outcomes for veterans, the Idaho Department of Labor (IDOL) strategically stations our DVOPs, Consolidated Positions (CPs) and LVERs throughout the state. In 2019, the agency reorganized its service delivery model. Eight offices located throughout the state in Post Falls, Lewiston, Caldwell, Boise, Twin Falls, Burley, 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. DVOP staffing also considers whether an area has a large educational institution that can translate to large numbers of Veteran Readiness and Employment (VR&E) participants.

Since the COVID pandemic, IDOL is seeing many veterans reach out to the American Job Centers (AJCs) via the Internet. JVSG staff are fully equipped to case manage many veterans virtually. The staff also have mobile office kits with two laptops, a printer and internet capability to assist rural veterans who cannot make it to a brick-and-mortar IDOL office.

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 ES consultant is appropriate.

A veteran who enters an AJC with a half-time DVOP Specialist receives the same services as a veteran who enters one of the state's Comprehensive AJCs with full-time grant-funded staff. If a veteran needs more than core services from one of the AJC offices that is temporarily without an assigned DVOP or CP, they are assessed by staff to determine if a referral to the nearest DVOP is appropriate. If a veteran doesn't have access to a computer to be provided services virtually then an appointment is made for the DVOP's next rural office visit where the veteran will receive all the services available in the larger offices.

Seven of the eight AJCs have JVSG funded employees. However, the state's shared internal website for all department employment service's staff includes all JVSG related veteran services information and training documentation. If there is staff turnover or AJCs are temporarily without JVSG staff these offices have all the same information available as offices with these staff

members. This ensures veterans receive appropriate and quality services in the absence of a JVSG funded staff member.

Our DVOPs and CPs provide individualized career services to veterans with significant barriers to employment, creating individual employment plans (IEP) using a case management framework. They assist the veteran in creating a targeted resume and provide interview skills and job search techniques. They also 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 LVER and CPs to use during employer visits. The LVER and CP staff review the veteran's resume and case management file to ensure appropriate referrals are made to employers.

IDOL employs one full-time regional LVER who works in the largest labor market area in the state: Boise/Meridian/Nampa. There is a full time DVOP presence in both the Boise and Caldwell offices, and CPs in Boise, Pocatello and Post Falls. In rural areas of the state where fewer veterans reside, IDOL assigns DVOPs on a half-time basis. Idaho has three individuals who devote half of their time (20 hours/week) performing DVOP functions and the other half (20 hours/week) performing 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 or CP conducts monthly outreach to rural areas of the state where there are not permanently stationed DVOPs or CPs to provide individualized career services to veterans with significant barriers to employment (SBEs).

Our LVER and CPs conduct training and workshops to help employers understand veterans and their needs, while promoting credentialing and licensing opportunities. Employers are trained in military terminology, culture and educated on the benefits of hiring veterans.

Our JVSG team has also identified the following targeted areas, programs, and partnerships for special consideration;

IDOL is committed to maintaining a strong relationship with VR&E and chooses to maintain an Intensive Services Coordinator (ISC), a half-time position filled by a full-time DVOP. The ISC is out stationed, at times, at the Boise VA Regional Office, but veterans enrolled in the VR&E program are referred to Idaho DVOPs from counselors assigned to Spokane and Seattle, WA, Salt Lake City, UT, and other regional locations. The ISC 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 ISC 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 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 regarding Veteran hiring events, the Stand Down and for special events, emphasizing the provision of individualized career services.

B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

IDOL prides itself on providing comprehensive services to veterans, with a special emphasis on those veterans with a significant barrier to employment (SBE).

An eligible veteran (as defined by 38 U.S.C. § 4211(4)) must also meet the criteria of having an SBE before they can be referred to a DVOP for individualized career services or belong to an additional population identified in guidance.

DVOPs may serve the following population of veterans per VPL 03-14, VPL 03-14 change 1, VPL 03-14 change 2, VPL 03-19, and VPL 07-14 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 those who would be entitled to compensation, yet are not receiving it due to the receipt of military retired pay) under laws administered by the Secretary of Veterans' Affairs; or
- Who were discharged or released from active duty because of service- connected disability.

- Other eligible veterans as defined under 38 U.S.C. § 4211(4); eligible veteran means a person who:
 - Served on active duty for a period of more than 180 days and was discharged with other than a dishonorable discharge;
 - Was discharged or released from active duty because of a service-connected disability;
 - As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or
 - Was discharged or released from active duty by reason of a sole survivorship discharge.
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento 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.
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration.
- A veteran lacking a high school diploma or equivalent certificate.
- A low-income individual (as defined by WIOA Section 3 (36)).

Additional eligible populations include:

- A veteran between the ages of 18 and 24 years old who possess limited civilian work history.
- A Vietnam-era veteran. Vietnam-era veterans are those for which another part of their active military, naval, or air service was during the Vietnam era (the period beginning February 28, 1961, and ending May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning August 5, 1964, and ending May 7, 1975, in all other cases).
- Eligible Transitioning Service Members, Spouses, and Caregivers. In annual appropriations bills since the consolidated Appropriations Act of 2014, Congress authorized JVSG grants to support services described in VPL 07-14 to:
 - Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
 - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in Military Treatment Facilities (MTFs) or Warrior Transition Units (WTUs); and

- The spouses or other family caregivers of such wounded, ill, or injured members.

Priority of service will be provided to veterans and other eligible persons who do not meet eligibility requirement for DVOP services. Referrals will be made as appropriate to other partner programs such as WIOA Title I for adults, dislocated workers, and youth or WIOA Title III for employment services under the Wagner-Peyser program.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

Duties of the DVOP:

DVOPs provide individual career services to the veteran population outlined in VPLS 03-14, VPL 03-14 change, VPL 03-14 change 2 and VPL 03-19. Staff provide the full array of workforce services to veterans with SBEs and eligible persons with their primary focus on providing individualized career services to those veterans as described 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) and consistent, continual contact;
- 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;
- Referral of veterans to employment opportunities.

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 principal 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; carries a DVOP produced list of job ready veterans;
- 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;
- Educating the employer about IdahoWorks, a system that allows employers to their job openings, search for veterans' resumes;
- Making employers aware of the HIRE Vets Medallion program, and Work Opportunity Tax Credit.

Duties of the consolidated DVOP/LVER position:

The consolidated position will have the same roles and responsibilities as the DVOP and LVER positions listed above. The only difference will be the time spent in each position. It will vary but will consist of approximately 20 hours performing DVOP duties and 20 hours performing LVER duties each week.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

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.

A comprehensive intake form is given to all veterans who self-identify at intake. The form identifies veteran eligibility to see a DVOP. If the form identifies the veterans as DVOP eligible they are referred to a DVOP who reviews the form and the veterans IdahoWorks account to confirm veteran eligibility. If the individual isn't eligible to see a DVOP they are referred to an ES staff person who provides all necessary services.

DVOPs attend ES and WIOA meetings on a regular basis and make appropriate referrals to WIOA. They also keep a list of job ready veterans that is available to all ES staff for appropriate job referrals.

All the state's AJC managers have attended NVTI training; all are aware of the role of the DVOP, LVER and CP. 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 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.

Other partners are made aware of the services available from a DVOP through outreach.

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 goal of facilitating employment opportunities for veteran job seekers. IDOL also has three CP's who utilize part of their work hours carrying out the statutory duties of a LVER. The LVER and CPs work with other organizations to jointly host events such as job search workshops and hiring events in local offices. They market veterans to employers using IDOL's marketing materials.

LVER and CPs also periodically visit employers within their 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. They attend quarterly employer committee meetings held by various AJCs 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.

LVER and CPs work closely with our ES staff to promote the hiring of veterans to private and public employers. During these outreach visits, they inform 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 for the LVER to work with these employers to create potential veteran job development opportunities.

LVER and CPs regularly e-mail, or hand deliver 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 employers can identify veterans who have indicated an interest in their industry.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

This award shall be used in accordance with VPL 01-22 and Title 38 U.S.C. § 4112 or the most recent guidance from USDOL-VETS. The objective of the JVSG cash incentive award program, known as the Veterans Service Performance Incentive Award Program, is to recognize, promote and reward exceptional performance in the provision of service to veterans within the context of statutes and regulations. The award program will create an awareness and continuous level of interest in the importance of providing intentional, high-quality outreach and services for veterans and promote an environment that engenders continuous improvement in the way staff support veterans across the spectrum of service. The award system shall continue to operate as defined in the applicable State Plan and as approved by USDOL. The state anticipates that individuals and teams will recognize the value and process of the awards program and will, as a result, develop a competitive attitude within the agency that supports esprit de corps within the team while sharpening the focus on service to other eligible persons. Incentive awards shall be expended up to and including 1 percent of the total grant amount for the fiscal year, which is set aside strictly, by the fiscal department of IDOL, for this purpose in the annual grant budget. Awards shall be determined based on a percentage of total award available for that fiscal year but shall not (in total) exceed 1 percent of the total available funds for a given fiscal year or the most current USDOL guidance on grant-funded incentive award amounts. Eligibility Criteria: Veterans Service Performance Awards will be granted to IDOL's local one-stop offices to recognize exceptional service to veterans or for specific activities or initiatives that promote successful employment of veterans. Nominations must detail the activities that meet this aim and may also include descriptions of how the Office achieved one or more of the following:

1. System improvements that result in improved services to veterans and other eligible individuals under JVSG,
2. Outstanding case management on behalf of a JVSG participants,
3. Exceptional effort expended to assist a homeless veteran, formerly incarcerated veteran, or other hard to place JVSG participant,
4. Activities led to improved performance, reduced time or cost, or promote collaboration around service to veterans,
5. Outstanding outreach or placement efforts on behalf of veterans and JVSG participants,
6. Extraordinary community relations efforts to increase the awareness of veterans' issues, or
7. Development of a program, for which the impact may not be directly measurable, (i.e. resume skills building program), targeted to support veterans.

Selection and Award Process: The solicitation for nominations shall be published in the monthly newsletter each March. The application must be completed, signed, and scanned to the State Veterans Coordinator by April 1 of each grant year. Each nomination will be screened to ensure the recipient is eligible to receive the award under state and department merit award policies. The State Veterans Coordinator will convene an award review committee of not less than 5 members of the Agency to include One area Manager, Two Office Managers, One Central Office employee and One ES staff member to review nominations and make award recommendations to the Administrator. Nominations will be scored based on information provided in response to the seven questions on the nomination form and may use a scoring rubric established by the State Veterans Services Coordinator. Recommendations after being reviewed by the Administrator will be forwarded to the Director by April 17 of each grant year. The Director will consider the recommendations and approve final awardees.

Winners will be announced in May of each grant year and all awards will be distributed by July of each year.

IDOL will provide an annual incentive award report as per IAW VPL 07-19, or the most updated policy guidance on this subject.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

Idaho elects to use one percent of the Jobs for Veterans State Grant (JVSG) allocation to provide cash performance awards for eligible employees in local one-stop offices. The IDOL has a team centric vision that allows all members to strive for excellence in all aspects up to and including serving our nation's veterans. The cash awards will go to the top two or three offices, depending upon funding availability. This is the reasoning behind awarding the cash incentive awards to the top three highest performing one-stop offices, the team performs together, and the team is awarded together. The awards program is intended to encourage and incentivize the improvement and modernization of employment, training, and placement services for veterans, and recognize eligible employees and offices for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

Award Amounts:

The state shall request 1 percent of its annual allocation for each year's JVSG grant as performance incentive awards for eligible one-stop Offices that will be paid in cash.

Local One-Stop Office Award Amounts:

1. 1st Place Local Office Winner (approximately 1/3 of the annual allocation)
2. 2nd Place Local Office Winner (approximately 1/3 of the annual allocation)
3. 3rd Place Local Office Winner (approximately 1/3 of the annual allocation)

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

Idaho Department of Labor will not charge non-cash incentive awards to the base allocation.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD

INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE.
DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

There are no anticipated challenges in carrying out the performance incentive award.

References & Resources:

VPL 01-22, VPL 01-22 Attachment 5, Public Law 109-461 Title VI Sec. 603, 38 U.S.C. § 4112, 38 U.S.C § 4102A(C)(7).

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY
JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

Idaho's JVSG performance targets for direct services are as follows:

Employment Rate 2nd Quarter After Exit: **59%**
Employment Rate 4th Quarter After Exit: **56%**
Median Earnings 2nd Quarter After Exit: **\$7,163**

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 with the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chooses 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.



November 3, 2023

Ms. Tamika Ledbetter
Region 6 Administrator
Employment and Training Administration
United States Department of Labor
90 7th Street, Suite 17-300
San Francisco, CA 94103-1516

Dear Ms. Ledbetter,

Enclosed is the Idaho Department of Labor's Unemployment Insurance State Quality Service Plan for the fiscal year 2024.

If you have any questions, please contact JoAnna Henry at 208-332-3570 ext. 3146, joanna.henry@labor.idaho.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jani Revier".

Jani Revier
Director

CENTRAL OFFICE • 317 W. Main St. • Boise, Idaho 83735 • Tel: 208-332-3570 • Web: 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 SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="09/19/2023"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="EXECUTIVE OFFICE OF THE STATE OF IDAHO, IDAHO DEPT OF LABOR"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="82-6000966"/>	* c. UEI: <input type="text" value="RX95DSJULDR9"/>	
d. Address:		
* Street1: <input type="text" value="317 W MAIN ST"/>	<input type="text"/>	
Street2: <input type="text"/>	<input type="text"/>	
* City: <input type="text" value="BOISE"/>	<input type="text"/>	
County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text" value="ID: Idaho"/>	<input type="text"/>	
Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	<input type="text"/>	
* Zip / Postal Code: <input type="text" value="83735-0001"/>	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="IDAHO DEPARTMENT OF LABOR"/>	Division Name: <input type="text" value="UNEMPLOYMENT INSURANCE"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="CARRIE"/>	
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text" value="PETERMAN"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text" value="FINANCIAL EXECUTIVE OFFICER"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="208-332-3570 EXT 4011"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="CARRIE.PETERMAN@LABOR.IDAHO.GOV"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p>A: State Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>	
<p>* 10. Name of Federal Agency:</p> <p>EMPLOYMENT AND TRAINING ADMINISTRATION</p>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p>17.225</p> <p>CFDA Title:</p> <p>UNEMPLOYMENT INSURANCE</p>	
<p>* 12. Funding Opportunity Number:</p> <p>FY 2024 BASE ALLOCATIONS -ETA UIPL 13-23</p> <p>* Title:</p> <p>FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSURANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES</p>	
<p>13. Competition Identification Number:</p> <p>ETA UIPL 13-23</p> <p>Title:</p> <p>FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSURANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p><input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <p>UIPL 13-23 - FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSURANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></p>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: ID-002	* b. Program/Project: ID-ALL
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 10/01/2023	* b. End Date: 09/30/2026
18. Estimated Funding (\$):	
* a. Federal	15,048,019.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	15,048,019.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text"/>	* First Name: JANI
Middle Name: <input type="text"/>	
* Last Name: REVIER	
Suffix: <input type="text"/>	
* Title: DIRECTOR	
* Telephone Number: 208-332-3570 EXT 3110	Fax Number: 208-334-6430
* Email: JANI.REVIER@LABOR.IDAHO.GOV	
* Signature of Authorized Representative: 	* Date Signed: 11/3/2023

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. FY 2024 BARR ALLOCATIONS-NYA WFPL 12-23 FY 2024 STATE WORKFORCE AGENCY OF MASSACHUSETTS TARGET AND GUIDELINES	19.225	\$ 15,040,919.00	\$	\$	\$	\$ 15,040,919.00
2.						
3.						
4.						
5. Totals		\$ 15,040,919.00	\$	\$	\$	\$ 15,040,919.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	FY 2024 BARR ALLOCATION-RTA STG 13-23 FY 2024 STATE WORKFORCE AGENCY ST RECOVERE PLANNING TRAVEL AND RETRNEMENT				
a. Personnel	\$ 9,972,426.00	\$	\$	\$	\$ 9,972,426.00
b. Fringe Benefits	4,692,709.00				4,692,709.00
c. Travel					
d. Equipment					
e. Supplies					
f. Contractual					
g. Construction					
h. Other	402,893.00				402,893.00
i. Total Direct Charges (sum of 6a-6h)	15,048,019.00				\$ 15,048,019.00
j. Indirect Charges					\$
k. TOTALS (sum of 6i and 6j)	\$ 15,048,019.00	\$	\$	\$	\$ 15,048,019.00
7. Program Income	\$	\$	\$	\$	\$

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SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8. FY 2024 BARR ALLOCATIONS-ETA UZPL 19-23 FY 2024 STATE WORKFORCE AGENCY ET RESOURCE PLANNING TARGET AND GUIDELINES	\$ 0.00	\$	\$	\$ 0.00	
9.					
10.					
11.					
12. TOTAL (sum of lines 8-11)	\$ 0.00	\$	\$	\$ 0.00	
SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 19,048,819.00	\$ 3,762,004.00	\$ 3,762,005.00	\$ 3,762,005.00	\$ 3,762,005.00
14. Non-Federal	\$				
15. TOTAL (sum of lines 13 and 14)	\$ 19,048,819.00	\$ 3,762,004.00	\$ 3,762,005.00	\$ 3,762,005.00	\$ 3,762,005.00
SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT					
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)				
	(b) First	(c) Second	(d) Third	(e) Fourth	
16. FY 2024 BARR ALLOCATIONS-ETA UZPL 19-23 FY 2024 STATE WORKFORCE AGENCY ET RESOURCE PLANNING TARGET AND GUIDELINES	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
17.					
18.					
19.					
20. TOTAL (sum of lines 16 - 19)	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
SECTION F - OTHER BUDGET INFORMATION					
21. Direct Charges:		22. Indirect Charges:			
23. Remarks:					

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ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

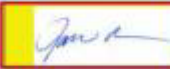
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE DIRECTOR
APPLICANT ORGANIZATION EXECUTIVE OFFICE OF THE STATE OF IDAHO, ID DEPT OF LABOR	DATE SUBMITTED 11/6/2023

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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

STATE PLAN NARRATIVE

Addendum to FY 2023 Biennial SQSP

(Idaho – Fiscal Years 2023-2024)

A. Overview

1. *State priorities and the strategic direction the state has adopted to ensure continuous improvement.*

The Idaho Department of Labor's priorities for the Federal Fiscal Year (FFY) 2023-2024 SQSP include:

Idaho's goals continue to align with national priorities for building UI program performance, paying benefits accurately and timely, ensuring equitable access, detecting and preventing improper payments, recovering overpayments, connecting claimants with re-employment services, and mitigating the likelihood and impact of fraud overall. Idaho is utilizing the resources and expertise identified through various grants and UIPL guidance to improve processes and promote equitable access to UI programs. Idaho is making progress in several areas.

Idaho is currently participating in the Tiger Team initiative and has been awarded funding for eight tiger team projects.

Promoting equitable access to UI programs is also a priority for Idaho. Several projects have been completed or are in progress in this area.

- a. The timely and accurate payment of UI benefits.
- b. An overall integrity goal of reducing the number of improper payments and the prevention, detection, and recovery of improper and fraudulent payments.
- c. Continuous business process analysis in all areas of UI to improve program performance with technology.
- d. Improve state capacity to administer and operate the UI program effectively and efficiently.
- e. To provide adjudication and claims processing performance that meets the standards established by USDOL.
- f. To assist and improve the timely reemployment of UI claimants with continued use of the Reemployment Services and Eligibility Assessment (RESEA) program.
- g. Annual and necessary interim training to enhance performance and quality.
- h. Behavioral Insights and Wage Calculator. We have begun work on this project and are utilizing USDOL resources on this project. This project will add a wage calculator to our continued claim filing process. We will also add prompts from

the Behavioral Insights toolkit to improve claimant compliance. • SIDES – adding three data exchanges and single sign-on.

- i. Robotic Processing Automation – adding this technology for easier creation of Benefit Accuracy Measurement packets and potential other processes.
- j. Improving our phone system and tracking results.
- k. Updating our claimant portal.
- l. Creating a reports and operations dashboard.
- m. Optical Character Recognition – routing of documents based on type, not requiring staff involvement.
- n. Banking information compared to Integrity Data Hub – this will allow us to crossmatch claimant direct deposit banking information to catch duplicate accounts and prevent fraudulent payment activity.
- o. UI Navigators: Idaho hired an additional three navigators to aid customers needing help with the UI claims process in-person at remote locations throughout the state. We also have seven other navigators not funded by the equity grant that are available at our one-stop centers. Idaho conducted an outreach campaign to communicate the availability of our navigators and remote locations this past winter and will have a second campaign this coming winter.
- p. Plain Language Improvements: Idaho is in the process of reviewing all our communications materials. All the forms, UI determinations, and web sites will incorporate “plain language” to make things easier to understand for the average person. We are currently working with a contractor on customer feedback for the changes made. Once the changes are finalized, these materials will also be translated into Spanish.
- q. Texting: To provide more flexibility for our customers, Idaho is pursuing texting as an option for our claimants. Texting will allow us to better communicate with targeted messaging to do things like encourage claimants to submit their weekly certifications once the benefit week ends, resulting in faster payment, and reminding claimants chosen for RESEA of their upcoming interviews, and other helpful information. Texting will be available in Spanish.
- r. Additional Fact-finding: Idaho is beginning work on implementing additional fact-finding questions on our Claimant Portal and continued claims process. Idaho will begin with Failure to Provide Earnings and School Attendance issues generated when the claimant files the weekly certification, then will begin incorporating additional factfinding for other issues to streamline and accelerate the factfinding process. Issues will not be auto adjudicated and will still be reviewed by staff, but this will likely speed up the adjudicated issues.
- s. UI Video: Idaho has incorporated our unemployment insurance video into the claim filing process. The video is available in English and Spanish. Disposable headsets are also available for claimants who file in the office.

- t. Language Documentation and Handouts: Idaho has created Babel notices for customers who speak languages other than English and Spanish in their preferred language, providing details on how to get help. We have also created a flyer in multiple languages explaining their rights and responsibilities.
 - u. Weekly Certification Optimization: Idaho started a process to automate processing of our paper continued claim reports. This will allow for faster payment of the claimant's weekly benefits.
 - v. Technology Upgrades: Idaho provided 32 tablets to our remote offices for use by claimants unfamiliar with traditional personal computers.
 - w. Screen Reader Accessibility: Idaho is in the beginning stages of an update to assist visually impaired claimants with the claim filing process by updating the website and claim filing software application to be compliant with accessible screen readers.
2. *Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.*

Idaho has six issues that are included in the FY2024 SQSP Corrective Action Plan(s). The root causes for the deficiencies in these areas are 1) staffing turnover and training, 2) system limitations, 3) Pandemic related workload. Idaho has several modernization projects in progress and expects to address the system limitations and data validation with those projects. Idaho is also working to fill vacancies and conduct standardized training for all staff. By the end of FFY 2024 many of the deficiencies will be corrected and continued monitoring will ensure Idaho remains within acceptable performance levels (APL). Specific plans to correct deficiencies are included in the FY2024 SQSP Quarterly Reporting Workbook.

Idaho has no adjudication or appeals backlog and is continuing to work through the BPC backlog. We recognize the need to better manage workload in light of lessons learned from the COVID-19 pandemic. We have a Tiger Team project planned to improve our claims application, simplifying processes in an effort to create less irrelevant issues. We have also worked through an Equity project to improve the terminology to plain language. We will also be working on a Tiger Team project to better track volume, route issues to adjudicators, and prepare reports for management.

Idaho recently analyzed claimant demographic data for disparate impact and found no issues. Our research team will regularly monitor this and provide reports to program staff. We also have many other equity projects in the works, those projects will be discussed in greater detail in further sections.

Idaho was awarded funding for three recent grant opportunities offered through the US Department of Labor – UI Integrity, IT modernization and Tiger Team opportunities. Implementing the projects under these grants will improve our IT infrastructure, detect, prevent and collect overpayments, and improve claimant

experiences, timeliness and equity, all leading to increased performance.

Over the last two years, Idaho has spent a substantial amount of time in training claim intake and contact staff as well as adjudicators. Claim intake staff are now able to handle many non-separation issues and all adjudicators are able to handle more complex separation and non-separation issues. Staff have also attended NASWA sponsored training, including fraud training. Idaho has a contact center application to allow us to better manage phone calls during high volume work periods. As part of the Tiger Team initiatives, Idaho will be making further enhancements to our phone tree, including an update to our tracking mechanism to better determine why claimants call so we can better provide messaging or routing to solve those issues.

Idaho has been working closely with our Workforce Division on transitioning the RESEA to AJLA. This process will be completed later this year and will allow the agency to better track claimant outcomes to be eligible for outcome payments. It will also allow the Workforce team to utilize a single system when conducting the interview and providing/ tracking services. Idaho provides notice to all claimants of their work search requirements upon the filing of their claim. We allow for a range of job search activities to meet the work search requirements. We also have a process where claimants are referred to available job openings from our workforce system and if they fail to follow through, they are referred to the adjudication team for a potential failure to apply issue.

3. *Coordination with other plans, including WIOA.*

Idaho has continued their demand driven focus for Employment Services and WIOA. This has allowed Idaho to expand their footprint in the state. Idaho currently holds office hours in 8 office locations and over 25 mobile service delivery locations. This has allowed Idaho to provide services in many small communities and rural areas. Idaho continues to utilize lean processes to reduce inefficiencies and eliminate redundancies.

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 youth WIOA. UI Adjudication and Claims Processing has been consolidated with UI Compliance into one UI division. These changes continue to enhance Idaho's ability to meet the employment needs of the employer and job seeker community. In addition, claimants are directed during the claims process to utilize the IDOL reemployment services offered in our 8 field offices and over 25 mobile service delivery locations located throughout the state.

The Idaho Department of Labor is the administrative entity for unemployment insurance, employment security and Labor Market Information, and is also the WIOA Youth service provider in each of the 8 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. All RESEA claimants receive referral information for the Idaho WIOA Dislocated Worker program service provider. Career center staff are trained annually on Idaho One Stop partner programs and services and provide a warm handoff referral to RESEA claimants as appropriate.

As part of the initial RESEA interview, career center staff review job postings in Idaho's labor exchange system, IdahoWorks. Based on the claimant's skills and experience, appropriate job referrals are given to the claimant and the staff follow up with the employers to ensure claimants have applied for these job referrals as required. If no application has been submitted, career center staff provide unemployment insurance staff with a potential issue needing review.

B. Federal emphasis (GPRA goals)

1. State performance compared to the GPRA goals.

- a. Percent of Intrastate Payments Made Timely (87%) - 94.33%
- b. Detection of Recoverable Overpayments (57.5%) - 198.15%
- c. Employer Tax Liability Determinations Made Timely (90%) - 80.11%

Idaho's performance exceeded the GPRA goals for the percent of intrastate payments made timely and the detection of recoverable overpayments. Idaho was below the GPRA goal for timely determinations of employer tax liability. The deficiency resulted from a combination of staffing and system-related issues.

2. Actions planned to achieve GPRA goals and targets.

Idaho's employer population increased during the Pandemic and continues to grow at a steady pace. Additionally, Idaho is taking a proactive approach to fictitious employer schemes which has resulted in slower processing of liability determinations as staff review applications and establish legitimacy. To combat these issues, Idaho will employ a dual approach by increasing staffing and modernizing the employer tax application process. This approach will bring Idaho into compliance with the 90% GPRA goal.

C. Program Review Deficiencies

1. Causes for failures to conduct required reviews/activities, e.g., Benefit Payment Control, Internal Security, Benefit Accuracy Measure, and Tax Performance System.

Idaho conducted and participated in all required reviews. An external BAM review was conducted. There were no deficiencies identified. Idaho also conducted the required internal reviews. Deficiencies were identified through the TPS review that are addressed on the related CAP workbook.

2. *Plans to conduct the reviews as required.*

Idaho plans to conduct all reviews as required.

D. Program Deficiencies

Plans to correct deficiencies identified through required program reviews, e.g., deficiencies identified during an internal security review.

Deficiencies were identified through internal reviews which required a CAP in the areas of tax quality, effective audit measures, detection of overpayments, data validation, and benefit accuracy measurement. The CAP details the plans to remedy the deficiencies in each area. In addition to the CAP milestones, Idaho is conducting continuous and ongoing training and quality reviews. This will ensure Idaho is able to sustain the quality of the program after the performance goals are met.

E. Reporting Deficiencies

Actions planned to correct reporting deficiencies. Reporting deficiencies are defined as missing reports, reports submitted late more than 50 percent of the time (7 of 12 months for monthly reports; 3 of 4 quarters for quarterly reports), and annual reports submitted late 3 consecutive years.

Changes to system functionality brought on by the Pandemic did create some challenges for Idaho's federal reporting. During FFY 2023, Idaho had delinquent reports and also made material changes to the ETA 227 reports. Amended reports have been submitted. Idaho will strive to submit timely reports in all areas during FFY 2024.

F. Customer Service Surveys (optional)

As part of the equity grant, the Department has contracted with a vendor for claimant input on our plain language initiative and gathered input from claimant populations, including claimants where English is not their preferred language.

G. Other (e.g., approach to maintaining solvency, requests for technical assistance)

Idaho has no requests for technical assistance at this time.

H. Assurances:

1. Assurance of Equal Opportunity (EO).
2. Assurance of Administrative Requirements and Allowable Cost Standards.
3. Assurance of Management Systems, Reporting, and Recordkeeping.
4. Assurance of Program Quality.
5. Assurance on Use of Unobligated Funds.
6. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).
7. Drug-Free Workplace (29 CFR Part 98).
8. Assurance of Contingency Planning.
9. Provide the most recent dates for the following:

- a. Information Technology (IT)Contingency Plan Implemented:
March 2006
- b. IT Contingency Plan Reviewed/Updated1:
Reviewed/updated annually, next scheduled review 4th quarter
2023
- c. IT Contingency Plan Tested2:
Most recent test conducted in September 2022

10. Assurance of Conformity and Compliance.

11. Assurance of Automated Information Systems Security.

Provide the most recent dates for the following:

- a. Risk Assessment Conducted3:
In October 2021, the Idaho Department of Labor began a qualitative and quantitative risk analysis. This is scheduled for completion in FY2024.
- b. System Security Plan Reviewed/Updated4:
A system security status review was planned and started in 2022; however, changes in personnel/staffing prevented completion at that time. The system security plan review is scheduled for completion during FY2024.

12. 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.

Idaho					
MEASURES/PROGRAMS TO BE ADDRESSED FOR BIENNIAL SQSP FISCAL YEAR (FY) 2023					
Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Corrective Action Plan (CAP)		Narrative Required (in Word Doc.)	SQSP 2023 Performance Year Data
		N	E		
B E N E F I T S	First Payment Promptness	≥ 87%			80.13%
	First Payment Promptness (IntraState 14/21 Days)	≥ 87%			79.88%
	First Payment Promptness (InterState 14/21 Days)	≥ 70%			72.76%
	First Payment Promptness (IntraState 35 Days)	≥ 83%			82.77%
	First Payment Promptness (InterState 35 Days)	≥ 78%			88.25%
	Nonmonetary Determination Timeliness	≥ 80%			63.53%
	Nonmonetary Determination Quality - Separations	≥ 75%			58.12%
	Nonmonetary Determination Quality - Nonseps	≥ 75%			87.13%
A P E A L S	Lower Authority Appeals (30 Days)	≥ 60%			34.35%
	Lower Authority Appeals (45 Days)	≥ 80%			53.54%
	Average Age of Pending Lower Authority Appeals	≤ 30 days			12.2
	Average Age of Pending Higher Authority Appeals	≤ 40 days			14.3
	Lower Authority Appeals Quality	≥ 80%			100.00%
	New Employer Status Determinations Timelapse	≥ 70%			83.40%
T A X	Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year			Pass
	Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years			Pass
	TPS Sample Reviews	Pass			Pass
	Effective Audit Measure	Pass 4 factors/score ≥ 7			Factor 5: 0.4
I N T E G R I T Y	Improper Payments Measure	< 10%			8.38%
	Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%			110.86%
	Overpayment Recovery Measure	≥ 68%			65.42%
	Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing			Not Submitted: Populations 3, 4, 12
	Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing			TPS 1-4
B A M	NDNH BAM Compliance	Pass			Pass
	BAM Operations Compliant	Pass All M&P			Pass
	Incorrect Recording of Issue Detection Date	95%			Pass
	Incorrect Recording of Determination Date	95%			Pass
	UI Reporting Requirements	Pass			Fail
U P R A	Percent of IntraState Payments Made Timely	87%			79.88%
	Detection of Recoverable Overpayments	57.5%			163.53%
	Percent of Employer Tax Liability Determinations Made Timely	90%			82.00%
Integrity Action Plan (IAP) Top Three Root Causes - Payment Integrity Information Act (PIIA) Year Data					
Monitoring Findings/Audit Resolution					

Idaho					
MEASURES/PROGRAMS TO BE ADDRESSED FOR ALTERNATE SQSP FISCAL YEAR (FY) 2024					
Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Corrective Action Plan (CAP)		Narrative Required (in Word Doc.)	SQSP 2024 Performance Year Data
		N	E		
B	First Payment Promptness	≥ 87%			94.28%
E	First Payment Promptness (IntraState 14/21 Days)	≥ 87%			94.33%
N	First Payment Promptness (InterState 14/21 Days)	≥ 70%			92.16%
E	First Payment Promptness (IntraState 35 Days)	≥ 93%			98.63%
F	First Payment Promptness (InterState 35 Days)	≥ 78%			98.43%
I	Nonmonetary Determination Timeliness	≥ 80%			83.49%
S	Nonmonetary Determination Quality - Separations	≥ 75%			84.90%
	Nonmonetary Determination Quality - Nonseps	≥ 75%			91.91%
A	Lower Authority Appeals (30 Days)	≥ 80%			94.05%
P	Lower Authority Appeals (45 Days)	≥ 80%			95.00%
E	Average Age of Pending Lower Authority Appeals	≤ 30 days			10.0
A	Average Age of Pending Higher Authority Appeals	≤ 40 days			11.1
L	Lower Authority Appeals Quality	≥ 80%			98.75%
S	New Employer Status Determinations Timelapse	≥ 70%			81.1%
	Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year			Fail
T	Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years			Pass
A	TPS Sample Reviews	Pass			Pass
X	Effective Audit Measure	Pass 4 factors/score ≥ 7			Fail Factor 1: 0.5% Factor 3: 0.6%
I	Improper Payments Measure	< 10%			8.11%
N	Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%			122.40%
T	Overpayment Recovery Measure	≥ 68%			54.34%
E	Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing			Fail Not Submit Benefits 3 & 4 Module 3
S	Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing			Fail TPS 1-4
R	NDNH BAM Compliance	Pass			Pass
I	BAM Operations Compliant	Pass All M&P			Fail
B	Incorrect Recording of Issue Detection Date	95%			97.05%
A	Incorrect Recording of Determination Date	95%			100.00%
M	UI Reporting Requirements	Pass			Fail
G	Percent of Intrastate Payments Made Timely	87%			94.33%
P	Detection of Recoverable Overpayments	57.5%			198.15%
R	Percent of Employer Tax Liability Determinations Made Timely	90%			85.11%
A	Integrity Action Plan (IAP) Top Three Root Causes - Payment Integrity Information Act (PIIA) Year Data				
Monitoring Findings/Audit Resolution					

TAX QUALITY											
Federal Fiscal Year 2023-2024 SQDP Corrective Action Plan & Progress Report				Back to Biennial Overview 2023				Back to Alternate Overview 2024			
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024			
Performance Measures	ALP	QIP Score in FY 2023/2024 - 12/31/2023 Performance	State's Sept/Annual Performance	12/31/2023 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4
Tax Quality (Part A)	No more than 3 tax functions falling TFS in a year	Status New	Target					Fail	Fail	Fail	Pass
			Actual								
		Status Successor	Target					Fail	Fail	Fail	Pass
			Actual								
		Report Delinquency	Target					Fail	Fail	Pass	Pass
			Actual								
		Credit/Refunds	Target					Fail	Fail	Pass	Pass
			Actual								
Regional Office Comments in call below:											
Corrective Action Plan Summary											
The Summary must provide:											
A. The Reason for the deficiency: The root causes for the deficiencies in the tax operations area are due to staff turnover and program limitations. Idaho has experienced a significant amount of turnover in all areas of tax operations over the last several years. This, as well as the Pandemic, resulted in a significant workload backlog and inability to process of backlog items. Idaho is also in the process of modernizing several tax operations systems; however, this modernization is not complete and limitations of the current systems contribute to issues on documentation and timeliness.											
B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities aka, Milestones, include IT requirements business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan. Plan: Idaho continues to be understaffed in the tax operations area. Efforts will be made to fill vacant positions and provide standardized training for staff during 4th quarter 2023. Idaho will also focus efforts on implementing outstanding modernization projects, including new account registrations. Do: Idaho will focus on prevention of 902005 employer schemes and SUTA dumping through a proactive approach. A modernization project is in the testing phases that will assist in this area. Idaho is also starting a new modernization project that will enhance Idaho's ability to follow up on delinquent accounts. Analysis of processes and procedures, specifically those surrounding documentation, notifications, and other correspondence, will be reviewed to determine where deficiencies can be made. Check: Regular progress meetings will ensure Idaho's resources are effectively utilized, both IT and subject matter experts. Regular progress and competency checks will ensure training is progressing as expected. Act: If any barriers are identified, actions will be taken to ensure all projects and initiatives are prioritized correctly and to inform all stakeholders of any changes. C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and an explanation of why the actions now specified will be more successful. Idaho did not have a CAP in this area during FY 2023. D. A brief description of plans for monitoring and ensuring accomplishment of planned actions and for controlling quality after achieving performance goal. Idaho will conduct quality control reviews, in addition to those required by the TFS program, to identify areas requiring further training. Performance metrics have been established to assist with timely processing of workload. These actions will ensure Idaho is able to meet minimum tax operations ALPs. NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summaries below the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.											
Enter Remaining Major Action Item											
Milestones											
1. Credit/Refunds: Analyze failure of resamples and investigate changes to policy and process automation. Status New: Review status of program modernization. Identify additional system requirements, and create a timeline for implementation. Status Successor: Identify requirements for modernization and develop a timeline for implementation. Report Delinquency: Analyze failure of TPS sample and investigate changes to policy and process automation. Staffing: Fill vacancies in tax operations.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										12/31/2023	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
2. Credit/Refunds: Identify requirements for automation and draft policy or process changes. Development begins on automation. Status New: conduct additional requirements gathering. Begin development and system testing. Coordinate changes with tax validation and SBI report. Status Successor: conduct additional requirements gathering. Begin development and system testing. Coordinate changes with tax data validation and SBI report. Staffing: conduct training on tax operations and report delinquency. Conduct quality control and staff competency reviews to ensure quality meets minimum standards.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										9/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
3. Credit/Refunds: Implementation of automation and policies. Status New and Successor: Program modernization and software are in production. Conduct quality control and staff competency reviews to ensure quality meets minimum standards.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										6/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
4. Conduct quality control reviews and testing to ensure compliance with policy and TFS requirements in all areas. Reporting structure in place that will allow Idaho to continue to monitor progress in these areas.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										6/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											

Effective Audit Measure (EAM) - Score ≥ 7; exceed all 4 factors											
Federal Fiscal Year: 2023-2024 SQIP Corrective Action Plan & Progress Report				Back to Biennial Overview 2023				Back to Alternate Overview 2024			
State: Idaho				Federal Fiscal Year: 2023				Federal Fiscal Year: 2024			
Performance Measure	ALP	QIP Score as of 10/31/2023 - 12/31/2023 Performance	Score Target/Actual Performance	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4
DAM - Factor 1 (Contributory Employees Audited)	Score ≥ 1		Target Actual					Pass	Fail	Pass	Pass
DAM - Factor 2 (Change In Total Wages from Audit)	Score ≤ 2		Target Actual					Pass	Pass	Pass	Pass
DAM - Factor 3 (Total Wages Audited)	Score ≥ 1		Target Actual					Pass	Fail	Pass	Pass
DAM - Factor 4 (Avg # of Misclassified Workers Detected per Audit)	Score ≤ 1		Target Actual					Pass	Pass	Pass	Pass
Effective Audit Measure Total Score	Score ≥ 7		Target Actual					Pass	Fail	Pass	Pass
Regional Office Comments in cell below:											
Corrective Action Plan Summary											
The summary must provide:											
A. The Reason for the deficiency. Idaho met the ALP requirements for factors 2 and 4. Idaho failed on factors 1 and 3. The deficiency was due to a lack of trained staff to perform audits. Idaho experienced turnover in the tax operations and audit programs. Additionally, Idaho's business population continued to grow during the Pandemic and the years following. Idaho's did not have a pool of internally qualified candidates to choose from when filling vacancies for the audit program. The training for external applicants takes 18-24 months. These factors contributed to Idaho's inability to conduct the required number of audits and the required minimum amount of wages. Idaho expects to meet the requirements for each factor and the EAM total score for calendar year 2023.											
B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities include: IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan. Plan: Idaho has a proven training process that fully equips employees in the audit program for their duties, although it takes a significant amount of time to reach the end of that program. Idaho expects many of the newly hired employees to contribute significantly to factors 1 and 3 during 2023. Do: Idaho will continue making through 2023 and 1st quarter 2024, at which time 85% of the employees in the audit program will have reached the end of the training cycle. Check: Monthly meetings will be held with the audit program management to determine if Idaho is continuing to progress as expected toward the factor 1 and 3 ALPs. Act: If barriers arise to Idaho's progress in these areas, those issues will be analyzed and addressed immediately, whenever possible. Idaho has historically passed on factors 2 and 4. Idaho will monitor these areas throughout FFY 2024 but will not establish milestones unless deficiencies are identified.											
C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful Idaho did not have a CAP in this area in FFY 2023.											
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals. Idaho has established quarterly monitoring of each factor and the EAM total score. Quarterly meetings will identify potential issues to meeting the ALP, which can be addressed immediately. Idaho does not expect this deficiency to remain to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.											
NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summaries, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.											
[Enter Remaining Major Actions Here]											
1. Idaho passes factors 1-4 and total EAM for calendar year 2023.										Completion Date	
										12/31/2023	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
2. Idaho passes factors 2 and 4. Idaho provides additional advanced audit training for staff.										Completion Date	
										5/31/2024	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
3. Idaho passes factors 1-4 on an ongoing basis.										Completion Date	
										6/30/2024	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
4. Idaho remains on track to pass factors 1-4 and total EAM for calendar year 2024.										Completion Date	
										5/30/2024	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											

Detection of Overpayments											
Federal Fiscal Year 2023-2024 SQBP Corrective Action Plan & Progress Report				Back to Normal Oversight 2023				Back to Alternate Oversight 2024			
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024			
Performance Measure	ALP	CAP Level or OADR/OPD - 03/31/2022 Performance	State's Sept/Venue Performance	12/31/2022	3/31/2023	6/30/2023	9/30/2023	12/31/2023	3/31/2024	6/30/2024	9/30/2024
				Quarter 1	Quarter 2	Quarter 3	Quarter 4	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Detection of Overpayments - Core Measure - +50% & +60% of Detectable/Recoverable Ops are Established for Recovery	+50% & +55%	110.66%	Target	94.33%	94.62%	95.68%					
Regional Office Comments in cell below:											
Corrective Action Plan Summary											
<p>The Summary must provide:</p> <p>A. The Reason for the deficiency. The deficiency in this area was related to Idaho's 227 reporting. Significant work was performed on the 227 reporting during FFY 2023. Amendments were made to several reports during 3rd calendar quarter 2023. These modifications brought the detection of overpayments into an acceptable range.</p> <p>B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities also, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.</p> <p>Plan: Idaho will continue to monitor the detection of overpayment percentage. Do: If there is a more than 3% change from the previous quarter, or if Idaho falls more than 3% outside acceptable levels in the quarterly detection of overpayment percentage, Idaho will investigate the cause and address those issues on the quarterly CAP. Check: Idaho will implement reporting that will allow for timely monitoring and detection of variances with this measure. Act: If progress is not made as expected on any specific milestones, Idaho will analyze processes and procedures to determine what changes can be made to meet milestones.</p> <p>Alternate Year Plan Updates: C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance and, an explanation of why the actions now specified will be more successful. This item was a CAP in the prior year. At that time, Idaho was investigating 227 reporting anomalies and felt this issue may be related. It was determined the 227 was the root cause of this issue. The deficiency has been resolved and regular monitoring will help ensure Idaho remains within acceptable levels. D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goal. Monthly progress checks will be conducted to ensure Idaho remains on target to meet the established milestones each quarter. Additional reporting mechanisms will be developed to assist in more timely monitoring.</p> <p>NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.</p>											
Milestones											
1. A team with subject matter experts will research and analyze the 227 report to identify any reporting discrepancies. SAM Supervisor will audit cases to verify all coding is correct.										Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet. Subject matter experts are meeting at a minimum of once per month to address 227 report discrepancies. It is unknown whether the 227 is affecting the detection of overpayment numbers.										9/30/2023	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): The subject matter experts have researched the 227 reporting errors and continue to work on resolving the issues. The SAM supervisor has sampled and reviewed cases to ensure coding is correct. Milestone met.											
FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023): The 227 anomalies and discrepancies have been resolved. Amended reports are expected to be complete by 9-30-23. Idaho doesn't expect significant changes as a result of the 227 issue resolution. Further investigation will be											
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Milestone complete											
2. If anomalies in the 227 report are identified, resources will be allocated to correct the anomalies and submit any amended reports.										Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet.										9/30/2023	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Resources have been dedicated to resolving issues identified by the subject matter experts. The developer resources continue to place a priority on this project.											
FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023): Issues related to the 227 report have been resolved. Amended reports are expected to be completed and submitted by 9-30-23.											
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Milestone complete											
3. The BPC Supervisor will review the ADL for Detection of CE and determine if they place Idaho within acceptable ranges. If no anomalies identified on the 227 report, or if the corrected data no longer Idaho within acceptable ranges, the team will continue to analyze and identify any additional issues causing the Detection of OPs to be out of range.										Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet.										9/30/2023	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet.											
FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023): Not due yet.											
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Milestone complete. New detection of overpayment figures: 12/31/2022: 94.33%, 03/31/2023: 94.62%, 06/30/2023: 95.68%											
4. The 227 report has been corrected and the BPC supervisor will monitor quarterly to verify Idaho remains within allowable ranges. If Idaho does not remain within 3% of the previous quarter or within 3% of the allowable range during the three period of calendar quarters 2nd/2023 through 2nd/2024, additional analysis will be done to identify further reasons for deficiency in this area.										Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022):										12/31/2023	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
5. Idaho will develop reporting that will allow timely monitoring of this measure.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										9/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											

Benefits Data Validation												
Federal Fiscal Year: 2023-2024 SQBP Corrective Action Plan & Progress Report				Back to Biennial Overview 2023				Back to Alternate Overview 2024				
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024				
Performance Measures	ALP	CAP Based on Validation Year 2021: 4/1/2021 - 3/31/2021 Performance		State's Target/Actual Performance	11/1/2022 Quarter 1	3/1/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4
		Population 3	Target	Actual	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
Data Validation Benefits - All Submitted and Pending	Submitted & Pending	Population 3	Target	Actual	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
		Population 4	Target	Actual	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
		Mod 3 Benefits	Target	Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
Regional Office Comments (in red below):				Corrective Action Plan Summary								
<p>The Summary must provide:</p> <p>A. The Reason for the deficiency.</p> <p>System changes and modernization projects have not included resources to address data validation with the modernization projects. Limited programmer time has been the main factor Idaho's delay in addressing data validation concerns.</p> <p>B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.</p> <p>Plan Idaho will address benefit data validation populations and modules first then will follow with the tax populations and modules.</p> <p>Idaho will continue to prioritize data validation with IT resources. Milestones will be set and shared with stakeholders to ensure milestones are achievable and reasonable. Coordination with other modernization projects and CAPs will be incorporated into future validation and production timelines.</p> <p>Check: As populations and modules pass, the associated reports will be updated to provide "real time" monitoring and analysis of populations.</p> <p>Act: Modules and conditions will be checked at least quarterly to ensure real-time validation.</p> <p>C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.</p> <p>Mod 3 was not on a previous CAP.</p> <p>Populations 3 and 4 have been on previous CAP. IT resources were allocated to pandemic related issues and required modernization projects in previous years, which resulted in a continued CAP on data validation. Idaho is committed to data validation and ensuring all benefit populations are passing. Idaho does not expect to have a continued CAP in this area after FFY 2024.</p> <p>D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.</p> <p>A data validation team will meet to review progress during and after modernization efforts are complete on at least a quarterly basis.</p> <p>Idaho will continue to monitor passing data validation populations and modules. If failures in a population/module is identified, Idaho will take actions to resolve any issues before the due date of the next population/module.</p> <p>NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summarize, below, the major actions you intend to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.</p> <p>Enter Remaining Major Actions Here:</p>												
Milestones												
1. Population 12: Identify the quarter in which it began to fail and identify the cause of the failure.											Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Population 12 continues to fail. The population began to fail 3rd quarter 2022; however, the cause of the failure has not been identified. Resources were devoted to the final stages of deploying a tax modernization project. Work in this FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Population 12 is passing. Milestone complete.											12/31/2022	
FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023): Milestone complete.												
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Milestone complete, population 12 no longer on CAP.												
2. Population 12: Assess and resolve population 12 discrepancies related to the ETA 227. Population 12 passes.											Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet.											6/15/2023	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Population 12 is passing. Milestone complete.												
FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023): Milestone complete.												
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Milestone complete, population 12 not included on the FFY 2024 CAP workbook.												
3. Assess and resolve population 4 discrepancies related to the ETA 5159, 506, 9050, and 9051. Population 4 passes.											Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet.											3/31/2024	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet.												
FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet.												
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet.												
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):												
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												
4. Assess and resolve population 3 discrepancies related to the ETA 5159, 218, and 586. Population 3 passes.											Completion Date	
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet.											3/31/2024	
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet.												
FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet.												
FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet.												
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):												
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												
5. Assess reasons for Mod 3 failures.											Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											6/31/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												
6. Resolve Mod 3 discrepancies. Mod 3 passes.											Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											9/31/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												

Tax Data Validation													
Federal Fiscal Year: 2023-2024 SQBP Corrective Action Plan & Progress Report				Back to Baseline Overview 2023				Back to Alternate Overview 2024					
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024					
Performance Measures	ALP	SQBP Based on Validation Year 2023 4/1/2023 - 3/31/2023 Performance		12/31/2023	3/31/2023	6/30/2023	9/30/2023	12/31/2023	3/31/2024	6/30/2024	9/30/2024		
		Target	Actual	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Quarter 1	Quarter 2	Quarter 3	Quarter 4		
Data Validation Tax - All Submitted and Posing	Submitted & Posing	Population 2	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
		Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
		Mod 3 Fix	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
		Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
		Mod 4 Status New	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
		Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
		Mod 4 Successor	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass
Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass		
Mod 4	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
Inactive/Transients	Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
Mod 4 Field Audit	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
Actual	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	

Regional Office Comments in red below:

Corrective Action Plan Summary

The Summary must provide:

A. The reason for the deficiency.

The extracts for the tax populations have not been created due to continuing work on the remaining benefits data validation populations and a focus on modernization of the tax system. The tax system has been modernized and is currently in the testing phase. Because of the limited resources we made to validate against the outgoing system.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Plan: Modernization of the tax systems is currently entering phase 1 testing and is expected to be ready for the full production environment during 1st quarter 2024.

Do: The modernization efforts include work on data validation. Upon phase 1 release of the modernized tax system, Idaho expects all tax populations to be a point of focus. Since the tax system isn't expected until 1st quarter 2024, Idaho expects to continue failing these populations until that time.

Check: A team will be created with relevant stakeholders to review and monitor progress of the data validation efforts as part of the overall modernization. After deployment of the tax system, dedicated staff will continue to review the progress of the populations, at minimum on a quarterly basis.

Act: The team will continue and develop resolutions to any issues after the data validation phase and after the tax system are identified into production.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful. A CAP was in place in this area in FY 2023. During the previous three years, Idaho continued to recover from the effects of the Pandemic. Idaho is also involved in a significant tax modernization project, both requiring significant resources. Data validation is part of the current overall modernization project. Idaho expects to complete the initial phase of the tax modernization during 1st quarter 2024. At that time, the extracts will be run and efforts focused on ensuring data validation of tax populations and modules. During FFY 2024 Idaho commits to ongoing resources to address data validation. In an effort to utilize resources as efficiently as possible, Idaho will remain committed to passing all benefit populations and modules before devoting the resources to tax populations and modules.

Alternate Year Plan Updates

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals. A data validation team will meet to review progress during and after modernization efforts are complete, at minimum on a quarterly basis. This team will take responsibility for identifying and resolving any ongoing concerns after goals are achieved.

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

(Enter Remaining Major Actions Here)

Milestones

1. A data validation team will be assembled to include stakeholders from IT, Data Validation, and Management. This team will meet quarterly beginning 1st quarter 2024. The team will identify what is needed to complete the tax data validation on all modules and populations. Each module and population will be prioritized with work commencing on the highest priority item in 2nd quarter 2023.

Completion Date: 3/31/2024

FF 2023 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet
 The data validation team did not meet this quarter. All efforts were focused on benefits Population 12 and the 227 reporting errors. The team is expected to meet during 2nd quarter 2023. The completion date for this milestone has been updated.
 FF 2023 Quarter 3 status report (Quarter Ending 6/30/2023): Not due yet
 The data validation team met and discussed the failing populations. The focus of efforts this quarter were on benefit populations and the 227 reporting issues. The completion date for the benefit populations is projected for 3-31-24. The focus of IT efforts will be on benefit populations and all are posing. The projected deadlines for tax populations has been modified to begin upon completion of the benefit populations.
 FF 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet. Milestone date has been updated to correspond with the projected date for completion of phase 1 of the tax modernization project.
 FF 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): Not due yet
 FF 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): Not due yet
 FF 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024): Not due yet

2. IT resources dedicated to address issues identified with data validation for all modules and populations. For Module 4, all parts will be validated, including verification of the TPO selection methodology, with the exception of the population validation.

Completion Date: 6/30/2024

FF 2023 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet
 FF 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet
 FF 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet
 FF 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): Not due yet
 FF 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): Not due yet
 FF 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024): Not due yet

3. For validation of population 1 - 5, the data validation team review the readiness of the new tax system, the SBI report, and the population extract process.

Completion Date: 6/30/2024

FF 2023 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet
 FF 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet
 FF 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet
 FF 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): Not due yet
 FF 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): Not due yet
 FF 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024): Not due yet

4. Populations are posing and failures are analyzed, resolved, and resubmitted.

Completion Date: 6/30/2024

FF 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): Not due yet
 FF 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): Not due yet
 FF 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): Not due yet
 FF 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024): Not due yet

Benefit Accuracy Measurement (BAM)											
Federal Fiscal Year 2023-2024 NDWP Corrective Action Plan & Progress Report				Back to General Overview 2023				Back to Alternate Overview 2024			
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024			
Performance Measure	ALP	CAP Number 2023 SAM Asset Microburke Index	Metric Target/Actual Performance	12/31/2022	3/31/2023	6/30/2023	9/30/2023	12/31/2023	3/31/2024	6/30/2024	9/30/2024
				Quarter 1	Quarter 2	Quarter 3	Quarter 4	Quarter 1	Quarter 2	Quarter 3	Quarter 4
BAM Operations Compliant - Monetary Comparison Reports	± 15%		Target					± 30%	± 30%	± 30%	± 15%
			Actual								
BAM Operations Compliant - Separation Comparison Reports	± 15%		Target					± 15%	± 15%	± 15%	± 15%
			Actual								
BAM Operations Compliant - Nonseparation Comparison Reports	± 15%		Target					± 15%	± 15%	± 15%	± 15%
			Actual								
Regional Office Comments in cell below:											
Corrective Action Plan Summary											
<p>The Summary must provide:</p> <p>A. The Reason for the deficiency.</p> <p>Idaho experienced staffing turnover and retirements over the last couple years. As a result, subject matter expertise in this area has been lost. Idaho identified contributing factors that could affect the report, including population 3 failures and queries run for federal reporting purposes. Idaho is coordinating the CAP for this category with the CAP for data validation. The root cause for this deficiency is believed to stem from a modernization project many years ago and the change in data structure at that time. Idaho has been within allowable limits on the separation and non separation comparison reports.</p> <p>B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities aka, Milestones include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.</p> <p>Plan: Idaho will coordinate the CAP for monetary comparison reports with data validation for population 3. As related populations and reports are changed or updated, Idaho will monitor for progress in moving closer to the allowable variance.</p> <p>Do: The Integrity team will monitor the progress during monthly meetings to ensure Idaho is making progress and coordinating with the data validation team. The taskforce will also monitor reflectives to ensure Idaho remains on target to meet them.</p> <p>Check: Idaho will monitor the separation and non separation comparison reports to ensure they remain within allowable limits. Milestones have not been established in this CAP for these areas because Idaho is currently within allowable limits for both areas.</p> <p>Act: Once within allowable limits for the monetary comparison reports, Idaho will continue to monitor on the same schedule as the separation and non separation reports. Any variance outside allowable limits will be analyzed and addressed as soon as possible.</p> <p>C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance and, an explanation of why the actions now specified will be more successful. A CAP was not in place during FFY 2023.</p> <p>D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.</p> <p>Idaho will create reporting which will allow real time monitoring of the BAM reports. These reports will be reviewed by the Integrity team. This will allow Idaho to identify and address any deficiencies immediately.</p> <p>NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summaries below the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.</p> <p>[Enter Remaining Major Actions Here]</p>											
Milestones											
1. Review and analyze benefit population 3 failures.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023)										12/31/2023	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024)											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024)											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024)											
2. IT and data validation resources correct and test population 3 changes/updates. Population 3 passes.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023)										3/31/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024)											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024)											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024)											
3. Analyze other contributing factors to the BAM variance report to determine any other potential areas for variances outside allowable limits. If resources allocated to making necessary adjustments.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023)										6/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024)											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024)											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024)											
4. If related changes are tested and verified, BAM monetary variance is within allowable limits. Reports are in place that will allow Idaho to monitor variances in all areas - monetary, non-monetary, and separation.										Completion Date	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023)										9/30/2024	
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024)											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024)											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024)											

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.

**State Quality Service Plan (SQSP)
Integrity Action Plan (IAP)
Idaho – Fiscal Year (FY) 2024**

Accountable Agency Official(s)

List the person or persons accountable for ensuring integrity in the state’s unemployment insurance (UI) program.

Name: *Jani Revier*

Title: *Director*

Email: *Jani.Revier@labor.idaho.gov*

Phone: *(208) 332-3570 ext. 3110*

***Note:** Unemployment, issued on June 30, 2023, makes reference to UIPL No. 22-21, Change 2, throughout the guidance. However, on July 13, 2023, the Employment and Training Administration (ETA) issued UIPL No. 10-23, which rescinded UIPL No. 22-21, Change 2. UIPL No. 11-23, also issued on July 13, 2023, changed the amount of the integrity grant funding originally issued under UIPL No. 22-21, Change 2, but maintained the guidance on required and recommended fraud prevention and detection and overpayment recovery activities.

- **(Topic #1: National Priority) – Ensuring UI program integrity by assessing and evaluating fraud risks, implementing and maintaining sufficient controls to effectively mitigate the likelihood and impact of fraud, and reducing improper payments.**

In evaluating fraud risks, states should consider both eligibility fraud risks and identity (ID) fraud risks.

- **State plans to evaluate UI fraud risks and implement and maintain sufficient controls to effectively prevent fraud and reduce improper payments, including state actions to develop their own state-specific antifraud strategy. *Idaho has a framework in place to mitigate fraud risk in the UI program. This framework includes a proactive approach to preventing fraudulent activity before benefits are paid on a claim or before an employer account is established. Preventing fraudulent activity is balanced with paying benefits when due and in a timely manner. Idaho utilizes a combination of queries, data analytics, cross-matches, and investigations to identify fraudulent activity within the program, as detailed below. Additionally, an integrity task force meets quarterly to review suggestions, process improvements, and system enhancements to reduce improper payments and improve recovery efforts on benefit overpayments and tax delinquencies. Idaho has dedicated Bureau with a primary responsibility for identifying fraudulent activity; however, Idaho has adopted the philosophy that integrity is everyone’s responsibility. Staff members are trained and encouraged to report suspicious activity. Although Idaho has framework in place, the Pandemic and the multiple fraud schemes since, have highlighted the importance of remaining vigilant and agile in responding to ever changing fraud activities. Idaho recognizes more can be done in this area and plans to utilize the UI IT modernization grant to enhance the***

current systems to further identify, refine, prioritize, and address potential fraud across all areas of the UI program.

- Key elements of an antifraud strategy include:
 - **Who** is responsible for fraud risk management activities?
 - Establish roles and responsibilities of those involved in fraud risk management activities, such as the antifraud entity and external parties responsible for fraud controls and communicate the role of the Office of Inspector General (OIG) to investigate potential fraud.
 - **What** is the program doing to manage fraud risk?
 - Describe the program’s activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.
 - **When** is the program implementing fraud risk management activities?
 - Create timelines for implementing fraud risk management activities, as appropriate, including monitoring and evaluations.
 - **Where** is the program focusing its fraud risk management activities?
 - Demonstrate links to the highest internal and external residual fraud risks outlined in the fraud risk profile.
 - **Why** is fraud risk management important?
 - See A Framework for Managing Fraud Risks in Federal Programs at <https://www.gao.gov/assets/gao-15-593sp.pdf> for additional information.
 - Communicate the antifraud strategy to employees and other stakeholders, and link antifraud efforts to other risk management activities, if any.
- **State use of tools, services, strategies, process improvements, and/or procedural changes adopted by the state to combat fraud, verify identities, and enhance recovery efforts. States must identify which tools, solutions, and service provider(s) are used in the state’s fraud management operations, including but not limited, to the following areas: data analysis, risk-based ID verification, fraud prevention and detection, and cybersecurity.**

- Include strategies, solutions, and/or activities using funds the Department has made available to states for combatting fraud and strengthening UI program integrity under UIPL Nos. 28-20; 28-20, Change 1; 28-20, Change 2; 28-20, Change 4; 22-21; 11-23; and 02-22.

Idaho was able to utilize funds from previous grant opportunities to support

staffing as well as modernization to programs that will now require less staff intervention. Idaho has also utilized the funding to pay ongoing subscription costs for identify verification through our trusted vendor, IDme.

- Provide details on overpayment recovery efforts including:
 - Actions with banks, financial institutions, and with Federal law enforcement's forfeiture and seizure efforts.
Idaho conducts recovery efforts internally. Recovery of overpayments includes lien filing and bank seizures. Idaho also maintains communication with banking institutions on potentially fraudulent activity, unused or misused benefit payment cards, and recovery of UI benefits from those cards. Idaho also responds to requests from law enforcement as quickly as possible.
 - Information on how the state is using waivers of recovery of overpayments both for regular UI and temporary UC programs created by the CARES Act, including if the state is using approved blanket waivers as described in UIPL No. 20-21, Change 1.
Idaho continues to review waivers on a case-by-case basis and waive overpayments that meet the criteria established by federal and state guidance. Idaho utilized blanket waivers several times over the previous 2 years for scenarios described in UIPL 20-21, Change 1.
 - How the state is using the Treasury Offset Program (TOP) for benefit overpayment recovery, how the state is ensuring covered debts are being submitted, and any barriers/challenges in working with TOP.
Idaho has utilized the TOP system for recovery of overpayments for many years. Idaho has checks and balances in place, as well as software, to detect any issues with the submission or receipt of TOP related information. Idaho does not have any barriers in this area.
- **State use of UI Integrity Center resources, with a particular focus on state connection to the Integrity Data Hub (IDH) and use of its datasets to cross-match unemployment compensation (UC) claims and aid in the prevention and detection of fraud and improper payments (see Training and Employment Notice (TEN) No. 24-21);**
 - Discuss the state's connection to the IDH, including frequency of IDH use.
 - Does the state submit all initial and continued claims for IDH cross-matching? If not, what is preventing the state from sending

all claims?

Idaho has incorporated IDH into an internal application, Fraud Finder. Initial and continued claims are cross-matched within Fraud Finder using a variety of data, including IDH, and checked on a daily basis.

- If the state is not connected to the IDH and/or is connected but not regularly submitting UI claims data through a webservice/real-time connection to IDH, provide details on the state's plan for how to increase usage and an anticipated timeline to:
 - Connect to the IDH.
 - Increase frequency of IDH use.
 - Fully leverage all available IDH capabilities. IDH capabilities include:
 - Suspicious Actor Repository (SAR)
 - Multi-State Cross-Match (MSCM)
 - Identity Verification (IDV)
 - Bank Account Verification (BAV)
 - Fraud Alerting
 - Foreign Internet Protocol (IP) Address Detection
 - Suspicious Email Domains and Patterns
 - Identify barriers to using any of the available IDH capabilities.
N/A: Idaho utilizes the IDH and does not have any barriers in this area.

- If the state has not executed IDH Participation Agreement - Version 5.0 (see TEN No. 24-21), provide details on the anticipated timeline to update to IDH Participation Agreement – Version 5.0.
N/A: Idaho has a participation agreement with IDH.

- Discuss the state's use of the UI National Integrity Academy's virtual trainings and/or eLearning lessons.
Idaho incorporated the UI National Integrity Academy's training into the regularly scheduled training for staff and managers.

- Discuss the state’s use of UI Integrity Knowledge Exchange Library resources, including the Behavioral Insights Toolkit (see TEN No. 15-21). ***Management and front-line staff have access and are able to research items within the UI Integrity Knowledge Exchange Library. Idaho is incorporating several ideas from the behavioral insights toolkit including a wage calculator and prompts throughout the claim process.***

- Discuss the state’s participation in State Consultative Services. ***Idaho participated in the Tiger Team Consultative Services and is in the process of implementing suggestions, including behavioral insights and wage calculator.***

Note: The IDH Team has a one-page dashboard report for each state summarizing current IDH utilization and areas where IDH use might be expanded. Please reach out to IDHTeam@naswa.org to request a copy of your state’s IDH utilization dashboard report.

- **State use of required and recommended integrity controls and overpayment recovery activities as outlined in UIPL No. 11-23, including any additional effective cross-matching and overpayment recovery activities and identified best practices.**
 - Provide details regarding the state’s use of each cross-match/integrity control and overpayment recovery activity (required and recommended) as outlined in UIPL No. 11-23. Include details on the frequency of crossmatch/integrity controls use (e.g., conducted on all initial claims, all continued claims, only when suspicious activity is identified?) and frequency of overpayment recovery activities.

 - Cross-matches/integrity controls and recovery activities include: **Cross-matches/Integrity Controls**
 - ID Verification;
Conducted on all new claims, continued claims, and weekly certifications.

 - National Directory of New Hires (NDNH);
Conducted quarterly.

 - Quarterly Wage Records Cross-match;
Conducted weekly.

 - Systematic Alien Verification for Entitlement (SAVE);
Conducted on all new claims.

- Referral of allegations reasonably believed to constitute UC fraud, waste, abuse, mismanagement, or misconduct to DOL-OIG; ***Idaho will refer when cases arise meeting these criteria.***
- UI Integrity Center's IDH; ***Monitored daily.***
- Digital Authentication, such as Multifactor Authentication (MFA); ***Built into all aspects of the claim filing and weekly certification processes. Claimants must pass ID.me each time they file an initial claim, log into our claimant portal or do their weekly certification. For claimants who are unable to do the ID.me process, we verify their identity in person.***
- Device Fingerprint/Reputation Management; ***Idaho does not participate in this activity. Idaho employs other methods for verifying identity prior to issuing benefits. There are currently no plans to implement this integrity control.***
- Fraud Risk Scoring (i.e., Case Management Prioritization); ***Idaho utilizes fraud risk scoring within our Fraud Finder application. A dedicated team reviews activity in Fraud Finder on a daily basis.***
- Comparisons and cross-matches that detect shared characteristics; ***Comparisons are conducted within our Fraud Finder application. A dedicated team reviews activity in Fraud Finder on a daily basis.***
- Social Security Administration cross-matches (i.e., Unemployment Insurance Query (UIQ), ***Prisoner Update Processing System (PUPS), Death Master File***); ***Conducted weekly***
- Federal, state, and local incarceration cross-matches; ***Conducted weekly***
- Deceased Records cross-matches; ***Conducted weekly***
- Vital Statistics cross-matches; ***Idaho utilizes vital statistics data for the deceased records crossmatch.***
- State Directory of New Hires (SDNH); ***Conducted weekly.***
- Department of Motor Vehicle cross-match; ***Conducted weekly.***

- Interstate Benefits (IB) cross-match;
Conducted manually. Idaho has plans to automate this process within the next FFY.
- State Identification Inquiry (SID) and IB8606 enhancements made to the Interstate Connection (ICON) network cross-match to prevent concurrent claim filing in multiple states;
Conducted manually. Idaho has plans to automate this process within the next FFY.
- Use of a unique identifier to identify claimants instead of using the full SSN;
Idaho uses a unique identifier for all claimants that does not include the full SSN.
- All claimants and claims are assigned a unique identifier that is not their SSN.
Idaho uses a unique identifier on all claimants and claims that is not the SSN.
- Fictitious employer cross-matches;
Conducted daily.
- Periodic IT security assessments and audits consistent with National Institute of Standards and Technology (NIST)-compliant information technology security guidelines;
Idaho completes annual audits for SSA and IRS against its computer environments. Both annual audits are conducted using the NIST framework.
- Adequate internal controls to protect the integrity and security of state assets;
Idaho has made significant investments in the Information Security technologies to monitor, detect, report and prevent on security threats in the Idaho Department of Labor computer environment. These technologies include, SIEM, EDR, email gateway, vulnerability management, firewall, data security and other platforms to ensure the security of the computer environment and data.
- Implement a cross-functional integrity task force to develop and implement state-specific action plans to reduce UI improper payments.
Idaho has an integrity taskforce that meets quarterly to discuss suggestions on integrity-related issues and to implement processes, procedures, and other action plans to increase the integrity of the UI program and reduce improper payments.

Overpayment Recovery Activities

- Benefit Offsets;
- TOP;
- Cross Program Offset Recovery Agreement (CPORA);
- Interstate Reciprocal Offset Recovery Arrangement (IPORA);
- Negotiating repayment plans;
- Accepting repayments through various methods (e.g., online, via debit/credit card);
- State Income Tax Offset Program;
- Wage garnishments;
- Property liens and assessments;
- Active participation in probate and/or bankruptcy proceedings;
- Skip tracing;
- Work proactively and collaboratively with banks and financial institutions;
- Civil actions;
- Penalties and interest on overpayments in compliance with state and federal law;
- Implementing a voluntary fraud self-disclosure program;
Idaho participates in all of the above overpayment recovery activities.
- State/federal prosecution;
Idaho is working with the Idaho Attorney General's Office and expects cases submitted to proceed to prosecution in FFY 2024.
- Offsets of lottery winnings, homestead exemptions, and other benefits;
Idaho has discussed this option but does not have immediate plans to implement offsets of lottery winnings, homestead exemptions, and other benefits.
- Credit bureau referrals;
Although Idaho does not directly report to the credit bureaus, liens are filed against outstanding

overpayments. Those liens are then reflected on the credit bureau reports.

- Collection agency referrals;
Idaho conducts collection activities internally and does not refer delinquencies to a collection agency.
- Other recovery methods as determined by state law or policy.
None.

- Identify any additional integrity controls or recovery activities the state uses that are not listed in UIPL No. 11-23.

Idaho utilizes CAPTCHA in instances of high-level traffic to assist in the prevention of brute force attacks.

- Provide promising practices.
Idaho takes a proactive approach to preventing fraud and makes all attempts to throughout the claim and weekly certification filing process to verify identify and educate claimants on proper reporting. Specific to fraud, Idaho supplies each claimant with a claim pamphlet talking about fraud, regularly emails notices to claimants about fraud, and provides information on various screens throughout the claim filing process on fraud.

- Identify challenges with cross-matches or in overpayment recovery activities.

Idaho utilizes a variety of cross-matches and risk scoring within the Fraud Finder program. Idaho also conducts overpayment recovery activities in-house. The workload brought on by the Pandemic and staffing limitations have been Idaho's biggest challenges.

- If the state does not currently use one of the integrity controls or recovery activities listed in UIPL No. 11-23, provide the state's plan and anticipated timeline to request and obtain access to the cross-match/integrity control or to implement the overpayment recovery activity.

Integrity activities not employed in Idaho's processes are discussed in the "Crossmatches/Integrity Controls" section.

Note: If the state does not plan to obtain access to a cross-match/integrity control or implement a specific recovery activity, please explain.

- **State use and employer participation in State Information Data Exchange System (SIDES) (see TEN No. 12-16).**
 - Provide details on the state's current usage of SIDES.
The Department has recently started an outreach campaign, contacting employers who return paper statements to see if they are interested in signing up for the SIDES separation exchange. This will increase our SIDES participation rate. Additionally, as part of the Tiger Team initiative, the Department plans to pursue implementing three additional exchanges: Determinations and Decisions, Monetary and Potential Charges, and Earnings Verification. We will also be implementing a single sign-on, connecting our employer portal to SIDES.
 - If the state does not currently use all available SIDES exchanges, provide the state's plan for how to connect to all SIDES exchanges and an anticipated timeline to implement each SIDES exchange. Sides Exchanges include:
 - Separation Information
 - Monetary & Potential Charges
 - Additional Fact-Finding
 - Determinations & Decisions
 - Earnings Verification
 - Benefit Charges
Idaho utilizes SIDES and has plans to review each of the exchanges to determine if/where process improvements or efficiencies can be made.
 - Identify any barriers to SIDES exchange participation, either in state promotion or in employer adoption.
Idaho does not currently have any barriers to SIDES participation.
 - **State strategies designed to facilitate claimants' compliance with state work search requirements while also supporting their reemployment such as adoption of the work search requirements in the Model Work Search Legislation (see TEN No. 17-19).**
 - Outline the state's work search requirement and explain state challenges with work search improper payments.
Idaho requires the claimant make a minimum of two contacts

per week and report details of those contacts when filing their weekly certifications. For those claimants returning to work for an employer, the claimant must maintain contact with the employer and return to work when scheduled. The claimant self-reports on their weekly certification whether they met this requirement.

- Discuss the state's plan to improve work search compliance by reducing work search errors and strengthening reemployment. *Idaho continues to utilize online systems requiring claimants to report work search activities on a weekly basis, including providing the contact's name and phone number. Idaho educates claimants on the work search requirements throughout the claim filing processes as well as through an online handbook available at any time to the claimant. Re-employment Services and Eligibility Assessment (RESEA) interviews are conducted on a weekly basis for claimants selected for these services. FAQs related to work search are also available on our website. Idaho is looking at the feasibility of expanding the verification of work search activities beyond the current levels.*

Our claim center staff and navigators verify work search contacts outside of the normal BAM process. A key week is selected, and claims staff review the work search for the key week as well as any other weeks claimed. They may reach out to the claimant for more details and/or contact the employer. In many cases, this is as much about education on an adequate work search, as it is a consequence for failing to look for work. Approximately 150 claimants have their work search reviewed each month through this process.

- **(Topic #2) – State plans and actions to address the state's top three improper payment root causes in Payment Integrity Information Act (PIIA) 2022.**
 - Identify the state's top three improper payment root causes. *Idaho's top 3 root causes are 1) benefit year earnings, 2) work search, and 3) separation issues.*
 - Explain the state's challenges in reducing improper payments in the top three root cause categories.

- ***Benefit year earnings: claimants misunderstand proper reporting. The claimant may report hours worked and their rate of pay and assume the Department will calculate their earnings for them. Claimants also attempt to conceal earnings in an attempt to obtain some, or more, benefits for a given week (fraud).***
 - ***Work Search: claimants fail to accurately report their work search activities because they feel they are improperly coded as work seeking versus returning to an employer or assume the Department will not follow up to verify work search contacts. Claimants also fail to conduct work search activities or misreport those activities knowing they will not receive benefits if they report properly (fraud).***
 - ***Separation issues: claimants don't update their work history because they do not have the separation information at their disposal when they file or they fail to recall working for an employer. Claimants also fail to report separations on their initial claim and weekly certifications in an attempt to receive benefits (fraud).***
- Discuss the state's plan to reduce improper payments in each root cause category.

Idaho's integrity task force meets quarterly to discuss improper payment rates, root causes, and associated processes and procedures. There are no changes to the current strategies. As viable recommendations are made, Idaho will determine the feasibility of the recommendations and develop a plan for implementation. Prior recommendations have proven successful in reducing Idaho's improper payment rate. Idaho expects the integrity task force to continue to identify areas for improvement and efficiency.

- ***Benefit year earnings: Idaho participated in the Tiger Team Initiative and addressed this topic through that process. Idaho is in the process of implementing a wage calculator on the continued claim report to assist with calculation of a claimant's gross earnings. Additionally, prompts from the Behavioral Insights toolkit will be added throughout the claim and weekly certification process to improve claimant compliance. Idaho will continue to utilize crossmatches to identify and investigate potential fraudulent reporting.***
- ***Work search: Idaho continues to educate claimants on proper reporting requirements throughout the claim filing processes as well as through an online handbook available at any time to the claimant. Suggestions, including IT modernization, will be discussed at future task force meetings.***
- ***Separation issues: Idaho conducted intensive staff training during the summer of 2023. The training included the identification and resolution of separation issues. Staff are now better equipped to identify and address separation issues. The task force is also***

exploring ways to educate and dissuade claimants from fraudulent reporting, including prompts and written notifications.

- **(Topic #3) – State coordination and collaboration with the DOL-OIG and other state and Federal law enforcement agencies to investigate and prosecute UI fraud and recover overpayments. This should also include state plans to continue providing all confidential UC information to DOL-OIG for purposes of both investigating fraud and performing audits.**

Idaho coordinates and collaborates with other state and federal agencies, including the DOL-OIG. Idaho attempts to provide any necessary UC information immediately upon request from the OIG for purposes of investigations and audits. Idaho also works with the State of Idaho Attorney General's office and with local, state, and federal law enforcement agencies to investigate and address fraudulent activity. This year, a representative from the US Attorney's office, located in Idaho, will present to UI benefit, BPC, Tax Audit, and management staff on what is being seen at the federal level as well as how Idaho can help detect fraudulent activity.

- **(Topic #4) – State plans to strengthen program integrity in UI tax operations, including current activities and plans to identify and prevent worker misclassification, State Unemployment Tax Act (SUTA) Dumping, and fictitious employer schemes, and development/use of effective employer audit strategies (i.e., use of remote audits).**
 - Identify current activities and plans to address:
 - **Worker Misclassification:**
Idaho combines data mining, staff contact, and discovery to identify and address worker misclassification. Various data mining queries assist in identifying high non-compliant industries and creating the staff workload. Staff members, both within and outside the UI Tax program, can document suspicious activity and contacts with employers or workers. These are flagged for further investigation by tax personnel. Idaho also conducts discovery for misclassified workers through investigation of unregistered businesses and through regular communication with other state agencies, exchanging information on potential non-compliance. Idaho utilizes the information provided by Internal Revenue Service to identify potential misclassifications. As with other states, Idaho experienced significant turnover during and after the Pandemic. For the FY2024, Idaho expects to implement quarterly meetings with staff and managers to address worker misclassification issues including case studies, analysis of current activities, and implementation of process and procedures to address misclassifications most effectively.

- SUTA Dumping
Idaho conducts a variety of internal and external checks on new accounts to identify potential SUTA dumping before an account is created. Any account self-reporting an acquisition and any account with a suspected acquisition is flagged for an investigation by tax personnel. Additionally, Idaho utilizes data mining on a quarterly basis to identify potential SUTA dumping on established accounts.

- Fictitious Employer Schemes
Historically, Idaho has not seen a significant number of fictitious account requests; however, in recent months, there has been an increase in activity in this area. Idaho conducts a variety of internal and external checks on new employer registrations to identify fictitious employers prior to creating an account. Idaho has determined it most effective to take a proactive approach to this issue. This approach requires staff time and expertise in reviewing the applications before assigning an account. Idaho also provides limited access to the employer account creation software. Only those directly performing services in the tax operations area are able to authorize account creation.

Any user, both within and outside the UI tax program, can identify and document suspicious activity (phone call, electronic, or in person contact) for investigation by tax personnel. Idaho will continue to conduct, at minimum, quarterly analysis and monitoring of the validation requirements for account creation. Frequent analysis is expected to assist in identifying the everchanging efforts of bad actors attempting to establish fictitious schemes in Idaho.

- Development/use of effective employer audit strategies (including, but not limited to, use of remote audits).
Idaho currently incorporates remote audits as a strategy for meeting the desired levels of achievement in the audit program. From 2020-2022, Idaho experienced significant staff turnover and reassigned audit staff to address backlogs created by the Pandemic. As a result, most audits conducted during this time were remote audits. In FY2023, Idaho returned to a field audit program and utilized remote audits to supplement the field audit schedule and to assist with training. This is a return to a pre-Pandemic structure, which was proven to be a very effective strategy for Idaho in the past. This structure also allows Idaho to further monitor fictitious employer schemes and SUTA dumping by conducting on site reviews of records and verification of business existence. For FY2024, Idaho expects to refine data mining

queries and audit workload to identify and address suspicious employer activity early in the life of the account.

- **(Topic #5) – State plans and actions to strengthen internal security and ensure that all appropriate internal controls and processes are in place and are adequate to assess internal risks and threats, ensure program integrity, and minimize program vulnerabilities (see UIPL No. 14-17).**

Idaho is in compliance with the criteria outlined in UIPL 14-17 and has adequate internal controls in place. Additionally, all staff and vendors with access to confidential UC information must fill out a nondisclosure agreement. This year, the Department is beginning the process of requiring background checks of all staff with access to confidential information. For all items involving payment, multiple parties are involved before issuing payment to make sure there is a clear separation of duties. Our claims center and Compliance unit both operate behind locked doors, requiring key card entry by Department or contracted staff only.

- **(Topic #6) – State plans and actions to evaluate the effectiveness and equity of fraud prevention and detection, ID verification, and improper payment reduction activities. State should include strategies to ensure that processes used to detect and prevent fraud are effective and do not limit the ability for a legitimate claimant to apply for and become eligible for UC. States implementing or using facial recognition technology in their ID proofing processes must also report findings from bias testing and provide updates on efforts to mitigate biases or barriers in this section of the IAP.**

- Identify potential barriers that are created by fraud prevention and detection functions for legitimate claimants. Provide plans and actions designed to mitigate such risks.

Anytime there is a focus on preventing and detecting fraud, there is the risk that a legitimate claimant will be flagged inappropriately. Idaho has a Discovery team that reviews claim activity on a daily basis, as part of their priority workload. In addition to fraudulent activity, they are also looking for false positives. When false positives are detected, the Department works closely with ID.me and/or the adjudication staff, to confirm identification and release any other incorrectly flagged issues.

- As required in UIPL No. 11-23, states must ensure there is at least one timely, effective, and accessible non-digital alternative to online ID verification, which should not be overly burdensome on applicants, limit access to public benefits programs or the timely receipt of benefits or stigmatize members of the public in any way. Provide details on the state's non-digital ID verification option(s).
For claimants who are unable or unwilling to utilize the ID.me process, we verify their identity in person at our one stop centers by having them submit copies of driver's licenses and social security cards. Representatives are

available to discuss the requirements and assist the claimant in-person through this process.

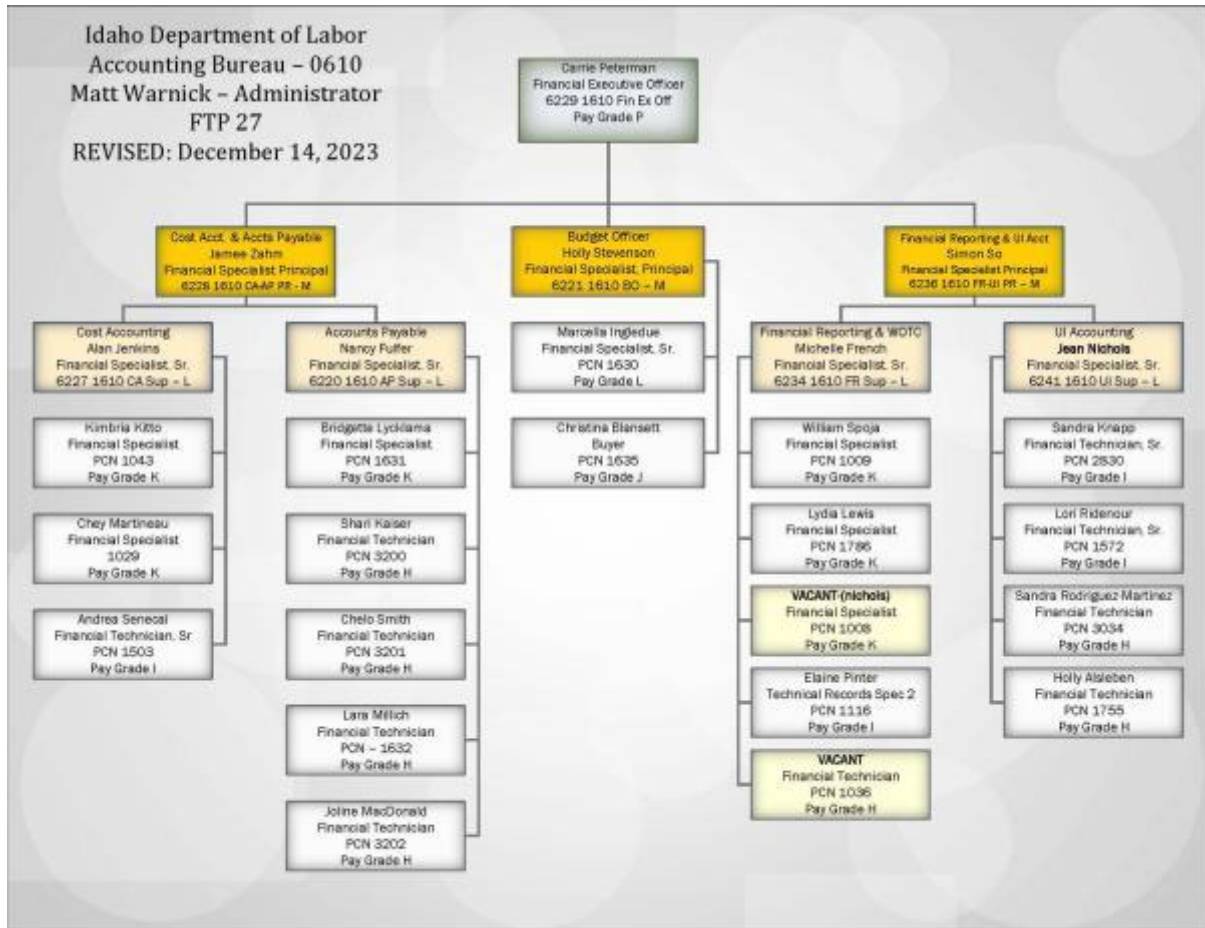
- Include how the state flags cases for suspected fraudulent activity and how investigation resources are assigned, including:
 - What risk scoring elements and/or prioritization elements are used.
Idaho uses IDH for risk scoring elements such as matching against multi-state claim and SAR, and name or DOB mismatch. Idaho also uses an internal Fraud Finder application for reviewing risks such as suspicious IP addresses, bank accounts, and multiple addresses.
 - How the risk scoring elements and/or prioritization elements are weighted.
Idaho uses IDH scoring elements for prioritization.
 - How the state evaluates the weights based on false positives and negatives.
Idaho evaluates each one on an individual basis for validity.
 - How risk scoring elements and/or prioritization elements are updated.
Idaho uses the webservice with IDH to ensure all elements are updated.
 - How the state ensures the fraud risk scoring and/or prioritization of cases does not negatively affect legitimate claimants.
Idaho individually reviews each one and only the claims that are suspicious or potentially fraudulent are flagged in the system. Claimants that are currently filing are prioritized in an effort to reduce the amount of any improper payments.

- Include details on how the state measures claimants' usage of both digital and non-digital identity verification options, how the state reviews digital services for false positive and false negatives, and how the state ensures legitimate claimants have alternative paths to prove their identity and/or resolve issues, including providing a possible recourse.
Identify verification starts with Idaho's partnership with ID.me, our trusted authentication vendor. Claimants must pass ID.me each time they file an initial claim, log into our claimant portal or do their weekly certification. Idaho is able to monitor the use of IDme services at will. In addition to IDme, Idaho monitors activity and conducts crossmatches in our Fraud Finder application. Claims that indicate a potential false positive are manually reviewed by staff. Idaho has staff members available to answer the phones lines throughout the workweek to answer questions, address issues, and provide guidance on the claim filing process. Claimants who are unwilling or unable to utilize digital ID verification are able to verify in-person if they choose.

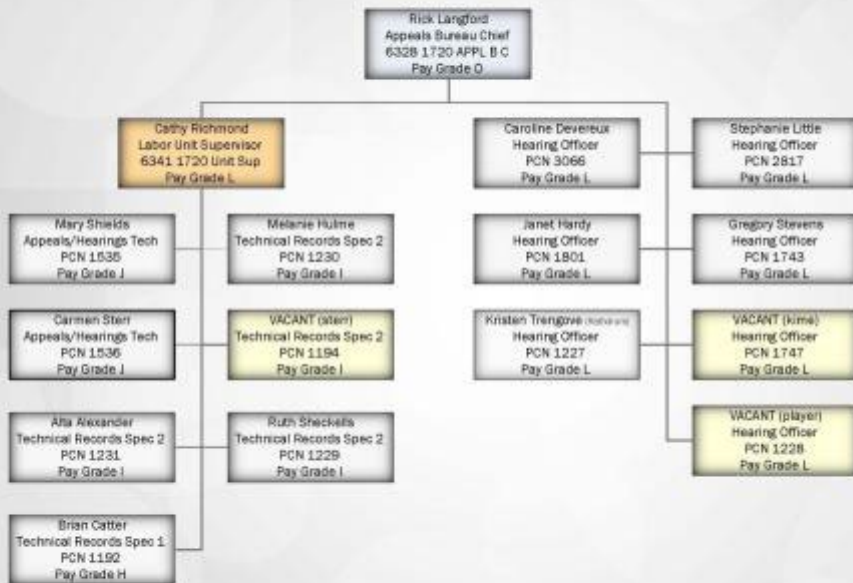
- **(Topic #7) – State plans and actions to mitigate negative consequences for victims of UI ID fraud, including ensuring simplified processes to remove the victim’s liability for overpayments resulting from ID fraud.**
 - Include details regarding how the state provides a reporting mechanism for UI ID fraud on their websites, communicates status updates for such investigations, and takes action to protect the victim when the state determines that UI ID fraud has occurred (see UIPL No. 11-23 for more details on protecting victims of ID fraud).
Idaho has a website that allows individuals to provide tips on UI fraud, including reporting ID fraud. Idaho also has dedicated phone staff that are able assist with individuals reporting ID fraud and with victims of ID fraud. Idaho has an offline system that allows victims of ID fraud to securely file for and receive UI benefits. The offline system requires manual intervention when filing the initial claim and each weekly certification. This provides an added layer of oversight and security for those individuals that were victims of identity theft. It also allows Idaho to accurately track weekly certifications and payments made to the victim separately from those associated with a bad actor.
 - Include the state’s procedures for mitigating negative impacts on the UI ID fraud victim (e.g., establishing a pseudo claim record, temporarily marking the overpayment as “uncollectible”, etc.).
When Idaho is confident that a claimant is a victim of identity fraud, Idaho will withhold fraudulent information from overpayments and Form 1099-Gs. Idaho codes the overpayment as uncollectable for the victim of the fraud.
- **(Topic #8) – If the state has not provided complete and accurate overpayment reporting on the ETA 227 reports (Overpayment Detection and Recovery Activities), and the ETA 902P report (Pandemic Unemployment Assistance Activities), the state must provide information on plans for improvement, including timeframes and milestones, for addressing the issue and ensuring complete, accurate, and timely reporting in FY 2024.**
 - If the state has submitted all data for the ETA 227 or 902P reports, this section is not applicable, and the state can input “N/A”.
N/A: Idaho has submitted all ETA 227 and 902P reports. Idaho will focus on data validation during FFY 2024 and will review reports throughout that process to verify accuracy. If deficiencies are identified, Idaho will take steps to correct the deficiencies and submit amended reports as quickly as possible.

6. ORGANIZATIONAL CHART

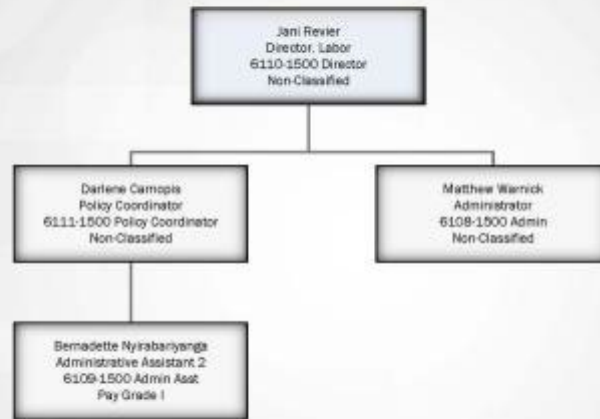
The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.



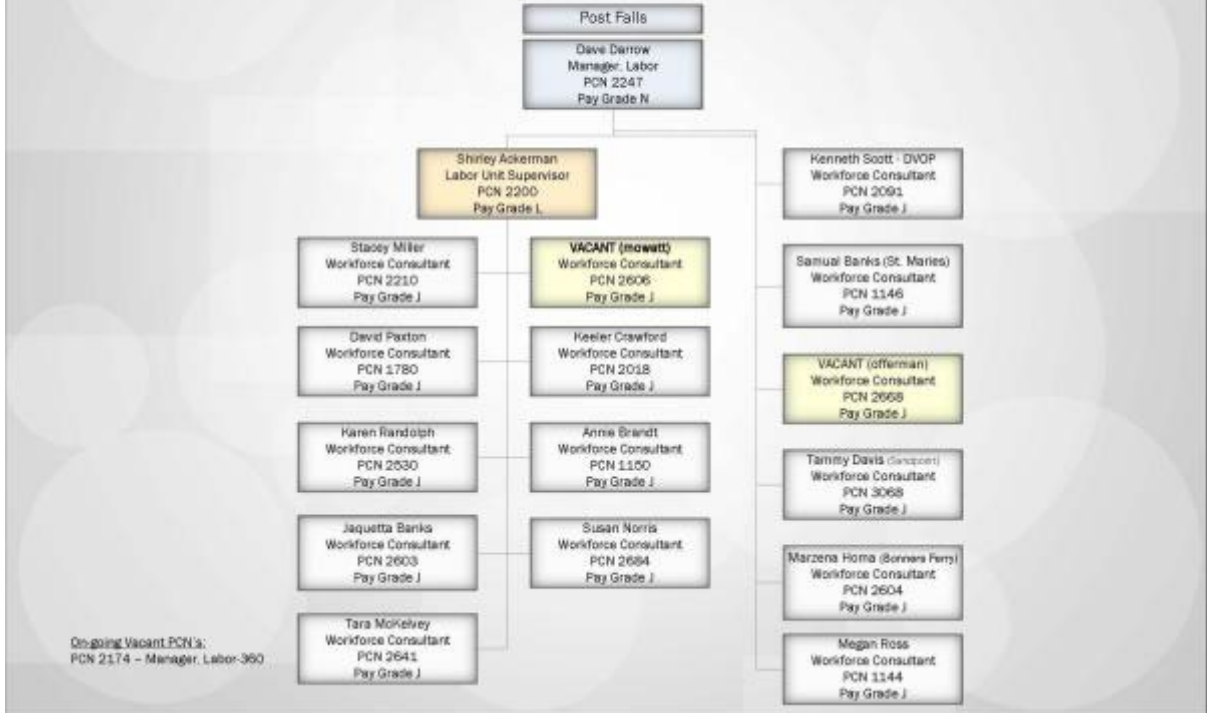
Idaho Department of Labor
 Appeals Bureau – 0720
 Michael Johnson – Administrator
 16.0 FTP
 Revised: November 30, 2023



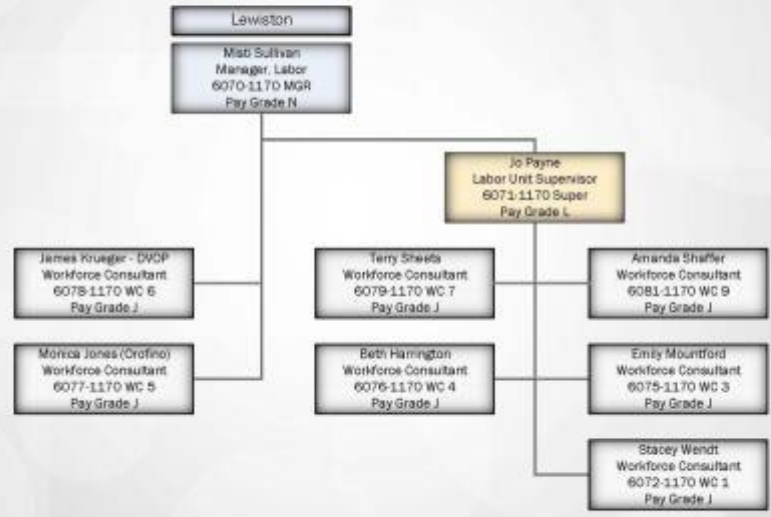
Idaho Department of Labor
Director's Office - 0500
4 FTP
Revised: August 18, 2023



Idaho Department of Labor
 Region 1 Local Offices
 Kristyn Carr, Administrator
 Kellye Sharp - Area Manager
 18.0 FTP
 Revised: December 14, 2023

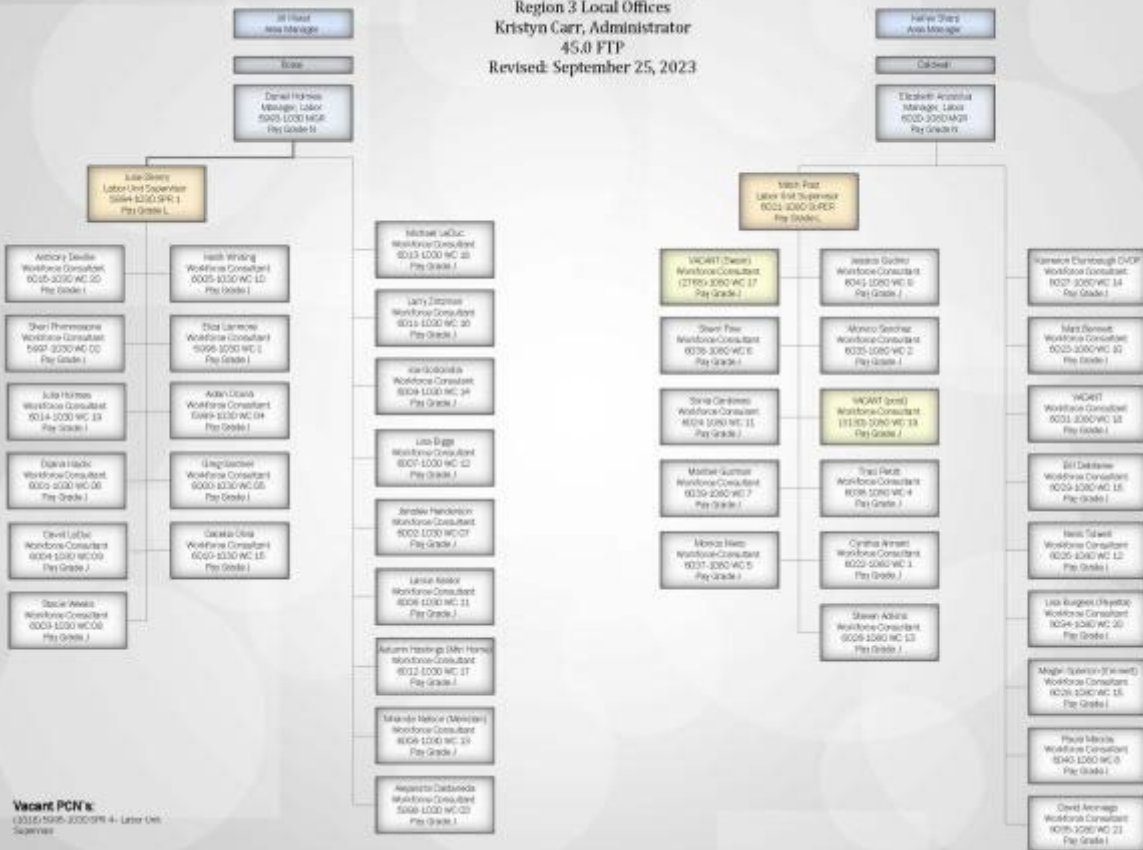


Idaho Department of Labor
 Region 2 Local Office
 Kristyn Carr – Administrator
 Kellye Sharp, Area Manager
 12.0 FTP
 Revised: December 14, 2023



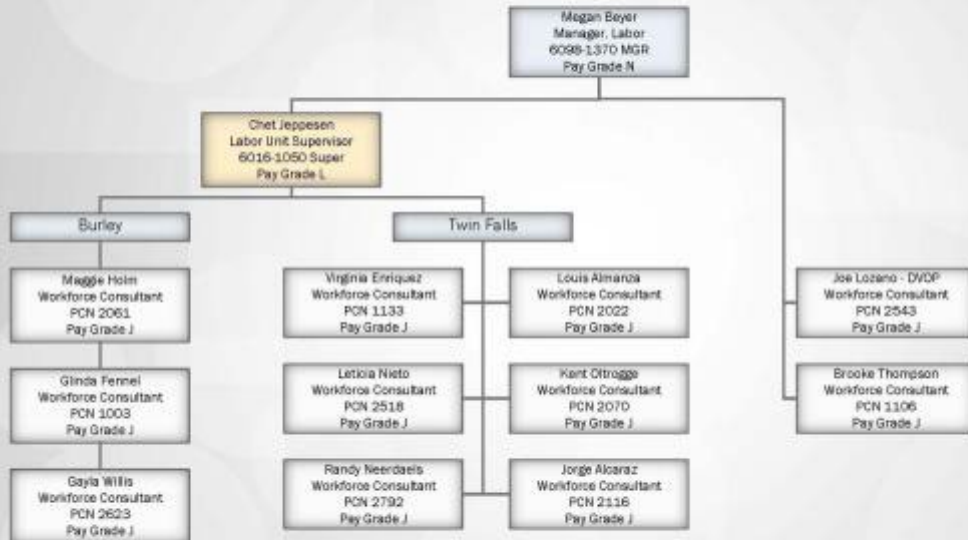
Ongoing Vacant PCR's:
 (2005) 1170 WC 8 Workforce Consultant
 (2806) 1170 WC 10 Workforce Consultant
 (1145) 1170 WC 2 Workforce Consultant

Idaho Department of Labor
 Region 3 Local Offices
 Kristyn Carr, Administrator
 45.0 FTP
 Revised: September 25, 2023



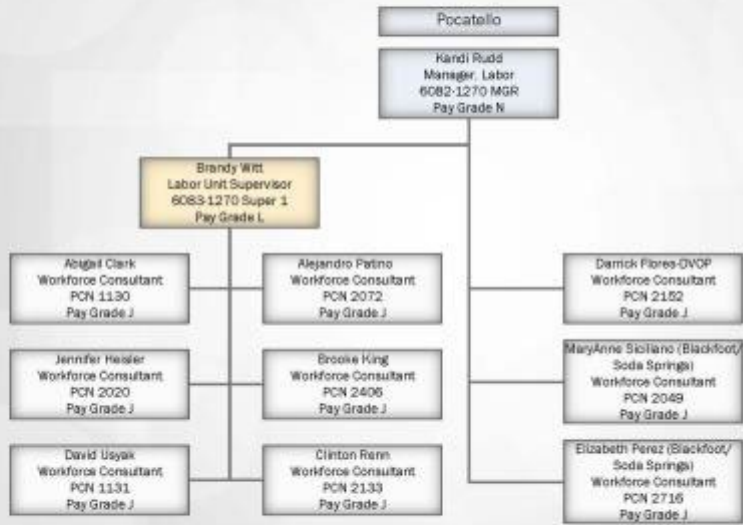
Vacant PCN's:
 13315 1000 W-14 - Labor Unit Supervisor

Idaho Department of Labor
 Region 4 Local Offices
 Kristyn Carr, Administrator
 Jill Kleist - Area Manager
 14.0 FTP
 Revised: September 25, 2023

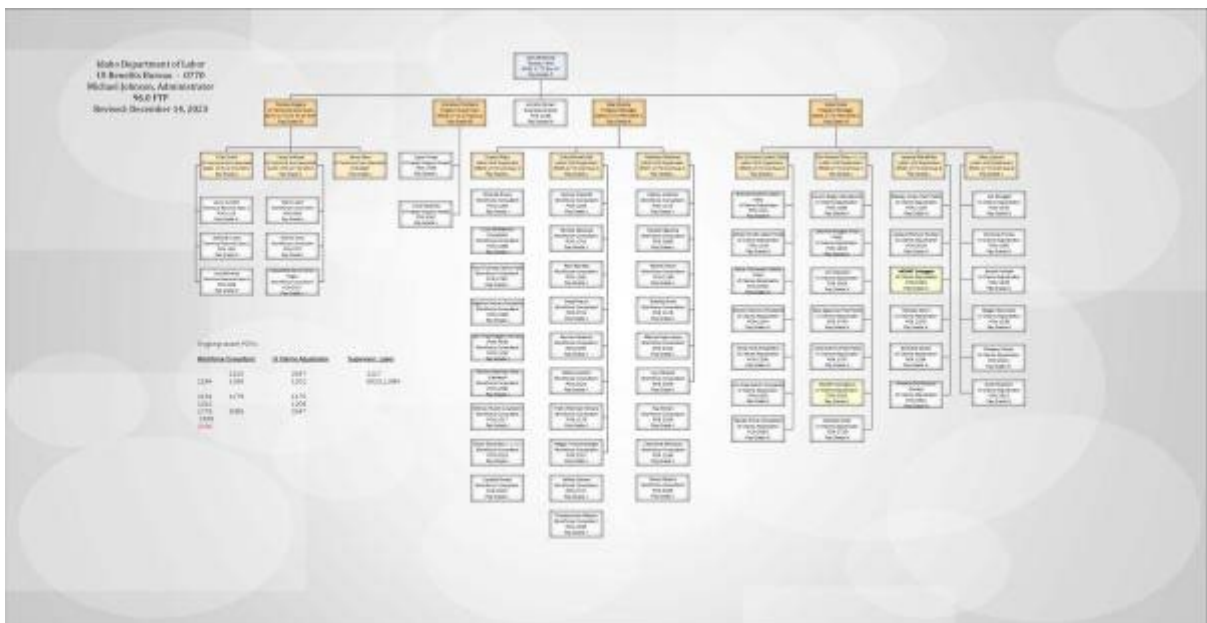
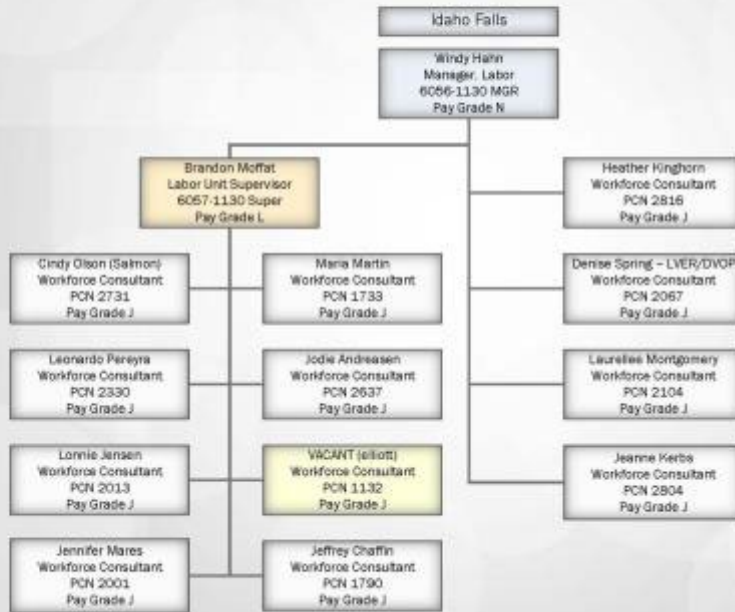


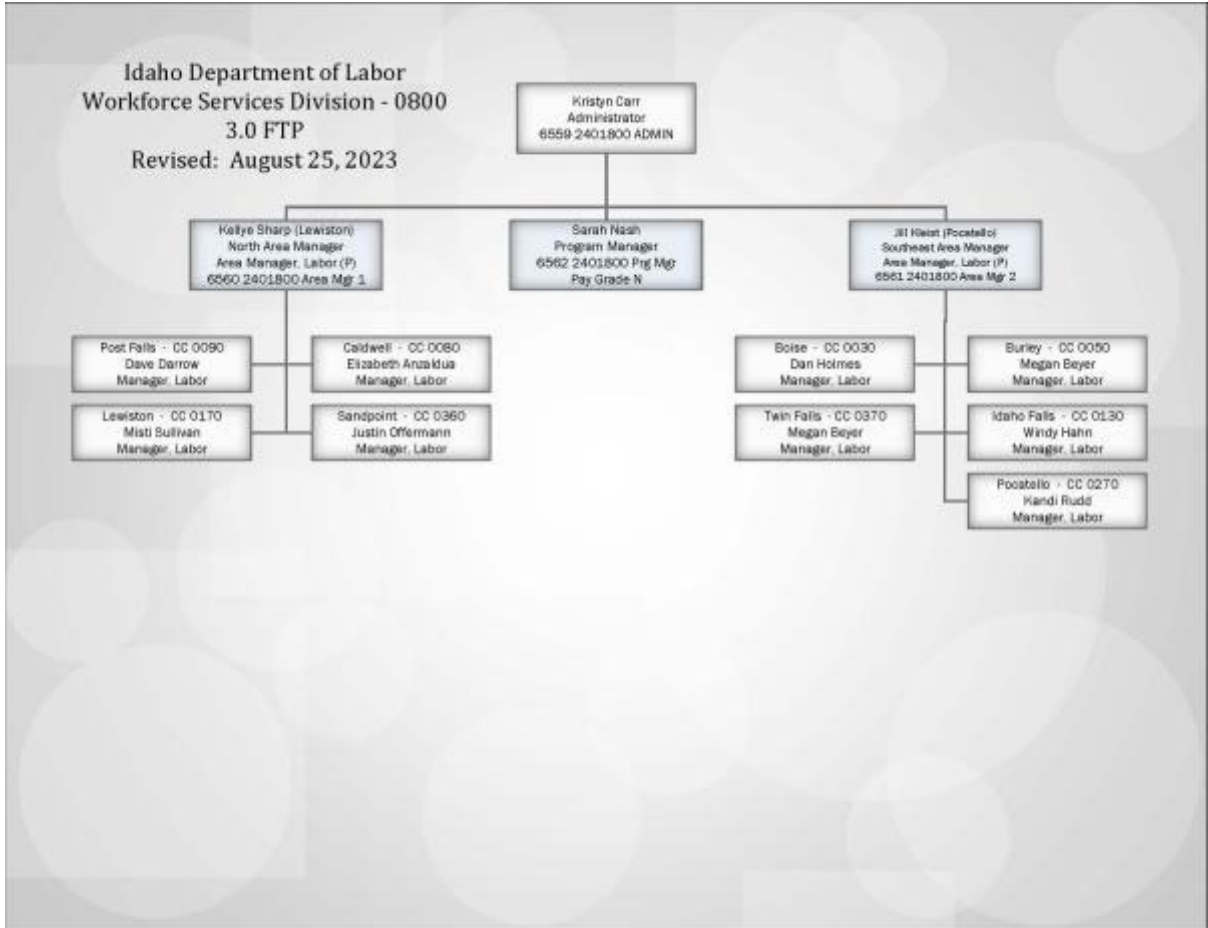
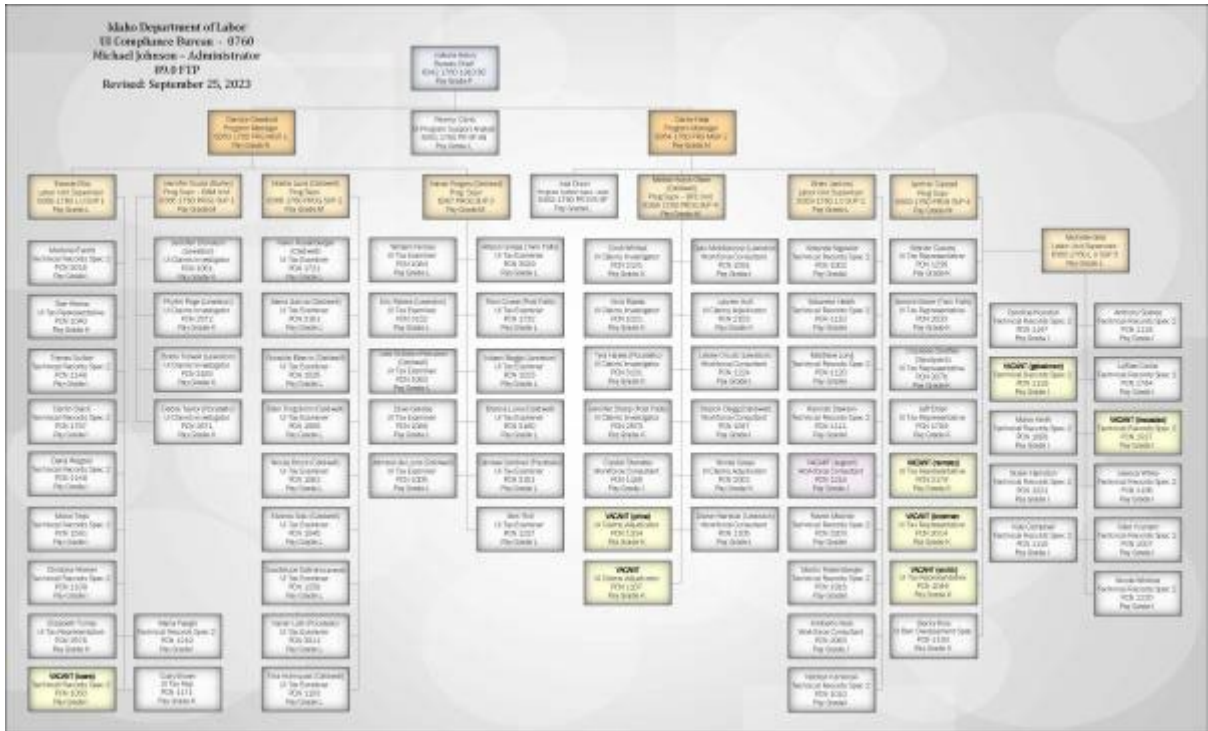
On Going PCN's
 1803 - Labor Unit Supervisor

Idaho Department of Labor
 Region 5 Local Offices
 Kristyn Carr, Administrator
 Jill Kleist - Area Manager
 11.0 FTP
 Revised: November 1, 2023



Idaho Department of Labor
 Region 6 Local Offices
 Kristyn Carr, Administrator
 Jill Kleist – Area Manager
 14.0 FTP
 Revised: September 25, 2023





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.

**U.S. Department of Labor
SQSP SIGNATURE PAGE**

OMB Control No.: 1205-0132

Expiration Date: 02/29/2024

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEAR FFY 2024	STATE IDAHO
UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE		
<p>This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and</p> <p align="center">_____ IDAHO DEPARTMENT OF LABOR (NAME OF STATE AGENCY)</p> <p>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.</p> <p>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.</p>		
TYPED NAME AND TITLE	SIGNATURE	DATE
JANI REVIER, DIRECTOR _____ STATE ADMINISTRATOR (print name)		11/6/2023
_____ DOL – REGIONAL OFFICE APPROVING OFFICIAL (print name)		
_____ DOL – NATIONAL OFFICE APPROVING OFFICIAL (print name) (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 first 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 first 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 first 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 (i.e., "supersectors"): Below is the number of jobs per targeted industry and the growth over the past six y

SCSEP Table 1: Workforce Development Council's Target Industries

Supersectors	2010	2020	2022	2010-20, Numeric Change	2020-22, Numeric Change	2020-22, Percent Change (Percent rounded to the nearest percentage)
Construction	31,200	55,900	66,000	24,700	10,100	18%
Education and health services	83,100	112,600	121,500	29,500	8,900	8%
Professional and business services	75,600	98,700	107,600	23,100	8,900	9%
Leisure and hospitality	57,900	75,300	89,100	17,400	13,800	18%

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	2020 Employment	2030 Projected Employment	Total Annual Openings (2022)	Median Hourly Wage
Retail Salespersons	25,032	27,128	6,129	\$16.75
Cashiers	17,708	18,545		\$13.25
Waiter and Waitresses	12,576	14,730		\$14.59
Customer Service Representatives	18,409	20,478	6,594	\$17.95
Food Preparation and Serving Workers, Including fast Food	14,803	17,243	348	\$13.42
Farmers, Ranchers, and Other Agricultural Managers	8,828	9,971	205	\$34.85
Office Clerks, General	18,336	21,206	891	\$17.50
General and	14,152	16,331	3,431	\$37.84

Occupation	2020 Employment	2030 Projected Employment	Total Annual Openings (2022)	Median Hourly Wage
Operations Managers				
Registered Nurses	15,352	18,402	8,922	\$37.79
Heavy and Tractor-Trailer Truck Drivers	14,440	15,403	3,519	\$24.48

* Annual Openings include openings due to growth and replacement needs

SOURCE: Idaho Department of Labor: lmi.idaho.gov/occupations-in-demand

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))

SCSEP Table 3: High Demand Jobs and Active Training Host Sites

Host Agency Types	Number of Active Sites	High Demand Skill Sets
Social Assistance	12	Customer Service Representatives, Office Clerks, Administrative Assistants
Stores	3	Customer Service Representatives, Office Clerks, Administrative Assistants, Maintenance and Repair Workers
Meal Sites/Food Banks	1	Customer Service Representatives, Office Clerks, Administrative Assistants
Senior Center	3	Customer Service Representatives, Office Clerks, Administrative Assistants

Source: Grantee Performance Management System (GPMS), Idaho SCSEP

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
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 GRANTEEES 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. ICOA will continue to uphold the statutes developed in the MOU for the upcoming WIOA State Plan.

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 has built the agreement roles and responsibilities into statewide contractor reviews. These reviews will be conducted on an ongoing basis between ICOA and its subrecipient, Easterseals-Goodwill.

B. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEEES 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 continue coordinating 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 and/or gain information available through their local AAA's such as administrative assistants, food service, health care, housing, recreation, and social service agencies. SCSEP Employment Specialists can meet with the AAA directors in each of ICOA's six planning and service areas.
 - ICOA's SCSEP contractor will provide eligibility training and establish referral protocols with the AAAs and coordinate regional resources and outreach activities. Training can be conducted by ICOA and/or ESGW staff.

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 coordinate information sharing with the following WIOA Advisory Groups for resource sharing and outreach via phone, email, and/or in-person meetings:

- 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

Additional collaboration will be coordinated with ICOA's stakeholders such as, but not limited to: senior meal sites, home delivered meal services, tribal leaders, Commodity Supplemental Food Program (CSFP) partners, and other AAA-contracted programs

Planned Actions:

- ICOA will plan to collaborate with WIOA Advisory Group partners to share information about the SCSEP program within their internal and external stakeholders
- ICOA will connect ESGW's employment specialists and/or other support staff with ICOA's six contracted Area Agencies on Aging (AAA) across the state to conduct training about SCSEP. Additionally, ICOA will refer
- ICOA's SCSEP contractor will provide training in regard to conducting referrals to 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 will continue participating 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 has worked with the Idaho Department of Labor to develop a standardized Memorandum of Understanding between state organizations and contracted providers.

Planned Actions:

- As needed, 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 continue to conduct SCSEP outreach to economic development offices located in rural counties with persistent underemployment.

Planned Actions:

ICOA's SCSEP contractor will continue to provide SCSEP outreach to local economic development offices in rural counties with persistent underemployment: Bonneville, Boundary, Cassia, Clearwater, Elmore, Franklin, Fremont, Jefferson, Jerome, Kootenai, Lemhi, Minidoka, Nez Perce.

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:

ICOA's SCSEP contractor will recruit nonprofit Health Care and Advanced Manufacturing organizations to participate as Host Agencies and/or prospective employers and prepare participants to compete for these job positions. Due to internal organizational changes with ICOA's SCSEP contractor, ICOA will work with to obtain monthly business outreach information to identify business recruitment activities and how to improve outreach efficacy.

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:

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 levels.

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:

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 meet or exceed “Employment Rate – 2nd Quarter after Exit” and “Employment Rate – 4th Quarter after Exit” levels. In the most recent program years (2021 and 2022), ICOA achieved the following rates:

PY 2021:

- Employment Rate – 2nd Quarter after Exit: 26.3%
- Employment Rate – 4th Quarter after Exit: 21.4%

PY 2022

- Employment Rate – 2nd Quarter after Exit: 22.2%
- Employment Rate – 4th Quarter after Exit: 13.6%

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 21	PY 21	PY 22	PY 22
Performance Measure	Goal	Performance	Goal	Performance
Common Measures Employment Rate – 2 nd Quarter after Exit	25.5%	26.3%	30.2%	22.2%
Common Measures Employment Rate – 4 th Quarter after Exit	19.8%	21.4%	22.8%	13.6%

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 USDOLS's Equitable Distribution level and determines the underserved areas to be targeted by the SCSEP contractor. Currently there are 17 counties that are underserved and 4 counties that are overserved.

SCSEP Table 8: SCSEP Authorized Positions by County

Urban and Rural Counties	2022 Authorized Positions	2022 Current Under Served (3 rd Quarter)	2022 Current Over Served (3 rd Quarter)
ADA (U)	3	-2	0
ADAMS (R)	0	0	0
BANNOCK (U)	0	0	1
BEAR LAKE (R)	0	0	0
BENEWAH (U)	0	0	0
BINGHAM (R)	0	0	0
BLAINE	0	0	0
BOISE (R)	0	0	0
BONNER (R)	2	0	1
BONNEVILLE (U)	2	-1	0
BOUNDARY (R)	1	-1	0
BUTTE (R)	0	0	0
CAMAS (R)	0	0	0
CANYON (U)	4	0	0
CARIBOU (R)	0	0	0
CASSIA (R)	1	-1	0
CLARK (R)	0	0	0
CLEARWATER (R)	2	0	1
CUSTER (R)	0	0	0
ELMORE (R)	1	-1	0
FRANKLIN (R)	1	-1	0
FREMONT (R)	1	-1	0
GEM (R)	1	0	0
GOODING (R)	1	0	0

Urban and Rural Counties	2022 Authorized Positions	2022 Current Under Served (3 rd Quarter)	2022 Current Over Served (3 rd Quarter)
IDAHO (R)	0	0	0
JEFFERSON (R)	2	-2	0
JEROME (R)	2	-2	0
KOOTENAI (U)	1	-1	0
LATAH (U)	1	0	0
LEMHI (R)	1	-1	0
LEWIS (R)	0	0	0
LINCOLN (R)	0	0	0
MADISON (U)	0	0	0
MINIDOKA (R)	3	-3	0
NEZ PERCE (U)	1	-1	0
ONEIDA (R)	0	0	0
OWYHEE (R)	2	-1	0
PAYETTE (R)	4	-4	0
POWER (R)	0	0	0
SHOSHONE (R)	2	0	0
TETON (R)	0	0	0
TWIN FALLS (U)	2	0	5
VALLEY (R)	1	-1	0
WASHINGTON (R)	2	-1	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.

- ICOA previously used data from www.scseped.org to identify changes in performance and areas that are underserved or have no positions. www.scseped.org is no longer a functioning website; therefore, USDOL sends each SCSEP state grantee their respective data for equitable distribution. ICOA will use this data when it becomes available annually by USDOL.

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

Strategy: ICOA will continue adhering to the developed policy to meet the USDOL's equitable distribution level and focus on increasing enrollment in the underserved areas.

Planned Action:

- Adhere to SCSEP policy that sets maximum participation levels and transition from overenrolled areas to underserved.
- The Policy has been submitted with the PY2018 grant and incorporated into the SCSEP contract.
- ICOA will work closely with the current national SCSEP grantee, Easterseals-Goodwill, to negotiate swaps for participant slots, if needed.

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 counties in which there are underserved and/or overserved participants, ICOA will work with the federal SCSEP contractor in Idaho to determine if a position transfer would allow both programs to meet USDOL's goals. (Note: the current state and federal SCSEP contractor in Idaho is Easterseals-Goodwill. This relationship ensures that transfers between state and federal participants, or vice versa, are executed in a coordinated manner.

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	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Ada (U)	118,760	23.38%	6,395	33,350	2,691	1,552
Adams (R)	2,061	0.41%	130	N/A	5	N/A
Bannock (U)	21,774	4.29%	1,488	1,694	445	345
Bear Lake (R)	2,030	0.40%	103	N/A	17	N/A
Benewah (U)	3,589	0.71%	221	N/A	20	N/A
Bingham (R)	11,736	2.31%	694	7,197	286	N/A
Blaine (R)	7,698	1.52%	341	N/A	457	N/A
Boise (R)	3,505	0.69%	192	N/A	5	N/A
Bonner (R)	18,027	3.55%	1,406	2,050	46	N/A
Bonneville (U)	27,177	5.35%	1,426	10,181	599	N/A
Boundary (R)	4,378	0.86%	300	N/A	0	N/A
Butte (R)	1,035	0.20%	51	N/A	1	N/A
Camas (R)	411	0.08%	48	N/A	8	N/A
Canyon (U)	52,290	10.29%	3,259	39,392	2,036	1,263
Caribou (R)	2,051	0.40%	67	N/A	44	N/A
Cassia (R)	5,891	1.16%	221	N/A	433	N/A
Clark (R)	215	0.04%	4	N/A	78	N/A
Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
Custer (R)	1,979	0.39%	103	N/A	9	N/A
Elmore (R)	6,518	1.28%	534	N/A	339	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Franklin (R)	3,389	0.67%	116	N/A	54	N/A
Fremont (R)	3,859	0.76%	145	N/A	147	N/A
Gem (R)	6,352	1.25%	435	N/A	233	N/A
Gooding (R)	4,452	0.88%	221	N/A	305	N/A
Idaho (R)	7,229	1.42%	569	N/A	51	N/A
Jefferson (R)	6,246	1.23%	209	N/A	174	N/A
Jerome (R)	5,685	1.12%	353	N/A	800	N/A
Kootenai (U)	50,603	9.96%	2,174	8,338	456	814
Latah (U)	9,377	1.85%	431	1,620	78	N/A
Lemhi (R)	3,674	0.72%	268	N/A	18	N/A
Lewis (R)	1,613	0.32%	164	N/A	8	N/A
Lincoln (R)	1,340	0.26%	111	N/A	130	N/A
Madison (U)	4,888	0.96%	184	N/A	98	N/A
Minidoka (R)	5,808	1.14%	372	N/A	573	N/A
Nez Perce (U)	13,464	2.65%	917	2,735	74	N/A
Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
Shoshone (R)	4,958	0.96%	302	N/A	77	N/A
Teton (R)	2,789	0.55%	59	N/A	121	N/A
Twin Falls (U)	22,501	4.43%	1,533	7,808	796	425
Valley (R)	4,901	0.96%	300	N/A	20	N/A
Washington (R)	3,950	0.78%	209	N/A	166	N/A

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 of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

Sources: U.S. Bureau of Census, American Community Survey 5-Year Estimates, Population 60 Years And Over In The United States (2020).

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U.S. Bureau of Census, American Community Survey 1-Year Estimates, Limited English-Speaking Households (2019).

U.S. Bureau of Census, American Community Survey 1-Year Estimates, Age by Disability Status by Poverty Status (2019).

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	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Ada (U)	118,760	23.38%	6,395	33,350	2,691	1,552
Adams (R)	2,061	0.41%	130	N/A	5	N/A
Bannock (U)	21,774	4.29%	1,488	1,694	445	345
Bear Lake (R)	2,030	0.40%	103	N/A	17	N/A
Benewah (U)	3,589	0.71%	221	N/A	20	N/A
Bingham (R)	11,736	2.31%	694	7,197	286	N/A
Blaine (R)	7,698	1.52%	341	N/A	457	N/A
Boise (R)	3,505	0.69%	192	N/A	5	N/A
Bonner (R)	18,027	3.55%	1,406	2,050	46	N/A
Bonneville (U)	27,177	5.35%	1,426	10,181	599	N/A
Boundary (R)	4,378	0.86%	300	N/A	0	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Butte (R)	1,035	0.20%	51	N/A	1	N/A
Camas (R)	411	0.08%	48	N/A	8	N/A
Canyon (U)	52,290	10.29%	3,259	39,392	2,036	1,263
Caribou (R)	2,051	0.40%	67	N/A	44	N/A
Cassia (R)	5,891	1.16%	221	N/A	433	N/A
Clark (R)	215	0.04%	4	N/A	78	N/A
Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
Custer (R)	1,979	0.39%	103	N/A	9	N/A
Elmore (R)	6,518	1.28%	534	N/A	339	N/A
Franklin (R)	3,389	0.67%	116	N/A	54	N/A
Fremont (R)	3,859	0.76%	145	N/A	147	N/A
Gem (R)	6,352	1.25%	435	N/A	233	N/A
Gooding (R)	4,452	0.88%	221	N/A	305	N/A
Idaho (R)	7,229	1.42%	569	N/A	51	N/A
Jefferson (R)	6,246	1.23%	209	N/A	174	N/A
Jerome (R)	5,685	1.12%	353	N/A	800	N/A
Kootenai (U)	50,603	9.96%	2,174	8,338	456	814
Latah (U)	9,377	1.85%	431	1,620	78	N/A
Lemhi (R)	3,674	0.72%	268	N/A	18	N/A
Lewis (R)	1,613	0.32%	164	N/A	8	N/A
Lincoln (R)	1,340	0.26%	111	N/A	130	N/A
Madison (U)	4,888	0.96%	184	N/A	98	N/A
Minidoka (R)	5,808	1.14%	372	N/A	573	N/A
Nez Perce (U)	13,464	2.65%	917	2,735	74	N/A
Oneida (R)	1,475	0.29%	73	N/A	36	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
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Power (R)	2,225	0.44%	50	N/A	230	N/A
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Valley (R)	4,901	0.96%	300	N/A	20	N/A
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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 of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

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B. HAVE THE GREATEST ECONOMIC NEED

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Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
Shoshone (R)	4,958	0.96%	302	N/A	77	N/A
Teton (R)	2,789	0.55%	59	N/A	121	N/A
Twin Falls (U)	22,501	4.43%	1,533	7,808	796	425
Valley (R)	4,901	0.96%	300	N/A	20	N/A
Washington (R)	3,950	0.78%	209	N/A	166	N/A

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 of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

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C. ARE MINORITIES

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Ada (U)	118,760	23.38%	6,395	33,350	2,691	1,552
Adams (R)	2,061	0.41%	130	N/A	5	N/A
Bannock (U)	21,774	4.29%	1,488	1,694	445	345
Bear Lake (R)	2,030	0.40%	103	N/A	17	N/A
Benewah (U)	3,589	0.71%	221	N/A	20	N/A
Bingham (R)	11,736	2.31%	694	7,197	286	N/A
Blaine (R)	7,698	1.52%	341	N/A	457	N/A
Boise (R)	3,505	0.69%	192	N/A	5	N/A
Bonner (R)	18,027	3.55%	1,406	2,050	46	N/A
Bonneville (U)	27,177	5.35%	1,426	10,181	599	N/A
Boundary (R)	4,378	0.86%	300	N/A	0	N/A
Butte (R)	1,035	0.20%	51	N/A	1	N/A
Camas (R)	411	0.08%	48	N/A	8	N/A
Canyon (U)	52,290	10.29%	3,259	39,392	2,036	1,263
Caribou (R)	2,051	0.40%	67	N/A	44	N/A
Cassia (R)	5,891	1.16%	221	N/A	433	N/A
Clark (R)	215	0.04%	4	N/A	78	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
Custer (R)	1,979	0.39%	103	N/A	9	N/A
Elmore (R)	6,518	1.28%	534	N/A	339	N/A
Franklin (R)	3,389	0.67%	116	N/A	54	N/A
Fremont (R)	3,859	0.76%	145	N/A	147	N/A
Gem (R)	6,352	1.25%	435	N/A	233	N/A
Gooding (R)	4,452	0.88%	221	N/A	305	N/A
Idaho (R)	7,229	1.42%	569	N/A	51	N/A
Jefferson (R)	6,246	1.23%	209	N/A	174	N/A
Jerome (R)	5,685	1.12%	353	N/A	800	N/A
Kootenai (U)	50,603	9.96%	2,174	8,338	456	814
Latah (U)	9,377	1.85%	431	1,620	78	N/A
Lemhi (R)	3,674	0.72%	268	N/A	18	N/A
Lewis (R)	1,613	0.32%	164	N/A	8	N/A
Lincoln (R)	1,340	0.26%	111	N/A	130	N/A
Madison (U)	4,888	0.96%	184	N/A	98	N/A
Minidoka (R)	5,808	1.14%	372	N/A	573	N/A
Nez Perce (U)	13,464	2.65%	917	2,735	74	N/A
Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
Shoshone (R)	4,958	0.96%	302	N/A	77	N/A
Teton (R)	2,789	0.55%	59	N/A	121	N/A
Twin Falls (U)	22,501	4.43%	1,533	7,808	796	425

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Valley (R)	4,901	0.96%	300	N/A	20	N/A
Washington (R)	3,950	0.78%	209	N/A	166	N/A

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 of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

Sources: U.S. Bureau of Census, American Community Survey 5-Year Estimates, Population 60 Years And Over In The United States (2020).

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U.S. Bureau of Census, American Community Survey 1-Year Estimates, Limited English-Speaking Households (2019).

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D. ARE LIMITED ENGLISH PROFICIENT

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Clark (R)	215	0.04%	4	N/A	78	N/A
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Custer (R)	1,979	0.39%	103	N/A	9	N/A
Elmore (R)	6,518	1.28%	534	N/A	339	N/A
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E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

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U.S. Bureau of Census, American Community Survey 1-Year Estimates, Age by Disability Status by Poverty Status (2019).

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

On April 15th, 2021, the US Department of Labor Employment & Training Administration released Training and Employment Guidance Letter No. 17-20 that provided guidance to Senior Community Service Employment Program (SCSEP) grantees regarding updates to the priority of service provisions, durational limit waiver categories, and State Plan requirements due to the passage of the Supporting Older Americans Act of 2020, which reauthorized the Older Americans Act (OAA) and included new provisions regarding certain individuals who were formerly incarcerated or under supervision following release from prison or jail. Under TEGL No. 17-20, “formerly-incarcerated individuals” are those individuals who: 1) were incarcerated and released from prison or jail at any point within the last five years; or 2) were under supervision at any point within the last five years, following release from prison or jail. The five-year period specified in this definition refers to the five years preceding the date of first determination of program eligibility, as described in 20 CFR 641.505, for initial enrollment into the program.

The following is statewide data for Idaho (per the US Department of Justice, Office of Justice Programs, "Census of Jails, 2005 - 2019 - Statistical Tables" report. Findings in this report are based on the 2005, 2013, and 2019 Census of Jails (COJ) and are statewide (county specific data is unavailable) and the most up-to-date version available:

Idaho	
Confined inmates in local jails - 2019	4,250
Average daily admissions in Idaho jails - 2019	113,450
Percent of Idaho jail facilities that provide prerelease/work release	88.0%
Percentage of Idaho prisoners aged 55+ (2015)	10.74%

Idaho	
Number of Idaho prisoners aged 55+ (2015)	781

References:

Zhen Zeng, Ph.D., and Todd D. Minton, BJS Statisticians. US Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. "Census of Jails, 2005 - 2019 - Statistical Tables". October 2021.

Widra, Emily. Prison Policy Initiative. "Since you asked: How many people aged 55 or older are in prison, by state?". May 2020.

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.

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.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	80.1%		80.1%	
Employment (Fourth Quarter After Exit)	79.8%		79.8%	
Median Earnings (Second Quarter After Exit)	\$7,175		\$7,175	
Credential Attainment Rate	70.0%		70.0%	
Measurable Skill Gains	58.2%		58.2%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM
PERFORMANCE INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	80.1%		80.1%	
Employment (Fourth Quarter After Exit)	80.1%		80.1%	
Median Earnings (Second Quarter After Exit)	\$8,236		\$8,236	
Credential Attainment Rate	69.8%		69.8%	
Measurable Skill Gains	61.1%		61.1%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE
INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	76.4%		76.4%	
Employment (Fourth Quarter After Exit)	79.8%		79.8%	
Median Earnings (Second Quarter After Exit)	\$4,765		\$4,765	
Credential	51.9%		51.9%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Attainment Rate				
Measurable Skill Gains	52.9%		52.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	66.0		66.0	
Employment (Fourth Quarter After Exit)	67.0		67.0	
Median Earnings (Second Quarter After Exit)	\$7,125		\$7,125	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	37.0	37.0	39.0	
Employment (Fourth Quarter	37.0		39.0	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
After Exit)				
Median Earnings (Second Quarter After Exit)	5200.0		5400.0	
Credential Attainment Rate	45.0		47.0	
Measurable Skill Gains	31.0		33.0	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to

report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.9%		64.9%	
Employment (Fourth Quarter After Exit)	62.7%		62.7%	
Median Earnings (Second Quarter After Exit)	\$4,951		\$5,075	
Credential Attainment Rate	63.7%		65.2%	
Measurable Skill Gains	57.5%		58.9%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.9%		64.9%	
Employment (Fourth Quarter After Exit)	62.7%		62.7%	
Median Earnings (Second Quarter After Exit)	\$4,951		\$5,075	
Credential Attainment Rate	63.7%		65.2%	
Measurable Skill Gains	57.5%		58.9%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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.

Additional Indicators of Performance
N/A

OTHER APPENDICES

N/A