WIOA STATE PLAN FOR THE STATE OF RHODE ISLAND FY-2018

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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),
- the Wagner-Peyser Act program (Wagner-Peyser Act, as amended by title III), and
- the Vocational Rehabilitation program (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 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 and III 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 (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 Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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* 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 and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 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, and
- 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 and Innovation 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.* States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

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* 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

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 Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program. No

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. Yes

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined State 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 (20 U.S.C. 2301 et seq.) No

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

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 Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) No

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))] Yes

II. STRATEGIC ELEMENTS

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

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATION

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 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

The successful implementation of the strategies outlined above begins with a thorough understanding of the Rhode Island economy and existing workforce development activities. According to the study, Rhode Island Innovates: A Competitive Strategy for the Ocean State, conducted by the Battelle Technology Partnership Practice, Metropolitan Policy Program at Brookings, Monitor Deloitte, and TEConomy Partners, LLC (2016), Rhode Island's economy is adrift. The State is 2.1% below its pre-recession employment level, and has lost momentum in many of its highest value export industries, leading to a lower rate of job production and business activity across the State's economy. The unemployment level was higher and declined more slowly than the rest of New England. The deterioration of the State's growth capacity has led to output and job growth numbers that are below the national average and an increase in income inequality.

Historically, Rhode Island's economy relied heavily on manufacturing. Jewelry, toy and textile manufacturing that were only moderately advanced made up a large portion of the manufacturing

base, and were vulnerable to offshoring. While total advanced industry employment has declined at the fastest rate in the nation from 1980 (134,500 jobs) to 2013 (68,600 jobs), Rhode Island's advanced business service output and employment growth was the highest in New England from 2010 to 2013. Advanced business services include services modern corporations rely on for back-office and headquarter operations such as web services, data processing, marketing, client management, human resources, financial services, and strategy and product development support. However, growth in advanced business services has only partially offset the decline of the manufacturing base. Advanced business services has only added about 12,000 jobs since 1980, making up for a small fraction of the 50,000 jobs lost in manufacturing. It is a bleak picture, but one that can be changed if Rhode Island focuses on making sure workers have the skills they need to succeed in industries that will grow the economy.

In the first step of its analysis, the report finds that Rhode Island "possesses an intricate, interrelated array of detailed industries that can be rolled up into broader clusters of promising industries." There are 33 groups of these interrelated industries that serve as building blocks for industry clusters, which have "sizeable economic potential." These 33 groups were analyzed for their strength in three measures: high relative concentration compared to the national average, job creation, and relative employment growth compared to national trends.

The researchers then collapsed the 33 industry groups into eight broader industry clusters. The 33 groups, individually, did not have the scale needed to drive growth on their own. The median size of the industry groups is about 2,000 jobs. It is notable that the largest advanced industry group, computer systems and software, contained less than 7,000 workers, illustrating the lack of scale.

The eight industry clusters are: software systems and internet; instruments, electronics, and defense; advanced business services; health and life sciences; marine, materials, and machinery; design, consumer products, and food processing; arts, education, hospitality, and tourism; and, transportation, distribution, and logistics. Only two (marine, materials, and machinery and advanced business services) have outpaced national growth rates, while transportation, distribution, and logistics has kept pace with national growth. The remaining clusters were below national growth, or declined at a greater rate than the national level.

The Bureau of Labor Statistics projects that the eight industry clusters will experience significant economic output gains between 2013 and 2022, although projected employment growth is substantially lower. The researchers explain this by saying that output gains will come from high productivity gains.

Core Competencies

In the second step in the study, the researchers found "significant industry-based core competencies in eight areas relating to the state's leading clusters." Core competencies show where a state has the expertise and creative activity necessary to grow that industry. Battelle performed a "network analysis of forward patent citations" that "revealed a cohesive set of clusters arranged around a large volume of multidisciplinary ties across diverse groups of capabilities". Eight industry-led core competencies were identified: advanced polymers, films, and composites; medical technology; data processing, e-commerce, and enterprise applications; semiconductors and electronic components; pharmaceuticals and supporting organic chemistry; games, toys, and gaming equipment; plastics packaging and containers; and, valves, piping and fluid systems.

Another analysis identified 17 research institution core competencies in areas corresponding to the state's leading clusters by analyzing clusters of publication activity, areas of specialization in

publications and research funding, presence of major funding, and national reputation. The majority of the core competencies stemmed from work at Brown University or the University of Rhode Island. Nine core competencies were identified in bioscience, a strong area for the State. Rhode Island also stands out nationally in math and ocean sciences, fine arts and design (led by the Rhode Island School of Design), and culinary arts (led by Johnson & Wales).

An additional analysis assessed Rhode Island's position in relation to technology deployment across two measures: value added per employee and capacity to generate good jobs. Higher value added signify that an industry is more competitive, while a good job is defined as offering a livable wage with benefits for full-time workers who have less than a four-year degree. Five industry clusters exceeded the national level of value added per worker, which means that Brookings expects these five to expand their market share. These clusters are defense shipbuilding and maritime; design, materials, food, and custom manufacturing; advanced business services; transportation, shipping, and logistics; and, arts, education, hospitality, and tourism. Six of the clusters employ a significant share of their workforce in good jobs: marine, materials, and machinery; health and life sciences; instruments, electronics, and defense; advanced business services; software systems and internet; and, transportation, distribution, and logistics. In Rhode Island, 230 occupations are considered good jobs, accounting for 27% of employment in 2014.

In its third step, Brookings added a line of sight to the markets analysis of the industry clusters and core competency findings to find the industries that will most grow Rhode Island's economy.

This analysis outlined five high-value advanced industry growth areas and two opportunity industry growth areas that produce larger numbers of good jobs to focus on to put Rhode Island's economy back on course. The five advanced industry growth areas are: biomedical innovation; IT/software, cyber-physical systems and data analytics; defense shipbuilding and maritime; advanced business services; and, design, food and custom manufacturing. The two opportunity industry growth areas are transportation, distribution, and logistics; and, arts, education, hospitality and tourism.

Biomedical innovation accounted for 31,548 jobs in Rhode Island in 2013, with priority areas in biopharmaceuticals, medical devices and digital health. This industry growth area had a 31% higher industry concentration that the national rate, with a -0.2% job decline from 2009-2013. The study identified a broader range of opportunities in neuroscience-related therapeutics; medical devices for orthopedic, bio-sensing and neurological applications; and, health care informatics and digital innovations.

IT/software, cyber-physical systems and data analytics supported 12,538 jobs in 2013, with priority areas in data sciences and cyber-physical systems. The industry concentration was 18% higher than the nation, and saw a -3.2% job decline from 2009-2013. Opportunities are in the priority areas, as well as in autonomous underwater vehicles, remote medical device monitoring systems, environmental and energy monitoring, and smart grid infrastructure.

Defense shipbuilding and maritime was responsible for 19,107 jobs in 2013. Priority areas were submarine and boat building, ocean sciences and marine/coastal tourism. Rhode Island has an 86% higher industry concentration when compared to the nation, and saw 9.1% in jobs gains from 2009-2013.

There were 34,780 jobs in advanced business services in 2013, with back office operations as the priority area. This industry growth area has a 30% higher industry concentration than the nation, with 7.9% job growth from 2009-2013. Back office operations include web services, data

processing, marketing, client management, human resources, financial services, and strategy and product development. These operations help firms improve their competitiveness in the megalopolis marketplace.

The fifth advanced industry growth area - design, materials, food and custom manufacturing - consisted of 11,045 jobs in 2013. This is a 128% higher industry concentration than the national rate, but saw a -9.4% job decline from 2009-2013. The priority areas are product design and food processing, with a growing interest in food manufacturing.

The two opportunity industry growth areas - transportation, distribution and logistics; and arts, education, hospitality and tourism - accounted for 21,322 and 42,801 jobs in 2013, respectively. Priority areas in transportation, distribution and logistics are grocery whole-sale and warehousing and storage, including ocean shipping, rail shipping and trucking. Priority areas in arts, education, hospitality and tourism are marine/coastal tourism and colleges and universities. Transportation, distribution and logistics was the only industry growth area with a lower industry concentration than the national rate at 27%, but saw a 5.3% job gain from 2009-2013. Arts, education, hospitality and tourism had a 38% higher industry concentration than the nation, and saw 5.2% in job gains from 2009-2013.

While these seven industries are identified as potential high growth areas, they are not individually large enough to support or justify a narrowly focused economic development strategy. The manufacturing base must move from low-end advanced manufacturing to higher-value, higher-tech production in niche markets. Increases in expenditures and production on medical equipment increase the demand for industry designers, which increases industry revenue across growth areas. To take advantage of this interconnectivity, the study recommends that Rhode Island use its network of interconnected industries to align core competencies and come up with broader growth opportunities. Specifically, the authors say, "To leverage its growth opportunities Rhode Island should pursue a focused strategy of investing in the most critical advanced industries growth drivers while improving its statewide platform for growth."

The Governors Workforce Board's Biennial plan also created a projection for other high employment industries such as health care and construction. According to the report, healthcare and social assistance services comprised almost one in five jobs . Healthcare is the largest industry in Rhode Island, employing over 80,000 people and is project to increase by nearly 13,000 jobs by 2020- which is a 16% increase over 10 years and has the largest job growth in any sector well about the state average of 10.7%. Of the 80,000 employed in the healthcare industry, 47,000 are patient care jobs ranging from entry level home care staff to surgeons and nurses. An additional 10,000 workers provide administrative support and 4,500 provide cleaning and food preparation .

Additionally, the construction industry at the time of the release of the Biennial plan employed 15,943 individuals or three percent of the total working population in Rhode Island. Construction jobs have declined 15 percent since 2008 when the Building Futures construction industry skills gap study reported 22,000 workers in the state . The growing occupation in this industry are carpenters and construction laborers. In addition, new workers entering the skilled technical trades are seeking much more competition for apprenticeship openings. In those trades more than 50 percent of candidates accepted as apprentices into the skilled trades have already completed two or more college courses or have a college degree in an unrelated field.

When it comes to the regional concentrations of labor throughout the state, almost half of Rhode Island's jobs are concentrated in the Providence, Cranston and Warwick communities. One-quarter

of the state's employment is located in providence alone. Pawtucket and East Providence together contain another 10 percent of employment. This concentration of employment in a few communities points to the importance of accessible transportation to work for both employers and workers, especially for those with disabilities and significant barriers to unemployment.

Employer Needs

Educational Background

In all of these industries, the biggest need is a stable and secure workforce pipeline with individuals who have at least basic understandings of the work being performed, or at least individuals who are prepared and able to learn at work. In the Governor's Workforce Board 2013 review; Bioscience: Identifying Employer Needs, Talent Gaps, & Strategies to Grow a Stronger Bio Science Workforce in Rhode Island, Tech Collective and other bio-medical companies from across the state expressed the same concerns. Employers look to find and retain employees who offer scientific as well as business/operations skill sets. In a highly regulated and complex industry, interdisciplinary knowledge and expertise can be a factor in whether a company achieves success and growth or it does not. Every respondent to Tech Collective's Employer Survey indicated that the "Lack of skilled workers/candidates to hire" is the biggest workforce challenge at their company. Competition with other companies to hire qualified workers and retaining skilled workers were also concerns for 40% of companies. This is a direct effect of having an under-education population. According to Tech Collective, even jobs such as Computer user support require an associate's degree. Occupations which do not require more than a high school diploma are Maintenance & repair workers, glass washers, and cleaning services.[1]

In the instance of construction trades and apprenticeship-able occupations, the main issue that employers face are directly tied to the demand of the economy. Since Rhode Island is still digging out of the recession, the demand that the state saw for construction and renovation projects has yet to fully rebound. The other biggest factor is the issue of recruitment. Most of the 360 registered apprenticeship programs have zero to one apprentice at any given time cannot mount an economically effective recruitment effort.

There are eight career and technical centers in RI that could be considered a pipeline to apprenticeships. However, most career centers offer construction programs focused only on home building cabinet making and, are geographically limited with just one center is located in Providence. Further, although five of these vocational centers offer programs to adults, none offer construction programs to adult students. Three sites in Rhode Island provide post-secondary training in construction, NEIT, MTTI, and Lincoln Technology Institute. These programs can cost up to $11,000 and are therefore not appropriate for the population that is seeking to join trade occupations.[2]

In the manufacturing industries, a number of challenges were outlined in "The Manufacturing Industry: Producing Rhode Island's Future- A Report of the Manufacturing Industry Partners" produced by the Governor's workforce board, the authors outlined a number of challenges that face manufacturers across the state. Focus group participants identified a need for manufacturing internships, apprenticeships and on the-job training opportunities for high school students. The study also cites issues such as the lack of educational institutions that focus on the skills necessary to carve a career pathway in the industry. However, this issue is disconnected due to many factors. Manufacturing Industry members pointed to the closing of four Community College of Rhode Island's certificate programs in 2012 as an example. Educational institutions, in turn, cite lack of

enrollments in those programs as the cause of those closures. Businesses recruit, instead, from educational and training programs outside of Rhode Island, but are competing with other markets on salary and cost of living, making it difficult to attract those workers. The biggest indicator of why manufacturing is struggling in Rhode Island is once again tied to an aging workforce. Boston College's Center on Aging and Work found that in 2008 the median age of Rhode Island's workers was 41.3. It was reported at that time that the manufacturing industry was among the most likely to be impacted, with several manufacturing sectors reporting more than one -quarter of their workforce between the ages of 50 and 59. Furthermore, 22.7% of production workers at the time were between the ages of 50 and 59.26 Manufacturing Industry Partner members described the aging workforce as a major workforce problem they face. They are losing qualified workers who possess industry know -how, and do not have qualified workers in the pipeline to replace them.

The common theme in all of these industries is the "skills gap"- that is the phenomena of younger workers who are looking to join the workforce not having the skills that employers are looking for. According to Rhode Island Defense Industry Skill Gap Study conducted by the Ninigret partners, this issue is the biggest for Rhode Island's defense sector. Rhode Island Defense employers perceive skill gaps in applicant pools across all occupational categories in our survey: engineers, technicians, production workers, and business administration professionals. Searches for engineers and technicians are more likely to be difficult (many open positions unfilled) than searches for business administration. Fewer respondents have recently hired production workers or logisticians, but among those that did, 60% found it difficult or marginal to find candidates with the right skill sets in production and 76% for logisticians. Technical writing was rated as a critical skill gap by 60% of respondents for engineers, 59% for technicians, 28% for production workers, and 44% for business administration. A theme that emerged through employer interviews is that technical businesses need employees who can be a bridge between the business and technical worlds. For example, engineers need to be connected to the customers' needs, the techniques of the production process, and the economics of production to design for manufacturability and affordability. Teamwork and ability to communicate with co-workers ranked as one of the most frequent critical skill gaps for employers hiring technicians (46%) and also for a large minority of employers hiring engineers (35%).

The best way to produce a workforce that meets the current and future needs of Rhode Island's businesses and industries is to ensure that Rhode Island graduates an ever-increasing percentage of employees who have earned a degree from a four-year college or university, an associate's degree, or a post-secondary, industry-recognized credential. By 2020, 71% of jobs in Rhode Island will require a post-secondary degree or certification. But currently, only about 40% of Rhode Islanders aged 25 or older have such a degree. In part this is due to the reality that far too many students are graduating with a high school diploma despite not being college or career-ready. We know this because two-thirds of the students who enter the Community College of Rhode Island require remediation before they can begin to take initial credit-bearing course. We know this because the four-year graduation rate at the University of Rhode Island is 42%. At Rhode Island College, the four-year graduation rate is 14%. At CCRI, the two-year graduation rate is a mere 2%.

This projected job growth through 2022 suggests that Rhode Island will have an economy in which only 36% of all jobs will require at least some college. However, research by Georgetown University's Center on Education and the Workforce suggests that by 2020, 65% of all jobs nationwide will require at least some kind of post-secondary education or training. In other words, beyond the 36% of jobs requiring some college, another roughly 30% can be expected to require some other sort of post-secondary preparation. Only about one-third of the state's workers will be

able to get by with only a high school diploma - but Rhode Islanders without such post-secondary credentials will comprise 42% of the state's workforce. United States Census data estimates of the most recent levels of educational attainment by Rhode Island's workforce include: 38.6% of Rhode Islanders aged 25 or older have a college degree (associate's, bachelor's, graduate or professional degree) 18.4% of Rhode Islanders aged 25 or older have some college education but have not earned a college degree. 28.7% of Rhode Islanders aged 25 or older have a high school degree or equivalent. 14.2% of Rhode Islanders aged 25 or older have less than a high school diploma or equivalent.

Soft Skills

Following the theme of the "skills gap", what has been called "soft skills" are also on the forefront of business challenges. Businesses want employees with particular education and skills, but what is most desired - and most often lacking, particularly in entry-level hires - are basic educational foundation and soft skills. Soft skills refer to various behaviors and qualities that help people work with others successfully in any field or occupation. For example, soft skills include communication skills (such as the ability to speak and listen well), professionalism (such as timeliness and appropriate attire), problem solving skills, the ability to collaborate, flexibility, and a strong work ethic.

If businesses can hire someone reliable with basic reading and math skills, and capable of problem solving, working with others, and coming to work on time ready and willing to work, they are often willing and able to provide the specific on-the-job training that person needs for that particular job. However, what businesses are finding is that many inexperienced workers who are hired for entry-level positions often fail basic reading and math tests and do not understand workplace norms and expectations. As a result, businesses put a premium on hiring people with work experience and particularly value those workforce programs that provide training (such as paid internships, apprenticeships, and on-the-job training) or retrain incumbent - and proven - workers for new positions. Small employers don't have capacity for lots of training. They want to hire someone who is ready the first day. - GWB Industry Partners Focus Group 36 In some sectors, particularly information technology, employees with mid- and high-level skills are also difficult to find. For example, computer programming and other high-tech firms reported having to recruit from out-of-state for mid-level programmer positions.

Unfortunately, many businesses - particularly small businesses, which are prevalent in Rhode Island - lack human resource departments or other staff skilled in recruitment and hiring. They often fail to plan for turnover or growth, struggle to articulate the skills or competencies new hires need, and are not skilled at sorting through resumes, conducting interviews, or selecting new employees. As a result, businesses often cannot find the applicants they want, or end up making hires that do not meet their actual needs.

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[1]Bioscience: Identifying Employer Needs, Talent Gaps, & Strategies to Grow a Stronger Bio Science Workforce in Rhode Island

[2] Building Futures: Skills Gap Study, Governor's Workforce Board's Construction Industry Partnership (2008)

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. ** Veterans, unemployed workers, and youth, and others that the State may identify.

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. SKILL GAPS

Describe apparent 'skill gaps'.

Workforce Analysis

In *Rhode Island Innovates: A Competitive Strategy for the Ocean State,* the researchers find that Rhode Island "will face near- and longer-term challenges in mobilizing the kinds of technical skills needed to grow its advanced industries".[1] In the *Comprehensive System Improvement Plan*, the Governor's Workforce Board states, "The state's workforce system is not consistently meeting the needs of businesses and workers- and ultimately all its residents - by not creating the dynamic workforce needed for the 21st Century".[2]

In order to be successful, particularly to grow the advanced business services industry, it will be critical within the next five years for Rhode Island to ensure that its "underserved populations have access to these growth opportunities."[3]

Lack of Education Necessary for Employment in the High-Growth Industries

The current working-age population is nationally competitive, but is behind that of the New England educational attainment rate. Rhode Island ranks sixth of six states in New England with regard to percentage of population with a bachelor's degree and fifth on number of people with a graduate or professional degree. The State has strong job growth in high-skill jobs requiring at least a bachelor's degree and middle-skill jobs requiring some postsecondary credential/associate's degree. Analysis by the Georgetown University Center on Education and the Workforce found that, by 2020, over seven out of ten jobs in Rhode Island will require some form of postsecondary

education. Yet Rhode Island, when compared to the national average, has struggled to maintain and grow the educational attainment of its residents. "In sum, Rhode Island's residents were barely more educated in 2014 than they were in 2009, and actually less educated in terms of the share of the population with only a bachelor's degree."[4]. This will create a shortage of labor supply for Rhode Island businesses. This is particularly acute in computer programming and coding jobs, which have seen thousands of openings each year in Rhode Island. The number of occupations requiring STEAM degrees is growing in the state, but Rhode Island produces the lowest or almost lowest number of STEAM degrees among its benchmark states and in the region.

The study by Battelle et al. (2016) also finds that Rhode Island does not have the near-term or future talent pool necessary to fill jobs in technical fields in identified growth areas. Students are not prepared to enter STEAM careers, showing a lack of proficiency in science and math. Students are not being introduced to computer science and coding, which offer pathways to jobs in high-value advanced industries. Only 72 students took the AP computer science exam in 2014-2015, with many students only taking a basic computer literacy class to fulfill the technology graduation requirement.

The Battelle et al. (2016) report uses blunt statistics to illustrate how Rhode Island is divided by racial, ethnic, gender, and income lines in preparing people of color and low-income communities for employment its advanced and opportunity industries:

For Rhode Island's students of color and those from low-income households, math proficiency challenges are especially acute. Among eighth graders, 41 percent of white students but just 13 percent of Hispanic students, 14 percent of black students, and 15 percent of low-income students scored at proficiency on the math portion of the NAEP in 2015. Among fourth graders, 48 percent of white children were proficient, compared to 18 percent of Hispanic students, 17 percent of black students, and 21 percent of low-income students. These are disturbing numbers for the state's economic future given that 30 percent of the state's PK-12 population is Hispanic or black and 46 percent are low income. As Baby Boomers retire it is far from clear that the state's future workforce will be ready to fill their jobs in critical advanced industries, let alone support sector expansion. (p. 101-102)

Rhode Island will need enough workers to replace the retiring Baby Boomers and fill additional growth in high- and middle-skill jobs. As shown in the economic analysis section and the data presented above, Rhode Island must bring all of its citizens into the new economy in order to succeed.

According to Rhode Island census data Rhode Island's workforce population is aging at an alarming rate. When it comes to working age citizens, in 2010 Rhode Islander's aged 15-34 constituted 27.5% of Rhode Island's population, while people aged 35-64 made up 40.8% of the population. From 2000 to 2010 children age 10-14 declined 10.1%, children 5-9 declined 15.9% and children under 5 declined 10%. In comparison, between 2000 and 2010 the percentage of Rhode Islanders age 55-64 increased 95%.

When analyzing Rhode Island's workforce it is crucial to pay attention to immigrant population trends. According to the American Immigration Council, almost 1 in 8 Rhode Islanders are "new Americans", comprised of foreign born residents and their children. In 1990 Rhode Island's immigrants made up 9.5% of the population as a whole, by 2000 it increased to 11.4% and in 2013 it further increased to 12.9%. Immigrants in the state comprised 15.2% of the workforce population.

The trends of immigration in Rhode Island are represented in overall census demographic data. In 2000 the population of Rhode Island was 1,048,319; in 2010 this increased to 1,052,567- a relatively small change but there is a larger story to be told about this sum. Between 2000 and 2010 white/Caucasian residents declined 3.9 percent, from 891,191 in 2000 to 856,869 while African American and Latino populations increased dramatically. The African American population rose from 46,908 to 60,189- a 28.3% increase. Additionally, Latinos saw an even larger increase than African Americans; the population of Latinos and/or Hispanics in Rhode Island jumped from 90,820 to 130,655- an overall increase of 43.9%. Asian populations also saw a 28.7% increase, while other minorities such as Native Americans (+18% increase) also saw boosts in numbers.

Through the Office of Vocational Rehabilitation services and programs, Rhode Island's disability population is also a crucial segment of our workforce that will be included in WIOA implementation and the execution of programs. According to the most recent available data from the Census Bureau, there are 63,400 working age Rhode Islanders with disabilities between the ages of 21 and 64. It is critical to distinguish between working age people and those that acquire disabilities due to the aging process. Of those working age citizens with disabilities, 33.9% of people with disabilities aged 18 to 64 are employed in juxtaposition with people who do not have disabilities who employed at a rate of 77.7%. Rhode Island currently ranks 32nd in the nation in terms of jobs for people with disabilities..

The Vocational Rehabilitation Program continues to serve Rhode Islanders with disabilities in increasing numbers. In FFY 2013, the VR Program provided services to over 7,500 individuals with disabilities. Additionally, 2,851 individuals completed applications for services; and 603 individual's successfully obtained and maintained employment consistent with their abilities, interests and informed choice. In addition to serving increased numbers of individuals with significant disabilities, the VR Program continues to outreach to un-served and underserved populations. In particular, this includes individuals from linguistically and culturally diverse backgrounds; veterans returning from war; and individuals with learning disabilities served through the federal Temporary Aid to Needy Families (TANF) program (in Rhode Island, the Rhode Island Works Program (RIWorks)). The VR Program is strongly focused on outreach and services for youth that are in transition from school to self-sufficiency in adult life through employment, develop advocacy and leadership skills for high school juniors and seniors with disabilities in Rhode Island. ORS is looking to expand services to eligible individuals with disabilities through Innovation and Expansion (I & E) activities.

In addition to the usual employment issues surrounding those with disabilities its important within this plan and in the broader scope of workforce development to breakdown the social stigmas and stereotypes that follow disabled citizens. Individuals with disabilities represent an untapped labor resource that can meet diverse talent needs of our state's growing job sectors, but unless we change the culture and perception of people with disabilities within said sectors Rhode Island will continue to fail in its effort to include this untapped labor resource. It is important to understand that the barriers to gaining employment are not only physical. Attitudinal barriers can be just as detrimental as physical inaccessibility. The stigmas and misconceptions about Rhode Islanders with disabilities are serious barriers that our workforce system needs to address. The best method to challenge stigmas is to introduce employers to other employers who are already succeeding by hiring individuals with disabilities. The state will achieve this through our sector strategy work in programs such as Real Jobs Rhode Island in conjunction with the Office of Rehabilitation. As industries come together and work to identify best practices for hiring different populations the state will encourage businesses who employ workers with disabilities to share their experiences

with their industry partners, we believe this will be the most efficient and effective way to incorporate this population into the work that is already underway for our sector strategy.

The comprehensive system improvement plan created by the Governor's Workforce Board reinforces the need for preparing and upskilling workers. Projected job growth in Rhode Island through 2022 suggests that 36% of all jobs in the state will require at least some college, and another 30% of jobs will require some type of post-secondary education. However, 42% of Rhode Islanders will not have any type of post-secondary education - and there will only be about 33% of jobs available to workers with only a high school diploma.[5]

Current Unemployment Data, Projected Future Employment, and Labor Market Trends

Rhode Island's December 2015 unemployment rate dropped to 5.1%, down from 6.8% in December 2014 and from a peak of 11.3% during the Recession in summer 2009.[6] This decrease in the unemployment rate moves Rhode Island closer to the national average, but this is not just due to job gains. Rhode Island's workforce is shrinking, partly due to retiring Baby Boomers.

A report by the Economic Progress Institute (2015) found that Rhode Island must add 12,700 additional jobs to regain jobs that were lost during the recession and keep up with population growth. The state is close to prerecession levels - 1,600 jobs short - but needs to continue to grow to keep up with projected population growth.[7]

The Economic Progress Institute (2015) breaks down unemployment data by race and ethnicity, painting a different overall picture of the unemployment rate in Rhode Island. In 2014, the average unemployment rate was 7.7%, which was tied for the highest overall unemployment rate in the nation. When the unemployment rate is looked at by demographics that number changes drastically. In 2014, the White unemployment rate was 6.2%, compared to 11.5% for Black workers and 16.2% for Latino workers. The highest White unemployment rate, 9.7% in 2009, was almost lower than the lowest minority unemployment rates. The data shows that Latino workers had a lower unemployment rate than 9.7% prior to 2008.

The report also looks at unemployment data by age. Younger workers, age 16-24, were particularly hard hit with an unemployment rate of 14.9% in 2014. Among the 14.9% who were unemployed, 26% were considered long-term unemployed.

According to the RIDLT Labor Market Information's 2022 industry Outlook Report Rhode Island employment is expected to increase by more than 51,000 jobs during the 2012-2022 projection period as the state's economy continues to recover from recessionary losses. Employment in 2022 is projected to reach 545,550 an increase of 51,420 (10.4%) job from the 2012 employment level. Much of this growth is attributed to the increased demand for the products and services provided by the Health Care & Social Assistance; Accommodation & Food Services; Professional, Scientific and Technical Services; Administrative & Waste Services; Construction and Manufacturing sectors. Nationally employment is projected to increase by 10.8 percent. The largest numeric gains will continue to occur in the Health Care & Social Assistance sector. This sector is expected to account for 17 percent of the new job growth expected in the state during the 2012-2022 projection period. Increasing coverage, medical advances along with an aging population will result in an increase of 13,852 (+17.2%) jobs. The Construction sector is projected to grow at the fastest rate (26.6 %) during the 2012 -2022 projection period. Prior to the recession, employment in this sector averaged 22,000 jobs. The projected growth of over 4,000 jobs will bring our construction industry close to its pre-recession levels.

Rhode Island's Consent Decree

In 2014, the U.S. Department of Justice and the State of Rhode Island entered into an agreement to give 3,250 individuals with intellectual and developmental disabilities (IDD) the option of integrated day and employment services. Prior to the agreement, only 12% of individuals were in individualized, integrated employment. In the latest court monitor report, the State has not met its benchmarks for fulfilling the agreement (Moseley, 2015). According to data from A. Anthony Antosh from the Sherlock Center on Disabilities at Rhode Island College, 21.2% of individuals with IDD were in integrated, paid employment in 2015.[8]

The state of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services or ORS, (2) the Rhode Island Department of Education or RIDE and (3) the Behavioral Health, Developmental Disabilities and Hospitals or BHDDH to develop and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The three state agencies are developing Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA.

While the consent decree represents one instance of deficiency in providing adequate training and employment opportunities to populations with disabilities, in the future Rhode Island will ensure that this issue is addressed more broadly beyond the consent decree. The state recognizes its short comings with respect to the consent decree and is actively working to address the needs of those with physical, emotional, developmental or other disabilities. The DOJ settlement with the state created an opportunity for Governor Chaffee to proclaim RI as an Employment First state. This proclamation clearly articulated a commitment to all individuals, regardless of type of disability, to have the same access to integrated competitive employment opportunities afforded to non-disabled adults and youths.

The Rhode Island employment rate of individuals with disabilities has improved in recent years; it remains one of the highest in the nation at 9% and is the highest among the New England region. Information obtained from the Disability Employment Policy Resource by Topic in January of 2013; 16-19 year olds with a disability were employed at a rate of 12.7% in comparison to non-disabled youth which were employed at a rate of 24.9%. Additionally, for youth ages 20-24 with a disability the rate of employment was 25.7% compared to non-disabled youth who were employed at a rate of 60.6%.

Workforce Development Activities in Rhode Island

The *Comprehensive System Improvement Plan*, developed by the Governor's Workforce Board, included an interactive map of all workforce development activities that shows resource allocation and a geographic distribution of vendors. The map can be viewed here: http://www.gwb.ri.gov/WFDdata.htm. In this report and accompanying map, more than $58.3 million in funding is illustrated. Of those funds, 66% are federal and 34% are state funds. This map also shows that workforce programs in Rhode Island serve a limited amount of people - out of 61 programs, 43% served fewer than 300 people and 23% served fewer than 100.

Expenditures per program vary widely, and do not paint an accurate picture of what it costs to train an individual and place them into meaningful employment. There are 340 unique vendors that receive funding from state agencies whose data was collected. Of those 340, the researchers point out that programs that cost more tend to provide more individualized or intensive services, yielding better long-term results for the individual, and therefore the State.[9]

The researchers suggest that the large number of programs is causing the State to spread its resources too widely, and should fund fewer programs with greater success rates. This could result in the workforce network becoming more cohesive and manageable for all involved, particularly in cases where vendors receive funding from more than one state agency. Increased coordination among agencies and targeted funding to more successful programs could lead to more effective service for job seekers and more growth opportunities for the identified high-growth advanced industry clusters.

However, work is currently underway in Rhode Island to develop sector based strategies to connect employers to the workers they need and addressing the state's "skills gap". The industry partnerships of the GWB started many years ago, and have now been integrated into the Real Jobs Rhode Island program. RJRI aims to allow industry partners to be the leaders in their own training programs. In the past, communication between the public and private sectors has not produced programs that have been exactly what businesses need. By creating a "demand driven" program which is led by the businesses and industries the state can help facilitate accurate training programs that exactly match business needs. Partnerships range across many sectors, including the Healthcare industry which employs over 80,000 people in Rhode Island.[10] Giving industry leaders a key role in creating these programs will help the workforce network become more cohesive while facilitating seamless cooperation between agencies.

The same organizing principle that is the foundation of demand-driven workforce development nationally, and Real Jobs RI locally - namely, the idea that employers and industries know better than the government what their needs are; has been extended to the supply-side in Rhode Island through the state-funded Real Pathways RI. Real Pathways is an associate program to Real Jobs RI, and supports partnerships between and among public, private, and nonprofit agencies, education and training providers, and others, that focus on serving populations with traditional barriers to employment (ex. veterans, homeless individuals) or on serving regions of the state with above average concentrations of poverty or unemployment. These partnerships collaborate and strategize how to best serve clients through cooperative or collaborative workforce development programming that is demand-driven, linked to the larger workforce development network, and designed to maximize the opportunities for middle class employment. From a WIOA perspective, these partnerships provide 'reinforcements' and enhanced capacity to the system at a time of limited resources.

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[1] Battelle Et Al. (2016) P. 97

[2] Rhode Island Governor's Workforce Board. (2016, January). Comprehensive System Improvement Plan For Workforce Development in Rhode Island.

[3] Battelle Et Al. (2016) Page 68

[4] Battelle Et al. (2016) page 99

[5] Governor's Workforce Board. (2016). Comprehensive System Improvement Plan. Cranston, RI: Governor's Workforce Board.

[6] RI Department of Labor and Training. (2016). Rhode Island-Based Jobs Up 1,100 from November; December Unemployment Rate Drops to 5.1 Percent [Press release]. Retrieved from http://www.dlt.ri.gov/News_Releases/NR012116.htm.

[7] Economic Progress Institute. (2015, December). The State of Working Rhode Island 2015: Workers of Color, page 6 figure 6; Providence, RI: Author.

[8] Antosh, Anthony A. (2016). RI Senate Committee on Health and Human Services Briefing on the Consent Decree. Providence, RI.

[9] Governor's Workforce Board. (2016). Comprehensive System Improvement Plan. Cranston, RI: Governor's Workforce Board.

[10] Governor's Workforce Board Rhode Island (2014), Biennial Employment & Training Plan

FY2014 and FY2015

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 *Education and Skill Levels of the Workforce* above, and the employment needs of employers, as identified in *Employers' Employment Needs* 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 and optional one-stop delivery system partners.*

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* 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.

Workforce Development Activities in Rhode Island

Workforce Development Activity, Strength and Weaknesses

One of the state's biggest workforce strengths is Rhode Island's commitment to fulfilling WIOA's foundational purpose of being innovative and creative, while creating meaningful links between all workforce development efforts within the state. On the forefront of these activities, which is pulling in a plethora of workforce organizations, economic organizations, and stakeholders from almost

every major industry in the state is Governor Gina Raimondo's Real Jobs Rhode Island Program. Rhode Island is transforming statewide workforce development into a demand driven strategy that 'works backwards' from employer need and aligns with the statewide economic development plan to ensure that demand for talented workers can be met across growing industries. Real Jobs RI serves as the cornerstone program of this transformation. As the state's new workforce development initiative, Real Jobs RI leverages strategic regional and industry partnerships to train workers and build other workforce solutions on a timeline that keeps up with business need. Flexibility and innovation are defining characteristics of this program. The Department of Labor and Training has awarded 21 planning grants to recipient organizations in 11 industries, as well as 3 regions. Planning Grants represent the first stage of the Real Jobs RI rollout.

Partnerships are a collaboration of businesses within an industry that are brought to a discussion by an intermediary. Real job partnerships must have at least 5 employers and have a designated lead. These partnership can consist of a combination of the following;

- industry employers;
- two and/or four-year institutions of higher education;
- local governments;
- local workforce boards;
- regional and local economic development entities;
- industry associations;
- labor unions;
- K-12 programs;
- philanthropic groups;
- nonprofits;
- community-based organizations;
- other training programs; and,
- Other relevant partners.

Planning Grants provided seed funding of up to $25,000 to assemble a strategic partnership within a particular industry or region, identify the specific workforce challenges that employers within that particular industry face, identify the training, education, human resource, and other solutions that are necessary to address these challenges and develop a detailed strategic industry workforce training plan to implement those solutions. The grants were all awarded using funding from a multitude of funding streams that RIDLT braids together in order to meet each partnerships specific needs. The Department pulls in federal grant money, the Governor's WIOA reserve, and state funding and then dispenses it in a way that allows the most flexibility for the partnerships while simultaneously breaking down unnecessary bureaucratic barriers.

The state has the ability to apply for, manage, and implement multiple workforce based grants. Federal grant dollars allows the Department to bring additional services and resources to diverse priority populations in addition to the core partner programs. The Department currently operates 8 separate grant programs. The programs and their target population are as follows:

Program	Target Population	Participants Served	Program Cost
SCSEP	Unemployed Seniors	61	$456,934
JVSG	Veterans	1621	$569,021

Program	Target Population	Participants Served	Program Cost
RESEA	UI Recipients	8530	$1,183,687
TAA	Laid off Workers	227	$1,730,695
RIWorks (tanf)	TANF Recipients	792	$953,279
Rapid Response	Laid off Workers	NA	$968,662
Foreign Labor cert	Migrant Workers	58	$88,956
WOTC	At Risk Populations	4543	$121,044
DEI	People w/ Disabilities	242	$3,455,592.00

Program Overviews

Wagner-Peyser: Wagner Peyser is the major funding source for the one-stop system. The WP act of 1933 established a nationwide system of employment offices known as Employment Service. The Employment Service provides employment-related labor exchange services including but not limited to job search assistance, job referral and placement assistance for job seekers, re-employment services to unemployment insurance claimants, and recruitment services to employers with job openings. Services are delivered in one of three modes including self-service, facilitated self-help services and staff-assisted service delivery approaches. Veterans receive priority referral to jobs and training as well as special employment services and assistance. The system provides specialized attention and service to individuals with disabilities, migrant and seasonal farm-workers, ex-offenders, youth, minorities and older workers.

The Federal Trade Act (TAA): Provides special benefits under the Trade Adjustment Assistance (TAA) program to those who were laid off or had hours reduced because their employer was adversely affected by increased imports from other countries. These benefits include paid training for a new job, financial help in making a job search in other areas, or relocation to an area where jobs are more plentiful. Those who qualify may be entitled to weekly TRA after their unemployment compensation is exhausted.

RI Works: This partnership between the RI Department of Labor and Training and the RI Department of Human Services provides intensive employment services to cash assistance beneficiaries under the TANF program. Under RI Works, participants engage in job search as a first and primary activity in their plan. Cash benefit and SNAP recipients must participate in approved job search activities.

Senior Community Services Employment Program (SCSEP): The Senior Community Service Employment Program (SCSEP) is a service and work-based program for low-income individuals aged 55 and older. DLT administers the program which includes recruitment and outreach, eligibility screening, enrollment assessment, Individual Employment Plans, follow-up, work site placement, monitoring and enrollee recertification. Through SCSEP, enrollees are placed at Host Agency sites for up to 30 hours per week and are compensated with wages commensurate with their occupation. Host Agency sites include faith-based organizations, senior centers, community action programs and community-based organizations. These agencies prepare and train

participants for future unsubsidized employment. The program is a bridge leading to unsubsidized employment and works to reintegrate participants into the workforce. Eligible SCSEP applicants must reside in Rhode Island, be unemployed at the time of application and be a member of a family with an income not more than 125 percent of federal poverty guidelines. Priority is given to applicants over the age of 60, veterans and spouses of veterans. Preference is given to limited English-speaking, minority applicants.

JVSG: JVSG funds are provided to states to fund two staff positions; Local Veteran Employment Representative (LVER) and Disabled Veteran Outreach Program Specialist (DVOP) which are fully integration in each American Job Center (AJC). Our integration strategy includes a streamline referral process to all partner programs such as WIOA and other combined state plan partners. Furthermore, DVOP specialists provide intensive services and facilitates placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor. DVOP Specialists refer eligible veterans and eligible persons to all partner programs as determined in their comprehensive assessment. Additionally, DVOP Specialist receive referrals from other state partner programs such as; WIOA Title 1B for those eligible veterans and eligible persons who have been determined to have one or more Significant Barriers to Employment (SBE) outline in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. In addition, LVER staff must perform only the duties outlined in 38 U.S.C. 4104(5), which are related to outreach to the employer community and facilitation within the state's employment service delivery system. Therefore, LVERs must be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. LVERs are also responsible for facilitating employment, training, and placement services furnished to veterans in the State under the applicable State employment service delivery system such as the delivery of training to other state plan partner staff with current employment initiatives and programs for veteran.

Foreign Labor Exchange and Migrant Workers (MSFW): The foreign labor certification process allows employers to hire foreign workers, who are temporarily authorized by the U.S. Citizenship and Immigration Service to live and work in the United States on a temporary basis. A qualifying business must demonstrate its inability to fill the position with a qualified citizen at prevailing wages.

Disability Employment Initiative (DEI): This program provides an integrated service system that creates a "One-Stop" entry point for individuals with disabilities to gain entrance to competitive and/or self-employment. This is accomplished by improving coordination and collaboration among employment and training programs implemented at state and local levels, including the "Ticket to Work" program under the SSA that enables disabled individuals to access employment services at an employment network site and other effective community partnerships that leverage public and private resources to better serve individuals with disabilities and improve employment outcomes. The array of services provided to DEI participants include; placement in suitable jobs, job search workshops, counseling, core, intensive, and training services, referral to supportive services, outreach to employers, and outreach to individuals with disabilities by providing services at various locations around the state.

Reemployment and Eligibility Assessment Program (RESEA): The State has conducted the Reemployment Services and Eligibility Assessment (RESEA) program (previously REA) since 2005 and continues to do so. Currently under the program, all UCX claimants and UI claimants deemed

most likely to exhaust benefits (based on profiling scores) are directed to report to the One-Stops for mandatory participation in RESEA. The program focuses on providing participants with an overview of and access to the services available at the One-Stop Centers as well as through the state's Virtual One-Stop (EmployRI), a detailed review of the claimant's responsibilities while collecting UI, and assistance accessing the resources necessary to lessen the time on unemployment and to return to work as quickly as possible**REXO- Corrections**

Through the Office of Rehabilitative Services and Correctional Industries, the Department of Corrections provides a series of educational and training programs to inmates at the Adult Correctional Institution (ACI). Educational and training services include special education, adult education, GED, postsecondary classes and occupational skill development offered through a partnership with the Community College of Rhode Island (CCRI). These classes are funded primarily through state general revenue dollars. Outcomes range from standard ESL and ABE measures such as gains in educational functional levels to credentials such as GED and occupational skill certifications. Many of these programs place an emphasis on work-readiness and soft-skill development in preparation for those transitioning out of prison and into the workforce. DOC and its community partners work hard at developing relationships with employers willing to hire ex-offenders.

RIWORKS

Rhode Island Works is Rhode Island's cash assistance program. The program provides cash assistance and employment support services to enable parents with children to support their families. Rhode Island Works (RIGL 40-5.2-5) replaced the Family Independence Program in 2008. Rhode Island Works is funded through the federal Temporary Assistance to Needy Families (TANF) program. TANF was enacted in 1996, replacing the nation's welfare program, Aid to Families with Dependent Children. As of the end of calendar year 2010, Rhode Island Works served 16,185 individuals, with an average monthly cost per person of $188.68, at a total monthly program cost of $3.1 million, all of which is federal funds. As a condition of eligibility, recipients must enter into an employment plan developed in coordination with the Department of Human Services (DHS) and the Department of Labor and Training (DLT). For most parents, the employment plan begins with a four week intensive job readiness and job search program operated by DLT at the One Stop Career centers. Single parents must work or prepare for work an average of 30 hours per week (20 hours if the household includes a child under age six). In two-parent families, one parent must work 35 hours per week; if the family uses a childcare subsidy, both parents must work a total of 55 hours per week. Receipt of cash benefits under Rhode Island Works is subject to time limits. A family can receive assistance for no more than 24 months (whether or not consecutive) in any 60- month period.

The goal of the Rhode Island Works Program (RI Works) is to help very low-income families meet their basic needs by providing cash assistance and work supports, including employment services, SNAP benefits, health insurance, and subsidized child care. Children and families qualify for cash assistance based on their income, resources, and the number of people in their families. RI Works cash assistance recipients must participate in an employment plan unless they meet specific criteria for an exemption. This employment plan must take into account the parent's skills, education, and family responsibilities as well as local employment opportunities and should outline a process for helping the parent meet his or her employment goals. Parents should be informed about opportunities to seek additional education or training to improve their employability prospects. RI Works provides a safety net for some children whose parents are unable to work due to a disability

and can function as an unemployment system for parents who do not have sufficient earnings or work experience to qualify for unemployment benefits. RI Works also provides time-limited supplementary cash assistance to very low-income working families.

In December 2014, the average hourly wage of working parents enrolled in RI Works was $9.81 per hour. RI Works connects families to the Office of Child Support Services, which assists families in establishing paternity (when applicable), identifying and locating non-custodial parents, and obtaining child support payments from non-custodial parents. In Rhode Island, the first $50 of child support paid on time each month on behalf of a child enrolled in RI Works goes to the custodial parent caring for the child. The balance is shared by the state and federal governments as reimbursement for assistance received through RI Works. The maximum monthly RI Works benefit for a family of three is $554 per month. Families receiving the maximum monthly cash benefit have incomes that are less than one-half the federal poverty level and are living in extreme poverty.

Summary

In total, aside from WIOA formula funding for the Dislocated Worker, Adult, and Youth services, WDS has been awarded and manages upwards of $8 million in grant funds. These funds helped to serve 48,126 participants in an array of services for PY15. These grant programs are a crucial complement to the core workforce activities as it allows the state to provide additional services such as familial support and individualized care to at risk populations that other funds do not allow for. Rhode Island is dedicated to leveraging every resource available to bring our workforce towards economic sustainability.

RI Dept. of Education

The Rhode Island Department of Elementary and Secondary Education (RIDE) is responsible for all K-12 education in the state, as well as those programs that serve out of school youth and adults working to improve literacy, numeracy, English language and workforce basic skills or to acquire a GED. The funds presented under this category are those for which the GWB has policy oversight: Carl Perkins Career and Technical Education (CTE) funds and adult education funds under Title II of the Workforce Investment Act. Both of these programs are a part of the Office of Multiple Pathways at RIDE.

The core mission of adult education is to provide adults with the basic academic knowledge and skills they need to participate in civic life and the workforce. Adult education programs serve students who have educational objectives such as learning to speak English; passing the oral and written exams for U.S. citizenship; earning a high school diploma; receiving job training; and obtaining proficiency in reading, writing, and mathematics to succeed in college, careers and community life. Adult education programs in Rhode Island are located in community-based organizations, public school districts, college campuses, libraries, correctional facilities, volunteer literacy organizations and a housing authority. Each of these is uniquely designed to include various combinations of the following components: basic academic skills instruction, work readiness, occupational skills training, structured work exposure activities, work experiences (such as internships or community service assignments), case management, wrap-around support services, and career coaching and job placement. These services may target welfare recipients; homeless adults; prisoners in reentry; unemployed or dislocated workers; incumbent workers in transition to new jobs and advancement in employment; and other eligible persons at all educational functioning levels including the lowest levels of literacy, numeracy, and English-language proficiency. Program

offerings also include contextualized classes in specific industry sectors to prepare adults for employment and career pathways.

Collaboration among RIDE, the Governor's Office and the Governor's Workforce Board has led to the establishment of key investment priorities in the following outcome areas:

- Provision of comprehensive community-based classroom Adult Basic Education, Adult Secondary Education, and English as a Second Language (English for Speakers of Other Languages);
- Expansion of distance learning;
- Expansion of adult education that is contextualized and supports career pathways for youth and adults in Rhode Island's critical and emerging industries;
- Integration of adult education and hands-on technical training leading to academic and industry credentials for low-skilled current and former welfare recipients and other unemployed low-skilled adults; · Integration of pre- and post-release adult education services for the incarcerated;
- Expansion of transition to postsecondary education and training/apprenticeship programs that use dual or concurrent enrollment including rigorous Adult Secondary Education for those preparing for postsecondary education based on internationally benchmarked college and career- readiness standards; and
- Support of the Department of Labor and Training Workforce On-Ramps pilot project at the state's two netWORKri One-Stop Career Centers.

The following measures shows the number of learners who have advanced from one EFL to the next highest EFL, which is two to three grade level equivalents in K-12 system terms. Credentials in adult education include the number of GED and high school equivalent diplomas earned. Additional federal funds come from the DHS Project Opportunity Program, which funds adult education and job preparation service for individuals on Temporary Assistance for Needy Families (TANF).

Program	Target population	Participants served	Program cost
Basic Adult Education	Adult learners	1273	$1936551
English Literacy and civis	ESL Learners	431	$256603
TANF	Low Income	458	$1,000,000
General Revenue Adult Ed	Adult Learners	1705	$2,000,000
GWB Job Devleopment	Job Seekers	2764	$3,500,000

As the eligible state agency and recipient of the Perkins funds, RIDE supports numerous career preparation programs across the state including aquaculture, cosmetology, pre-engineering/robotics, asbestos and lead paint removal, manufacturing, culinary arts, biotechnology, CAD, business/finance, automotive, construction and information technologies, the arts, health careers and more. Federally-mandated secondary student program outcomes include math,

reading/language arts and technical skill attainment, and program completion, graduation, and placement in postsecondary education/training, work and/or the military. Postsecondary and adult student program outcomes include technical skill attainment; program retention, industry recognized credential and degree earning (as appropriate); and placement in advanced education/training, work and/or the military. The following technical programs are operated and funded by RIDE.

Program	Target population	participants served	program cost
On Ramps	Unemployed and Underemployed	95	31,700
CTE Program	Unemployed and Underemployed	7509	2,552,413
Incarcerated programs	Incarcerated Individuals	69	168,452
Adult skills Training	Skills deficient adults	631	300,000
Post Secondary Programs	Skills deficient adults	1759	271,023
Secondary School Concentrators	Skills deficient adults	10688	3,791,348

Dept. of Human Services, Executive Office of Health and Human Services

The Executive Office of Health & Human Services (EOHHS) fulfills the crucial function of serving as the Medicaid state agency in Rhode Island. It is also responsible for overseeing and managing publicly-funded health and human services in our state. In this capacity, the EOHHS coordinates the organization, finance and delivery of services and supports provided by the following agencies:

- Department of Behavioral Healthcare, Developmental Disabilities & Hospitals (BHDDH).
- Department of Children, Youth & Families (DCYF);
- Department of Health (HEALTH);
- Department of Human Services (DHS), including its divisions of Elderly Affairs and Veterans Affairs; and Office of Rehabilitative Services (ORS).

BHDDH partners with licensed Behavioral Health Organizations (BHO), which focus on mental health and/or substance abuse disorders, and Developmental Disabilities Organizations to provide supportive employment services to clients. Community based organizations (CBO) network with local businesses to develop relationships and build a referral/job pool. Depending on the needs of the individual, CBOs often provide on-site coaching and job retention services. BHDDH and its partner agencies work closely with the Business Leadership Network to help link individuals with disabilities to employers.

Developmental Disability Organizations (DDO): Individuals eligible for services through the Division of Developmental Disabilities are assessed and authorized a level of services and are able

to choose from 34 licensed developmental disability organizations to provide these services or individuals may choose to "Self-Direct" services and hire employees to work directly for them to provide services. Supported Employment Services are included in an array of 24 services, specifically the services include job development, job coaching and job retention, as well as vocational assessments and training

Community Mental Health Center (CMHO) Employment Supports: Activities to support employment for Severely Mentally Ill (SMI) clients of the Community Mental Health Organizations include a variety of client-specific supports to prepare them for work, including coaching their job-search efforts and supporting job retention by helping individuals to overcome the barriers presented by the their illness. Services are delivered either by certified Supported Employment Specialists or by Certified Community Support (CSP) Case Managers. Although specific outcomes are not required as a condition for funding, and access to Supported Employment Services is just one of the variables determining whether CSP clients get and keep employment, the goal of the service is to increase the number of clients in competitive, gainful employment. In FY 14, of 7,024 CSP clients, 633 were gainfully employed.

Cookie Place: The Cookie Place training program is supported by a legislative grant to offer job training in the food service industry for individuals with severe mental illness. Because of their handicaps, many of these individuals have limited ability to find employment, and the program's goal is to increase the number SMI individuals who are competitively employed. In addition to its job training program, Cookie Place also runs a wholesale bakery, a retail shop and a catering business, but only the training program is supported by this grant. The grant-funded program provides 10 weeks of hands-on training in Cookie Place's commercial bakery. Kitchen skills, food handling safety, food preparation and menu planning are part of the curriculum, and coaching in job readiness and job application skills and assistance with job placement are also provided

New Leaf: New Leaf is a full-service, non-profit florist shop affiliated with the Providence Center that trains and employs individuals with severe mental illnesses in an integrated commercial business. The program aims to operate a business that trains and employs disabled workers alongside non-disabled workers who help to model acceptable workplace behavior. This kind of work setting is considered highly effective in helping psychiatrically disabled individuals prepare for competitive employment because it provides them with normative social interactions and realistic performance expectations. Disabled workers who have received on-the-job training may seek other competitive employment or remain as longer term employees of New Leaf.

Program	participants served	program cost
Community HEalth Org	95	294,125
Behavioral Health Treatment	7509	91,821
Developmental Disabilities	69	1,974,086

Dept. of Children, Youth, and Families

The Department of Children, Youth and Families (DCYF) was established by the RI Legislature in 1980 by margining children's programs previously administered by four different state agencies. The director of DCYF is also a member of the RI Children's Cabinet, which addresses cross-departmental issues relating to children's needs and services. Rhode Island is one of a small group of states that integrates the three major public responsibilities for troubled children, youth and families in one agency: Child Welfare, Children's Behavioral Health and Juvenile Corrections. The funds and activities presented in this report are those dedicated to workforce development for older youth.

The Department of Children, Youth and Families provides a series of educational and training programs to adjudicated youth at the Thomas C. Slater Training School. Educational services include special education, regular education, Adult Basic Education, training and post-secondary classes

Harvest Kitchen Project: The Harvest Kitchen Project is a culinary and job-readiness training program for youth within the Division of Juvenile Corrections both for youth on Probation and for youth at the Thomas C. Slater Training School. The youth will create a line of high-quality preserved foods using ingredients sourced from local farmers at a certified kitchen in Providence.

For youth on Probation: The Harvest Kitchen Project is a 15-week culinary and job-readiness training program followed by the opportunity for a 6 week paid internship in a professional kitchen with one of our partners. Classes for youth on Probation take place in the community at the Harvest Kitchen Training Kitchen located at 542 Pawtucket Ave Pawtucket, RI 02860.

For Youth at the Thomas C. Slater Training School: The Harvest Kitchen Project takes place on Monday evenings, Saturday mornings, and is one of the food stations inside of the facilities weekly Culinary Arts Program. The Harvest Kitchen Project inside of the Thomas C. Slater Training School utilizes the same recipes and procedures used in the community. The program is intended to introduce to youth detained at the Thomas C. Slater Training School to the Harvest Kitchen Project to better prepare them for the application and interview, as well as the training and internship opportunities the Harvest Kitchen has to offer in the community.

Barbering/Cosmetology Program: The RITS contracts with licensed personnel to provide classroom instruction and practicum sessions for residents. Residents begin the 1200 hours of classroom instruction and practicum required by the RI Department of Health while residing at the RITS but also have the opportunity to complete these hours in the community through our contracted instructors.

Program	Participants served	Program cost
Adult Basic Education	57	280,000
Barbering, Cosmetology	22	43,000
CCRI Courses	36	8,000
Harvest kitchen	38	21,244

Program	Participants served	Program cost
Culinary classes	41	150,000

Department of Human Services The Department of Human Services sponsors a variety of programs and activities with the goal of workforce development. For many DHS customers, the initial goal is to increase education or skills and employability, and then pursue the ultimate goal of gainful employment and financial independence. DHS considers "entered employment" at the time a participant begins work at any job. The following workforce development programs are available to DHS clients.

The REACH program at the Community College of Rhode Island - Customers attend CCRI programs, and are assigned to a coordinator to provide case management and support in order to successfully attain their educational goals. Participants must have a High School Diploma, or a GED and a minimum of 10th grade TABE scores. Outcomes vary based on the educational goals of each individual. At the end of the program, the participants are one step closer to employability than beforehand

SER/South Shore Center/DLT/OnRamps - Customers who receive cash assistance and are ready to look for work are referred to these four programs for assistance with job search and job readiness activities, including work experience, subsidized employment, and on-the-job training opportunities. Through OnRamps, in addition to the services listed, customers receive career coaching and can earn a National Career Readiness Certificate (NCRC+). The desired outcomes for participants in these programs are employment and job retention.

South Shore/Workforce Solutions of Providence-Cranston/Family Resources On-The-Job Training (OJT) - DHS sponsors three OJT programs for TANF recipients, during which they participate in work readiness activities and are then placed as employees into training with employers who are reimbursed for 50% of the participants' wages. At the end of the training period, most participants are retained by the employers as unsubsidized employees. The desired outcome of OJT is full-time unsubsidized employment.

Project Opportunity - this program provides intensive adult education for customers at or below a fourth grade reading level. The program provides: English as a second language and/or literacy instruction; life skills, cultural adjustment, confidence building, leadership development; work readiness and work exposure activities; computer skills and financial literacy; job skills training modules; and life skills related case management. Participants receive certificates of progress for increased educational levels, computer skills, and financial literacy. The desired outcome of this program is to bring customers up to a level at which they are ready to look for work.

Pre-Certified Vendor Training - Rhode Island Works recipients are able to attend one appropriate training, from the list of pre-certified vendors, paid for by DHS. The types of training programs include CNA, Office Assistant, Auto Services, Bookkeeping and accounting, Building, Custodial, CDL, Computer Skills, Customer Service, Homemaker, Insurance Tech, Medical Billing and Coding, Recycling/Green services, Security, and Teachers' Assistant training. Desired outcomes are completion or graduation, and ultimately employment and retention.

Youth Success - provides case management services to all pregnant and parenting teens requiring or requesting them. The objectives are to improve academic and other life skills including parenting

skills, improve social skills/character development, and reduce repeat pregnancy. Also, Youth Success assists customers with establishing paternity, child support, finding adult-supervised living arrangements if necessary, and opportunities for career exploration, work experience and community service.

Program	Participants served	Program cost
CCRI Reach	2708	433534
Job Search On Ramps	5037	3015718
On the job Training	258	575140
priject opporunity	371	1,000,000
Youth Success	425	1,304,436
SNAP E&T	297	423,216
supportive Services	2694	1,222,333

The Office of Rehabilitation Services (ORS) consists of three distinct programs: Vocational Rehabilitation (VR) Program, Services for the Blind and Visually Impaired (SBVI), and Disability Determination Services (DDS). ORS has partnerships with the Governor's Appointed State Rehabilitation Council (SRC), Governor's Advisory Council for the Blind and Visually Impaired, the Statewide Independent Living Council (SILC) and the RI Council on Assistive Technology (RICAT). The Vocational Rehabilitation Program of ORS assists Rhode Islanders with disabilities to achieve quality employment outcomes and to increase self-sufficiency. ORS has several specialized programs that serve Rhode Islanders with disabilities: Supported Employment, Business Enterprises Program, Adaptive Telephone Equipment Loan (ATEL), Home and Vehicle Modification, Assistive Technology Access Partnership (ATAP) and Transition Services program for youth with disabilities. The Office of Rehabilitation Services (ORS) administers the Title I Federal/State funded Vocational Rehabilitation Program (VR), the Title VI Supported Employment Program, and the statewide

Transition program for youth with disabilities. The Rehabilitation Act of 1973, as amended via WIOA in 2014, authorizes a federal-state vocational rehabilitation program to provide services to eligible individuals with disabilities in order to prepare for and engage in employment. The "Act" requires states to match federal funds at a ratio of 78.7 percent federal to 21.3 percent state dollars. The Vocational Rehabilitation Program (VR) is the federal government's largest and most successful employment program for individuals with disabilities. The agency assists Rhode Islanders with disabilities to select, prepare for, obtain and maintain competitive employment.

The VR Program has continued on an order of selection, which is a mandated system of prioritization that limits service provision to only individuals with the most significant disabilities. Few other programs offer a holistic approach that advances empowerment, informed choice as well as a full range of services and supports that individuals with disabilities need to fully participate in education, training and employment.

Services/Outcomes - The VR program helps individuals with disabilities to obtain an integrated competitive employment outcome at or above minimum wage. Masters level Vocational Rehabilitation Counselors tailor services to the individualized needs of the person with a disability. Services may include: evaluation and assessment, vocational counseling and guidance, training, assistive technology, job development and placement, including services that support individuals with disabilities to obtain and keep jobs. The objective of the program is to assist individuals with disabilities to become successfully employed in a job that matches the individual's skills, abilities and interests.

Work Readiness/Job Preparation - VR provides several options for Work Readiness/Job Preparation. Through the general and supported employment components of VR, a 4 week job preparation program is tailored for customers to learn about the demands of employment, interviewing and job retention. In addition, the VR Work Force Development Supervisor conducts interviewing workshops for clients. In FY 2014, 37 participants attended of which 8 or 22% obtained employment. VR funds clients to attend training programs and educational institutions based on the employment goal of the client's Individualized Plan for Employment (IPE). ORS has been funding and coordinating summer work program for in-school and out of school youth in the community since 2010. Last year ORS funded summer work experiences to 335 students with a range of disabilities

Employer Based skill Assessments (EBSA) - The VR Program partnered with 2 employers to conduct EBSA. These assessments are a unique opportunity for VR to assess an individual's work skills and behaviors within a business environment. The employer provides feedback to VR and the client about their skills and potential. Some of these assessments have resulted in a job match while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, the VR Program partnered with 23 employers to provide on-the-job (OJT) training opportunities.

Training Participation - The VR program has a wide array of fee for service training options for clients that include but are not limited to: culinary arts, pet grooming, tractor trailer driver, green recycling, auto repair, pharmacy technician, etc. Client participation in these programs is based on an assessment of the client's skills, interests and labor market need. As a component of career and employment plan development, clients are encouraged and supported to explore an array of job settings and career options. Such tools as informational interviewing, job shadowing and situational assessments are utilized to provide hands on experiences in different career areas to ensure informed client choice in selecting an occupation.

Interagency Collaboration - VR, Goodwill Industries of Rhode Island and the Department of Human Services (DHS) agreed to provide intensive support services with an expected employment outcome to RIWork's clients who are also eligible for ORS services. This collaboration provided an array of intensive, coordinated services to assist RIWork clients with disabilities to achieve employment success and self-sufficiency. The Journey to Success Program began in 2013 and in FY 2014 had 17 participants of which 14 became employed.

Program	Participants served	Program cost

Program	Participants served	Program cost
On the job Training	23	59,292
College Assistance	217	794,153
Short Term Skills Training	501	575,140
Vocational Evaluation	1009	1248331
Job Prep	46	44063
Assessments	346	423,216
Summer Work	243	476473
LEAP	141	166371
Journey to Success	28	101500

Workforce Development Weaknesses

The workforce programs and services that have been in place for many years in Rhode Island do not function as a "system," because the term "system" implies a hierarchy, where one entity has the authority to articulate goals and hold a vast array of actors (government agencies, community partners, and others) accountable for progress toward those goals. To view the disparate workforce programs and services offered in Rhode Island as a system assumes that all involved parties are operating according to a pre-defined set of goals and principles and that they are strategically organized and connected in such a way as to meet those goals and principles. But this is not how workforce programming in Rhode Island operates. Symptoms of this situation can be seen in the following challenges and barriers:

- Workforce development services are highly fragmented in the absence of a single unified and comprehensive vision;
- Multiple state and federal workforce programs each have differing rules, regulations, and limitations and are not always the number one priority of their respective administering agency;
- A widely-held perception is that services are geared toward low to low-medium skilled positions, despite the fact that this is not where employer hiring challenges and, by extension, job opportunities, lie;
- There is a lack of consistent and dynamic marketing to create and maintain awareness among job seekers and employers of workforce development offerings;
- Multiple entry points exist for job seekers and employers that increase the risk of customer confusion and detachment;
- Demand continues to increase for adult basic education and English language training and services;
- There is a lack of robust connections to K-12 and higher education systems.

To address these and other barriers the GWB laid out a series of recommendations that will improve the delivery of workforce development services and maximize efficiencies throughout the state workforce network. Partnerships between Government agencies have key roles within the workforce development network, from developing policy to funding activities. Therefore, it is necessary to ensure the network connections between government agencies are maximized and able to support network solutions involving non-government agencies.

There are two main projects to pursue in the context of improving partnerships between government agencies: strengthening internal structures within agencies to better support interagency collaboration, and creating capacity within agencies to support interagency problem solving as part of daily operations. As agencies improve their internal supports for interagency collaboration, each agency must take steps to ensure the capacity to work with other agencies exists. Networked government allows problems found under specific circumstances to be articulated to key staff within an agency. Each individual agency must create clear procedures for evaluating those problems identified and determining if other agencies must be involved in developing the solution. Clear points of contacts should be developed to provide consistent interagency communication and to provide a clear method for follow up. By improving these partnerships within and between government agencies, Rhode Island will be better positioned to implement interagency projects that get included in the states forthcoming Workforce Innovation and Opportunity Act (WIOA) plan and solve problems that are identified by Rhode Island businesses and partners. In addition to this partnership strengthening work, the state will:

- Establish common measures and definitions.
- Establish common information around individuals and service providers.
- Set up mechanisms to improve coordination at the agency level.
- Further strengthen the relationship of the two local workforce areas.
- Establish a mechanism for policy reform based on employer and job-seeker feedback.
- Consolidate planning efforts.
- Improve referral processes between programs.

Connecting employer demand to the supply of available workers in the state is the core challenge of each workforce development program. As demonstrated by persistent hiring challenges across all industries, the direct employer connection to a job seeker is insufficient to meet the workforce needs of employers throughout the economy. Employers rely on other actors in the workforce network to identify, and in some cases train, the individuals needed to fill vacant or new positions. Because no actor in the network can expect to have all the connections necessary to connect employers and jobseekers while ensuring all the needs of each group are met, it is important for each actor to determine what strengths they lend to the network and what purpose they want to serve. Actors then make connections with each other to provide more comprehensive interventions that lead people to employment opportunities.

Networked government allows entities that represent first contacts to build relationships with other entities in an effort to help the individual make subsequent connections. Rather than consolidate programs and try to reduce them to an ordered, sequential set of steps that an individual would follow like a technical manual, entities providing services should partner around common themes to create more effective connections around shared topics. Formal partnerships

should emerge from this process and more comprehensive solutions that combine the strength of all engaged entities can be developed. This already has begun to occur through Real Jobs Rhode Island and will continue to expand. While government agencies can help support the convening of these partnerships, this approach requires substantial engagement by all entities within the workforce development and One Stop Job centers.

'One-Stop Career Centers' are intended to provide a full range of assistance to job seekers under one roof. With such unrealistic expectations placed upon the One Stop, the staff have been unable to focus on their greatest strength, career counseling, due to the need to attempt to make all network connections themselves. Furthermore, the barriers that some individuals face to becoming unemployed are excessively difficult for One Stop staff to address properly. The ability to provide supportive services for individuals with substance abuse and the homeless can be exhaustive for staff who are not trained to handle extensive mental disabilities and deficiencies. It can become increasingly difficult to properly case manage individuals who do not have the capacity to meet deadlines or are unable to meet with case councilors multiple times. In order for One Stop staff to fully assist the hardest to serve, NetworkRI centers will have to be reimagined under WIOA.

WIOA provides Rhode Island with the opportunity and flexibility to reimagine the role of One-Stops as a network connections facilitator, connecting jobseekers to the services or industry partnership based on the jobseeker's specific needs and allowing the partnering entities to provide the services and help the individual make subsequent connections. An important part of reimagining the One Stops is retooling Network RI, Rhode Island's Workforce IT platform and job bank, to produce a system that works to collect the data needed by state and local staff, jobseekers, service providers, and employers to make informed workforce development decisions. One key component will be the management of the WIOA Eligible Training Provider List, which will become a more useable and accurate list to catalogue training opportunities and provide performance data on training providers to the public. Accompanying the development of this web-based repository will be a network wide initiative focused on training career coaches, case managers, and guidance counselors on how to navigate the workforce development network (including the information contained in the training repository), aligning coaching with industry needs, and providing clearer and more refined guidance for job seekers. Career coaching plays a crucial role in all corners of the workforce development network.

The one stop will become a single point of collaboration for many of the WIOA core partners and their programs. The staff at the One Stops will be able to coalesce their efforts to provide training and education opportunities to their customers through rigorous alignment of the core programs. Seamless integration of referrals and intake procedures, coupled with data sharing positions the one stops to provide more services to the hardest to serve individuals of the state. The joint management of education and training participants will reduce duplicative efforts and create a customer work flow that will seem natural and easy to navigate. Co-locating the WIOA core partners along with optional partners like UI, TANF, and ReXO. Sharing infrastructure costs by co-locating will also ease the fiscal burden of each agency to deliver services to Rhode Island communities.

Workforce development funding can is also an area of difficulty for Rhode Island. About two-thirds of the state's workforce funding comes from federal sources. Each federal funding stream mandates a particular set of services, has different eligibility thresholds and requirements, and places restrictions on how funds can be used. For example, Wagner Peyser mandates the use employment services and cannot be used for skills training while certain WIOA funds must include certain basic

services to customers and cannot be used solely for training. In addition, each funding source requires particular outcomes. These outcomes and how they are measured are not consistent across all core partners. This complicates efforts to establish employer- or employee-centered programs that incorporate multiple funding streams while coordinating efforts with other agencies. Additionally, attaching funding to different target populations and determining eligibility can be burdensome on One Stop staff, especially when counselling the hardest to serve populations. Documentation requirements can cause individuals to come in to the job centers more than once, and some may not have documentation at all. In order to determine individuals eligible for training services, customers may need to report back to the one stops multiple times, they may become disinterested in the process and potentially can leave one stops without any meaningful intervention.

Although Rhode Island is a small state, the geographic locations of training services and delivering services to target populations can be challenging. Programs are concentrated in the north-south corridor between Woonsocket and Providence. For example, there are very few offerings in the western and southern regions of the state for adult education or case management, while occupational skills training is more broadly available. It also seems apparent that the same types of services are funded by multiple agencies. For example, the data suggests that adult education, occupational skills training, and work readiness/job search skills all are funded by agencies such as DLT, DHS, ORS, BHDDH, GWB, and RIDE. While there may be specialized programs to assist targeted populations, there could be value in consolidating and streamlining funding to fewer vendors - making the system easier for users to navigate and providing an opportunity to focus resources only on those providers producing the best outcomes. Additionally, many vendors receive funding from more than one state workforce agency. While in and of itself that practice is not problematic, it does suggest an opportunity for agencies to coordinate and collaborate to improve service delivery and potentially benefit from economies of scale.

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) above.

Please refer to field A of this section

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

Before WIOA, the Rhode Island Governor's Workforce Board operated many of the state's niche workforce programs that were aimed at different populations through customized training programs aimed at specific target populations. The GWB personifies the state's willingness and flexibility in creating effective training interventions for Rhode Island's neediest populations. In addition to trying to meet the individual needs of the citizens of the state, the GWB has also payed close attention to the needs of employers and what sort of assistance they may need to create a booming economy for the state. The Department of Labor and Training along with the GWB recognizes the symbiotic relationship that the state has alongside with both the workers and the employers- what benefits one usually benefits the entire system. Employer partnerships, work readiness, and career pathways are the corner stones that GWB has operated by for years, and now

with the advent of WIOA they are able to bring many smaller tried and true programs to scale to effect change at a much higher level than before. The capacity of the GWB can be outlined in its previous activities and the diversity of their programs, of which will lend evidence to how the board and its DLT staffers will carry on into WIOA implementation. Furthermore, the transparency of the GWB allows it to disseminate information on programs regularly which allows for stakeholders to provide feedback to the Department which in turn makes for more responsiveness of the staff.

In the GWB's 2016-2017 Biennial Training and Employment Plan which the GWB publishes every two years as a general overview of the goals that the state aims to focus on. To address employer needs, the biennial plan recommended the following:

• Identify and support Private Sector Champions Private Sector Champions Private Sector leaders to promote, challenge, and engage business leaders to ensure the workforce system is informed by, and responsive to, employer workforce needs. • Connect Job Seekers with Job Openings by engaging employer partners more thoroughly in the workforce system and by raising awareness, participation, and engagement among employer partners regarding initiatives that support the training and hiring of individuals with significant barriers to employment. • Identify additional opportunities for Incumbent Worker Training and assist businesses in backfilling openings that are created by upgrading current staff.

These goals were entirely aggregated in 2016 with Real Jobs Rhode Island, so it can be said that the state has found a sure-fire way to reach its 2 year goals. Real Jobs Rhode Island has already identified workforce intermediaries such as the South Eastern New England Defense Industry Association (SENEDIA) who have brought together businesses from across the state in the Defense industry to identify their employment needs. These partnerships are using braided grant funding to conduct intensive outreach in conjunction with state efforts to diverse and inclusive populations to fill the positions that are created by this employer-led collaborative effort.

The Education Exchange of Rhode Island has taken the lead of the state's Real Jobs Rhode Island Aquaculture partnership. This is but one example of how RJRI is meeting the need of the states aging workforce and incumbent workers. The Aquaculture Training Partnership has developed an innovative approach to provide training for careers in the oyster farm industry while providing incumbent workers with additional industry certifications to increase skills and wages. When the GWB identifies a deficiency within the state's economy, its capacity to address those issues in a comprehensive manner cannot be overstated.

In combating the loss of youthful workers to larger neighboring economies, the GWB has aimed at upskilling Rhode Island workers in the specific industries that are growing rapidly within the state. The GWB's overall goal as outlined in the 2016-2017 biennial plan for work readiness is to ensure that All youth and adults must have the opportunity to acquire the core literacy, numeracy, and work readiness skills (such as team work, communication, and problem-solving) necessary to succeed in the workplace. In order to provide that opportunity, the Governor's Workforce Board recommended the following goals be met:

• Expand Programming for Youth that includes opportunities to explore industries and occupations while gaining valuable work experience.

• Expand resources and improve services to address literacy, numeracy, English language proficiency, computer skills, and other work readiness skills for Target Populations with populations Barriers to employment

• Establish a statewide, employer-recognized work readiness credential to be incorporated into workforce education and training programs and the K-12 system.

In order to reach these goals, the GWB has instituted incentives for employers to bring on newer and younger potential workers into their industries to give school age kids and out of school youth with work experience that they would have otherwise never had the opportunity to do. As an incentive to provide work experiences for Rhode Island youth and unemployed adults, the GWB offered bonus funding of up to $10,000 through its Incumbent Worker Training Grants and up to $5,000 through its Express Grants to businesses that provided a school-year or summer internship to a youth, or a temporary work experience for an unemployed adult. In FY 2015, 13 youth and four unemployed adults were provided a work experience through this initiative. By the end of FY 2015, this initiative was replaced by the much more successful GWB Work Immersion program.

Conducive to reaching these goals, the GWB expanded resources to improve academic skills for the underprivileged and low income youthful workers of the state, the GWB created the Work Readiness Credential. Businesses locally and nationally cite literacy and math skills along with soft skills as essential elements of work readiness. In surveys of GWB Industry Partners, 50 percent mentioned mathematics and 44 percent reading skills as high priorities for incoming workers. Among GWB Incumbent Worker Training grantees, 46 percent highlighted English language skills. As part of multi-year federal Workforce Innovation Fund grant, the RI workforce development system launched a pilot program in two netWORKri one-stop centers.

In order to establish a statewide, employer recognized work readiness credential RIDLT created the OnRamps program. Funded by a multi-year $2.7 Workforce Innovation Grant from the U.S. Dept. of Labor, the Workforce OnRamps pilot tested different ways to inform and connect job seekers to four different career pathways (CP) in Rhode Island's high-growth industries: Health Care, Hospitality, Information Technology and Manufacturing. FY 2015 concluded with a phasing out of some of the initiatives included in the grant, but still remained focused on sustaining certain elements like the Career Pathways maps, career coaching and work readiness tools and support.

Ninety-two percent (92%) of those enrolled in training completed training with 470 NCRC Certificates and 371 work experience certificates. One overall compelling conclusion from the results was that participants were more successful when the pre-employment training provider had an established relationship with an employer—in combination with effective career coaching, case management, and a work experience opportunity in a career pathway. The GWB is committed and determined to analyze the states workforce and economic issues and address them in a comprehensive manner.

When it comes to Career Pathways, the GWB has set its sights on mapping out exactly how and where individuals may begin their journey to a financially sound career. The GWB laid out the idea that the public workforce system, in partnership with employers, must provide youth and adults with Career Pathways that encompass a continuum of training, education, work experience, and supportive services that lead to good jobs and careers in high-growth, high-demand, strategically important sectors of the Rhode Island economy. In order to attain that goal, the GWB set out the following career pathway activities:

• Promote funding of "Dual Enrollment" Academic Programs that allow students to gain high school and college credits simultaneously, particularly through programs linked to growth sectors of the economy.

• Promote the establishment of new Apprenticeship Programs in traditional and non-traditional occupations with links to secondary education, post-secondary education, and the workforce system.

• Develop Career Pathways in Rhode Island's industry sectors—both those represented by GWB Industry Partnerships and others that have been identified by DLT and/or CommerceRI as strategically important to the state's economic development.

• Act As a bridge to more advanced workforce development programs, build Career Pathways coaching into work readiness programs, pre-employment training programs, adult education, and K-12.

• In order to meet the changing demands of the labor market, establish a process for identifying establish a process for identifying High-Wage, High-Demand occupations that are not supported by existing career pathways.

Although Career Pathway mapping and implementing a comprehensive plan to pick people out of low-wage dead end jobs and put them on the path to a solid career, the Governor's Workforce Board's Career Pathways Advisory Committee continued its work to develop an effective career pathways system in Rhode Island that will better align workforce skills with employer needs. The Career Pathways Advisory Committee met eleven times last fiscal year. Activities included developing career coaching standards, refining memorandum of understand between partners, and compiling RI career pathways best practices. Toward the end of the last fiscal year, the committee developed working groups of policy, program, and capacity building. Attendance at the meetings was robust, with over 25 stakeholders from across the education and workforce system regularly attending. Guided by Governor Raimondo's vision for career pathways, the CPAC will continue to exam current pathways and practices, focus on implementing new pathways strategies and tools, and develop metrics to evaluate the effectiveness of career pathways in addressing the needs of vulnerable populations, while meeting the workforce needs of RI businesses.

The ability to react and meet the current needs of the states employment and economic woes stems from its planning and assessment tools. Every two years, the GWB authors and publishes the Biennial Plan which is a culmination of the states challenges and the ways in which the state will address these challenges based on models of other states along with assistance from USDOL. Using Labor Market Information data and survey data of the state's employers, the GWB and stakeholders identify the industry areas of the state that show promise in providing a boost to the Rhode Island economy while also increasing wages and job availability for individuals. The Biennial Plan aggregates this work and lays out a plan for the next two years of workforce development activities.

In 2014, the GWB also published the Comprehensive System Improvement Plan for Workforce Development in Rhode Island. In June, 2014, the Governor's Workforce Board (GWB) was directed by the RI General Assembly to conduct a Comprehensive System Improvement Plan (CSIP) to "facilitate the seamless and coordinated delivery of workforce services in this state, consistent with the goals and objectives of the board's statewide employment and training plan." The statute further calls for the CSIP, among other things, to identify specific barriers to creating a seamless and coordinated system and provide recommendations to overcome or eliminate these barriers, along with a time frame and responsible agencies for doing so.1 In the fall of 2014, the GWB partnered with the Rhode Island Foundation to expand the scope of the CSIP by producing a comprehensive review and 'map' of RI's workforce development system, including a detailed inventory and

analysis of all workforce development programs in the state and their functions, responsibilities, areas of overlap, common populations served, performance indicators, outcomes, and goals.

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.

Workforce development begins with understanding the demand for a workforce. The development of a workforce consists of many programs and investments, but collectively is meant to connect employers in need of labor for producing the goods and services that make up the economy to the individual workers who will supply such labor. Workforce development has a symbiotic relationship with economic development. Labor is a resource needed by all organizations and as an organization becomes more successful in trading their products or services, the need for labor as a resource increases.

As more organizations require labor and the competition among employers to attract talented workers increases, the economy grows. As the economy grows, so too must the workforce development efforts that ensure a sufficient labor market supply is available to meet the continued demand of employers. If workforce development efforts are unable to maintain employer access to an adequate supply of workers, employers are left with an insufficient resource of manpower which hinders, and in some cases reverses, their economic growth. If a pervasive workforce shortage exists, then the overall economic health of the state is jeopardized and opportunities available to Rhode Islanders shrink. To prevent this situation, workforce development efforts must be coordinated to bring out the talents of each Rhode Islander in a way that those talents match the demand generated by employers.

Therefore, the vision of Rhode Island is a state in which the talent of each Rhode Islander; including individuals with barriers is realized to increase the community capacity and the economic growth of Rhode Island. Robert Chaskin defined community capacity for the Urban Affairs Association's 1998 annual meeting as:

"the interaction of human, organizational and social capital existing within a given community that can be leveraged to solve collective problems and improve or maintain the well-being of a given community. It may operate through informal social processes and/or organized efforts by individuals, organizations, and the networks of associations among them and between them and the broader systems of which the community is part."

In order to maximize Rhode Island's community capacity, individuals have to be aware of the opportunities present, but they must also be cognizant of their own ability to seize those opportunities. These opportunities represent the options a person has to better their life and benefit their communities at large. The more people seize these opportunities, the more community capacity is generated. As community capacity expands, the more competitive a community becomes which increases the number of opportunities available to the community and its citizens. Markets grow when there is healthy competition forcing them to expand, the same idea can be applied to

workforce opportunities. Community capacity can be measured by comparing available opportunities and the ability of community members to seize said opportunities while contending with the barriers they encounter. BY increasing available opportunities, whether it be the availability of jobs or training interventions to employment, and creating better mechanisms for individuals to realize their own capacity to seize opportunities through the services of diverse programs. Within our state we can create more economic competition through collective advancement.

Workforce development serves the purpose of assisting individuals achieve their maximum capacity for seizing opportunities through strategic investment in services, education, and training that improve equity and socio-economic conditions among the state's community members. Such efforts increase the ability of individuals to achieve economic security and to collectively strengthen the competitive advantage of the state. As the competitiveness of the state increases so too does the availability of economic opportunities. This increase in community capacity creates a feedback loop -- increasing community capacity supports greater economic opportunities, which further strengthens community capacity.

The availability of economic opportunities can often be used as an indicator of economic growth. Economic growth is a sign of improving conditions and therefore is often the desired result of strategic investment in workforce development activities. Rhode Island seeks to improve economic growth by providing an environment in which firms are comfortable taking the risk of starting new ventures or expanding existing operations in the state. Investing in those industries that have the greatest potential for offering the most opportunities to the most individuals is the key to Rhode Island's economic development and the improvement of the quality and quantity of opportunities available to its citizens. However, economic development is only possible if individuals in the community have the capacity to access and sustain those emerging opportunities. The focus of this plan is to support economic growth through the development of the state's workforce and community capacity. While the purpose of this plan is set forth under the Workforce Innovation and Opportunity Act, the principles contained in this plan are the guiding principles of all workforce development activities within the state regardless of the statutory or fiscal source of the activity.

The guiding strategies of this plan include:

1. Implementing a demand-driven sector-based strategy to aggregate economic opportunities by employers and their intermediaries

2. A career pathway strategy to provide employment, education, training and support services for individuals, particularly those with barriers to employment, so they can improve own individual capacity to effectively compete in the labor market to achieve economic security for themselves and their families.

3. Develop an effective performance measurement strategy to track labor market interactions beyond federal reporting requirements

To accomplish the statewide vision of maximizing the talents of all Rhode Islanders to meet the labor demand of employers, Rhode Island will utilize a demand driven sector strategy to aggregate the demands of employers by developing industry based sector partnerships and leveraging workforce intermediaries in each sector. To develop the talent of individuals, the State of Rhode Island will use the career pathway strategy and the expertise of the provider network to develop individual plans of service that provide intensive individual attention and provide the combination

of services that provides the greatest competitive advantage to the individual when competing in the labor market.

2. GOALS

Describe the goals for achieving this vision based on the above analysis 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 of employment* and other populations.**
B. Goals for meeting the skilled workforce needs of employers.

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* 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.

** Veterans, unemployed workers, and youth and any other populations identified by the State.

Demand Driven Sector Strategy:

Identifying and aggregating the workforce demands of employers and developing comprehensive solutions to meet those demands is the core of a sector strategy. In Rhode Island, the sector strategy is applied through the use of industry-based partnerships, also known as workforce intermediaries. As defined by Robert Giloth in Workforce Intermediaries for the Twenty-First Century, workforce intermediaries are "homegrown, local partnerships that bring together employers and workers, private and public funding streams, and relevant partners to fashion and implement pathways to career advancement and family-supporting employment for low-skilled workers." Giloth goes on to explain workforce intermediaries complement the work of the public workforce system by focusing on the development of specific workforce solutions and implementing those solutions by integrating services and funding from a variety of sources both public and private. Public workforce program administrators and public boards complement the work of the intermediaries through the setting of policy, providing insight on larger economic trends, and improving access to public programs and funds.

Rhode Island's state workforce board recognized the need to develop the capacity of workforce intermediaries and used state funding to support industry partnership grants. Building on the success of this initiative, Rhode Island under WIOA seeks to bring the

workforce intermediary strategy to scale in all target industry clusters and to use all programs included in this plan to support this effort. This sectoral approach, the most ambitious according to Giloth, will develop workforce solutions that address connecting the labor supply to the workforce demand across employers in an industry cluster. By taking a sector approach to growing workforce intermediaries, Rhode Island will be able to align cross industry, demand-based workforce solutions to the statewide economic development initiatives in the same industry clusters. In addition, sectoral workforce intermediaries will be able to provide higher quality actionable intelligence that policymakers can use to better leverage public resources for the success of Rhode Island's workforce members and employers.

The purpose of the sector based strategy and the use of workforce intermediaries is twofold. First, this strategy provides a structured way for employers within the same sector to collaborate to generate solutions for shared problems. Finding enough workers with the skills needed to supply the labor necessary to produce goods and services is one of the most critical issues facing employers and the reason why a sector strategy is needed to promote workforce development. The use of intermediaries allows employers the ability to collaborate through a third party so that the natural competition of employers doesn't hinder the industry's ability to develop solutions to common challenges that, if met, would benefit all employers in an industry. In addition, the structured collaboration managed through the intermediary helps employers to think critically about their workforce needs and then helps employers articulate those needs in a way that the workforce network can respond to.

The second purpose of a sector based strategy is to provide actionable intelligence to and from those programs serving clients who need to compete for employment, or who need to improve their current employment status. The sector based strategy leverages intermediaries to provide real-time information about current labor needs and future needs. Using intermediaries to take the guess-work out of anticipating where employment is available will help programs working with clients to spend more resources serving clients than trying to perform the role of the workforce intermediary of determining what employers are looking for in the workforce. In addition, by leveraging intermediaries, workforce development partners will have better information around what RI employers actually need in terms of their workforce and how individuals can connect to those opportunities. This intelligence has often been to the missing link between industry projections for workforce needs and the individuals seeking to connect to those projected opportunities. The construction industry provides a good example of this missing link. For many years the construction industry has projected a shortage of workers as existing workers begin to reach retirement age. Due to the long periods of time to train for certain trades, the number of younger workers available to replace retiring workers does not match the number of workers projected to retire. However, despite having this information many workforce programs struggle to find ways to connect their clients to this sector. By building upon the roles of workforce intermediaries in sectors such as construction, information about employer led training and recruitment activities can be provided in real-time to help connect existing clients to existing opportunities that represent the larger industry projections supported by labor market research and trends.

The scaling up of workforce intermediaries has started under the Real Jobs Rhode Island program. This grant program combines several federal and state funding sources to

officially recognize workforce intermediaries and to fund workforce solutions developed by the intermediaries and their participating employers. These partnerships are comprised of at least five employers and at least two diverse entities. Employers in the partnership work collaboratively to identify shared workforce challenges, existing positions to be filled and the qualifications necessary to perform the tasks associated with the positions. In addition, near future labor needs are also identified and analyzed for the skills needed by future workers. Once this analysis of the labor needs of the employers is complete, the employers work with the non-employer partners to develop a strategy for obtaining the workers needed to fill the current or near future open positions. Such strategies primarily include developing industry "boot-camps", on the job training programs, registered apprenticeships or other educational and occupational training programs.

Industry-based partnerships provide the mechanism for employers to convene around common workforce challenges and to enter into a formal partnership with government or community providers of their choice to develop customized solutions to the present labor shortage in their industry. Typically these partnerships are convened by an entity that is trusted in the employer community, such as an employer association, labor union, or other industry intermediary. The partnership develops the training modules, selects or develops the training curriculum, develops a recruitment strategy, and sets the application criteria for entering training. Each partnership is provided a grant advisor from the Department of Labor and Training who is responsible for assisting the partnership refine its planned solution and resolving any challenges the partnership may face implementing their proposed solutions, including obstacles such as connecting to other needed partners, overcoming bureaucratic processes and red tape, and ensuing public funding is received in a timely manner.

The role of the grant advisor and the other program staff involved in the partnership is critical to supporting the capacity building of the workforce intermediary by connecting the intermediary to new potential partners and providing the partnership information about other existing resources that may help the partnership's effort. For example, one Real Jobs Rhode Island workforce intermediary developed a workforce solution that requires the development of a registered apprenticeship program for Biomedical Equipment Technicians and Data Scientists. The grant advisor connected the partnership to ApprenticeshipRI, an apprenticeship intermediary developed under the American Apprenticeship Initiative, to receive technical assistance in developing program standards and registering the new apprenticeship programs. The services of ApprenticeshipRI are provided at no cost to the partnership and will expedite the registration process. Such connections help workforce intermediaries leverage existing resources and maximize existing workforce investments.

In addition to connecting the workforce intermediaries to other resources, the advisor becomes an advocate for the work of the partnership inside of state government. Typically, the workforce intermediary will encounter a government process that creates an undue burden or hinders the very work of the partnership public investments are trying to support. The grant advisor has the authority to bring such issues to program administrators and work with the administrators on developing solutions that resolve the conflict between a partnership's work and a government process.

A prime example of how workforce intermediaries through networked government work through undue burden brought on by governmental processes was apparent in a local school who attempted to acquire used manufacturing equipment to expand school based training for CNC machining. The proposal of a local manufacturing company to sell used equipment to the school that had a CTE program designed to provide students with manufacturing training seemed to be a cut and dry idea that served both the needs of the school and the employer simultaneously. However, as the request moved through the procurement process at the local and state level the response to the school became a purchase document for buying new equipment which would eliminate the employer relationship and limit the number of machines the school could purchase. Through networked government, the employer intermediary for the manufacturers brought this problem to the Department of Labor and Training. The department then facilitated a meeting with the purchasing agencies and the local school. The issue was resolved and the original proposal progressed as planned. In this instance the immediate need to improve the state's workforce was resolved and the agencies involved gained valuable knowledge about how internal procedures could be amended to prevent similar situations from occurring in the future.

Industry-based partnerships with employers as the primary participants invert the common method of employer engagement. Rather than have employers participate in a service provider developed program, service providers are invited to participate in an employer led workforce development program. Employers determine what level of intervention they are willing to support when it comes to preparing future employees. In addition, employers choose which service providers they want to collaborate with in delivering the workforce solution developed. The freedom of partnerships to control their own membership allows existing collaborations to be supported and creates a healthy competition for those organizations, both employer and non-employer, looking to join the partnership. Employers looking to join the partnership must be willing to collaborate with the other employers and commit to the workforce solution developed. Service providers seeking to become partnership members directly must demonstrate their value to the employers and must provide services that fit the proposed solution strategy. Depending on the level of intervention included in the workforce solution, some service providers may provide services as part of the industry-based training program, whereas other service providers may not be directly involved in the partnership but may align their pre-industry training services to the partnership's program.

The ability of service providers to participate in the partnership provides a unique opportunity for providers to work with employers directly to create or customize education or service programs and creates more opportunities for such programs to be delivered within the context of an occupational skills training program. Contextualized program delivery coupled with the direct input from employers will generate opportunities for services provided [Title I and II of WIOA and title IV of Vocational Rehabilitation] by each of the combined partner programs to be provided in tandem to a client participating in a contextualized learning program that also supports the attainment of a secondary education degree or its equivalent, or a post-secondary education credential. By providing services in tandem, workforce partners participating in the partnership will be more responsive to the employer demand for workers, while simultaneously providing more effective services to clients.

The more efficient delivery of services allows employers to connect with workers quicker while ensuring workers are adequately prepared for the training or placement. With the elimination of the sequence of services mandated under WIA, partner programs may now provide more services concurrently and may expedite the client's progress in achieving their career goals. An illustrative example, Title I Youth services can be used to provide tutoring and other academic supports for an older youth to compliment Title II education services provided to a client. In addition to complementary academic services, Title I funds for paid or unpaid work experience can be used to support occupational training for the same client. Further, the older youth may be co-enrolled as an Adult to receive additional training services when transitioning to a permanent position. Using funding in such a way allows participants to succeed in completing the employer-based training in a timely way and provides the employer with a trainee or employee that is achieving both academic and occupational skills attainment.

Diverse entities, regardless of type, participating in workforce intermediary partnerships have the ability to work directly with employers to develop workforce solutions that blend the occupational factors an employer group needs to see addressed with the services and education individual workers need to be successful. The workforce intermediary model builds diverse entitles into the intermediary structure because the entire reason employers need a workforce intermediary is that their recruitment methods alone are unable to supply the workforce they need. Therefore, because employers cannot solve this workforce shortage alone, diverse entities and the people they serve are critical to the success of any workforce solution developed.

In addition to having direct access to employers, the workforce intermediary strategy provides diverse entities the opportunity to develop customized programs and service delivery methods for the intermediary's workforce plan. This ability gives the diverse entities a way to develop solutions that do not need to be system-wide changes. Many divers entities have experienced pressure to make system-wide changes is response to employer needs. Such large scale projects, such as developing CTE curriculum or drafting elements of an adult education provider contract, hinder the entity's ability to engage in customized solutions development. A sector-based training program may not require education reform or to different statewide regulations changes around service delivery and the demand captured by the partnership may not represent a large enough or long-term type of employer demand to justify legacy system changes. Yet just because employer needs for workforce talent may not warrant a system-wide change, the demand for those workers is real and diverse entities are needed by employers to find and retain those workers. The recognition of the need for diverse entities to participate in the workforce intermediary helps those entities connect client serving programs to the workforce solutions. The new workers required by employers must come from the client pools served by diverse entities, however, by working through workforce intermediaries the expertise of employers and diverse entities are brought together in an official capacity to solve workforce shortages and connect clients to open positions.

As partnerships form and the results of workforce solution plans are generated, best practices will emerge. While each partnership responds to the unique demands of its employer members, a community of learning will develop among partnerships, helping employers to better articulate their needs and match those needs to the appropriate service provider, helping service providers to better respond to the needs of employers in a

meaningful way and more effectively serve their clients. In addition, grant advisors and other government staff can begin to solve practical challenges facing partnerships and can refine workforce, economic, and education policy to further support the efforts of the partnerships.

Another benefit of bringing employers and service providers together in industry-based partnerships is employers will learn how to better signal their workforce needs to trigger the appropriate response from the government and non-government workforce organizations. Translating the real time talent needs of an employer into a recruitment or application qualifications often results in a misalignment of the skills of potential candidates to the skills required at the production level or a shortage of qualified candidates responding to a recruitment. For example, education credentials are often required by employers more as a means to measure an individual's reliability rather than their academic skills. However, if a six week "boot camp" or similar program can demonstrate to an employer in real-time the reliability of a candidate than the employer may hire the individual with more confidence in the long-term success of the individual while the individual is spared having to overcome the barrier of having an academic credential before being qualified to gain employment. By working together, employers and service providers can produce a more accurate descriptions of what skills employers are looking for and how to find or develop those skills in the pool of available workers.

As the capacity of the workforce intermediaries within the targeted sectors of the economy grows, the intermediaries will provide industry employers even greater assistance in identifying and meeting employer workforce development needs. For many employers across the industry sectors, internal human resources capacity has been reduced. Companies have shed many of the internal human resources functions and analysis capability, limiting the available internal succession or expansion programs to ensure workforce continuity. Sectoral workforce intermediaries are positioned to fill this need. In earlier sector based partnerships, intermediaries were able to resolve single workforce challenges and to pilot best practice models. However, by taking the workforce intermediary strategy to scale, workforce intermediaries will be able to provide more comprehensive plans to address employer needs that are both immediate and long-term. Such efforts will include topics such as succession planning, reducing turnover, and developing post-employment training for continuing staff development. The workforce development network offers several tools to help employers address their workforce challenges. Educational programs, internships, on-the-job training, registered apprenticeship, and other programs can be used in the workforce intermediary's plan unifying workforce efforts across the industry and within individual employer.

As workforce intermediaries begin to work with employers in a more comprehensive way, the government programs and the diverse entities participating in the intermediary will be able to develop investment strategies that braid multiple resources and funding sources together to support the planned workforce solution. Participating programs can add resources to aspects of the workforce plan that align with the program mission and goals. By looking to create a comprehensive strategy and investment plan, the intermediary will be able to attract more resources for its employer partners and their future workers. Participating programs receive better placement and retention of clients within the employer community and receive a more transparent account of how funds are used to

support activities. This transparency not only allows for more effective investment, but will help prevent programs duplicating efforts and funding.

As partnerships begin to develop comprehensive workforce strategies and use the investments supporting the strategy, the larger workforce related programs, including all programs contained in this plan, will be able to analyze the trend of these workforce solutions and create more informed policy and investment decisions to improve the function and collaboration of workforce network entities. As the workforce intermediaries grow in capacity and organize more of the employer demand for workforce, the larger workforce related programs will align with each other to ensure greater connections to industry partners and to scale up existing efforts to complement the increased capacity of the intermediaries. This relationship creates a sustainable cycle of improving program alignment with aggregated demand where employer participation in intermediary partnerships increases the information available regarding employer demand to diverse entities, who are able to respond more effectively to employer demand.

Sector partnerships are now the primary mechanism for delivering workforce funding to employers, but will not be the sole mechanism. Businesses who wish to utilize subsidized services can be helped regardless of whether they belong in a sector partnership or not. Also, the grant program Real Jobs Rhode Island is not the only program that supports the sector strategy. The sector based approach helps build the capacity of many intermediaries including the work underway in our core programs. These include the Business Leadership Network operating under the Vocational Rehabilitation program, the workforce councils that are apart of Job Corps, and other existing grant work performed by the GWB such as the Workforce Innovation Grant. Workforce intermediaries will be prioritized for all available funding and services.

All programs should encourage employers to engage in industry collaboration to foster strong relationships between businesses, governments, and individuals. These new sector strategies are in no way exclusionary, the new standard of partnerships is meant to bring all parties responsible for the growth of the state's economy together. While not required, the participation in a partnership should be the primary way employers engage with the workforce network. The ability to aggregate demand and develop effective solutions depends on the use of this sector strategy. The ability for businesses that wish to utilize already established tools such as job listings through EmployRI without working with their industry peers will remain, however as employers seek more comprehensive workforce development solutions the mechanism of sector partnership will be used to assist employers in the development of these solutions

Career Pathway Strategy:

The goal of the sector based strategy is to aggregate the workforce needs to employers and to provide and mechanism to clearly articulate these needs to the workforce development network. This goal aims to help industries development statements of need that translate into activities that meet those needs, such as recruitments, training, etc. The career pathway strategy compliments this effort by coordinating the services and resources necessary to connect individuals to the opportunities presented as a result of the work of the sector intermediaries under the sector based strategy. The career pathway strategy is intended to aggregate individuals in the labor market and help those ready to be connected to the opportunities provided by the sector strategy find placements within sector based training

and employment openings while preparing those who are not yet ready to take advantage of future opportunities.

It is important to understand that career pathways are not linear, nor the opportunities presented under the sector strategy will be unattainable to those individuals with barriers to employment. In fact, sector strategies often result in diverse populations participating in the opportunities generated by the workforce intermediaries. For example, the EARN Maryland program served a total of 912 people between June 2014 and December 2015 in entry level opportunities and of those participants 60% were women and 83% were minorities. Participants in the EARN Maryland program were also diverse in age with 35% served under the age of 30 45% between the ages of 30 and 49, and 20% over the age of 50 including 6 people over the age of 70.

The benefit of having a sector strategy is that it complements the career pathway strategy is that the workforce intermediaries are able to connect employers and workforce development partners directly. This provides workforce partners clear information about the requirements for participating in a sector based opportunity, which lends clarity on who to refer to these programs. At the same time the intermediary can work with workforce partners to determine if any unnecessary barriers are being put in place by the industry that are preventing quality applicants from being accepted.

In addition to managing barriers, the sector approach compliments the career pathway strategy by stabilizing the communication of employer demand which allows workforce partners to contribute to establishing an individual's career pathway so the individual can achieve his or her own goals in the most effective and efficient way. As mentioned above, a career pathway is not linear, nor is it the same for every individual. Understanding the needs and goals of the individual will inform what services are needed and the more effective tuning of those services. The career pathway strategy is the mirror strategy of the sector based approach, helping individuals determine their needs and then meeting those needs so the individual can take advantage of the opportunities presented through the sector strategy.

The Career Pathway elements provided by the United States Department of Labor and used by the GWB Career Pathway Advisory Committee illustrate that career pathways represent the client based perspective of the demand driven sector strategies. The six elements are as followed;

- Build cross-agency partnerships and clarify roles
- Identify sectors and industry and engage employers
- Design programs that meet the skill needs of high demand industries
- Identify funding needs and sources
- Align policies and programs
- Measure system change and performance

When employing the career pathway strategy that includes these elements, Rhode Island aligns with the definition of career pathway provided by WIOA. A career pathway is defined by WIOA Sec. 3 (7.) as:

"A combination of rigorous and high quality education, training, and other services that;

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;

- Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937;

- Includes counseling to support an individual in achieving the individual's education and career goals;

- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

- Enables an individual to attain a secondary school diploma or it recognized equivalent, and at least 1 recognized postsecondary credential; and

- Helps an individual enter or advance within a specific occupation or occupational cluster."

The goal of the Rhode Island career pathway strategy is to create a client-centered planning process that can be used by all entities that may contribute to the individual's career and educational development. By creating uniform processes that encompass intake, referral, and service delivery across programs we ensure that all participating agencies have a defined role and how to execute those roles equitably. When a client comes to a one-stop career center for services, they should move seamlessly through the frontline staff that represent separate agencies as if they are one single entity and not multiple entities working through collocation. Since no one agency has the ability to meet every need of any given client it is crucial that systems flow smoothly into each other between programs. The flexibility of WIOA and the nature of combine planning allows us to create a career pathway strategy that is facilitated and operated by all participating agencies, intermediaries, and frontline staff.

The career pathway planning for each individual shall have several components. First, the client profile will be established. This will provide demographic information and previous experience and education levels to help the service, training, or education entity know more about the individual client. The second component will be goal setting with service providers. The client will work to set their own goals regarding their career, education attainment and any other relative life goals, such as entering the military, breaking an addiction, obtaining housing, etc. Once the client has established their goals, then the client will identify their immediate needs, such as housing, finding immediate employment, filing for unemployment insurance, etc. Next, the client will identify their short term needs, which include any need that should be met in the next two years such as, obtaining a high school diploma or its equivalent, becoming English proficient, etc. Third, the client will identify their long term needs, such as finishing a registered apprenticeship, applying for an advanced position within a desired sector, becoming economically self-sufficient, etc.

Due to the unique characteristics of each individual, the needs identified and the expected timeline for meeting those needs will vary depending on the individual. In addition, the career pathway planning should continue to evolve as clients experience success or if a client needs to adjust their goals and needs. Once the client's goals and needs are identified, the client should work with service providers to develop a financial plan that allows immediate needs to be met while supporting the individual's progress on meeting their longer-term goals. This plan may incorporate topics such as planning around expected unemployment insurance payment, financial assistance for college classes, the cost of training, childcare, or other topics. Once the financial needs of the client are understood the councilor can recommend an appropriate combination of services, training, and education to assist the client in meeting their needs in a financially sustainable way and refer the client to other professionals to assist them in accessing services. WIOA also provides for financial literacy services and clients should be offered the opportunity to take advantage of such services during as the financial planning process begins.

Financial planning with the service providers includes identifying other potential resources the client may be entitled to from other workforce development or supportive service programs. Because many of the available programs education rehabilitation services are client focused, program funding may be braided on an individual basis to provide the client with the most complete array of services to improve their competitiveness in the labor market. While a single program staff may be unable to determine client eligibility for other programs, the client-centered network will provide access to other program staff directly in order to quickly gain a response from a partner program about the eligibility of the client for additional services or resources. The financial and programmatic resources received by the client should support all aspects of the individual's career pathway plan.

By having the client complete a goal setting and needs assessment exercise, the service provider can determine what referrals should be made to connect the individual with additional resources and subject matter experts that can further help provide direction and assistance to the individual. For example, a client who is finishing an adult education program and has obtained a GED may be looking to participate in a sector-based training program. The adult education provider may refer the individual to the American Job Center where the individual can be connected to the workforce intermediary providing the sector-based training program, who in turn may connect the individual to the financial aid office of the local community college if college coursework is an element of the training program. This approach recognizes that no single entity has all the information a client may need and that the comprehensive career pathway planning will need multiple contributors who will help bridge the client's current situation to the next step in connecting the client to the next area of information or service. Again, a collaborative network government approach will allow entities in the workforce network to remain true to their core missions while assisting the client to connect to the services and resources needed.

Such opportunities and resources will be combined in such a way as to maximize the individual's competitiveness so they can successfully compete to achieve their career goals. This career pathway strategy will be used for WIOA clients initially, however, this tool can be adopted in other programs including, secondary and post-secondary institutions. Because career pathway planning reflects the individual's specific goals and needs, the appropriate combination of services is not limited and can be used for any population. In

addition to being versatile for different client types, this plan can also be used to coordinate service delivery across programs and service providers.

The need to expand career pathway planning into secondary and post-secondary institutions is especially critical when addressing the workforce needs of both in-school and out-of-school youth. While the Carl D. Perkins Career and Technical Education Act is not a combined program partner in this plan the relationship between the Career and Technical Education programs offered at the secondary level and the workforce development opportunities for youth are integral to the overall success of the state vision. Career pathway planning should start for CTE students currently enrolled in high school using existing student support mechanisms. In addition, CTE centers and programs should be included in sector-based intermediary partnerships to better align the education programs to the training requirements of industry. Such alignment will give CTE program administrators better insight into how to maintain program relevance to the employer community while providing employers a pipeline of talented new workers. Such alignment would promote the continuation of CTE students into industry training programs, such as registered apprenticeship or other workforce intermediary sponsored training. The youth funding available for in-school youth provided under Title I of WIOA, should be prioritized to support youth involved in CTE programs.

Career Pathway Planning for youth goes beyond the connection to the K-12 system and will include all programs and services necessary to assist the youth participating achieve their education and career goals. The career planning for participating youth should address all elements that effect their ability to meet their career and educational goals. Such elements include leveraging activates to support the success of youth populations with disabilities, such as those provided in partnership with the Office of Rehabilitation Services, while the youth pursue both the educational and career goals. In addition, the provisions of adult education for youth who are not attending school and who have not attained an equivalency credential will be included in the planning process. Ensuring those youth who receive TANF services are included in this planning is also imperative to the success of this strategy. This work is already underway in the Community Action Plans (CAP) that operate the youth centers around the state. Such inclusionary practices go beyond the scope of this plan to include other services outside those directly connected to career and education activities such as medical care. Overall, the career pathway strategy intends to eliminate silos among core programs and coordinate the services available to the youth in a way that is centered around helping the individuals meet their own goals. Such efforts will require the day to day collaboration of programs and partner staff across organizations both governmental and non-governmental. The mechanisms to be used to foster such collaboration are described in the implementation section.

An example of such alignment can be seen through the relationship of the Title I and Title II adult education literacy programs. This example illustrates how core and combined programs should identify services can be delivered in tandem to maximize the resources available to participant. For older youth over the age of 18, the career pathway plan should include those additional services provided under Title I for youth, such as activities leading to a high school diploma, high school diploma equivalency, or post-secondary credential, as well as additional services provided for Adult workers. Training services available to Adult and Dislocated Workers under Title 1 may be used for qualifying older youth. Career pathway planning for an older youth may span a longer timeframe and may include

additional milestones than a similar plan for an Adult or Dislocated Worker. For example, an out-of-school youth may need job experience services funded under Youth services which may lead to a placement requiring additional support provided under the Adult and Dislocated Worker Training services. Such a transition may include a Youth summer internship that becomes the need for On-the-Job Training once the Youth is hired into a permanent position. Similar coordination should be taken among all core and combined programs.

Whether it be for services intended for a youth or adult client, the customer centered career pathway strategy should be implemented throughout all programs. Standards for career pathway planning will be developed under the leadership of the state board and will assist workforce, educational, and service partners engage in a coordinated conversation around serving shared clients and provide mechanisms partners can use to attach a particular resource or service to an individual's plan without having the responsibility of providing all the services and resources the client may need. This work has begun under the Career Pathways Advisory Committee convened under the Governor's Workforce Board. This committee is currently using the U.S. DOL career pathways readiness assessment tool to evaluate current initiatives in preparation for the implementation of the network-wide career pathway strategy outlined above.

Additionally, through the Office of Rehabilitation (ORS) an extensive infrastructure is in place with the Rhode Island Department of Education a (RIDE) and every local education authority (LEA) to provide transition services to in-school youth with disabilities. The intent of this partnership is to ensure that youth with disabilities have an opportunity to experience career exploration, real work experiences and a plan for employment after high school. Through a Cooperative Agreement between RIDE and ORS, a Masters level Vocational Rehabilitation Counselor from ORS works with every high school in the state of RI to provide technical assistance, case consultation and function as a referral source. Referrals to ORS occur while youth are still in high school so assessments, community based work experiences and transition planning can occur prior to graduation. This relationship between youth and ORS prior to graduation creates a link for youth to the world of adult services and ongoing movement toward employment.

College and Career Focus

Since the initial issuance and submission of this state plan, Rhode Island Governor Gina Raimondo announced an ambitious goal to ensure that 70% of working-aged Rhode Islanders hold some form of post-secondary credential by the year 2025. Based on national data as well as state labor market projections, the Governor found that nearly seven out of ten jobs created in Rhode Island over the next decade will require more than a high school diploma. Reaching this ambitious goal will require an 'all hands on deck' effort, and WIOA clients such as adult learners and job seekers will be an essential area of focus.

As mentioned previously, Rhode Island's career pathways strategy takes an individualized approach to career services that will be built around whatever strategies are most effective in helping the client meet their own career goals. In some cases, a client may have some post-secondary education but no degree - completing their education and securing that degree may be part of their personal and professional goals. Although WIOA does not prioritize college degree completion as a direct goal, we nonetheless recognize the value of

college completion to an individuals' employability and to the overall economy, as well as the critical role that WIOA could play in helping customers meet their aspirations.

A key lever to help advance this workforce and economic imperative will be the state's Eligible Training Provider List. Rhode Island plans to review present ETPL policies and practices to better support college completion, as well as the goals of the Real Jobs RI industry sector initiative. Customer choice is paramount, and any policies and activities related to this strategic priority would focus on expanding options and opportunities for clients.

Performance Measurement Strategy:

As Rhode Island responds to the legislative intent of WIOA to revamp and revitalize the methods and parameters state governments use to create effective workforce development intervention, developing the capacity to effectively measure the success of such interventions becomes imperative. Such measurements around the mechanics and effectiveness of an intervention provides policy makers the information necessary to determine the success of the program and effects future investment decisions. Although WIOA has been enacted to modernize our workforce development systems, it lacks sufficient performance metrics and uses measures which outcomes do not provide adequate documentation of progress. Rhode Island, through its innovative Real Jobs Rhode Island workforce development sector strategy program has taken upon itself to move beyond WIOA's general output measurements and will use more precise outcome based measurements in order to better understand the included program's efficacy on the state's economy. These measures and others like them will be managed at the state level access programs, providing decision makers a clearer understanding of the effectiveness of the interventions provided. These core measures are required for all six core programs.

The primary indicators of WIOA for core programs miss their intended mark and do not provide for the reporting of the programs in a comprehensive way. The primary indicators include recordings of how many participants enroll and finish the program, their employment status six months and a year after exiting the program, their annual salaries after six months and a year after exiting the program, and whether or not they have obtained post-secondary diplomas or certificates after leaving a WIOA funded program. Rhode Island has operationalized these measures in a formal Performance Accountability Policy and has also selected "Retention with the same employer" and "Employer Penetration Rate" as our measures of Employer Effectiveness. With the State Workforce Board as thought-leader, Rhode Island plans to enhance the use and analysis of these indicators to better inform program design; however, the amount of information that can be extracted from these indicators is somewhat limited.

What these primary indicators fail to produce is an idea of whether or not the programs or services are responsible for these measured successes, and create assumptions about participants and the overall effectiveness of programs. By only using output metrics via recording the number of clients entering and exiting a program and whether or not they gain and retain employment; WIOA assumes the participant completed the program, entered a job related to the training, and retained that employment due to the skills obtained within the program. Yet the metrics mandated in WIOA do not allow these assumptions to be verified. When analyzing data, it is indeed accurate to say "x" number of participants "exited" the program and are now employed as an output of a program, but this

information is not as useful for future programs as reporting that "x" number of participants reached a specifically defined outcome based on career pathway planning activities.

The state of Rhode Island is emphasizing continuous service and not rushing premature exits to simply meet these output measures. The state recognizes that clients in the greatest need of service from multiple programs to both gain and retain employment will likely need services beyond the date of employment. Prematurely having a client exit may jeopardize the long term success of that client and limit their ability to connect to future services. The state will track the outcome measures that will be developed in addition to the complementary outputs to these required by WIOA. Such outputs will include measures such as "entered employment before exit of the program", employment retention (6 month and a year after exit). Outcome measures will assist the state in tracking individuals between programs, and the change experienced by a client as a result of both the individual and collective effect of all interventions provided. This will provide the state information on the existence of gaps between programs and will allow decision makers to make informed decision regarding strengthening referrals, increasing co-enrollment, and identifying processes that may hinder the delivery of services concurrently.

For example, a program participant could be employed six months or a year after exiting a program, but their employment may be unrelated to the subsidized training they received, or their salaries may also not have been determined by the skills gained in the program. Furthermore, the language of "exiting the program" within WIOA does not indicate whether the participant completed the training programs or not. These metrics fall short of indicating program effects on employment rates, labor force skill acquirement, or wage rates increases. Although the Governors Workforce Board (GWB) under WIOA mandate is to be representative of businesses located in different geographical regions throughout each state, WIOA's metrics do not attempt to measure whether or not these subsidized services and programs are being utilized by participants throughout these represented regions.

Such measures do not provide enough information to decision makers about the effectiveness of a program. Therefore, Rhode Island will develop outcome measures to determine the effectiveness of both individual programs and the strategies outlined in this plan to supplement the output measures required by WIOA. Outcome measures will be used to analyze the comprehensive effect of a program, and more broadly the workforce network as a whole. While individual outputs can track the efficiency of individual program elements, outcome measures will assess the overall quality of change experienced by program participants and employer partners.

Outcome measures focus on quality and the improvement or change experienced by a participant. Such measures allow for multiple aspects of a participant's experience to be tracked at the same time as the participant progresses through a program. Outcome measures can be connected across programs to provide better data around the number of participants in multiple programs or who complete one program and enter another. By linking outcome measures between programs and analyzing the quality of change experience by participants as a result of a single program and the combined results of multiple programs, the acuity of serving individuals with different barriers to employment will be expressed and can inform future negotiated performance levels for individual programs. By having the necessary data to analyze who is being served and the level for service necessary to provide participants the skills they need, despite any barriers they may

experience, programs will be able to set more realistic, evidence based performance levels for the WIOA common measures.

The mechanism for developing such comprehensive measures already exists; Rhode Island's GWB under state law is responsible for gathering and distributing information from, and to, all agencies, departments, and councils within the coordinated-programs system. The board's duties also include maintaining a comprehensive inventory and analysis of workforce development activities in the state to support the biennial statewide employment and training plan. This collection of data provided to the GWB through programs like RJRI allow the board to make comprehensive decisions about broader economic growth. Recording general output measurements alone may provide an unclear picture of the effectiveness of workforce service interventions.

Rhode Island's Department of Labor and Training has begun this work in collaboration with the Harvard Kennedy School Government Performance Lab by developing the Real Jobs RI project that will utilize robust outcome based metrics that paint a complete picture of the program's effectiveness in creating success for program sector partners and training participants alike. The work underway for this program provides a detailed example of the type of outcome based performance measurement Rhode Island seeks to create to more accurately measure the effectiveness of the strategies of this plan. These measurements aim to keep track of every level of the training process and all parties involved; the RIDLT will create reports for the following;

- Individual Participant Background Measurements
- Training Module Measurements
- Participating Employer Measurements
- Industry and Sector level Measurements
- System Level Measurements

On an individual participant level, the measurements that the RI DLT will use in The Real Jobs Rhode Island program will allow the agency to accurately gauge the programs effect on creating upward mobility for participants. Understanding a participant's background is imperative to knowing the possible barriers to employment and how to address them. These metrics also allow the department to follow individuals more closely on their advancement into the field they train for. Recording a participants pre-training wage gives the DLT and the GWB a standpoint in which to measure programs efficacy on these factors and allows the agency to compare them to post-training wages. This also gives a broader understanding of how programs affect the Rhode Island workforce as a whole.

The training module measurements the RIDLT will use to gauge the success of individual training programs go far beyond the reporting mandates in WIOA. By paying close attention to the relevancy of a participant's employment after completion (not just exodus) of the program, we can ensure that it is in fact the program's training that affected the participant's employment status. It is critical to know whether a client staying in the industry in which they were trained resulted from these interventions provided by the programs. Without these measurements the

RIDLT could not know if interventions are assisting sector partners filling vacant positions, which is the main goal of a demand based strategy. These metrics will also pay close attention to the advancement of incumbent workers and their wages within their industries.

In order for RJRI to truly be the "demand driven" sector strategy that it is expected to be, the RIDLT will closely monitor how satisfied employers are with the number of participants they actually employ while taking into account the acuity of those positions filled. These metrics ensure that businesses are fully involved in every step of this process and the agency retains them as partners in future employment acquisitions. Having a close relationship with business partners will give the department the information to determine efficient protocols and processes and where to make changes. Through this metric system the RIDLT will be able to gather more accurate information on the effect of program intervention on productivity and employment quality and communicate this information to other workforce partners. By recording the number of positions retained as a result from programs we can follow which programs create the most stable employment and reproduce these results to later projects.

On a larger scale, beyond individual businesses, within the state's industries and sectors the RIDLT will collect industry specific information to determine the program's effect on sectors as a whole. Although Real Jobs Rhode Island is designed to give jobs to unemployed citizens across the state, the state seeks to also ensure that the industries that fuel our economy are benefitting from these programs across the board and not just support isolated employer needs that cannot be related to a larger industry based strategy. By recording the sum of positions filled across multiple businesses in a sector, a better understand of whether meaningful changes to the state's economy have taken place will emerge. This also makes industries more competitive with our neighboring states and helps attract new businesses.

The System level measures the RIDLT will collect will give the state as a whole the information necessary to make statutory and legal changes in order for programs to operate more smoothly. These measures will be, in effect, an aggregated sum of the individual and sector level measures. This will shed light on where the state can cut red tape where necessary. These metrics will also allow the state government to know whether the system is becoming more responsive to the needs of local businesses and where they can create more efficient policies.

Although WIOA does not mandate such rigorous measurement requirements, Rhode Island believes proper and precise outcome based metrics lead to a greater understanding of how programs affect our state's economy. Real Jobs Rhode Island is based on aligning agency and program goals with these new performance metrics. Rhode Island will take the comprehensive performance measurement structure developed for RJRI to scale, by adding additional outcome measures for all programs included in this plan.

As evident by the combined planning process, Rhode Island recognizes that it is the combined efforts of programs and services that truly affect change for clients and employers in the state. No agency or program can complete the work alone. When measuring progress towards the goal of providing the correct combination of investment and service to ensure individual workers are connected to opportunities in the labor market while ensuring employer demands for skilled workers are met, outcome measures for the network must be adapted. These reporting mechanisms will allow the agency to use

recorded data to improve program operations, evaluate programs impacts on workers and employers while creating a funding feedback loop.

By using evidence based outcomes the state can gather real-time information on what aspects of services and programs are effective in employment interventions which, in turn, will affect funding allocation. By taking the initiative through RJRI Rhode Island will be the example of a laboratory of democracy that other states can use as an example in creating new workforce development programs. When developing comprehensive outcome measures for WIOA partner programs the state of Rhode Island will convene subject matter experts both government and non-government to develop the measures with support from Harvard's Kennedy School of Government Performance Lab. Outcome measures for the six core programs will be developed over the next year, followed by the combined partner programs.

3. PERFORMANCE GOALS

Using the table provided in Appendix 1, 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.)

EMPLOYMENT(SECOND QUARTER AFTER EXIT)	Proposed/Expected PY 2018	Proposed/Expected PY 2019
Adults	73.3%	73.6%
Dislocated Workers	78.0%	79%
Youth (Education, Training, or employment)	55.8%	56.6%
Adult Education	BASELINE	BASLINE
Wagner Peyser	65.0%	67.0%
Vocational Rehab	BASLINE	BASELINE
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)		
Adult	72.8%	73.6%
Dislocated Worker	80.0%	81.0%
Youth	59.2%	59.4%
Adult Education	BASELINE	BASELINE
Wagner-Peyser	62%	63%
Vocational Rehabilitation	BASELINE	BASELINE

EMPLOYMENT(SECOND QUARTER AFTER EXIT)	Proposed/Expected PY 2018	Proposed/Expected PY 2019
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT**)**		
Adults	$5,800	$6,000
Dislocated Workers	$7,000	$7,100
Youth	BASELINE	BASELINE
Adult Education	BASELINE	BASELINE
Wagner-Peyser	$5,122	$5,144
Vocational Rehabilitation	BASELINE	BASELINE
CREDENTIAL ATTAINMENT RATE		
Adults	68.0%	69.0%
Dislocated Workers	77.4%	77.8%
Youth	53.7%	60.6%
Adult Education	BASELINE	BASELINE
Wagner-Peyser	NA	NA
Vocational Rehabilitation	BASELINE	BASELINE
MEASUREABLE SKILLS GAINS		
Adults	BASELINE	BASELINE
Dislocated workers	BASELINE	BASELINE
Youth	BASELINE	BASELINE
Adult Education	52.0%	53.0%
Wagner-Peyser	NA	NA
Vocational Rehabilitation	BASELINE	BASELINE

4. ASSESSMENT

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

As Rhode Island responds to the legislative intent of WIOA to revamp and revitalize the methods and parameters state governments use to create effective workforce development

intervention, developing the capacity to effectively measure the success of such interventions becomes imperative. Such measurements around the mechanics and effectiveness of an intervention provides policy makers the information necessary to determine the success of the program and effects future investment decisions. Although WIOA has been enacted to modernize our workforce development systems, it lacks sufficient performance metrics and uses measures which outcomes do not provide adequate documentation of progress. Rhode Island, through its innovative Real Jobs Rhode Island workforce development sector strategy program has taken upon itself to move beyond WIOA's general output measurements and will use more precise outcome based measurements in order to better understand the included program's efficacy on the state's economy. These measures and others like them will be managed at the state level access programs, providing decision makers a clearer understanding of the effectiveness of the interventions provided. These core measures are required for all six core programs.

The primary indicators of WIOA for core programs miss their intended mark and do not provide for the reporting of the programs in a comprehensive way. The primary indicators include recordings of how many participants enroll and finish the program, their employment status six months and a year after exiting the program, their annual salaries after six months and a year after exiting the program, and whether or not they have obtained post-secondary diplomas or certificates after leaving a WIOA funded program. Rhode Island has operationalized these measures in a formal Performance Accountability Policy and has also selected "Retention with the same employer" and "Employer Penetration Rate" as our measures of Employer Effectiveness. With the State Workforce Board as thought-leader, Rhode Island plans to enhance the use and analysis of these indicators to better inform program design; however, the amount of information that can be extracted from these indicators is somewhat limited.

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The state of Rhode Island is emphasizing continuous service and not rushing premature exits to simply meet these output measures. The state recognizes that clients in the greatest need of service from multiple programs to both gain and retain employment will likely need services beyond the date of employment. Prematurely having a client exit may jeopardize the long term success of that client and limit their ability to connect to future services. The state will track the outcome measures that will be developed in addition to the complementary outputs to these required by WIOA. Such outputs will include measures such as "entered employment before exit of the program", employment retention (6 month and a year after exit). Outcome measures will assist the state in tracking individuals between programs, and the change experienced by a client as a result of both the individual

and collective effect of all interventions provided. This will provide the state information on the existence of gaps between programs and will allow decision makers to make informed decision regarding strengthening referrals, increasing co-enrollment, and identifying processes that may hinder the delivery of services concurrently.

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Such measures do not provide enough information to decision makers about the effectiveness of a program. Therefore, Rhode Island will develop outcome measures to determine the effectiveness of both individual programs and the strategies outlined in this plan to supplement the output measures required by WIOA. Outcome measures will be used to analyze the comprehensive effect of a program, and more broadly the workforce network as a whole. While individual outputs can track the efficiency of individual program elements, outcome measures will assess the overall quality of change experienced by program participants and employer partners.

Outcome measures focus on quality and the improvement or change experienced by a participant. Such measures allow for multiple aspects of a participant's experience to be tracked at the same time as the participant progresses through a program. Outcome measures can be connected across programs to provide better data around the number of participants in multiple programs or who complete one program and enter another. By linking outcome measures between programs and analyzing the quality of change experience by participants as a result of a single program and the combined results of multiple programs, the acuity of serving individuals with different barriers to employment will be expressed and can inform future negotiated performance levels for individual programs. By having the necessary data to analyze who is being served and the level for service necessary to provide participants the skills they need, despite any barriers they may experience, programs will be able to set more realistic, evidence based performance levels for the WIOA common measures.

The mechanism for developing such comprehensive measures already exists; Rhode Island's GWB under state law is responsible for gathering and distributing information from, and to, all agencies, departments, and councils within the coordinated-programs system. The board's duties also include maintaining a comprehensive inventory and analysis of workforce development activities in the state to support the biennial statewide employment and training plan. This collection of data provided to the GWB through programs like RJRI allow the board to make comprehensive decisions about broader economic growth. Recording general output measurements alone may provide an unclear picture of the effectiveness of workforce service interventions.

Rhode Island's Department of Labor and Training has begun this work in collaboration with the Harvard Kennedy School Government Performance Lab by developing the Real Jobs RI project that will utilize robust outcome based metrics that paint a complete picture of the program's effectiveness in creating success for program sector partners and training participants alike. The work underway for this program provides a detailed example of the type of outcome based performance measurement Rhode Island seeks to create to more accurately measure the effectiveness of the strategies of this plan. These measurements aim to keep track of every level of the training process and all parties involved; the RIDLT will create reports for the following;

- Individual Participant Background Measurements
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On an individual participant level, the measurements that the RI DLT will use in The Real Jobs Rhode Island program will allow the agency to accurately gauge the programs effect on creating upward mobility for participants. Understanding a participant's background is imperative to knowing the possible barriers to employment and how to address them. These metrics also allow the department to follow individuals more closely on their advancement into the field they train for. Recording a participants pre-training wage gives the DLT and the GWB a standpoint in which to measure programs efficacy on these factors and allows the agency to compare them to post-training wages. This also gives a broader understanding of how programs affect the Rhode Island workforce as a whole.

The training module measurements the RIDLT will use to gauge the success of individual training programs go far beyond the reporting mandates in WIOA. By paying close attention to the relevancy of a participant's employment after completion (not just exodus) of the program, we can ensure that it is in fact the program's training that affected the participant's employment status. It is critical to know whether a client staying in the industry in which they were trained resulted from these interventions provided by the programs. Without these measurements the

RIDLT could not know if interventions are assisting sector partners filling vacant positions, which is the main goal of a demand based strategy. These metrics will also pay close attention to the advancement of incumbent workers and their wages within their industries.

In order for RJRI to truly be the "demand driven" sector strategy that it is expected to be, the RIDLT will closely monitor how satisfied employers are with the number of participants they actually employ while taking into account the acuity of those positions filled. These metrics ensure that businesses are fully involved in every step of this process and the agency retains them as partners in future employment acquisitions. Having a close relationship with business partners will give the department the information to determine efficient protocols and processes and where to make changes. Through this metric system the RIDLT will be able to gather more accurate information on the effect of program intervention on productivity and employment quality and communicate this information to other workforce partners. By recording the number of positions retained as a result from

programs we can follow which programs create the most stable employment and reproduce these results to later projects.

On a larger scale, beyond individual businesses, within the state's industries and sectors the RIDLT will collect industry specific information to determine the program's effect on sectors as a whole. Although Real Jobs Rhode Island is designed to give jobs to unemployed citizens across the state, the state seeks to also ensure that the industries that fuel our economy are benefitting from these programs across the board and not just support isolated employer needs that cannot be related to a larger industry based strategy. By recording the sum of positions filled across multiple businesses in a sector, a better understand of whether meaningful changes to the state's economy have taken place will emerge. This also makes industries more competitive with our neighboring states and helps attract new businesses.

The System level measures the RIDLT will collect will give the state as a whole the information necessary to make statutory and legal changes in order for programs to operate more smoothly. These measures will be, in effect, an aggregated sum of the individual and sector level measures. This will shed light on where the state can cut red tape where necessary. These metrics will also allow the state government to know whether the system is becoming more responsive to the needs of local businesses and where they can create more efficient policies.

Although WIOA does not mandate such rigorous measurement requirements, Rhode Island believes proper and precise outcome based metrics lead to a greater understanding of how programs affect our state's economy. Real Jobs Rhode Island is based on aligning agency and program goals with these new performance metrics. Rhode Island will take the comprehensive performance measurement structure developed for RJRI to scale, by adding additional outcome measures for all programs included in this plan.

As evident by the combined planning process, Rhode Island recognizes that it is the combined efforts of programs and services that truly affect change for clients and employers in the state. No agency or program can complete the work alone. When measuring progress towards the goal of providing the correct combination of investment and service to ensure individual workers are connected to opportunities in the labor market while ensuring employer demands for skilled workers are met, outcome measures for the network must be adapted. These reporting mechanisms will allow the agency to use recorded data to improve program operations, evaluate programs impacts on workers and employers while creating a funding feedback loop.

By using evidence based outcomes the state can gather real-time information on what aspects of services and programs are effective in employment interventions which, in turn, will affect funding allocation. By taking the initiative through RJRI Rhode Island will be the example of a laboratory of democracy that other states can use as an example in creating new workforce development programs. When developing comprehensive outcome measures for WIOA partner programs the state of Rhode Island will convene subject matter experts both government and non-government to develop the measures with support from Harvard's Kennedy School of Government Performance Lab. Outcome measures for the six core programs will be developed over the next year, followed by the combined partner programs.

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).

Identifying and aggregating the workforce demands of employers and developing comprehensive solutions to meet those demands is the core of a sector strategy. In Rhode Island, the sector strategy is applied through the use of industry-based partnerships, also known as workforce intermediaries. As defined by Robert Giloth in Workforce Intermediaries for the Twenty-First Century, workforce intermediaries are "homegrown, local partnerships that bring together employers and workers, private and public funding streams, and relevant partners to fashion and implement pathways to career advancement and family-supporting employment for low-skilled workers." Giloth goes on to explain workforce intermediaries complement the work of the public workforce system by focusing on the development of specific workforce solutions and implementing those solutions by integrating services and funding from a variety of sources both public and private. Public workforce program administrators and public boards complement the work of the intermediaries through the setting of policy, providing insight on larger economic trends, and improving access to public programs and funds.

Rhode Island's state workforce board recognized the need to develop the capacity of workforce intermediaries and used state funding to support industry partnership grants. Building on the success of this initiative, Rhode Island under WIOA seeks to bring the workforce intermediary strategy to scale in all target industry clusters and to use all programs included in this plan to support this effort. This sectoral approach, the most ambitious according to Giloth, will develop workforce solutions that address connecting the labor supply to the workforce demand across employers in an industry cluster. By taking a sector approach to growing workforce intermediaries, Rhode Island will be able to align cross industry, demand-based workforce solutions to the statewide economic development initiatives in the same industry clusters. In addition, sectoral workforce intermediaries will be able to provide higher quality actionable intelligence that policymakers can use to better leverage public resources for the success of Rhode Island's workforce members and employers.

The purpose of the sector based strategy and the use of workforce intermediaries is twofold. First, this strategy provides a structured way for employers within the same sector to collaborate to generate solutions for shared problems. Finding enough workers with the skills needed to supply the labor necessary to produce goods and services is one of the most critical issues facing employers and the reason why a sector strategy is needed to promote

workforce development. The use of intermediaries allows employers the ability to collaborate through a third party so that the natural competition of employers doesn't hinder the industry's ability to develop solutions to common challenges that, if met, would benefit all employers in an industry. In addition, the structured collaboration managed through the intermediary helps employers to think critically about their workforce needs and then helps employers articulate those needs in a way that the workforce network can respond to.

The second purpose of a sector based strategy is to provide actionable intelligence to and from those programs serving clients who need to compete for employment, or who need to improve their current employment status. The sector based strategy leverages intermediaries to provide real-time information about current labor needs and future needs. Using intermediaries to take the guess-work out of anticipating where employment is available will help programs working with clients to spend more resources serving clients than trying to perform the role of the workforce intermediary of determining what employers are looking for in the workforce. In addition, by leveraging intermediaries, workforce development partners will have better information around what RI employers actually need in terms of their workforce and how individuals can connect to those opportunities. This intelligence has often been to the missing link between industry projections for workforce needs and the individuals seeking to connect to those projected opportunities. The construction industry provides a good example of this missing link. For many years the construction industry has projected a shortage of workers as existing workers begin to reach retirement age. Due to the long periods of time to train for certain trades, the number of younger workers available to replace retiring workers does not match the number of workers projected to retire. However, despite having this information many workforce programs struggle to find ways to connect their clients to this sector. By building upon the roles of workforce intermediaries in sectors such as construction, information about employer led training and recruitment activities can be provided in real-time to help connect existing clients to existing opportunities that represent the larger industry projections supported by labor market research and trends.

The scaling up of workforce intermediaries has started under the Real Jobs Rhode Island program. This grant program combines several federal and state funding sources to officially recognize workforce intermediaries and to fund workforce solutions developed by the intermediaries and their participating employers. These partnerships are comprised of at least five employers and at least two diverse entities. Employers in the partnership work collaboratively to identify shared workforce challenges, existing positions to be filled and the qualifications necessary to perform the tasks associated with the positions. In addition, near future labor needs are also identified and analyzed for the skills needed by future workers. Once this analysis of the labor needs of the employers is complete, the employers work with the non-employer partners to develop a strategy for obtaining the workers needed to fill the current or near future open positions. Such strategies primarily include developing industry "boot-camps", on the job training programs, registered apprenticeships or other educational and occupational training programs.

Industry-based partnerships provide the mechanism for employers to convene around common workforce challenges and to enter into a formal partnership with government or community providers of their choice to develop customized solutions to the present labor shortage in their industry. Typically these partnerships are convened by an entity that is

trusted in the employer community, such as an employer association, labor union, or other industry intermediary. The partnership develops the training modules, selects or develops the training curriculum, develops a recruitment strategy, and sets the application criteria for entering training. Each partnership is provided a grant advisor from the Department of Labor and Training who is responsible for assisting the partnership refine its planned solution and resolving any challenges the partnership may face implementing their proposed solutions, including obstacles such as connecting to other needed partners, overcoming bureaucratic processes and red tape, and ensuing public funding is received in a timely manner.

The role of the grant advisor and the other program staff involved in the partnership is critical to supporting the capacity building of the workforce intermediary by connecting the intermediary to new potential partners and providing the partnership information about other existing resources that may help the partnership's effort. For example, one Real Jobs Rhode Island workforce intermediary developed a workforce solution that requires the development of a registered apprenticeship program for Biomedical Equipment Technicians and Data Scientists. The grant advisor connected the partnership to ApprenticeshipRI, an apprenticeship intermediary developed under the American Apprenticeship Initiative, to receive technical assistance in developing program standards and registering the new apprenticeship programs. The services of ApprenticeshipRI are provided at no cost to the partnership and will expedite the registration process. Such connections help workforce intermediaries leverage existing resources and maximize existing workforce investments.

In addition to connecting the workforce intermediaries to other resources, the advisor becomes an advocate for the work of the partnership inside of state government. Typically, the workforce intermediary will encounter a government process that creates an undue burden or hinders the very work of the partnership public investments are trying to support. The grant advisor has the authority to bring such issues to program administrators and work with the administrators on developing solutions that resolve the conflict between a partnership's work and a government process.

A prime example of how workforce intermediaries through networked government work through undue burden brought on by governmental processes was apparent in a local school who attempted to acquire used manufacturing equipment to expand school based training for CNC machining. The proposal of a local manufacturing company to sell used equipment to the school that had a CTE program designed to provide students with manufacturing training seemed to be a cut and dry idea that served both the needs of the school and the employer simultaneously. However, as the request moved through the procurement process at the local and state level the response to the school became a purchase document for buying new equipment which would eliminate the employer relationship and limit the number of machines the school could purchase. Through networked government, the employer intermediary for the manufacturers brought this problem to the Department of Labor and Training. The department then facilitated a meeting with the purchasing agencies and the local school. The issue was resolved and the original proposal progressed as planned. In this instance the immediate need to improve the state's workforce was resolved and the agencies involved gained valuable knowledge about how internal procedures could be amended to prevent similar situations from occurring in the future.

Industry-based partnerships with employers as the primary participants invert the common method of employer engagement. Rather than have employers participate in a service provider developed program, service providers are invited to participate in an employer led workforce development program. Employers determine what level of intervention they are willing to support when it comes to preparing future employees. In addition, employers choose which service providers they want to collaborate with in delivering the workforce solution developed. The freedom of partnerships to control their own membership allows existing collaborations to be supported and creates a healthy competition for those organizations, both employer and non-employer, looking to join the partnership. Employers looking to join the partnership must be willing to collaborate with the other employers and commit to the workforce solution developed. Service providers seeking to become partnership members directly must demonstrate their value to the employers and must provide services that fit the proposed solution strategy. Depending on the level of intervention included in the workforce solution, some service providers may provide services as part of the industry-based training program, whereas other service providers may not be directly involved in the partnership but may align their pre-industry training services to the partnership's program.

The ability of service providers to participate in the partnership provides a unique opportunity for providers to work with employers directly to create or customize education or service programs and creates more opportunities for such programs to be delivered within the context of an occupational skills training program. Contextualized program delivery coupled with the direct input from employers will generate opportunities for services provided [Title I and II of WIOA and title IV of Vocational Rehabilitation] by each of the combined partner programs to be provided in tandem to a client participating in a contextualized learning program that also supports the attainment of a secondary education degree or its equivalent, or a post-secondary education credential. By providing services in tandem, workforce partners participating in the partnership will be more responsive to the employer demand for workers, while simultaneously providing more effective services to clients.

The more efficient delivery of services allows employers to connect with workers quicker while ensuring workers are adequately prepared for the training or placement. With the elimination of the sequence of services mandated under WIA, partner programs may now provide more services concurrently and may expedite the client's progress in achieving their career goals. An illustrative example, Title I Youth services can be used to provide tutoring and other academic supports for an older youth to compliment Title II education services provided to a client. In addition to complementary academic services, Title I funds for paid or unpaid work experience can be used to support occupational training for the same client. Further, the older youth may be co-enrolled as an Adult to receive additional training services when transitioning to a permanent position. Using funding in such a way allows participants to succeed in completing the employer-based training in a timely way and provides the employer with a trainee or employee that is achieving both academic and occupational skills attainment.

Diverse entities, regardless of type, participating in workforce intermediary partnerships have the ability to work directly with employers to develop workforce solutions that blend the occupational factors an employer group needs to see addressed with the services and education individual workers need to be successful. The workforce intermediary model

builds diverse entitles into the intermediary structure because the entire reason employers need a workforce intermediary is that their recruitment methods alone are unable to supply the workforce they need. Therefore, because employers cannot solve this workforce shortage alone, diverse entities and the people they serve are critical to the success of any workforce solution developed.

In addition to having direct access to employers, the workforce intermediary strategy provides diverse entities the opportunity to develop customized programs and service delivery methods for the intermediary's workforce plan. This ability gives the diverse entities a way to develop solutions that do not need to be system-wide changes. Many divers entities have experienced pressure to make system-wide changes is response to employer needs. Such large scale projects, such as developing CTE curriculum or drafting elements of an adult education provider contract, hinder the entity's ability to engage in customized solutions development. A sector-based training program may not require education reform or to different statewide regulations changes around service delivery and the demand captured by the partnership may not represent a large enough or long-term type of employer demand to justify legacy system changes. Yet just because employer needs for workforce talent may not warrant a system-wide change, the demand for those workers is real and diverse entities are needed by employers to find and retain those workers. The recognition of the need for diverse entities to participate in the workforce intermediary helps those entities connect client serving programs to the workforce solutions. The new workers required by employers must come from the client pools served by diverse entities, however, by working through workforce intermediaries the expertise of employers and diverse entities are brought together in an official capacity to solve workforce shortages and connect clients to open positions.

As partnerships form and the results of workforce solution plans are generated, best practices will emerge. While each partnership responds to the unique demands of its employer members, a community of learning will develop among partnerships, helping employers to better articulate their needs and match those needs to the appropriate service provider, helping service providers to better respond to the needs of employers in a meaningful way and more effectively serve their clients. In addition, grant advisors and other government staff can begin to solve practical challenges facing partnerships and can refine workforce, economic, and education policy to further support the efforts of the partnerships.

Another benefit of bringing employers and service providers together in industry-based partnerships is employers will learn how to better signal their workforce needs to trigger the appropriate response from the government and non-government workforce organizations. Translating the real time talent needs of an employer into a recruitment or application qualifications often results in a misalignment of the skills of potential candidates to the skills required at the production level or a shortage of qualified candidates responding to a recruitment. For example, education credentials are often required by employers more as a means to measure an individual's reliability rather than their academic skills. However, if a six week "boot camp" or similar program can demonstrate to an employer in real-time the reliability of a candidate than the employer may hire the individual with more confidence in the long-term success of the individual while the individual is spared having to overcome the barrier of having an academic credential before being qualified to gain employment. By working together, employers and service providers

can produce a more accurate descriptions of what skills employers are looking for and how to find or develop those skills in the pool of available workers.

As the capacity of the workforce intermediaries within the targeted sectors of the economy grows, the intermediaries will provide industry employers even greater assistance in identifying and meeting employer workforce development needs. For many employers across the industry sectors, internal human resources capacity has been reduced. Companies have shed many of the internal human resources functions and analysis capability, limiting the available internal succession or expansion programs to ensure workforce continuity. Sectoral workforce intermediaries are positioned to fill this need. In earlier sector based partnerships, intermediaries were able to resolve single workforce challenges and to pilot best practice models. However, by taking the workforce intermediary strategy to scale, workforce intermediaries will be able to provide more comprehensive plans to address employer needs that are both immediate and long-term. Such efforts will include topics such as succession planning, reducing turnover, and developing post-employment training for continuing staff development. The workforce development network offers several tools to help employers address their workforce challenges. Educational programs, internships, on-the-job training, registered apprenticeship, and other programs can be used in the workforce intermediary's plan unifying workforce efforts across the industry and within individual employer.

As workforce intermediaries begin to work with employers in a more comprehensive way, the government programs and the diverse entities participating in the intermediary will be able to develop investment strategies that braid multiple resources and funding sources together to support the planned workforce solution. Participating programs can add resources to aspects of the workforce plan that align with the program mission and goals. By looking to create a comprehensive strategy and investment plan, the intermediary will be able to attract more resources for its employer partners and their future workers. Participating programs receive better placement and retention of clients within the employer community and receive a more transparent account of how funds are used to support activities. This transparency not only allows for more effective investment, but will help prevent programs duplicating efforts and funding.

As partnerships begin to develop comprehensive workforce strategies and use the investments supporting the strategy, the larger workforce related programs, including all programs contained in this plan, will be able to analyze the trend of these workforce solutions and create more informed policy and investment decisions to improve the function and collaboration of workforce network entities. As the workforce intermediaries grow in capacity and organize more of the employer demand for workforce, the larger workforce related programs will align with each other to ensure greater connections to industry partners and to scale up existing efforts to complement the increased capacity of the intermediaries. This relationship creates a sustainable cycle of improving program alignment with aggregated demand where employer participation in intermediary partnerships increases the information available regarding employer demand to diverse entities, who are able to respond more effectively to employer demand.

Sector partnerships are now the primary mechanism for delivering workforce funding to employers, but will not be the sole mechanism. Businesses who wish to utilize subsidized services can be helped regardless of whether they belong in a sector partnership or not.

Also, the grant program Real Jobs Rhode Island is not the only program that supports the sector strategy. The sector based approach helps build the capacity of many intermediaries including the work underway in our core programs. These include the Business Leadership Network operating under the Vocational Rehabilitation program, the workforce councils that are apart of Job Corps, and other existing grant work performed by the GWB such as the Workforce Innovation Grant. Workforce intermediaries will be prioritized for all available funding and services.

All programs should encourage employers to engage in industry collaboration to foster strong relationships between businesses, governments, and individuals. These new sector strategies are in no way exclusionary, the new standard of partnerships is meant to bring all parties responsible for the growth of the state's economy together. While not required, the participation in a partnership should be the primary way employers engage with the workforce network. The ability to aggregate demand and develop effective solutions depends on the use of this sector strategy. The ability for businesses that wish to utilize already established tools such as job listings through EmployRI without working with their industry peers will remain, however as employers seek more comprehensive workforce development solutions the mechanism of sector partnership will be used to assist employers in the development of these solutions

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).

As partnerships begin to develop comprehensive workforce strategies and use the investments supporting the strategy, the larger workforce related programs, including all programs contained in this plan, will be able to analyze the trend of these workforce solutions and create more informed policy and investment decisions to improve the function and collaboration of workforce network entities. As the workforce intermediaries grow in capacity and organize more of the employer demand for workforce, the larger workforce related programs will align with each other to ensure greater connections to industry partners and to scale up existing efforts to complement the increased capacity of the intermediaries. This relationship creates a sustainable cycle of improving program alignment with aggregated demand where employer participation in intermediary partnerships increases the information available regarding employer demand to diverse entities, who are able to respond more effectively to employer demand.

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).

Rhode Island has a strong legacy of highly engaged state-level board leadership on workforce development. This has evolved out of a decade's long stewardship of not only federal workforce dollars but of significant state investment as well. WIOA builds on this foundation and provides new opportunity to organize around the system leadership responsibilities.

The board is also charged with overseeing the funding and investments in workforce development including WIOA dollars. As such it plays an important role in system decisions like one-stop infrastructure costs and partners roles. It is also best situated to discuss and inform on the technological improvements necessary to implement WIOA across agencies and for customers.

The Governor's Workforce Board capacity to effectively meet its WIOA duties lies first in its dynamic membership and it enlightened committee structure. The full GWB meets no less than 10 time a year, while its committees are typically active monthly. The boards work is coordinated across the following committees - Strategic Investment and Evaluation, Executive, Adult Education & Employment, and Career Pathways. Each committee plays a critical role under WIOA with the Executive Committee playing the principle lead and hub of coordination. The Executive Committee consists of the chairs of each of the other committees.

Under both state and federal statute the GWB is responsible for the development, implementation and oversight of the state's workforce development plan. State program administrators and their respective agencies bring planning recommendations and options to the committee for input and approval. It is the Executive Committee that also coordinates board input into the plan itself.

The Executive Committee has developed the expertise among its members and staff around the development and issuance of WIOA policy. It is here that technical advisories, system guidance and ultimately final policy emerge. Most of the formal WIOA items are then brought to the full board via consent agenda, with the opportunity for full board discussion.

The Executive Committee is also responsible for overseeing the one-stop system including the development of statewide policies.

Strategic Investment and Evaluation Committee

This Committee has evolved into the primary player for workforce development accountability. Rhode Island and the GWB have moved aggressively towards better data-driven decision making. This work spans beyond WIOA to include state-funded investments and programs as well as those programs outside the traditional workforce partners including housing and transportation. The GWB has pioneered a Unified Program and Expenditure Report that annually captures the investments and outcomes across all workforce development programming (The report can be viewed here http://www.gwb.ri.gov/WFDdata.htm). The SI&E Committee is responsible to lead and inform the entire WIOA performance cycle including annual reports and continuous improvement strategies.

Adult Education & Employment Committee and Executive Committees

Title II Adult Education policy is coordinated through these respective committees. The Adult Education and Employment Committee membership either brings or has developed an expertise in the area of adult education and job training and will be responsible going forward for this work. The Executive Committee reviews and executes all WIOA policies and ensures consistency, uniformity, and alignment with the state plan and priorities

Career Pathways Committee (Youth) and Executive Committee

Rhode Island has been leading on career pathway system work for several years now. The Career Pathways Advisory Committee was made statutorily required in 2011. Since then the committee has been the forum for emerging Career Pathway implementation. The mission of the CPAC is to prepare in school and out of school youth for careers and connect businesses to a skilled workforce. This will be accomplished through service integration by unifying training, education, employment and supportive service programs into a single, customer-focused system across the state of Rhode Island. The Rhode Island career pathways model values employer engagement, customer focus, and data-driven decision making through programs and services that are collaboratively developed by education, workforce, employer and economic development partners. Title I Youth policy is developed and deliberated through the Career Pathways Committee. The Executive Committee reviews and executes all WIOA policies and ensures consistency, uniformity, and alignment with the state plan and priorities.

State Board Activities

The Governor's Workforce Board manages its responsibilities via a highly responsive and expert committee structure. An overview of this structure is presented above in section III (a)(1) of this plan. The GWB is staffed by six professionals including an executive director. The staff have responsibilities related to policy development, performance and accountability, career pathways, youth programming, and employer/sector partnership.

2. IMPLEMENTATION OF STATE STRATEGY

Describe how the lead State agency with responsibility for the administration of each core program or a Combined State 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.

Network government replaces the historic top-down, centralized strategy of government decision making. In Rhode Island, the strategy of embracing the network government approach allows past successful collaborations to be formally recognized and expanded, but also requires new collaborations to be fostered. While WIOA requires the collaboration of numerous partners, Rhode Island is taking such collaboration to the next level, integrating inter-agency and community partner collaboration into the official policy making and program design processes. Such collaborations not only generate policy recommendations, but solutions to day-to-day operational challenges that hinder service delivery to both clients and employers. This foundational strategy of networked government supports the three workforce strategies identified above.

While such cooperative service delivery may be substantially more difficult to establish and coordinate than a centralized bureaucracy, a network government strategy to service design and delivery provides unique service combinations more effectively to individuals and employers. Recognizing the need for a network government strategy and requiring agencies to solve problems through a network government approach allows the combined planning described in this document to take place and for practical implementation challenges to be addressed. The network government approach also provides workforce entities a more complete understanding of a client or employer and the ability to provide services in tandem to maximize the effectiveness of those services.

For this reason Rhode Island has included, in addition to the core program partners, the following combined program partners in this state plan: Temporary Assistance for Needing Families, Trade Adjustment Assistance for Workers program; Jobs for Veterans State Grants program; Unemployment Insurance and Senior Community Service Employment Program. Workforce development partners shall include other community based job training and placement agencies. By coordinating the planning activities of these programs, Rhode Island seeks to create a common vision for meeting the career needs of all Rhode Islanders served under these programs.

WIOA allows networked government to be achieved by providing the flexibility needed to let its one stops play a role that is natural for them within the fabric of our states workforce development network. We want to reimagine the One Stops to be a network connections facilitator. While workforce intermediaries will have the job of working with the demand end of the market, one stops gain the latitude to reimagine the role they play in our state specific and unique network. By spending the appropriate amount of time with job seekers, rather than attempting to be the entire network for the individual, the one stop can help connect job seekers to the services or industry partnerships based on the job seeker's

specific needs. Some of the important aspects of re-aligning the one stops include focusing on training career coaches, case managers and guidance counselors on how to navigate the workforce development network, aligning coaching with industry needs and providing more clear and more refined guidance for job seekers.

Four major factors of network government collaboration must be addressed between all partners included in this plan before the most effective service delivery can be provided. These factors include: clarifying partner roles and implementing an integrated response team model, braiding resources across programs to maximize investments, establishing common standards around client intake and service referrals, and developing an IT infrastructure to support intelligence sharing and effective case management among partner entities, both government and non-government.

Clarifying partner roles and implementing an integrated resource team model is critical in developing a coordinated and collaborative service delivery system. The integrated resource team model started as a pilot model under the Rhode Island Disability Employment Initiative grant. In the pilot participating agencies committed to participating in ad-hoc teams developed around meeting the needs of individual clients. If one agency determined a client needed to be referred to additional services, the agency receiving the referral would commit to participating in a joint case management team with staff from other programs serving the same client. As a result, coordination and collaboration among employment and training programs fundamentally improved through a blending and braiding of resources at a customer level. This was achieved by developing better communication processes between multiple service systems for more integrated service delivery. By giving a goal specific explanation of available resources, the Resource Plan helps the customer, One-Stop staff, and community partners to coordinate and maximize available resources.

Bringing the integrated resource team model to scale for all programs included in this plan requires the implementation of formal mechanisms to create response teams. For frontline service employees state agencies responsible for administering a program shall assign points of contacts between frontline staff members to provide as close to immediate feedback as possible on the eligibility of a client for additional services. Frontline staff should be directed to view their caseload as a shared caseload with partnering agencies and that referrals requiring attention do not constitute a competing caseload. A client in need of TANF or a similar service is not more or less in need based on how the need was identified. Frontline staff connections between agencies does mean each agency will designate a single point of contact for all staff from a partner agencies. Such lop sided points of contacts often result in the single point of contact becoming overwhelmed with referrals and a lack of responsiveness all together if the individual is unavailable to process referrals. In addition, directing frontline staff to work collaboratively across agencies and to view their work as extensions of each other will also promote a greater knowledge and competency among frontline staff about available programs and resources that may benefit the client. Such work increases client access to programs and the efficiency of inter-program referral, making inter-program collaboration at the frontline level routine business practice.

In addition to directing frontline staff to share caseloads, taking the integrated resource team model to scale also requires a government and non-government continuous improvement team structure to develop solutions around practical challenges hindering

collaborative efforts throughout the workforce network. Continuous improvement teams are ad-hoc teams comprised of subject matter experts from both government agencies and non-government organizations convened to solve practical challenges facing the workforce network. The members of the team are identified in response to the level of practical challenge presented. Teams will be ad-hoc in nature and therefore will not be standing committees. Teams are topic centered not membership centered. When a team resolves a challenge the team will be dissolved even if the team members may serve on a new team. While a subtle difference, having topic-based teams rather than member-based teams ensures only the relative members are participating in a team for a given topic and that the topic at hand is addressed before a new topic is introduced.

The continuous improvement teams will be responsible for determining the cause of the challenge and will amend any internal policies or processes contributing to the cause of the challenge. If the team identifies more formal policies, such as regulations or statute, as being the cause of the challenge, the team shall make recommendations for amending the official policy to the appropriate agency executive or workforce board for consideration. Similar to the problem solving work of the workforce intermediary, the continuous improvement teams will be topic centered and responsible for implementing identified necessary changes. The stakeholder process for this plan resulted in a recommendation that the following five topics be addressed by the continuous improvement teams first. Please refer to Appendix A for a copy of the official memorandum documenting the recommendations of the stakeholder groups to the leading state agencies. This memorandum was presented to the state board on February 18th 2016.

First, it was recommended to convene a continuous improvement team to study the issue of common assessments and to provide recommendations to the departments for establishing a statewide common assessment policy. Different assessments of a similar competency are required by separate programs, which in some cases requires a client to take multiple assessments for the same competency before a service can be provided. Such duplication delays service provision to the client and consumes program resources that could be put towards other needs of the client.

Since the initial issuance and submission of this state plan, the State Workforce Board has begun work on developing a Common Assessment framework for the WIOA system. Working in partnership with a Community Workgroup - comprised of community advocates, providers, and knowledgeable stakeholders, and an Interagency Workgroup - comprised of mid-level or higher department leadership across all core WIOA programs - the Board has divided the issue of common assessment into component pieces; the first focusing on a uniform assessment of basic literacy, mathematics, and English Language skills. A universally applicable assessment would eliminate duplication and simplify the customer experience. The state has made progress on identification of a single common assessment tool and intends to 'roll out' this common assessment by July 2018. Future priorities will be the adoption of centralized/shared database where all programs will be able to access assessment results and standardized test data, as well as common client demographic information.

It was also recommended to convene a team to develop solutions around collecting and sharing client information among one-stop network partners. The stakeholder group articulated the need for basic client data collection standards that all service providers

could collect as part of an intake process. This team would be tasked with determining which data elements about a client should be shared among one-stop partners to increase the quality and efficiency of services provided. However, although stakeholders agreed on the need for better data sharing practices, concerns over the sharing of confidential data between entities was also expressed.

A third factor of partner coordination that must be addressed to provide better service delivery is the need to establish common standards around client intake and service referrals. This factor does not only pertain to the work conducted at the American Job Centers, but all partners providing services or connecting clients to services. Such partners may be government agencies, community providers, education institutions, and non-profit organizations. As clients receive services from multiple programs and as program staff seek to refer clients successfully to other services, the need for common data collection and sharing standards that can be adopted by all workforce partners. During the stakeholder meeting held January 13th, 2016, both community and government partners identified the need to establish a client profile that each partner can access, eliminating the duplication of data collection, and the need to establish information sharing standards around program eligibility.

The client profile should contain a record of the individual's demographic information, resume elements, assessment results, and other data that is commonly used by service providers. The Rhode Island Departments of Education, Human Services, and Labor & Training will convene a work group comprised of program administrators and community providers to identify the common data elements of the client profile and the format in which those elements should be presented. Included in this work will be an analysis of all applicable privacy statutes of these elements and recommendations for establishing data sharing policies that fully comply with these statutes. The recommendations of this work group will be presented to the agency directors and the Governor's Workforce Board so a statewide, multiple agency, data sharing policy can be adopted.

Standards for sharing program information help create uniformity among partners for how program information is communicated. For programs receiving referrals from other partner agencies, standard information should be provided to the referring program. For example, program eligibility requirements or program contact information should be provided to the referring program to ensure the referral is appropriate for the client and to maximize the opportunity for a client to successfully enter the new program. Creating information standards does not mean creating another form for program staff to complete, instead the standard provides programs with guidance on what information referring programs need in order to make a quality referral. The work group described above will also recommend such information sharing standards for programs receiving referrals.

Both government and non-government partners rely on provided program information to make informed decisions about referring a client to an education program, training, employer recruitment, or other service. However, the information regarding the eligibility requirements of different opportunities may not provide enough detail for a quality referral to be made. For some organizations the volume of referrals made on a daily basis makes following up on each potential referral unfeasible. Establishing basic standards for eligibility data elements would create a uniform format to provide organizations making referrals the information necessary to prevent referring a client to an opportunity for which

they are ineligible. Such standards may include education level required, documents required, and any other application requirements.

Stakeholders recommended establishing a team comprised of government and non-government partners to evaluate customer focus within the one-stop network and provide an action plan for increasing the customer centeredness inside the one-stop network in collaboration with the two local Workforce Development Boards. The issue of accessibility ranged from ensuring the hours of operation of career centers met the needs of clients to offering services in more geographic areas using technology, other partner organizations, and a mobile unit. These recommendations also included increasing individualized attention and case management services to one-stop clients, ensuring resources are provided to meet the language, education, physical, and technological needs of clients, and improving one-stop partner collaboration around delivering services to a shared client.

Alongside this emphasis on more individualized case management, stakeholders also emphasized a need for improved referrals not only among WIOA partner agencies but to and from external service providers and community organizations. Historically, Job Center staff has been prepared to make referrals for the more common barriers to employment such as transportation, childcare, or housing. However, community advocates have stressed the importance of connecting clients to as many services as possible, particularly for significant and potentially harmful situations such substance abuse or domestic violence. In conversations with the Community Workgroup, the State Board stressed that AJC staff cannot serve as social workers and should not be expected to be a referral mechanism to the entire spectrum of assistance and support programs. However, in speaking with frontline AJC staff; they also described a desire to be more well versed in the range of support referral opportunities within the community. One commented that, as professionals, they do not want to be caught 'flat footed' when a client enters a Job Center with significant barriers and needs and staff is unsure how best to assist them.

In response to the community feedback and the input of AJC staff; the state board has been working on the development of an enhanced support service referral initiative in partnership with the United Way. The initial work product will be desk guide of all near-by service providers who are equipped to assist with the most frequently identified barriers and challenges encountered by AJC staff such as lack of health insurance, food insecurity, substance abuse, and legal barriers. This will be a paper-based guide initially but the intent is to migrate into a web-based tool in the future. The development of this guide will be followed by informational and technical assistance sessions with AJC staff to learn more about these services and better understand what clients can expect upon referral. Lastly, the State Board will work with our Local Boards on the development of a MOU between AJC staff and the United Way's 211 program to make 211 staff available to confer with AJC in instances where a client has multiple and/or complex challenges that appear to go beyond the available services listed in the desk guide.

As a next step to all of these reforms and improvements; it was recommended to the state to establish an evaluation committee to develop performance measures to gauge the effectiveness of the one-stop network beyond the requirements of federal program reporting and track those measures on a continuous basis in collaboration with the two Local Workforce Development Board. With recommendations and goals brought forth

creating a more client centered one-stop network, performance measures should be developed to track indicators of client centeredness.

Executive management coordination is the final aspect of the integrated response team model to be discussed. Executive managers in all program agencies are responsible for ensuring the new model is implemented throughout all levels of the program, committing mid-level administrators to participating in the continuous improvement teams, and ensuring changes resulting from continuous improvement teams are implemented. Executive management is also responsible for handling any formal policy recommendations resulting from the continuous improvement teams. These policy recommendations and other executive management coordination will take place through the Governor's Skill Cabinet and Children's Cabinet. The Governor's Children's Cabinet aims to improve the health, education, and wellbeing of the state's children, increase efficiency in coordination of service delivery, and improve data and evidence based decision making through strengthened data sharing capacities. The Cabinet is composed of directors from six agencies, representatives of child advocacy groups, and the Secretary of the Office of Health and Human Services. Similarly, the Governor is proposing to create a skills cabinet to align skills initiatives at the executive level with other programs. This cabinet will be comprised similarly to the Children's Cabinet with director level representatives. Both cabinets will include the agency leadership necessary to deliver high-level policy decisions and to make any formal policy changes. These cabinet meetings also allow such policy issues to be elevated to the Governor for consideration.

Formalizing such collaborative efforts at each management level and including both government and non-government participants will clarify the roles of network partners. Because most workforce related programs have similar goals for their clients, program design and requirements are also similar. As a result, programs have created numerous microcosms that perform similar functions yet remain unrelated from each other and often serving clients based on a specific set of client characteristics, such as having a disability or being a veteran. Examples of overlapping functions include, but are not limited to, employer outreach, subsidized employment programs, client counseling, and client assessment. Such duplication limits the resources of all programs, and creates confusion among both individual clients and businesses about what services exist, how to access services, and what combination of services will best suit an existing need.

Employer relations is one of the most important areas where role clarity is vital to program success and provides an illustrative example of how role clarity can improve program performance. With so many client-focused programs, there is very little inherent support for a coordinated employer engagement strategy. As a result employers may develop a strong relationship with one program and not gain access to other resources that may assist their workforce development efforts, or may experience the opposite challenge of government fatigue, which occurs when an employer is approached by too many programs seeking their advice and participation. In a state the size of Rhode Island government fatigue can happen quickly if a coordinated employer engagement strategy is not in place.

All programs struggle to develop enough employer connections to generate enough employment opportunities for their clients. The inadvertent competition among programs for the same employer pool further reduces this capacity at the program level. By designating a lead agency to manage employer engagement for workforce purposes and

ensuring that agency is aligned with the economic development strategy of the state will allow programs to combine resources to support this consolidated approach, which will allow freed funding to be used on other key program priorities. This does not mean programs will no longer interact with employers, on the contrary, program relationships with employers will be strengthened as a quality, coordinated approach will be used across programs resulting in more meaningful and numerous employer relationships for all partners.

To address this issue, and others like it, the Rhode Island Executive Office of Commerce will be responsible for setting and communicating the economic development strategy for the state. This office is required by Rhode Island state law to coordinate with the Department of Labor and Training to align the state workforce development efforts to the wider economic development efforts underway. With this relationship in place and with the state department of labor leading the statewide effort to create and scale up sector-based partnerships in line with the industries identified by the Executive Office of Commerce as targeted economic development industries, the department of labor will have the lead responsibility of coordinating employer engagement for partner programs included in this plan. The Department of Labor and Training will convene program administrators to identify current employer engagement with existing programs and develop joint employer engagement strategies.

Once programs are able to collaborate around shared functions, then program resources can be more effectively braided to support common goals. Because most program funding is participant based, programs have often struggled to leverage funding in a meaningful way since pooling funds has not been an option. Recognizing these past failings, Rhode Island seeks to develop real-time braiding practices that capitalize on pursuing the shared goals of separate programs and developing customized funding plans for each participant in a jointly supported activity. For example, the Real Jobs Rhode Island grant program is a sector-based program that uses several funding streams to support workforce solutions proposed by industry-based partnerships. Because Real Jobs Rhode Island is sector-based, the identity and characteristics of individual training participants is unknown at the time the grant proposal is submitted and even when participants are identified future cohorts may include a completely different combination of participants. As a result, the multiple funding sources supporting the program must be managed in such a way as to respond to the specific training plans and participants selected by the partnership in real-time. As Rhode Island implements its demand driven sector strategy and career pathway strategy, the ability to braid funding in real-time to address the unique needs of clients and employers becomes a critical function of all partner programs.

The fourth factor of developing an IT infrastructure able to support intelligence sharing and case management across programs provides workforce partners the technology necessary to access client information as needed and to keep all service providers working with a client up-to-date on the services received by the client. The IT infrastructure solution will include an umbrella data system that is able to mine existing agency MIS systems to generate client data without requiring agencies to directly access those MIS systems. Such a system will also have the capability to generate referrals, allowing all partner programs to track client referrals in the same system and to allow staff from each program to connect quickly if additional information is required to serve the client. This data system can also serve as the electronic version of the client profile described above.

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.

Workforce development activities within Rhode Island span across a multitude of government agencies, community based organizations, and private sector economic development organizations. The ideal of networked government goes beyond cooperative activities within the state government, but also includes supporting and collaborating with every stakeholder involved in making the states workforce as competent and capable as possible. The symbiotic relationship of individuals and their communities must grow together in order for there to be continuous expansion and upward mobility. The GWB, along with WIOA core partners will align training and employment services for specific populations through the One Stop network, institutions of higher education, registered apprenticeship programs, and through any other network of organizations capable of providing employment intervention services.

Rhode Island struggles with coordination of services, and at this time overall alignment of workforce training services are not entirely connected and should be folded into the activities performed by WIOA core partners. When it comes to services such as adult basic education, GED preparation and test administration, and older youth services; efforts have become siloed within both government agencies and private entities. While RIDLT, RIDE, and RIDHS partner with many providers, and in some cases contract with the same providers across the state, efforts may be duplicated by not coinciding activities together. This stretches both resources and time for all parties. RI has become successful in consolidating hiring practices under Real Jobs Rhode Island, but other areas of workforce development lacks this aggregation.

Real Jobs Rhode Island is defining innovation in employer led workforce development, however this program is based around the idea of allowing a group of employers to develop their own workforce training plans and use their own recruitment plans. Typically, RJRI participants do not face the barriers to employment as some of the hardest to serve citizens of the state. RJRI has aggregated the challenges of finding workers to fill job positions, but aggregating challenges that GED providers, disability service providers, and other foundational skill providers has yet to come to fruition. In order to align and connect community based advocacy groups, basic skill providers, and other organizations outside of the established workforce development system, WIOA core partners will have to engage each one of these providers and convene them to discuss their overall challenges and facilitate collaboration in the same sense that Real Jobs Rhode Island has done with its sector partnerships. Although basic skill providers are working with the best interest of citizens in mind, competition exists among providers as it does in the business world. Competition for participants, funding, and outcomes are the barriers to collaboration within basic skill providers who are competing for provider capacity. Although divulging programmatic specifics may seem against the best interest of a provider, collaborating may increase the provider's capacity to provide better services, referrals between programs

would become seamless, and would meet the overall goal of advancing skills for the hardest to serve in the state, mirroring the governmental work to align agency priorities and policies. This style initiative can be the beginning of true integration between WIOA core partner agencies, economic and workforce development stakeholders, and providers of services that have been previous left to fend for themselves.

The Department of Education is already forming this type of collaboration to scale through its use of the New Skills for Youth Initiative. RIDE is mirrioring the intent of WIOA in bringing together the key actors in providing work-related skills to in-school and out of school youth in order to create a more work-ready workforce in the future. The overall goals of the New Skills for Youth Initiative in Rhode Island is two fold- to dramatically increase the number of students who successfully complete career pathways that begin in secondary school and culminate in postsecondary degrees and/or industry credentials with labor market value, and to catalyze transformational approaches to the design and implementation of programs and policies that increase students' career-readiness. By bringing together representatives from Education, Labor, commerce, higher education, and industries the state is aggregating expertise across entities to determine the best practices of providing students with access to post-secondary credentials and transferable workplace skills.

Outside of the NSFY Initiative, Rhode Island has tried to fold in as many internal and external partners into the workforce network as possible and has funded many initiatives aimed at improving skills, and enhancing individual occupational marketability within under-represented populations. Operation Stand-down is a 501c3 nonprofit, funded through various grants including grants awarded by USDOL which refers individuals to the workforce agency and has worked in tandem with RIDLT in the past on providing training interventions to veterans facing poverty and homelessness. Currently, OSD staff operate much in the same capacity as the one stop DVOPs. OSD funding stops them from being able to provide subsidized training to their participants in the same way the one stops can, and thus they have referred their candidates to the one stop for supplemental resources.

Statewide collaboration between veteran organizations, basic skills providers, and other community based organizations in the same fashion as "sector strategies" will be the key to continuously improving services within the state. Creating "partnerships" or workgroups that share best practices, efficient processes, and other beneficial activities that enhance the overall quality of service delivery for the customer is essential to the success of the state's citizens.

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.

Refer to Field A

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 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.

Refer to Field A

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

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

The Rhode Island WIOA Core Partners are currently working towards aligning with the state's educational institutions through cooperative activities that integrate networks such as the Community College network of Rhode Island, the state's public universities and colleges, and adult education providers. The key factor in successfully integrating educational institutions to the DLTs workforce development activities is to leverage the infrastructure that is already in place and folding educational institutions into the foundations. Currently, Rhode Island lists all four public institutions of higher education and the community college network on the Eligible Training Provider List. This relationship has allowed the one stop system to refer people to training and services and subsidizing their education and employment training through the use of Individual Training Accounts. The ability to subsidize unemployed and underemployed population's college education and provide them to access to post-secondary credentials is transformative. It allows for the most robust customer choice possible. The one stops, through assessments such as the TABE test, are able to guide individuals into the training programs that best fit them, while also allowing participants to play an active role in their career advancement.

The Real Jobs Rhode Island grant program is also creating strong bonds with the state's educational institutions. Real Jobs partnerships create their own training curriculums in order to synthesize a training that will best fit their needs. For example, the Rhode Island Department of Labor and Training awarded Toray Plastics, Inc., to develop a leadership training program. The $25,000 grant application was written in partnership with Astro-Med, Inc., of West Warwick, the University of Rhode Island, and the Rhode Island Association of Manufacturers. The four organizations are working together to create a training program which includes a vigorous curriculum at The University of Rhode Island which mirrors the skills that Toray Plastics will need to create the best labor force possible.

Additionally, The Real Jobs Rhode Island Cybersecurity Partnership is partnering with Roger Williams University, University of Rhode Island, Brown University, New England Institute of Technology, Bryant University, and Johnson & Wales University to align information technology curriculums with the industry's need. Considering the speed in which cyber security and information technology changes and how drastically the skills necessary to compete in those industries are updated, this link between the IT/Cyber Security industries and higher education is paramount for Rhode Island to compete on a

national and global scale within these industries. Utilizing this synergistic strategy through Real Jobs Rhode Island will allow the state to engage education, businesses, and government agencies simultaneously in order to eliminate the skills gap.

The Rhode Island Department of Education is working on mirroring the scope of WIOA by engaging and aligning efforts with other community based orgs and state agencies in reducing duplicative efforts and to facilitate seamless integration of programs. The State is also engaging stakeholders from The Department of Education, The Department of Labor and Training, in tandem with The Commerce Corporation, institutions of higher education, and the Governor's office in the JP Morgan Chase New Skills for Youth Initiative grant program. Core team members of the workgroup that are leading this effort range from DLT administrative staff represented by Assistant Director of Workforce Development Serv Department of Education administrative staff to advance CTE programs within the state. Rhode Island is a "phase one" recipient of the New Skills for Youth Grant, which provides Rhode Island with technical assistance and peer support develop plans to transform its system of career preparation through higher quality and more demand-driven, rigorous, and accountable approaches to career-focused programs.

The work has two overarching goals - to dramatically increase the number of students who successfully complete career pathways that begin in secondary school and culminate in postsecondary degrees /or industry credentials with labor market value, and to catalyze transformational approaches to the design and implementation of programs and policies that increase students' career-readiness. Rhode Island's efforts over these six months will culminate in a three-year action plan that details the state's approach to this work and this plan will be potentially eligible for a phase two grant of up to $650,000 per year for three years to implement the action plan. The Governor's Office and the Department of Education have coordinated a core state team of leaders, as well as a working group of employers, educators, and other stakeholders to develop and lead the action plan that will conclude its work at the end of September by delivering the action plan to state leaders.

Rhode Island will continue to engage as many actors and stakeholders as it takes to align workforce development efforts, community based economic efforts, education efforts to meet the needs of every under employed and unemployed individual in the state.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS.

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

Industry-based partnerships with employers as the primary participants invert the common method of employer engagement. Rather than have employers participate in a service provider developed program, service providers are invited to participate in an employer led workforce development program. Employers determine what level of intervention they are willing to support when it comes to preparing future employees. In addition, employers choose which service providers they want to collaborate with in delivering the workforce solution developed. The freedom of partnerships to control their own membership allows existing collaborations to be supported and creates a healthy competition for those organizations, both employer and non-employer, looking to join the partnership. Employers looking to join the partnership must be willing to collaborate with

the other employers and commit to the workforce solution developed. Service providers seeking to become partnership members directly must demonstrate their value to the employers and must provide services that fit the proposed solution strategy. Depending on the level of intervention included in the workforce solution, some service providers may provide services as part of the industry-based training program, whereas other service providers may not be directly involved in the partnership but may align their pre-industry training services to the partnership's program.

The ability of service providers to participate in the partnership provides a unique opportunity for providers to work with employers directly to create or customize education or service programs and creates more opportunities for such programs to be delivered within the context of an occupational skills training program. Contextualized program delivery coupled with the direct input from employers will generate opportunities for services provided [Title I and II of WIOA and title IV of Vocational Rehabilitation] by each of the combined partner programs to be provided in tandem to a client participating in a contextualized learning program that also supports the attainment of a secondary education degree or its equivalent, or a post-secondary education credential. By providing services in tandem, workforce partners participating in the partnership will be more responsive to the employer demand for workers, while simultaneously providing more effective services to clients.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

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

Rhode Island will be expanding educational access through a myriad of initiatives. First, Real Jobs Rhode Island program is bringing together employers and educational institutions together to create curriculums in the states institutions of higher education and secondary education that are aligned with the needs of industries across the state. Real Jobs grantees in some partnerships will be able to be referred to post-secondary credential classes at the states community colleges by One Stop staff. While institutions of higher education are included on the states eligible training provider list, conducting eligibility can stop some individuals from being able to get into career services or training. By referring individuals from the one stops to Real Job Rhode Island partnership programs the state is able to expand access to subsidized training and employment even if an individual does not meet eligibility requirements due to the nature of some of the funding streams that RJRI operates under.

Rhode Island is also applying for a variety of grant, which the state will be using to not only increase accessibility to the states institutions of higher education and independent education providers, but it aims to increase the diversity of individuals in these programs. The regional project targets several different populations, based on partner expertise and needs. Project partners will serve unemployed young adults state-wide; students who began and disconnected from community college in the greater Rhode Island area; and un- and underemployed Rhode Islanders living in Providence and throughout the state. These populations will be served by partners with experience in reaching out to the respective populations, through advertisements, referrals and direct outreach.

To supplement the regional training strategy, un- and underemployed Rhode Islanders will be targeted statewide for enrollment in training. Partners will advertise training opportunities through digital ads and jobs boards; high volume phone calls through access to state and local unemployment databases; outreach to community organizations; and, events such as job fairs. Once a person has been screened, he/she is assisted with connecting to necessary supportive services, such as English-language learning and adult education.

Apprenticeship offers an opportunity to increase educational access to the state. While apprenticeship is not traditionally academically based, the education provided by pre-apprenticeship programs provide valuable information about the possible career pathways available for individuals in the state. RIDLT was awarded the USDOL Accelerator Grant and is beginning to convene experts from across the state in traditional and non-traditional apprenticeship programs to plan out the strategies that will increase the overall number of apprentices in the state. Additionally, Rhode Island DLT funds Apprenticeship RI through the $5 million apprenticeship grant that was awarded to the state in 2015. Apprenticeship RI acts as an apprenticeship intermediary between the state and businesses interested in starting their own apprenticeship programs. Aligning the states apprenticeship intermediary using grant funding has allowed the state to scale up apprenticeship into an invaluable asset in expanding opportunities to Rhode Island residents.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

The State of Rhode Island's Governor Gina Raimondo tasked the state Department of Labor and Training with creating and operating an innovative industry led, demand driven strategy that aims at identifying and eliminating some of the state's major workforce dilemmas. This grant program convenes industries ranging from construction to fashion design in meetings to identify industry wide issues such as the "skills gap". RIDLT awarded grant money to partnerships who agree to share information on the best hiring and training practices in their respective sectors and to get more people into unfilled jobs at a faster pace than ever seen before, and many of the partnerships are providing post-secondary credentials that will create a career pathway for participants. Some of these trainings and "boot camp" style hiring methods come with industry recognized post-secondary credentials.

The Marines and Composites Partnership lead by the RI Marine Trades Association, representing 8 businesses and workforce entities, received nearly $150,000 to train eligible individuals in marine composite manufacturing and ship building through their pre-apprenticeship program. The Pre-apprenticeship training through RIMTA is a demand-driven, industry-proven 280-hour entry-level training program which meets the entry-level needs of marine and composites industry employers; aligns with registered apprenticeship programs in the marine trades and new composites-focused apprenticeship programs under development; and provides graduates with five industry recognized credentials including RIMTA Completion, OSHA10, First Aid/CPR, Safe Boaters and Fork Lift

certifications. The pre-apprenticeship program targets 20 un- or under-employed individuals ages 18 and up and features expanded curricula and training components that enable program graduates to be valuable, billable employees their first day on the job. Wrap-around case management, placement assistance and follow-up services are provided by a seasoned, industry-specific workforce development professional ensuring that both the trainee and the employer are well-matched.

Building Futures is a pre-apprenticeship program for the building trades targeting low income residents of the state. The classes provided give an overview of trade jobs through basic training, and reaches into specific trades as well. Building Futures had been working with the GWB during their pre-Real Jobs Rhode Island sector partnership program, and has moved over to Real Jobs Rhode Island as a grantee. With these funds, the Building Futures Partnership has expanded its impact in the non-residential construction industry by continuing to convene industry sector leaders to identify and address current and future workforce issues; increase employer participation in workforce development by promoting apprenticeship; respond to skilled trade labor shortage through multiple pipeline pathways including phased scale up of pre-apprenticeship; and integrating pathways into pre-apprenticeship and apprenticeship in Career and Technical Education Schools. Building Future programs include 10 weeks of hands-on on-the-job site training. Trainees learn as they construct low-income single family homes in hard hit Providence neighborhoods. Trainees gain soft and technical skill necessary to be successful in the building trades while overcoming barriers to employment.

Intermediaries such as Building Futures and Apprenticeship RI are integral to the expansion of registered apprenticeship and bringing in under-represented populations into trades occupations. 82% of placements out of Building Futures have been non-white, with over 200 individuals placed in registered apprenticeship programs. Building Futures has had a nearly 97% 1st year employment retention rate and has seen wage increases from $17 an hour to $37 an hour with $23 in benefits. 100% of their participants are low income, and 80% of them were unemployed at the time of entrance into the program. Registered Apprenticeship programs create a steady career pathway which includes the attainment of a post-secondary credential. These programs are of great value to Rhode Island's economy as it allows individuals to go through on the job training while collecting a salary on a progressive wage scale. RIDLT is currently working with Apprenticeship RI and is using funds awarded under the USDOL Apprenticeship Accelerator Grant to continue to expand registered apprenticeship locally and regionally. The grant will provide funding to Apprenticeship RI to facilitate the expansion of apprenticeship in Rhode Island as to meet the Governor's goal of doubling the number of apprentices in Rhode Island by 2020. The expansion of apprenticeship is guaranteed to expand access to post-secondary credentials and industry recognized certificates as every pre-apprentice who graduates from Building Futures leaves with a post-secondary credential, and every apprentice who finishes an indentureship leaves with an industry recognized certificate. As previously stated, the state workforce development activities under WIOA will aligned with instructions such as apprenticeship in order to create effective mobility for low income individuals in the state in the most efficient manner.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES.

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

Refer to field A

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 THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

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

Rhode Island continues to build upon successful strategies of the past as well as embrace new ideas for improving the public workforce development system while supporting these approaches with a strong policy and operational architecture. Increasing integration across workforce development is a continued focus which is evident through the many examples where operating system alignment has either taken place or is expected to.

<u>EmployRI</u>

Rhode Island's statewide virtual One-Stop and case management system, EmployRI represents an early investment made by the state to align systems and support many of the its strategies by providing the information needed to inform and assist both employer and job seeking customers as well as cross-agency workforce development professionals and policy-makers. EmployRI also functions as the state's Job Bank and Labor Market Information system.

The operating system was procured from Geographic Solutions, Inc., and implemented in May of 2009; it is a free online workforce development tool designed for jobseekers, students, training providers, workforce professionals, and analysts. The system has greatly improved netWORKri's and YouthWORKS411's ability to assist with job matching for self-service jobseekers and employers. It has also been proven to be a helpful tool for staff-assisted matching and individualized skills gap analysis to assist jobseekers who may require additional schooling to upgrade their skills to meet current workforce demands.

In addition to jobs posted in EmployRI by Employers, the system spiders job postings from multiple job boards (state and private), government sites, corporate websites, social media sites, and the National Labor Exchange to create a job bank within the Virtual One-Stop. The system allows jobseekers to target their search by preferred employer, job location, source, date and/or required skills. The system also offers additional features for jobseekers and students such as résumé creation wizards (Resume Builder) and scheduled, automated job search tools (Virtual Recruiter), as well as lists of eligible training providers and programs. Jobseekers can also enter the job and personal skills they possess as well as information on

desired careers to further customize their job search within the system. Employers utilize the system to create and post job orders, write job descriptions, and conduct talent searches.

EmployRI is also an important labor market information tool, containing a vast database of industry and occupational information including wages, projected employment, and career and industry growth rates. The labor market information module contains state and national data and allows jobseekers to research potential careers and the required training and/or experience needed to excel in them.

EmployRI is used as the case management system for multiple workforce development programs, among them Wagner-Peyser (Labor Exchange), the Workforce Innovation and Opportunity Act (WIOA), Trade Adjustment Assistance (TAA), Reemployment Services and Eligibility Assessment (RESEA), National Dislocated Worker Grants and RI Works. With the exception of RI Works, the federally required reports are run using this platform. Additionally, the state has purchased the Generic Program module for EmployRI that allows us to utilize the system for case management of additional grants and programs including disability employment initiatives. On-Ramps to Career Pathways (concluded), and is being updated now to include case management and reporting options for the Real Jobs Rhode Island program.

In 2011 the state purchased and implemented Scan Card Technology for EmployRI, which is designed to capture and record labor exchange services provided to customers; those services are automatically recorded into the system. Scan cards are issued to customers at the NetWORKri One-Stop Career Centers and are utilized to track Wagner-Peyser, RESEA, and RI Works participant activities. Since implementation, this technology has recorded more than 400,000 activities that would have otherwise been manually entered by staff and has provided a very positive return on investment in terms of improved productivity and data quality.

In 2015 the state purchased and launched both a Spanish module and a mobile app for EmployRI. The Spanish module is designed to allow users with Limited English Proficiency (LEP) to view the EmployRI in Spanish affording many the opportunity to fully utilize all features the site offers in their primary language. The mobile app is available for both Apple and Android devices, is free for customers to download from either the Apple Store or Google Play, and allows mobile job-searching both manually and using GPS technology on mobile devices. Users can login to their EmployRI account from a mobile device and conduct and save general and customized job searches. The mobile app can also be utilized in Spanish by users who chose to set the phone's language settings to Spanish. Job searches conducted through the mobile app while jobseekers are logged into their EmployRI account are recorded for reporting under Wagner-Peyser just as they are when jobseekers are logged in to the full website and conduct a job search. Lastly, the vendor is currently in development of an app version for Employers that will allow them to conduct talent searches through their mobile device and thereby expand their EmployRI usability as well.

All of the improvements made to the employ RI reporting mechanisms and the services that have been updated allows it to be our primary data management system for the state's new sector based approach to workforce development and the career pathway strategies. Because of the push for more comprehensive data recording within both strategies, the

activities of employers within the EmployRI network feed into the umbrella data system which will generate data about the needs of employers and job seekers.

In addition, Employ RI has an integrated internet-based management information system (EmployRI) which includes common intake, case management, and data tracking components to meet the data collection and reporting requirements of and provide a single interface for WIOA, Wagner-Peyser, TAA, Jobs for Veterans State Grants (JVSG), Rapid Response activities, Business Services, the Migrant and Seasonal Farmworkers program (MSFW), and other reportable One-Stop services. The system provides Local Workforce Development Boards with the tools needed to deliver WIOA services through an income growth model, integrating workforce information, transferable skill sets, and career paths into the case management system. With data from other One-Stop partners, EmployRI data provides seamless information sharing and data exchange in addition to increased customer service. This connectivity forms the basis for the development of enhanced interagency data exchange. DLT has an agreement with WRIS wage record exchange system in order to maximize documented performance outcomes.

This integrated intake system and resulting tracking system provides DLT, other state agency funded One-Stop partners and local entities, and most importantly, the Local Workforce Development Boards with the data necessary to operate and coordinate programs effectively. Utilizing this data, Rhode Island is able to evaluate how our systems are functioning, provide timely technical assistance, and help the local boards make programmatic and funding decisions. DLT and local workforce board staff continue to be involved in the development of the MIS system. Rhode Island is fully prepared to provide USDOL with any data it requires. EmployRI is a comprehensive data collection and management operating system that is used to enter participant and employer data, case notes, activities, assessments, exits, and follow-up activities. It contains online, real-time case management reports, providing local staff with demographic, activities, soft exit data, youth goals, and case management information.

The system also provides predictive performance reports based on staff entered data as well as the quarterly and annual WIOA reports and Wagner-Peyser 9002 series and Veterans 200 series reports which also incorporate wage record data. The predictive reports allow local workforce boards to determine performance and implement corrective action in a timely manner without having to wait for wage record data.

CALIS- RIDE/Adult Education

The Adult Education Management System in Rhode Island is named the Comprehensive Adult Literacy Information System (CALIS) and was developed to provide greater accountability and improve performance in Adult Education systems at the state and local levels. Administrators at every level have immediate, accurate access to program data and reports, allowing them to effectively manage the programs under their jurisdiction. The system is designed to meet all requirements for the National Reporting System for Adult Education. It delivers all federal NRS reports and has been designed to deliver several state-specific customized reports. CALIS is a web-based, real-time reporting system with the capability to provide teachers, local administrators and state administrators with instant feedback on students, classes and groups of classes. CALIS can also be used to deliver administrative messages to all users or to select groups of users based on login.

Local adult education programs are required to begin each fiscal year by entering basic program information, class information and schedules, and staff information. After intake and orientation has occurred for students, local programs enter student demographic information and assessment results; daily attendance is entered into CALIS on a biweekly basis at a minimum. Local program administrators can run NRS reports as well as customized reports at any time. The state office runs NRS reports quarterly to track educational gain performance and outcome measures. The state office is also able to export quarterly data from CALIS to follow up the employment outcome measures, and the office matches this data with the RI Department of Labor and Training wage records. The successful matches are then imported back into the system and recorded as outcomes for those students. In addition, the state can export data to match with the National Student Clearinghouse for the postsecondary education follow-up outcome measure. Both statewide and local program NRS Tables can be run by the state office, and final statewide reports are submitted annually to the NRS web system of the US Department of Education.

RIDHS

ORS has an Electronic Case File/MIS that is cloud based, proprietary and uniquely designed to meet the data collection requirements of Vocational Rehabilitation (VR) Programs. The product, Libera System 7, provides data security, reporting compliance, project management,

case management, integrated authorization & billing, customer service and customization options. This product currently serves at least 14 state VR agencies and is WIOA compliant.

The software is specific to State operated VR programs, used nationally by several other State VR Agencies, facilitates the Agency's ability to meet and report on its Federal mandates and captures 392 data elements required by RSA/WIOA - all necessary to maintain Title I and Title VI funding for and function of Vocational Rehabilitation Programs that assist individuals with disabilities to obtain and maintain employment in integrated competitive work settings.

The Vocational Rehabilitation Program has staff co-located at each of the one stop sites and pays an annual rental fee for space, clerical and technology support. The VR program meets all the approximately 320 data elements required for the RSA -911. VR has an electronic case file system that integrates all the required data elements, client specific services, financial authorizations and expenditures. The program captures all services authorized and provided to clients, plan development and employment outcomes. A client is not considered successfully employed until the client has been on the job for at least 90 days.

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

Currently, Rhode Island Department of Education and Rhode Island Department of Human Services are not co-located within the one stop network. RIDLT and the local workforce development boards current operate and administer all one stop programs. In the future, all WIOA core partners will be co-located within a one stop and will provide the required services while operating under MOUs that will be drafted to facilitate data collection and data sharing.

RIDLT collects data from the LWDBs on a quarterly basis and logs all information into RIDLT's MIS system EmployRI. EmployRI has the capabilities of reporting all required outcome data to USDOL as required by WIOA and Wagner-Peyser. All participant information is collected and tracked using social security numbers and EmployRI specific individual identifiers. The path that participates travel during their time as one stop customers is tracked on EmployRI longitudinally.

WIOA mandated outcome measures have started to be collected from WIOA participants within the one stops. ETPL vendors who are mandated to report outcome data to The Department report on a quarterly basis and are required to provide outcome data in order to secure sustained eligibilty. All youth providers contracted by DLT to provide youth services provide outcome data for youth participants on a quaterly basis. All providers currently report all WIOA outcome indicators.

THE VOCATIONAL REHABILITATION PROGRAM HAS STAFF CO-LOCATED AT EACH OF THE ONE STOP SITES AND PAYS AN ANNUAL RENTAL FEE FOR SPACE, CLERICAL AND TECHNOLOGY SUPPORT. THE VR PROGRAM MEETS ALL THE APPROXIMATELY 320 DATA ELEMENTS REQUIRED FOR THE RSA -911. VR HAS AN ELECTRONIC CASE FILE SYSTEM THAT INTEGRATES ALL THE REQUIRED DATA ELEMENTS, CLIENT SPECIFIC SERVICES, FINANCIAL AUTHORIZATIONS AND EXPENDITURES. THE PROGRAM CAPTURES ALL SERVICES AUTHORIZED AND PROVIDED TO CLIENTS, PLAN DEVELOPMENT AND EMPLOYMENT OUTCOMES. A CLIENT IS NOT CONSIDERED SUCCESSFULLY EMPLOYED UNTIL THE CLIENT HAS BEEN ON THE JOB FOR AT LEAST 90 DAYS.

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

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

RIDLT Business Affairs Division determines the infrastructure costs for the One Stop core partners by calculating staff salary and fringe, then run a GA-93B report. BA staff then calculate the GeoSol License cost for the use and management of our case management information system. The number of seats within the one stop is then taken used to divide the total cost, and determine how many spaces will be taken by DLT, RIDE, and DHS staff. BA then prepares an actual cost allocation sheet for each One Stop working from the GA93B through the most recently completed month by summarizing the cost categories. Finally, staff prepare a budget allocation spreadsheet for the upcoming fiscal year by projecting actual cost through the end of the current fiscal year and then rounding to the nearest whole dollar.

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.

Organizational charts of the RIDLT Divisions and the Governor's Workforce Board can be found in appendix C. The organizational structure of the RI Workforce Network starts at the Governor's office. The Governor has dictated the responsibilities of each WIOA core partner agencies as dictated by state and federal law. RIDLT operates workforce development, and acts as the operator for the state's WIBS as well as acting as the fiduciary agency for WPGRI. All adult and dislocated worker programs are run out of the one stops, of which the state has four located in different regions within the state. All youth programs are contracted out to independent youth centers- of which the state has 14 spread across the state.

RIDE funds and operates numerous adult basic education programs, such as the Rhode Island Family Literacy Initiative for ESL learners, and The Regional Rhode Island Adult Learning Initiative which focuses on ESL learners and GED preparation. RIDHS currently contracts with RIDLT to provide work ready services to RIWorks (TANF) recipients within the One Stop network. RIDHS also has a number of offices around the state which determine eligibilty for assistance and refers individuals to programs within the one stops, and other basic skill providers.

The Governor's Workforce Board uses the Job Development Fund which is allocated from the Unemployment Insurance funds to administer niche programs such as "Work Immersion" programs for college students, and set the ground work through their early sector partnerships for Real Jobs Rhode Island. RI GWB in tandem with The Division of Workforce Development Services sets workforce development policy for the state, and oversees the administration of WIOA activities under RIDLT.

Other agencies are included in the workforce network as well. The Department of Corrections works with RIDLT to provide employment services to ex-offenders and newly released inmates. Correction houses their parol office in the same location as the Woonsocket One Stop, which allows for ex-offenders to be referred to One Stop staff seamlessly.

Some workforce development activities are located outside the immediate workforce development network. Registered apprenticeships are included on the state's ETPL list, but the Apprenticeship office is housed within the RIDLT Division of Workforce Regulation and Safety. Apprenticeships are registered by that division, but the Division of Workforce Development Services works with the apprenticeship office to expand outreach and referral activities within the One Stops.

The Office of Rehabilitation Services (ORS) administers the Title I Federal/State funded Vocational Rehabilitation Program (VR), the Title VI Supported Employment Program, and the statewide Transition program for youth with disabilities. The Rehabilitation Act of 1973, as amended via WIOA in 2014, authorizes a federal-state vocational rehabilitation program as a core partner to provide services to eligible individuals with disabilities in order to prepare for and engage in employment. The "Act" requires states to match federal funds at a ratio of 78.7 percent federal to 21.3 percent state dollars. The Vocational Rehabilitation Program (VR) is the federal government's largest and most successful employment program for individuals with disabilities. The agency assists Rhode Islanders with disabilities to select, prepare for, obtain and maintain competitive integrated employment. The VR program consists of a team of professionally trained and qualified Masters Level Vocational Rehabilitation Counselors who tailor services to the individualized needs of the individual with a disability. Services may include: vocational evaluation and assessment, vocational

counseling and guidance, situational assessments in the community, summer work, skill specific training, assistive technology, vehicle and home modification, job preparation/work readiness, job development and placement, including services that support individuals with disabilities to obtain and maintain employment in integrated competitive employment settings at or above the prevailing minimum wage.

B. STATE BOARD

Provide a description of the State Board, including—

Rhode Island has a strong legacy of highly engaged state-level board leadership on workforce development. This has evolved out of a decade's long stewardship of not only federal workforce dollars but of significant state investment as well. WIOA builds on this foundation and provides new opportunity to organize around the system leadership responsibilities.

The board is also charged with overseeing the funding and investments in workforce development including WIOA dollars. As such it plays an important role in system decisions like one-stop infrastructure costs and partners roles. It is also best situated to discuss and inform on the technological improvements necessary to implement WIOA across agencies and for customers.

The Governor's Workforce Board capacity to effectively meet its WIOA duties lies first in its dynamic membership and it enlightened committee structure. The full GWB meets no less than 10 time a year, while its committees are typically active monthly. The boards work is coordinated across the following committees - Strategic Investment and Evaluation, Executive, Adult Education & Employment, and Career Pathways. Each committee plays a critical role under WIOA with the Executive Committee playing the principle lead and hub of coordination. The Executive Committee consists of the chairs of each of the other committees. ***Executive Committee***

Under both state and federal statute the GWB is responsible for the development, implementation and oversight of the state's workforce development plan. State program administrators and their respective agencies bring planning recommendations and options to the committee for input and approval. It is the Executive Committee that also coordinates board input into the plan itself.

The Executive Committee has developed the expertise among its members and staff around the development and issuance of WIOA policy. It is here that technical advisories, system guidance and ultimately final policy emerge. Most of the formal WIOA items are then brought to the full board via consent agenda, with the opportunity for full board discussion.

The Executive Committee is also responsible for overseeing the one-stop system including the development of statewide policies.

Strategic Investment and Evaluation Committee

This Committee has evolved into the primary player for workforce development accountability. Rhode Island and the GWB have moved aggressively towards better data-driven decision making. This work spans beyond WIOA to include state-funded investments and programs as well as those programs outside the traditional workforce partners

including housing and transportation. The GWB has pioneered a Unified Program and Expenditure Report that annually captures the investments and outcomes across all workforce development programming (The report can be viewed here http://www.gwb.ri.gov/WFDdata.htm). The SI&E Committee is responsible to lead and inform the entire WIOA performance cycle including annual reports and continuous improvement strategies.

Adult Education & Employment Committee and Executive Committees

Title II Adult Education policy is coordinated through these respective committees. The Adult Education and Employment Committee membership either brings or has developed an expertise in the area of adult education and job training and will be responsible going forward for this work. The Executive Committee reviews and executes all WIOA policies and ensures consistency, uniformity, and alignment with the state plan and priorities.

Career Pathways Committee (Youth) and Executive Committee

Rhode Island has been leading on career pathway system work for several years now. The Career Pathways Advisory Committee was made statutorily required in 2011. Since then the committee has been the forum for emerging Career Pathway implementation. The mission of the CPAC is to prepare in school and out of school youth for careers and connect businesses to a skilled workforce. This will be accomplished through service integration by unifying training, education, employment and supportive service programs into a single, customer-focused system across the state of Rhode Island. The Rhode Island career pathways model values employer engagement, customer focus, and data-driven decision making through programs and services that are collaboratively developed by education, workforce, employer and economic development partners. Title I Youth policy is developed and deliberated through the Career Pathways Committee. The Executive Committee reviews and executes all WIOA policies and ensures consistency, uniformity, and alignment with the state plan and priorities.

State Board Activities

The Governor's Workforce Board manages its responsibilities via a highly responsive and expert committee structure. An overview of this structure is presented above in section III (a)(1) of this plan. The GWB is staffed by six professionals including an executive director. The staff have responsibilities related to policy development, performance and accountability, career pathways, youth programming, and employer/sector partnership.

I. MEMBERSHIP ROSTER

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

- 1. Stefan Pryor Commerce Secretary
- 2. Ken Wagner Commissioner RI Department of Elementary and Secondary Education (WIOA Title II)
- 3. Scott Jensen Director RI Department of Labor and Training (WIOA Titles I and III)
- 4. VACANT PENDING STATE SENATE A&C (WIOA Title IV)
- 5. David Chenevert Executive Director Rhode Island Manufacturers Association (EMPLOYER)

- 6. Mike Grey (Chair) VP of Operations, North East Region Sodexo School Services (EMPLOYER)
- 7. Debbie Proffitt Vice President- Defense Division, Purvis Defense Systems (EMPLOYER)
- 8. John C. Gregory President and CEO Northern Rhode Island Chamber of Commerce (EMPLOYER)
- 9. Janet Raymond Senior Vice President of Economic Development and Operations Providence Chamber of Commerce (EMPLOYER)
- 10. Steve Kitchin VP of Corporate Education and Training New England Institute of Technology (EMPLOYER)
- 11. Bahjat Shariff Vice President of Operations Howley Bread Group (EMPLOYER)
- 12. Jordan Boslego Managing Member, Sydney Providence and Quay (EMPLOYER)
- 13. Susan Rittscher President and CEO Center for Women and Enterprise(EMPLOYER)
- 14. VACANT PENDING STATE SENATE A&C (EMPLOYER)
- 15. VACANT PENDING STATE SENATE A&C (EMPLOYER)
- 16. VACANT PENDING STATE SENATE A&C (EMPLOYER)
- 17. George H. Nee President RI AFL-CIO (WORKFORCE - LABOR)
- 18. Robin M. Coia Assistant Administrator New England Laborer's Labor-Management Cooperation Trust (WORKFORCE - LABOR)
- 19. Paul A. MacDonald President, Providence Central Federated Council (WORKFORCE - LABOR)
- 20. VACANT PENDING STATE SENATE A&C (WORKFORCE - LABOR)
- 21. Cathy Doyle Executive Director Year Up Providence (WORKFORCE - COMMUNITY)
- 22. Suzanna Alba Director of Alumni Affairs & College Relations Rhode Island College Kauffman Center (WORKFORCE - COMMUNITY)
- 23. Mario Bueno Executive Director Progreso Latino (WORKFORCE - COMMUNITY)

II. BOARD ACTIVITIES

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

The Governor's Workforce Board manages its responsibilities via a highly responsive and expert committee structure. An overview of this structure is presented above in section III (a)(1) of this plan. The GWB is staffed by six professionals including an executive director. The staff have responsibilities related to policy development, performance and accountability, career pathways, youth programming, and employer/sector partnership.

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

A. ASSESSMENT OF CORE PROGRAMS

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area

or provider. Such state assessments should take into account local and regional planning goals.

As elaborated within the performance accountability section of the state vision above, Rhode Island is proposing a significant and robust methodology for truly assessing the performance of the public workforce system, the WIOA core programs and one-stop platform of service delivery.

The state vision further outlines the state's capacity to manage this accountability system, to analyze performance data in real time and longitudinally. Its ultimate goal is to produce actionable intelligence for the state, local workforce areas and regions to drive improvement.

Consistent with the statewide vision for meeting the labor demand of Rhode Island employers and serving the needs of its citizens, Rhode Island will also conduct research and evaluations to determine the effectiveness of new collaborations built under this plan. Complementing the new comprehensive performance measurement strategy, research and evaluations of the implementation and the results of the new initiatives, particularly the success of the workforce intermediaries, will provide greater context for the performance measures. Such context will be especially useful as Rhode Island uses a networked government approach to increase collaboration among programs and partners, and as services are delivered jointly among partner programs. Such work will be carried out under the direction of the state board and through partnerships with local institutions of higher education. This work is already underway with the University of Rhode Island, which will be providing case study analyses of the Real Jobs Rhode Island partnerships.

B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS

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

Partner programs will be assessed based on their statutorily-required performance metrics and reporting requirements. Partner programs will be asked to make such reports available on request to workforce partners and the State Workforce Development Board.

Partner programs will also be assessed based on meeting other commitments outlined in MOUs. The State Board will review achievement of locally determined performance targets and measures of effectiveness. Along with these reviews, the State Board may review performance on specific matters such as services to individuals with barriers, customer satisfaction, program flexibility and alignment, and others.

Rhode Island has two additional vehicles through which assessment and public accountability of One Stop Partner programs can occur. The State Board - Adult Education and Employment Subcommittee is undergoing a restructuring that will position it as a critical lead in oversight, coordination, and direction of WIOA partners. This Committee will review One Stop partner performance and responsiveness in a public forum and make recommendations to partner agencies and the full board when appropriate. The Interagency Workgroup - a multi-agency workgroup comprised of sub-cabinet level decisionmakers from all core and partner programs, as well the State Workforce

Development Board is able to discuss performance and program delivery in a collaborative fashion and offers the opportunity for group problem-solving when necessary.

In November 2017, the Rhode Island State Workforce Development Board issued its certification requirements in accordance with WIOA (https://gwb.ri.gov/wp-content/uploads/2017/06/18-04-One-Stop-Certification.pdf?189db0). This policy provided guidance to Local Workforce Development Boards, Local Workforce Development areas, and One-Stop Operators regarding the certification of one-stop centers and the one-stop delivery system.

In addition to any standards and criteria a local board may establish; the policy listed twenty-four (24) criterion upon which the One Stop Centers must be assessed which are designed to gauge:

•Their ability to provide effective and responsive services in a coordinated manner to employers and participants

•Whether participants can easily access the programs and services that are available to them

•Whether the physical design and location of the One Stop is accessible to people of all capabilities and though a range of transit options

•Whether the One Stop is committed to continuous improvement

C. PREVIOUS ASSESSMENT RESULTS

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

D. EVALUATION

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

Refer to Field A

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

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),

Allocation of WIOA Youth Funds: (See Workforce Investment Notices Appendix G and Appendix H) The Secretary of Labor and the Governor of each state use the same three-part formula for the distribution of Youth funds, in the Secretary's case to the states and in each Governor's case, to local Workforce Development Areas. The three data factors utilized by the State for calculation of the formula are:

PART I: 33 1/3 percent shall be allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each Workforce Investment Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State;

PART II: 33 1/3 percent shall be allocated on the basis of the relative excess number of unemployed individuals in each Workforce Investment Area as compared to the total excess number of unemployed individuals in all Workforce Investment Area in the State; and

PART III: 33 1/3 percent shall be allocated on the basis of the relative number of economically disadvantaged YOUTH within each Workforce Investment Area as Compared to the total number of economically disadvantaged YOUTH in the State.

Of the WIOA formula funds allotted for services to Youth, the Governor must reserve funds from this source for statewide workforce development activities. In making these reservations, the Governor may reserve an amount up to a percentage determined by the U.S. Secretary of Labor. The State then distributes the remainder of these funds among the local workforce development areas in accordance with the provisions of WIOA as stated above. A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

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

Allocation of WIOA Adult Funds: (See Workforce Investment Notices Appendix G and Appendix H) The Secretary of Labor and the Governor of each state use the same three-part formula for the distribution of Adult funds, in the Secretary's case to the states and in each Governor's case, to local Workforce Development Areas.

PART I: 33 1/3 percent shall be allocated on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each Workforce Investment Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State

PART II: 33 1/3 percent shall be allocated on the basis of the relative excess number of unemployed individuals who reside in each Workforce Investment Area as compared to the total excess number of unemployed individuals in the State; and

PART III: 33 1/3 percent shall be allocated on the basis of the relative number of economically disadvantaged ADULTS within each Workforce Investment Area as compared to the total number of economically disadvantaged ADULTS in the State.

Of the WIOA formula funds allotted for services to Adults, the Governor must reserve funds from each of these sources for statewide workforce development activities. In making these reservations, the Governor may reserve an amount up to a percentage determined by the U.S. Secretary of Labor. The State then distributes the remainder of these funds among the local workforce development areas in accordance with the provisions of WIOA as stated above. A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

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

(iii) **Allocation of WIOA Dislocated Worker Funds:** The Governor shall use the following factors when determining the distribution of Dislocated Worker funds.

- Unemployment data;
- Unemployment concentrations;
- Plant closings and mass layoff data;
- Declining industries data;
- Farmer-rancher economic hardship data; and
- Long-term unemployment data

Because Rhode Island lacks sufficient data for the *Farmer/Ranch Economic Hardship* factor; no weight has been assigned to that category. The policy assigns a uniform 20% weight to each of the remaining five factors:

Factor	Weight
Insured unemployment data	20%
Unemployment concentrations	20%
Plant closings and mass layoff data	20%
Declining industries data	20%
Long-term unemployment data	20%

Of the WIOA formula funds allotted for services to Dislocated Workers, the Governor must reserve funds from each of these sources for statewide workforce development activities. In making these reservations, the Governor may reserve an amount up to a percentage determined by the U.S. Secretary of Labor. The State then distributes the remainder of these funds among the local workforce development areas in accordance with the provisions of WIOA as stated above. A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

B. FOR TITLE II:

I. MULTI-YEAR GRANTS OR CONTRACTS

Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

The application process is uniform to include said rubric which contains scoring criteria that ensures a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. A centralized online grant management system also allows for all grant and contract related announcements and communications to be made public and shared. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder's conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

In awarding grants or contracts under Section 243, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;

5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ¬uals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

II. ENSURE DIRECT AND EQUITABLE ACCESS

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.

refer to field 1

C. TITLE IV VOCATIONAL REHABILITATION

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.

This does not apply for the State of Rhode Island

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

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

WIOA Core Programs are administered across several state agencies each with separate case management and performance data systems. The ability to align, integrate and ideally unify these information management systems has been a coveted yet elusive goal. All too often these separate systems represent major investments in infrastructure, contracts and staff training. Both WIOA and significant advancements in web-based technology hold promise.

WIOA Adult, Dislocated Worker and Youth data systems are already integrated with Wagner-Peyser with the Rhode Island Department of Labor and Training (DLT). DLT utilizes an Management Information System (MIS) developed by Geographic Solutions Inc.

(GeoSol) that integrates reporting and case management for these core programs as well as Trade Adjustment Assistance for Workers, Jobs for Veterans State Grant and other ETA programs. GeoSol has already made the necessary enhancements and database changes needed to meet WIOA reporting and service delivery requirements. This includes the new reporting around eligible training providers.

Adult Education and Vocational Rehabilitation are located at the Departments of Education and Human Services respectively has their own systems of reporting. These core programs have a long history of working together to support each other's' data needs including the sharing of wage record information. However a true integrated system has never materialized.

Given the data driven decision-making imperative within WIOA and the robust performance accountability standard Rhode Island will be holding itself, Rhode Island is reviewing several emerging cloud-based umbrella technologies that would permit agencies to keep existing databases while providing a solution to common intake, reporting and analysis.

Assessment of Participants' Post-Program Success

Rhode Island has invested a significant amount in its ability to track its participants longitudinally. Through several Workforce Data Quality Initiatives, Rhode Island has built out linked data systems between core partners and other state agencies to evaluate workforce development interventions over time. This LDS will augment an already robust methodology for collecting data and measuring performance as described in the Strategic Elements section of this plan.

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 marketing information, consistent with Federal and State Law. (This Operational Planning element applies to core programs)

Rhode Island uses both state wage record data and Wage Record Interchange System (WRIS) data to track and report on state and local performance measures. DLT and the local WDBs have access to state wage record information. WIOA performance reports are distributed to the local areas on a quarterly basis.

Privacy Safeguards

EmployRI, the State's Virtual One-stop and Case Management Information System, provides the highest level of confidentiality where required and conforms to federal law Sec. 205 [42 U.S.C.] (c) (C) (vii). The VOS system supports the security standards recommended for State Employment Security Agencies by the Information Technology Support Center, College Park, Maryland. The system supports user name and password access. The user name determines the access level and whether a user may access certain services and confidential data. If a user does not have privileges to view certain data, these fields will not be shown.

To secure VOS internet communications, a Secure Sockets Layer (SSL) encrypts a session between the server and the Web user. SSL is a highly reliable program layer for managing the security of message transmissions in a network. The programming for maintaining data

confidentiality is contained in a program layer between an application such as VOS and the Internet's TCP/IP layers. The "sockets" part of the term refers to the socket methods of passing data back and forth between a client and a server program in a network or between program layers in the same computer. SSL uses the public-and-private key encryption system for RSA. This Internet authentication system uses an algorithm that also includes the use of a digital certificate.

A digital certificate is an electronic "access card" that establishes credentials when carrying out transactions on the Web, and is issued by a certification authority. It contains a copy of the certificate holder's public key (used for encrypting and decrypting messages and digital signatures) and the digital signature of the certificate-issuing authority so that a recipient can verify that the certificate is real. The following data is always encrypted when is accessed by a Virtual OneStop:

- Social Security Number
- Federal Employer Identifier Number
- Wage Records
- Individual benefits and public assistance Information
- User ID and Password

The controls in the VOS Administration Site and the SSL method for security give the VOS the means to protect confidential information and restrict access to that data. Our VOS has been successful with these methods of security.

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.

See textbox (6)(A)(1)

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.

See textbox (6)(a)(1)

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

See textbox (6)(a)(1)

Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

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.

Rhode Island has invested a significant amount in its ability to track is participants longitudinally. Through several workforce data quality initiatives, RHode Island has built out linked data systems between core partners and other state agencies to evaluate workforce development inteventions over time. This LDS will augment an already robust methodology for collecting data and measuring performance as described in the strategic elements section of this plan.

Follow up services will be provided for WIOA Adult, Dislocated Workers, Wagner Peyser and Trade participants utilizing quarterly wage records to determine entered employment and retention rates in the second and fourth quarters after exit. Intensive job development and referrals will be an integral part of the follow up services comining the efforts of the AJC staff and the staff of the Business Workforce Center to properly match customers with employment opportunities. AJC staff will also perform case management and follow up services individually to clients to ensure they are recieving the supportive services neccesary to maintain employment after placement.

The VR program does not close a client as successfully employed until that individual has been employed in the same position, consistent with an Individualized Plan for Employment (IPE) for at least 90 days of uninterrupted employment. Prior to closure with VR, the assigned Vocational Rehabilitation Counselor is expected to contact the client to verify satisfaction with the job, wage and hours of work/week. The VR agency has a type of service called Post Employment that enables the client to receive an additional time limited service, if warranted, to sustain employment. In addition, a client can re-apply for services for additional training for advancement or if alternate employment is indicated. VR also conducts satisfaction surveys of closed cases as part of its Continuous Quality Improvement Program.

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.)

Rhode Island uses both state wage record data and Wage Record Interchange System (WRIS) data to track and report on state and local performance measures. DLT and the local WDBs have access to state wage record information. WIOA performance reports are distributed to the local areas on a quarterly basis.

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Employment Security Agencies by the Information Technology Support Center, College Park, Maryland. The system supports user name and password access. The user name determines the access level and whether a user may access certain services and confidential data. If a user does not have privileges to view certain data, these fields will not be shown.

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- Social Security Number
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- Wage Records
- Individual benefits and public assistance Information
- User ID and Password

The controls in the VOS Administration Site and the SSL method for security give the VOS the means to protect confidential information and restrict access to that data. Our VOS has been successful with these methods of security.

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.

EmployRI, the State's Virtual One-stop and Case Management Information System, provides the highest level of confidentiality where required and conforms to federal law Sec. 205 [42 U.S.C.] (c) (C) (vii). The VOS system supports the security standards recommended for State Employment Security Agencies by the Information Technology Support Center, College Park, Maryland. The system supports user name and password access. The user name determines the access level and whether a user may access certain services and confidential data. If a user does not have privileges to view certain data, these fields will not be shown.

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The controls in the VOS Administration Site and the SSL method for security give the VOS the means to protect confidential information and restrict access to that data. Our VOS has been successful with these methods of security.

7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

As required by 38 U.S.C 4215 (b) and 20 CFR part 1001 and 1010, priority of service is provided to ensure that all eligible veterans and covered persons receive priority access for all career service opportunities for which they qualify within the employment service delivery system and any sub-grantee funded in whole or in-part by the US Department of Labor. Rhode Island's two local workforce development boards the Workforce Partner of Greater Rhode Island and the Workforce Solutions of Providence/Cranston, include the priority of service requirements in their local plans. In every one of our four American Job Centers (AJC) we have visible signage that is posted at the AJC point of entry that clearly describes priority of service an effort to encourage individuals to self-identify their veteran status. Furthermore, AJC staff are provided training by the Local Veteran Employment Representative (LVER) on a quarterly basis to review priority of service regulations, veteran referral processes and guidance on the "Initial Veteran Assessment Tool." At point of entry, AJC staff are required to verbally ask every customer which enters the center "Are you a veteran, spouse of a veteran or caregiver of a veteran." When a veteran or eligible persons status is self-attested, all eligible veterans and eligible person are made aware of: •

Their entitlement to priority of service; • The full array of employment, training and placement services available under priority of service; and • Any applicable eligibility requirements for those programs and/or services. Subsequently, at the point of entry all eligible veterans or eligible persons are given opportunity to be screened by AJC staff member using the "Initial Veteran Assessment Tool.'" When an eligible veteran or eligible person has indicated to one or more Significant Barriers to Employment (SBE) outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14, then a referral is made to a Disabled Veteran Outreach Specialist (DVOP) for intensive services and the AJC staff member will enter an "Initial assessment" in Employri. As a result, oversight of priority of services to covered persons at point of entry will be monitored by the ETA 9002F quarterly report. In addition, the ETA 9002F report will indicate the percentages and total number of covered persons receiving staff-assisted services during the entry period, this report will be review and monitored for compliance. In an event that a DVOP is unavailable the eligible veteran and/or eligible person is afford the opportunity to be seen by next available AJC staff member. In addition, the eligible veteran and/or eligible person's information is referred to the AJC managers who are responsible for ensuring he or she will be outreached by a DVOP for intensive services at a later time. If a eligible veteran and/or eligible persons, at a point of service does not have the documentation verifying his or her eligibility for priority of service, he or she is afforded access on priority base to all services provided by program staff (including an intensive service) while awaiting verification. If a veteran or eligible person completes an online registration on Employri, our web-based system Employri includes content that explains priority of service, as well as provides veterans and eligible persons the opportunity to self-identify veteran status through virtual self-service registration. In Employri there are questions that are embedded at initial enrollment that will act as the screening tool to identify a Significant Barriers to Employment (SBE) outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. When an eligible veteran or eligible person has indicated having one or more Significant Barriers to Employment (SBE) it will generate a notification that will be sent to the closes geographical located AJC to be outreached by a DVOP. For USDOL funded training at within the local AJCs, priority of service is given to veterans and eligible person over non-covered persons. AJC managers review all applicant files before approving an applicant's training request. When reviewing training request, the AJC manager implements the priority of service procedure, as follows: First, if there is a waiting list for the training, priority of service is awarded by requiring the veteran or eligible person go to the top of that list. Second, the AJC manager applies priority of service up to the point at which an individual is both: a) approved for funding; and, b) accepted or enrolled in a training class. Therefore, once a non-covered person has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible person to "bump" the non-covered person from that training class. The Veteran Service Coordinator will assist AJC managers in the verification process of veterans and/or eligible persons by providing expertise in veteran documents and priority of service. In such cases where a veterans or eligible persons is unable to produce supporting documents at point of enrollment they will be able to gain access to training funds as a non-covered person till supportive documentation are verified. During this time, DVOP specialists and/or AJC staff members will continue to render career services to the veteran or eligible person per self-attestation as first indicated at point of entry. In addition, DVOP Specialist and AJC staff will provide

assistance and provide these veterans or eligible persons with resources to recover these documents, while continuing providing services.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

Rhode Island's One-Stop Career Centers (netWORKri Offices) are fully accessible and in compliance with both WIOA Section 188 regulations on non-discrimination and Rhode Island General Laws Section 28-5 Fair Employment Practices. Each One-Stop Career Center has been monitored and inspected bi-annually by the Rhode Island Governor's Commission on Disabilities and has been found to be in compliance. Rhode Island has had policy in place for many years dictating that when deficiencies are identified, One-Stops are informed in writing of the findings and a corrective action plan is put into place. There are currently no outstanding issues.

The Department of Labor and Training has been committed to making One-Stop Centers and programs more accessible to individuals with disabilities. In the past much of our Adaptive Technology has been upgraded using the Disability Employment Initiative Grant and the Office of Rehabilitation Services Assistive Technology Program. These Assessments of accessibility which allowed upgrades in Adaptive Technology and increased staff development when serving customers with disabilities.

In addition, ORS funds space on a daily basis at each of the One Stops to accommodate Masters Level vocational Rehabilitation Counselors from ORS working out of the One Stops. This relationship enables ORS clients to develop familiarity with the One Stop Services. Furthermore, the ORS Vocational Rehabilitation counselor is a referral resource and provides technical assistance to the One Stop Staff.

All of the centers provide universal access to their services including registration, skills assessment, career counseling, job search, assistance in filling out unemployment claims and evaluation of eligibility for training programs to people with disabilities. Alternate formats for all information and application materials are offered. These include large print documents and use of various assisted technology devices and tools including TTY, Captel, Zoom Text, Magnifier, Pocket Talkers, Jaws and Magic. All staff in the One-Stops have been trained on the use of these tools and educated as to methods of communicating all services to individuals with disabilities. ORS personnel are periodically enlisted to provide training on Disability related topics.

Rhode Island's goal in WIOA services is to continue to improve training, employment opportunities and outcomes of adults with disabilities who are unemployed, underemployed, and/or receiving Social Security Disability insurance benefits. Staff training is an essential component to ensure compliance and maintain excellent customer service

levels. Training has been provided by the RI Commission for the Deaf and Hard of Hearing about the ADA and issues concerning the Deaf and Hard of Hearing Community. Upcoming trainings are to include "Disability Discrimination and the ADA" presented by the RI Commission for Human Rights. In addition to Departmental trainings, the RI Department of Administration has held numerous trainings regarding diversity and inclusion.

EmployRI supports the collection of data for the new performance measurement strategy the state is implementing in this plan. The recording mechanisms in this system will collect data that goes above and beyond federal requirements in WIOA. These outcome based metrics collected within EmployRI and others like them will be managed at the state level access program, providing decision makers a clearer understanding of the effectiveness of services provided. By collecting information about all levels of participants involved in the workforce development, state leaders can have a better picture of which aspects work the best and which processes can be improved.

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.

Rhode Island's One-Stop Centers provide substantial access to individuals with Limited English Proficiency (LEP). Useful and assistive tools include informative posters in visible locations in the centers that indicate language proficiency assistance is available and free of charge.

Staff at the One-Stops have been trained on LEP procedures and instructed to recognize individuals with LEP and disseminate appropriate information as needed.

- **Language Identification Card:** This process provides a Menu of Languages (over 150) that customers can identify and select their language of origin. The staff member has the ability to contact an interpreter immediately by telephone and start the translation process to begin services and help set up future appointments.
- **Translation Services:** The Workforce Development Services Division of the RI DLT has procured vendors to perform Interpretation and Translation services for individuals identified as Limited English Proficient Customers. Interpretation services for appointments and programs are available within 24 hours of the customer's request.
- **Internal Bi-lingual Staff:** All Comprehensive One-Stop locations have limited Bi-lingual staff on hand for immediate assistance.
- **EmployRI Spanish Module:** EmployRI.org is an internet-based system that contains information about job seekers, employers, job orders and training providers. EmployRI is also available in Spanish for the benefit of the department's Limited English Proficient customers.
- **EmployRI Mobile App (Spanish):** In 2015, RIDLT introduced the EmployRI Mobile app for both Apple (iOS) and Android mobile devices in English and Spanish. The app makes it easier for job seekers to search and apply for jobs posted in EmployRI.

In December of 2013, RI DLT established an LEP workgroup to address Limited English issues throughout its constituency. The workgroup consisted of RIDLT employees from each division and members of Community Based Organizations. The Department LEP plan was developed in January of 2014 and each division implemented accordingly. The Department is also in the process of procuring a WIOA Equal Opportunity Monitoring Training for the spring of 2016.

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.

Due to the geographic size of Rhode Island and the centralization of many partner programs in certain state agencies, the state has established methods for undertaking combined planning efforts. These effort were used to develop this state plan for the purposes of the Workforce Innovation and Opportunity Act. With the election of Governor Raimondo, coordinated workforce planning began as an effort to align program strategies and goals to the priorities the Governor set around workforce and economic development; primarily meeting the labor needs of employers and ensure Rhode Islanders have the skills necessary to complete in the state's economy.

As a result, the Governor's cabinet members including; the Director of the Department of Labor and Training, the Director of the Department of Human Services, and the Commissioner of Elementary and Secondary Education, have regular cabinet meetings to discuss how to align department programs and services to achieve the Governor's vision. Governor Raimondo has established a Children's Cabinet to convene decision makers and set statewide policy related to youth initiatives. In addition, a new Skills Leadership Team will be comprised of cabinet members and will focus on continuing coordinated planning around workforce development efforts. These standing sub-cabinets provide sustained executive coordination and also provides a mechanism for executive decision making to be responsive and timely in providing guidance to agency programs.

Below the cabinet level, department level program administrators meet on a monthly basis to discuss common areas of concern and to address interagency policy concerns. The interagency administrators meeting includes representatives from all partner programs, the Executive Director of the Governor's Workforce Board, representatives from the local workforce boards, institutions of higher education, and the Office of Library and Information Services among others. Administrators are able coordinate technical details among programs and solve the internal policy challenges that do not require the attention of executive cabinet members. Administrators also coordinate with community partners who are involved in the provision of service directly related to a program or in conjunction with a program's services.

Both the state workforce board and the two local workforce boards also contribute to maintaining coordination between partner programs. All workforce boards have representatives from the partner programs serving as board members or have those programs without direct representation provide regular program reports. Committees have been established to address policy and research initiative to improve coordination among workforce development partners, including partner programs. In addition, the executive staff of each board also participate in the inter-agency administrators meeting and other convening held by community partners.

In addition to the coordination within public agencies and the workforce boards, community organization also hold monthly meetings to improve coordination among government programs and community partners. For example, the Workforce Alliance is

comprised of several adult education providers, community based organizations, such as the United Way, workforce intermediaries, organized labor, and state programs. This organization meets regularly to ensure community and government partners can coordinate services and initiatives to better provide the assistance needed by Rhode Islanders.

Such coordination efforts are supplemented by special stakeholder meetings as well. Stakeholders comprised of public agencies, community partners, workforce board members, among others, are regularly convened to provide insight and feedback during the planning processes, both statewide and program specific, and in response to the several workforce development activities analyses required of the state and local areas. Stakeholder meetings are often topic specific and convened to elicit feedback in preparation of a specific project, such as this plan.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes

2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes

3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes

4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes

5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes

6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure 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. ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

A. IDENTIFY THE REGIONS AND THE LOCAL WORKFORCE DEVELOPMENT AREAS DESIGNATED IN THE STATE.

Rhode Island has designated two local workforce development areas with the state:

A. Providence/Cranston Workforce Development Area (Workforce Solutions of Providence/Cranston) comprised of the cities of Providence and Cranston.

B. Greater Rhode Island Development Workforce Area (The Workforce Partnership of Greater Rhode Island) comprised of the remaining cities and towns within the state of Rhode Island.

While the labor market differences between the urban core of Rhode Island and the balance of state may be sufficient to justify two workforce development areas; the collaboration between and among these local boards and the state board is already of such a nature that it meets the spirit and intent of "regional planning" as required under WIOA Section 106(a).

Pursuant to state policy WIN 17-01 (https://gwb.ri.gov/wp-content/uploads/2017/06/17-03-6-15-2017.pdf?189db0) The State Workforce Board has determined based on geographic boundaries (Rhode Island is geographically the smallest state in the United States), Labor Market Area analysis, and funding and resource realities, that the state itself is a "region" for the purposes of regional planning and identification. The State Plan shall therefore also serve as a regional plan. Nevertheless, the Board will continue to consider the opportunity of regional intrastate planning in the future and may approach bordering states and local areas about the possibility of interstate regional planning as well.

B. DESCRIBE THE PROCESS USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR "PERFORMED SUCCESSFULLY" AND "SUSTAINED FISCAL INTEGRITY" IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS.

Rhode Island's Local Workforce Development Area Designation policy mostly mirrors federal regulations as it relates to designation.

Consistent with WIOA section 106(b)(4), the Governor's Workforce Board, in consultation with Local Boards and chief local elected officials, will review all requests for local workforce development area designation using the procedures outlined in the policy, and will make a recommendation to the Governor. In reviewing new designation requests, the State Board shall evaluate the extent that requested areas meet the following:

a. Are consistent with labor market areas in the state;

b. Are consistent with regional economic development areas in the state; and

c. Have available the federal and non-federal resources necessary to effectively administer activities under provisions of WIOA, including whether the areas have the appropriate education and training providers, such as institutions of higher education and career and technical education schools.

WIOA section 106(b)(2) outlines the criteria by which a Governor must designate a local workforce development area under Initial Designation. WIOA section 106(b)(3) outlines the criteria by which a Governor must designate a local workforce development area under Subsequent Designation.

The procedures for designating local workforce development areas are outlined below:

Initial Designation: For the first two full program year following the date of enactment of WIOA and clarified through the WIOA Final Rule to mean Program Years 2016 and 2017 (July 1, 2016-June 30, 2018), any area that was designated as a local area for the purposes of the Workforce Investment Act of 1998 for the 2-year period preceding the date of enactment of WIOA received initial designation provided they performed successfully, and sustained fiscal integrity. The State's two Workforce Development Boards both submitted requests for initial designation in November of 2015. A review of their submitted documentation of fiscal and programmatic records indicates that all of the above conditions have been met.

Subsequent Designation: After the period of Initial Designation, the Governor shall approve Subsequent Designation as a local workforce development area, if such area:

a. performed successfully;

b. sustained fiscal integrity; and

c. in the case of a local area in a planning region, met the requirements of planning regions outlined in WIOA [note: Pursuant to WIN 17-01; the state plan serves as a regional plan and the regional planning requirement does not apply to local areas]

Per section 106 (b)(3) of WIOA and 20 CFR 679.250, local areas are considered to have requested continued or subsequent designation unless the local area and chief elected official notifies the State indicating that they no longer seek designation. Therefore it is not necessary for existing local areas to submit requests for designation.

The State will review the criteria for subsequent designation for local areas considered to requested such designation. Under section 106 (b)(3) of WIOA, the State shall approve

subsequent designation of a local workforce development area which met the criteria for subsequent designation.

The State will notify the chief elected official(s) within 30 calendar days after the review indicating approval or denial of subsequent designation of the local workforce development area

New Designation: The process outlined below is to be followed by a unit or units of local government seeking new designation of local workforce development areas under the WIOA:

Step 1. The local government unit(s) seeking designation of a local workforce development area(s) should coordinate and consult with the chief local elected officials of the local areas and existing local workforce investment boards.

Step 2. If a decision is made by the local government unit(s), in coordination with the chief local elected officials, to seek designation under the WIOA, the local government units must undertake a formal public comment period and provide documentation of the results of the formal public comment period with the designation request to partners, including existing local workforce investment boards. The formal comment period must allow for comments by businesses, labor organizations, institutions of higher education, community based organizations, and the public at-large.

Step 3. The request for designation of a local workforce development area under the WIOA shall include the following information:

a. How the proposed local workforce development area is aligned with labor market areas including information on growth industries and occupations in the local labor market.

b. How the proposed local workforce development area is aligned with a regional economic development area within the state of Rhode Island.

c. How the proposed local workforce development area can effectively administer activities under provisions of the WIOA with available federal and non-federal resources, including a description of area education and training providers, a description of how the available resources will be made available for training activities, and a description of the percentage of overall resources administered by the local area that will be dedicated to training activities.

Step 4. After submission of the designation request, the Governor's Workforce Board will review the request and provide a recommendation for the Governor. As required by the WIOA, the Governor will use the consultation of the Board and consult with chief local elected officials prior to designating local workforce development areas in the state. The Governor may rely on the submissions from the requestor(s) as meeting the requirement for consultation with chief local elected officials, including the public records of meetings and any recorded votes or resolutions regarding the designation request.

Step 5. Pursuant to WIOA section 106(b), the Governor may designate local workforce development areas in Rhode Island for two-year periods, as appropriate.

For the purpose of determining subsequent local workforce development area designation, the term ''performed successfully" means the local workforce development area met or

exceeded the adjusted levels of performance for primary indicators of performance for the last two consecutive years for which data are available, and that the local area has not failed the same measure for the last two consecutive program years.

Sustained Fiscal Integrity for all program years means the Secretary of the United States Department of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence or failure to comply with accepted standards of administration for the two-year period preceding the determination.

C. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS.

As per WIOA Section 102(b)(5) and proposed 20 CFR 679.290 and 683.630, a Chief Elected Official who requests and is denied initial and/or subsequent designation has 10 business days to submit a formal appeal to the State Board by communicating, in writing, the reason(s) for appealing the Governor's decision and providing evidence or information that support the appeal. Upon receipt of a formal appeal, the State Board has 10 business days to render a decision on that appeal. If a decision is not rendered within that time frame or if the appeal is similarly denied, the Chief Elected Official may request review by the U.S. Secretary of Labor pursuant to proposed 20 CFR 683.640. The Secretary may subsequently order local workforce development area designation if the Secretary determines that the entity was not accorded procedural rights under the state's appeals process or finds that the area meets the initial and/or subsequent designation requirements at WIOA Section 106(b)(2) or 106(b)(3) and proposed 20 CFR 679.250.

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

Rhode Island will include this appeal process as part of its overall coordinated approach to infrastructure funding. Given the geographic compactness of Rhode Island and the ease of bringing state agencies together, the state's strategy is provide the leadership on infrastructure matters and attempt to broker at the outset a mutually-acceptable arrangement for all.

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 Governor has identified RI Department of Labor and Training as the coordinating agency for the issuance and communication of WIOA policy to the workforce development system. RIDLT will also perform this function on behalf of the state workforce development board when appropriate. As an ongoing and progressive activity, the dissemination of WIOA policies to USDOL and the workforce system will take place when each discreet policy is completed. Similarly, the strategies and policies around the use of state-level funds will evolve necessarily and will be made available when developed.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND

TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

The guiding principles that will inform the use of Governor's set-aside funds are three-fold. The first will be a laser-focused approach to developing and supporting demand-driven strategies including Real Jobs Rhode Island as authorized under WIOA 134 (a)(3)(A)(i). This priority will help grow the capacity of the workforce intermediaries and support the implementation of the sector based strategy. In addition, Rhode Island plans to also use formula based funding to support the training of eligible individuals participating in sector based training programs offered through sector based strategies.

Emphasis will also be placed on supporting customer-centered solutions when implementing the opportunities under WIOA. Lastly, Rhode Island is committed to driving system improvement with its state resources, including the effective execution of the required activities under the law. With these priorities in mind, Rhode Island reserves the right to maximize its flexibility to support Governor's agenda with the set-aside funds.

The Rapid Response Program, administered by the Rhode Island Department of Labor and Training's Business Services Unit, proactively responds to layoffs and plant closings by quickly coordinating services and providing immediate aid to companies and their affected workers. The Rapid Response Unit works with employers and employee representative(s) to maximize public and private resources quickly and to minimize disruption associated with job loss. Rapid Response staff members conduct on-site services when possible to disseminate information on accessing unemployment insurance benefits, One Stop Career Center re-employment services and training opportunities. Additional Rapid Response team members presenting to Dislocated Workers include HealthSource RI and United States Department of Labor Employee Benefits Security Administration. Other on-site services include job fairs and customized re-employment workshops, such as resume development and interviewing strategies. Email distribution lists of Dislocated Workers are formed to provide immediate information and reemployment opportunities to these individuals. Additionally mailings will be sent out to notify those without computer access. Rapid Response activities have and can also be scheduled utilizing the One Stop Career Centers and the Business Workforce Center.

For those companies affected by increased imports or shifts to production out of the United States, Rapid Response staff members provide information about the Trade Adjustment Act (TAA), Reemployment Trade Adjustment Assistance RTAA, and Health Coverage Tax Credit (HCTC) programs. Layoff aversion and business retention strategies are practiced as part of the scope of work for Rapid Response as a function of the Business Service Unit. The Business Service Representatives continually work on relationship building with the employer community to support them throughout all business cycles. Workshare has been a very popular and often used program by businesses experiencing a downturn in business. Joint visits to employers by the RI Department of Labor and Training Business Service Unit and other economic resources entities such as The RI Commerce and Small Business Development Corporations are conducted regularly initiated by outreach as a result of employer requests.

C. IN ADDITION, DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

At this time Rhode Island does not have a current National Disaster Policy.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

For those companies affected by increased imports or shifts to production out of the United States. A Trade petition is filed on behalf of the employees who have lost or threatened loss of employment due to trade-related circumstances. DOL investigates and determines if all worker group who have been identified as a impacted worker group are certified under the guidelines of The Trade Adjustment Reauthorization Act of 2015 (TAARA 2015). Rapid Response staff members provide information to the certified worker group about the Trade Adjustment Act (TAA) benefits and services. TAA benefits are employment and case management, training, job search allowance, relocation allowance and; Trade Readjustment Allowance (TRA) income support benefits once impacted employee exhausted their regular unemployment insurance and; Reemployment Trade Adjustment Assistance RTAA a wage subsidy for a specific targeted group and; Health Coverage Tax Credit (HCTC) a tax credit for qualified health insurance premiums. All Trade services are available to all impacted workers who fall within the guidelines of certified worker group.

Layoff aversion and business retention strategies are practiced as part of the scope of work for Rapid Response as a function of the Business Service Unit. The Business Service Representatives continually work on relationship building with the employer community to support them throughout all business cycles. Workshare has been a very popular and often used program by businesses experiencing a downturn in business. Joint visits to employers by the RI Department of Labor and Training Business Service Unit and other economic resources entities such as The RI Commerce and Small Business Development Corporations are conducted regularly initiated by outreach as a result of employer requests.

B. ADULT AND DISLOCATED WORKER 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.

Work Based Training Models:

Work based training models will be used as a part of the demand driven strategy described in the strategic elements section of this plan. Due to Rhode Island's intent to plan to take the demand strategy to scale, all work based learning models will be available to employers. Workforce intermediaries will be able to use such models funded by the Adult and dislocated worker programs. For the purpose of this plan, the emphasis of work based learning models should be the connection to the sector partnerships described under the sector strategy section of this plan. Specific policy and guidance will be issued as needed.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Work Based Training Models:

Work based training models will be used as a part of the demand driven strategy described in the strategic elements section of this plan. Due to Rhode Island's intent to plan to take the demand strategy to scale, all work based learning models will be available to employers. Workforce intermediaries will be able to use such models funded by the Adult and dislocated worker programs. For the purpose of this plan, the emphasis of work based learning models should be the connection to the sector partnerships described under the sector strategy section of this plan. Specific policy and guidance will be issued as needed.

Registered Apprenticeships.

Rhode Island is responding to the national call to double the number of Registered Apprenticeships by 2020 and is on track to meet this goal. As a recipient of $5 Million apprenticeship grant under the American Apprenticeship Initiative. Rhode Island has created an apprenticeship intermediary, apprenticeship RI to provide technical assistance to any sponsor seeking to register a program. In addition Rhode Island provided direct funding to three single employers and three employer associations to develop non—traditional apprenticeships in industries such as information technology, manufacturing, healthcare and maritime trades. In addition to supporting the expansion of the registered apprenticeship with resources from the grant, all new sponsors receiving grant funds are also participating in the Real Jobs Rhode Island's Sector program. Apprenticeship is not part of the statewide sector strategy and can be used by sector partnerships to provide long term training to meet the needs of the industries in Rhode Island as part of this expansion effort has also committee to increasing the diversity of participation in the apprenticeship system by increasing the number of women, people of color, persons with disabilities and other underrepresented populations participating in apprenticeship programs.

In addition to the alignment of apprenticeship with the larger sector strategy work, Rhode Island is also aligning the pokucy making structure of registered apprenticeship and workforce development. The current apprenticeship council chair serves as the director of the apprenticeship RI, and serves on one of the local workforce development boards. In

addition, the apprenticeship council shares a member with the Governors workforce board. Connecting Registered apprenticeship and workforce development efforts is helping Rhode Island to expand apprenticeship into new industries as part of a coordinating sector strategy/

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).

I. INTRODUCTION: [REF. - ACT SEC. 122(A); REGS. - SUBPART D §680.400]

A. What is the ETPL?

a. Purpose and Mission

The Eligible Training Provider List (ETPL) was established in compliance with the Workforce Investment Act (WIA) of 1998 and amended by the Workforce Innovation and Opportunity Act (WIOA) of 2014 to provide quality training choices for a growing workforce.

b. How is the list used?

Eligible WIOA title I-B participants in need of training services to enhance their job readiness or career pathway are referred to the ETPL by a counselor at a *net*WORKri office and may access career training through a list of state-approved training provider programs, including Registered Apprenticeship programs.

c. How are ETPL training services funded?

WIOA provides funding for various types of training. The ETPL is funded through Individual Training Accounts (ITAs). ITAs are one training option available to eligible and appropriate participants when it is determined by a career counselor in the American Job Center, known as *net*WORKri Offices in Rhode Island. An ITA is limited in cost and duration, and result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

ITAs are allowed for out-of-school youth ages 18-24 (out-of-school youth ages 16-17 are not eligible for ITAs) per WIOA Section 129(c)(2)(D) and 20 CFR 681.550. ITAs are not entitlements and shall be provided to eligible participants on the basis of an individualized assessment of the person's job readiness, employment and training needs, financial, social and supportive needs, labor market demand and potential for successful completion, as documented on the participant's Individual Employment Plan (IEP). Participants choose career training with Eligible Training Providers in consultation with career counselors.

ITA funding for training is limited to participants who:

- Complete an assessment and an IEP that identifies the selected training course;
- Are unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals;

- Select training programs that are directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in another area in which the participant is willing to travel or relocate [WIOA Section 134(c)(3)(G)(iii)]; and
- Maintain satisfactory progress/grades throughout the training program.

Other WIOA Training Options Exempt from the ETPL Policy:

Not all allowable types of training services are subject to the requirements of the eligible training provider provisions in WIOA title I-B. Training services exempt from the Section 122 (ETPL) eligibility requirements include:

- On-the-job training; customized training; incumbent worker training; transitional paid or unpaid employment or work experiences; or
- The circumstances described in WIOA sec.134(c)(3)(G)(ii), training services authorized pursuant to a contract in lieu of an individual training account where the LWDB determines that:

o There are insufficient providers, or

o There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or

o It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice, or

- When the LWDB provides training services through a pay-for-performance contract.

B. Roles and Responsibilities

The workforce development system established under WIOA emphasizes informed consumer choice, job-driven training, provider performance, career pathways, and continuous improvement. The quality and selection of providers and programs of training services, including Registered Apprenticeship programs and others, is vital to achieving these core principles. The State plays a leadership role in ensuring the success of the eligible training provider system in partnership with local workforce development boards (LWDBs), the one-stop system, and its partners. The approved list of eligible training providers should serve as an important tool for participants seeking training to identify appropriate providers, and relevant information such as cost and program outcomes.

The Role of the State: [Ref. - TEGL 41-14]

The Department of Labor and Training (DLT) is the designated state agency for WIOA administration. The Governor's Workforce Board (GWB) on behalf of the Governor must establish eligibility criteria and procedures for initial determination and renewals of eligibility for training providers and training programs to receive funds under WIOA Title I-B. The Governor and DLT has explicit responsibility for managing and disseminating the

approved list of eligible training providers. The State must perform the following required roles:

• Establishing eligibility procedures and criteria, and clarifying State and LWDB roles and responsibilities;

• Establishing a mechanism for adding Registered Apprenticeship programs to the listand verifying registered status at least every two years;

• Consulting with the State Board (GWB) when establishing these procedures;

• Providing an opportunity for interested members of the public to makerecommendations and submit comments regarding the eligibility procedure including LWDBs;

• Determining whether the provider submitted accurate information, and take enforcement actions as needed;

• Making training provider eligibility decisions in collaboration with the LWDBs;

• Notifying training providers and the LWDBs of denial of programs at the state level;

• Disseminating the list to the LWDBs, the one-stop system, its partner programs,and the public accompanied by credential, cost, and performance, and other consumer information for each ETPL training program;

• Evaluating performance data of all training providers during the continued eligibility review;

• Monitoring training providers for compliance and performance;

• Monitoring LWDBs and administration of ETPL implementation;

• Determining if state-established minimum performance levels for eligibility are met;

• Removing programs that do not meet state-established program criteria or performance levels for eligibility and/or are out of compliance with provisions of WIOA; and,

• Establishing an appeals procedure for providers to appeal a denial of eligibility under this section.

<u>The Role of the Local Workforce Development Boards (LWDB)</u>:

The LWDBs have statutorily required responsibilities related to eligible training providers, roles that the Governor assigns the LWDB, and additional options for their local area.

Local Workforce Development Boards must work with the State to ensure that:

• There are sufficient numbers and types of providers of career services and training services (including eligible providers with expertise in assisting individuals with disabilities and eligible providers with expertise in assisting adults in need of adult education and literacy activities) serving the local area and providing the services involved in a manner that maximizes consumer choice and leads to competitive integrated employment for individuals with disabilities;

• The State's Eligible Training Provider list is disseminated publicly through the local one-stop system, and its partner programs;

• Inform the State ETPL Coordinator in cases where termination of an eligible provider is considered;

• Inform the State ETPL Coordinator of any changes reported by the training provider that ultimately affect their corresponding approved programs;

• Collecting participant information for purposes of managing individual participant data; and

• The LWDB may set additional eligibility criteria, information requirements, and minimum performance levels for local providers beyond what is required by the DLT's procedure. LWDBs may also provide comment and input into the DLT's development of the eligible provider procedure through the public comment process. Any additional requirements established by the LWDB will only affect a program's eligibility and performance level eligibility requirements within the local area.

C. Eligible Provider Entities:

a. Types of Entities

In order to receive WIOA title 1-B funds, eligible providers shall be at least one of the following types of entities:

1) Institutions of higher education that provide a program which leads to a recognized post-secondary credential.

Entities requiring approval by the RI Board of Governors for Higher Education under R.I.G.L. §16-40 are considered eligible under this section.

2) Entities that carry out programs registered under the National Apprenticeship Act 29 U.S.C. 50 *et seq.*)

Registered Apprenticeship Programs can request to be added to the Eligible Training Provider List during their registration process with the Office of Apprenticeship. Once a Registered Apprenticeship Program has indicated that they desire to be placed on the ETPL, they will automatically be included in the State's ETPL and are not subject to the same application and performance requirements or to a period of initial eligibility or initial eligibility procedures. Performance data on Registered Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the State Eligible Training Provider list, Registered Apprenticeship programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470; ETA TEGL 41-14 sec. 8(a)]

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

This includes Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with the LWDB. [ETA TEGL No. 41-14 sec. 4]

4) LWDBs, if they meet the conditions of WIOA sec. 107(g)(1).

b. Training Provider Qualifications

Licensing/Accreditation:

Eligible Training Providers must be licensed by the appropriate Rhode Island or federal licensing authority, as required both by Rhode Island and Federal law. Training providers must be in good standing and compliant with all other state and federal regulatory agencies following:

A. Specific occupations have governing boards that issue licenses, such as the RI Department of Health, RI Division of Motor Vehicles, and others. Training providers must be licensed by the appropriate governing board to offer training for the occupation.

B. Private post-secondary institutions and training providers must be approved by a federal or RI authority such as the RI Office of Postsecondary Commissioner.

a. The RI Council on Postsecondary Education has approval authority for private/nonprofit degree-granting institutions not specifically exempted by statue or legislative action and approval authority.

Licensed/Accredited Training Providers not eligible to be on the ETPL include but are not limited to:

C. Training providers that are debarred by any state or the federal government during the debarment period;

D. Private post-secondary training providers, who apply for a RI Private Postsecondary license and are denied due to a determination that the training program is not vocational in nature.

Business Requirements:

A. Training providers must be a legal entity, registered to do business in the State of Rhode Island.

B. Training providers must have provided training services during all of the 12 months prior to applying for the ETPL and have a proven track record of students successfully completing the programs. This provision does not apply to Registered Apprenticeship programs.

C. Training providers are required to have refund policies specifying when refunds for tuition and other costs associated with the training program will be allowed. Refund policies that indicate that no refunds will be made are not acceptable. Refund policies must be written and published so that students are aware of how to request a refund.

D. Training providers must have a grievance policy which provides for due process for students to file complaints with an organization against faculty, staff, or other employees. Grievance policies must be written and published so that students are aware of how to file a complaint.

E. Training providers must have a form of general liability insurance. General Liability Insurance is defined as a standard insurance policy issued to business organization to

protect against liability claims for bodily injury (BI) and property damage (PD) arising out of premises, operations, products, and completed operations; and advertising and personal injury (PI) liability. If the nature of the organization is "all other Public or Private Provider of Training", this certificate must be current and provide "insurance coverage as may be required by any federal or state applicable laws and/or the Workforce arising out the operation of this agreement". Upon expiration of the certificate, the provider must submit a new certificate to the designated ETPL agency.

F. Training providers must establish, publish, and disseminate to students materials including, but not limited to, official catalogs and other materials. Training providers must provide to students, and to prospective students, information that is complete and accurate. The information provided must be sufficient to enable prospective students to make rational decisions about enrolling in the school and to enable enrolled students to understand their rights and responsibilities as students in the school.

G. A training provider's financial capacity must be appropriate to its scale of operations. The school must demonstrate, principally from its annual comprehensive financial statements, and from other financial information, that it has adequate capability to satisfy its contractual obligation to students, including the capability to provide the programs and services described in its official publications and to meet its financial obligations.

H. Training providers must comply with non-discrimination and equal opportunity provisions of all federal and state applicable laws including but not limited to:

1. Regulations under Section 188 of the Workforce Innovation and Opportunity Act of 2014;

2. 29 CFR 37, Title VI of the Civil Rights Act of 1964;

3. Age Discrimination Act of 1998;

4. Sections 504 and 508 of the Rehabilitation Act of 1973;

5. Title IX of the Education Amendments of 1972;

6. Title II Subpart A of the American with Disabilities Act of 1990; and

7. The Genetic Information Nondiscrimination Act of 2008.

D. Eligible Program of Training Services:

a. Definition

A program of training services must be delivered in person, online, or in a blended approach that includes one or more courses, or a structured regimen that leads to:

a) A recognized post-secondary credential, secondary school diploma or its equivalent,

b) Employment, or

c) Measurable skill gains toward such a credential or employment.

The Employment and Training Administration (ETA) defines a measurable skills gain as one of the following types of gains; 1) Educational Functioning Level (EFL), 2) Secondary Transcript/Report Card, 3) Training Milestone, 4) Skills Progression, and 5) Other Recognized Credential.

b. Apprenticeship Programs

Under WIOA Title I-B, Registered Apprenticeship Programs are considered eligible programs of training services that meet one or more of the criteria defined above. Once on the State eligible provider list, registered apprenticeship programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list.

Pre-Apprenticeship programs do not have the same automatic ETP status. Pre-Apprenticeship programs are, therefore, subject to the eligibility requirements outlined in this policy.

c. Technology-Based Learning

Requirements

Training providers using technology-based learning, also referred to as distance, online, web-based or computer-based learning, must meet the following requirements:

A. Training providers offering distance learning programs must be licensed to provide training in the State of Rhode Island.

B. Training providers must have a mechanism for student interaction with an instructor or instructors.

C. Training providers must ensure periodic assessment of each student.

D. Training providers' policy must describe the responsibilities of each party (training provider, participant) to the distance learning experience.

E. Training providers must have a mechanism in place for tracking student's participation in the ETPL Training program.

F. Training providers must comply with any additional requirements determined by the LWDB.

d. Program Quality

The WIOA legislation mandates that providers of education and training meet certain specified performance levels. This performance information is required to ensure customers can effectively evaluate the quality of each training program. The performance and cost information that training providers must submit for their program(s) to be identified as eligible for WIOA funding is essential for ensuring consumers are able to make informed decisions on types of training that will lead to their individual success.

Factors determining quality of a training program include:

- the degree in which the training program relates to in-demand industry sectors and occupations;
- length and cost;
- training delivery method including reasonable access to individuals who are employed and individuals with barriers to employment, and the ability to access the training program in rural areas;

- credentials- how they are valued by an employer, and how they are associated with specific occupations;
- training program completion rates
- performance as defined by participant outcome information, taking into consideration the characteristics of the population served and relevant economic conditions, and information specifying the percentage of such participants who entered unsubsidized employment in an occupation related to the program, to the extent practicable.

E. Criteria for Eligibility:

a. State Criteria - In establishing criteria pursuant to WIOA sec. 122(b)(1), the State shall take into account each of the following:

i. Performance Accountability and Outcomes

ii. Ensure access to training services throughout the State (including use of technology)

iii. Dissemination of Performance Outcomes and training information

iv. Training must lead to "In-Demand" industry occupations and sectors

v. State licensing requirements and licensing status of providers

vi. Encouragement of industry recognized certifications

vii. Provider's ability to offer a credential

viii. Quality of training

ix. Ability to serve individuals with barriers

x. Other;

a. Compliance

b. Informed Choice

c. Providers must meet the needs of local employers and participants

d. Accountability of providers

i. Collection of information required to demonstrate compliance with the criteria is not unduly burdensome or costly to providers.

b. Local Criteria: The LWDBs may establish criteria and information requirements in addition to the criteria and information requirements established by the State, or may require higher levels of performance than required by the State for purposes of determining the eligibility of providers of training services to receive funds. The criteria set by each LWDB will be described in their corresponding policy and contract.

F. Solicitation:

The State and each LWDB may solicit an invitation to training providers to submit applications to apply for status as approved training providers. This solicitation may be done through a combination of direct mailings, newspaper notices and other appropriate

means. The State and the LWDBs may also solicit training providers from outside of the local area, including other states. The State will be responsible for ensuring that the training providers have access to the forms for making application and to a list of demand occupations for its area. The application will be reviewed by the ETPL Application Team, consisting of members from the LWDB, the ETPL Coordinator, and DLT management.

Inquiries: If a student expresses an interest in a provider and the provider is an eligible entity but is not currently on the list, the State shall make an effort to reach out to the provider. An interested Provider that is currently not on the list can also inquire with the State. Inquiries can be directed to:

Rhode Island Department of Labor and Training

ETPL Office

1511 Pontiac Avenue, Building 73-3

Cranston, Rhode Island 02920

Phone (401) 462-8860

G. Publication of List [ETA TEGL 41-14 sec. 10]

WIOA requires that the State disseminate the statewide list of eligible training providers and accompanying performance and cost information to LWDBs and to members of the public. The State of Rhode Island will post the list on its Virtual One-Stop System. Individuals, counselors, and providers will have direct access to the list.

Training providers will appear on the statewide list after the State verifies the eligibility. As new programs are submitted and approved throughout the year, the statewide list will be updated on an ongoing basis. If the program is removed from the statewide list, the LWDB will cease to approve additional Individual Training Accounts for that program and the ineligible program will be removed from the statewide list.

The State eligible training provider list must be accompanied by appropriate information to assist participants in choosing employment and training activities. Such information must include the following, disaggregated by local areas served, as applicable:

- Recognized post-secondary credential(s) offered;
- Provider information supplied to meet the State's eligibility procedure;
- Performance and cost information aligned with the time periods; and,
- Additional information is determined by the State as follows:

o Program Length including number of units such as credits, hours, weeks or semesters needed to earn the credentials offered.

o Program Service/Location and type

o Class/Faculty Size

o Program Pre-requisites

o Target Occupations

o Program Description, and

o Additional information as deemed appropriate.

II. ELIGIBILITY DETERMINATION:

A. Initial Eligibility

All providers and programs that have not previously been eligible to provide training services under WIOA sec. 122 or WIA sec. 134, except for registered apprenticeship programs, must submit required information to be considered for initial eligibility. The requirements to become an eligible provider of training services apply to all organizations providing WIOA Title I-B training to adults and dislocated workers, with the specific exception of Registered Apprenticeship programs. For Registered Apprenticeship programs, WIOA makes a change from WIA in that Registered Apprenticeship programs must be included upon request and maintained on the list of eligible training providers for as long as the program remains registered.

a. Application Process

Determining ETPL eligibility is a two tier approach. First, the training provider must be an eligible entity to apply for the ETPL and secondly, the training programs offered by the training provider must meet eligibility and performance criteria to be listed on the ETPL.

Under WIOA Title I-B, a training provider must provide verifiable program-specific information based on criteria established by state. The application process for initial eligibility on the ETPL is as follows:

1. The Training Provider must submit an online application on the State's website: www.dlt.ri.gov/wio/ApplicationInfo.htm. The provider must submit any required supporting documents via standard mail, or by electronically uploading the documents into the online application.

The provider application will include the following required information:

a. At least one or more factors for performance [refer to section III for details on performance information];

b. A description of the degree in which the training provider is in partnership with a business. This could include information about the quality and quantity of employer partnerships;

c. A description of the accessibility of all training programs pertaining to physical access, programmatic process, and communications. This includes but is not limited to location, delivery of service, and access for individuals with barriers;

d. Other documentation as needed [refer to section IV for list of Documentation Needed]

2. An initial review is conducted by the State's ETPL Coordinator to determine if the Training Provider is an eligible entity.

3. Once the Training Provider is deemed an eligible entity, the Training Provider will receive log-on credentials for the State's virtual one-stop system.

4. The Training Provider will then be instructed to submit each desired program for program approved through the virtual one-stop system.

5. The application is scored by the ETPL Application Team through the use of a standard ETPL Rubric.

Rubric Components include factors determining quality of a training program as indicated in Section I-A:

i. Performance Data

ii. Partnership(s) with Employer(s)

iii. In-Demand Occupation/Industry

iv. Credential obtained upon completion

v. Accessibility of Program

6. A determination of eligibility letter will be sent to the training provider.

a. If approved, a WIOA Eligible Training Provider Agreement and Approved Program List Addendum (ETPL Contract) is sent by the State's ETPL Coordinator to the provider with 30 days of the provider application submittal.

Once the contract is signed, the State will disseminate the new program listing on the State's website and virtual one-stop system.

b. If denied, the training provider has the right to appeal or reapply when ready.

b. Process for Registered Apprenticeship Inclusion on the List

The inclusion process for a Registered Apprenticeship begins once a Registered Apprenticeship program has indicated that they desire to be placed on the ETPL. At that time, the Registered Apprenticeship program must supply the following information to RIDLT:

- Occupations included in the RA program
- The name and address of the RA program sponsor
- The name and address of related technical instruction provider and location of instruction if different from the sponsor address
- The method and length of instruction and,
- The number of active apprentices

The Registered Apprenticeship program will automatically be included in the State's Eligible Provider List (ETPL) and are not subject to the same application and performance requirements or to a period of initial eligibility or initial eligibility procedures. Performance data on Registered Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the State eligible provider list, Registered Apprenticeship programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470; ETA TEGL 41-14 sec. 8(a)]

c. Initial Period of Eligibility for Approved Programs

Initial eligibility will be granted for a 12-month period once approved by the State. After the initial period of eligibility, the training provider is subject to continuing eligibility requirements outlined in section II - B.

B. Continuing Eligibility

Eligible training providers that were determined to be initially-eligible under WIOA title I-B will be subject to the application procedure for continued eligibility when their initial year of eligibility expires.

a. Application Process

Initially eligible providers of training services must submit a reapplication on the State's virtual one-stop system for each program for which recertification is sought 1 month prior to the expiration of the initial period of eligibility. The training provider must confirm all detailed program information listed. To maintain eligibility status, training providers must submit to the State, at such time, in such manner and containing such information as the State may request to adequately prepare the performance information for each training program for which continued eligibility is being sought.

In determining continuing eligibility status, the State takes into consideration the following elements:

1. Changes in Organization/Provider Info:

a) Business requirements

b) Accreditation/licensure renewals, if needed

c) Updated Certificate of Insurance

d) Updates and/or changes in refund or grievance policies, if any;

2. Changes in Program Information:

a) Schedule changes

b) Curriculum updates

c) Match against In-Demand List

d) Credential offered

e) Review of business partners that affect the program; and

3. The performance of providers of training services on the performance accountability measures described in WIOA sec 116(b)(2)(A)(i)(I-IV). This includes the timeliness and accuracy of the eligible training provider's performance reports. The State reserves the right to establish minimum performance standards. Until the performance data for all accountability measure is available, the State may take into account alternate factors related to performance for that accountability measure. Once training providers have two years of performance outcomes using the WIOA performance indicators specified in section 116, the State will take them into account.

Other factors taken into consideration when determining eligibility include:

1. Specific economic, geographic and demographic factors in the local area for which providers are seeking continued eligibility; and

2. Characteristics of the populations served, including demonstrated difficulties in serving these populations.

Upon completed review of factors above, the State will determine if the program maintains eligibility. A continuing eligibility determination letter will be sent to the training provider. Continued eligibility status will be confirmed through the virtual one-stop system.

A continuing eligibility review must be conducted at least once every two years from the first continuing eligibility review.

b. Continuing Eligibility Review for Registered Apprenticeship Programs

Registered Apprenticeship Programs who have initially indicated their desire to be placed on the ETPL are not subject to the same continuing eligibility and performance requirements of the State's ETPL policy. The biennial review of the provider eligibility will include verification of the registration status of registered apprenticeship programs and removal of any registered apprenticeship programs as described in 20 CFR sec 680.470. Performance data on Registered Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the State eligible provider list, Registered Apprenticeship Programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470; ETA TEGL 41-14 sec. 8(a)]

c. WIOA Transitional Eligibility Period

WIOA provides for a transition period that allows previously approved training programs who were approved under WIA to continue to be considered eligible until June 30, 2016. These programs will not be subject to the initial eligibility process during this transition period. The continuing eligibility of these programs as of June 30, 2016 will be contingent upon receiving outcome data previously set forth by WIA and according to the provider's existing contract for each program currently on the ETPL prior to June 30, 2016. Once continuing eligibility is established, the State will conduct another continuing eligibility review within 2 years of this determination. These procedures do not apply to Registered Apprenticeship programs.

C. Provision [Act Sec. 122(b)(4)(E)]

The provider shall provide the information described in this policy to the State and LWDB in a manner that will permit the State and LWDB to make a decision on inclusion of the provider on the list of eligible providers.

III. Documentation Needed

The provider must meet all State and Local criteria listed in section I of this document. The information requirements established require that a provider of training services submit appropriate, accurate, and timely information to the State, to enable the State to disseminate information that assist participants in choosing providers.

Approval or Exemption Letter from Oversight Agency

Pursuant to WIOA sec 122(b)(1), state licensing and accreditation status of providers are a required state criteria in determining an eligible entity. An approval or exemption letter from oversight agency must be supplied at time of application. For example: A private postsecondary institution must be approved or exempted by the RI Office of Postsecondary Commissioner.

Financial Statements.

The determination will consist of checking liquidity and solvency ratios over 2-years' time or in relation to assets and liabilities. A copy of a Profit and Loss Statement, Balance Sheet or Statement of Financial Position, A Financial Audit, or other financial document that would detail the financial soundness of the organization will be accepted. If revenues are $700,000 or more, A133 Audited Financial Statements are required.

Certificate of Liability of Insurance.

General Liability insurance is defined as a standard insurance policy issued to business organization to protect against liability claims for bodily injury (BI) and property damage ~~(PD)~~ arising out of premises, operations, products, and completed operations; and advertising and personal injury ~~(PI)~~ liability. If the nature of the organization is "all other Public or Private Provider of Training", this certificate must be current and provide "insurance coverage as may be required by any federal or state applicable laws and/or the Workforce arising out of the operation of this agreement." Upon expiration of the certificate, the provider must submit a new certificate.

Refund Policy.

A refund policy must establish general guidelines, document circumstances in which a refund will be given for tuition, fees, or other costs, and clearly define the refund process for over-invoicing or for services not provided.

Grievance Policy.

A training provider must have an established grievance policy to provide a process for the effective management and resolution of concerns, disagreements or complaints arising out of premises, operations, products, and completed operations.

Published Course Catalog or Program Brochure

The catalog and/or brochure MUST be available to the public and prospective students and must include the following:

- All fees required to be paid by students including tuition, required fees, books, supplies, activities, and all other program costs. Providers must ensure that the cost of training to WIOA students does not differ from the training cost charged to non-WIOA students;
- Educational program details and curricula;
- Course cancellation policies.
- All other student policies and procedures promulgated by the school, including those required by state or federal regulations.

The catalog and/or brochure must be submitted in electronic form or hard copy. The student policies can be submitted separately from the catalog and/or brochure but must be an official document that is available to the public and prospective students.

W-9 Form

A W-9 form must be submitted at time of initial application and every two years thereafter in order to file the Tax Payer Identification Number and Certification for tax purposes.

IV. Performance

A. Required Information

The State will collect performance data from eligible training providers for *all* students as well as WIOA participants in ETPL eligible training programs each quarter and upon request. Reportable elements include:

i. The percentage of all program participants who are in unsubsidized employment during the second quarter after exit from the program;

ii. The percentage of all program participants who are in unsubsidized employment during the fourth quarter after exit from the program;

Note: The State acknowledges that obtaining timely and accurate information regarding employment is difficult and may represent an undue burden on training providers. The State will work with providers to develop a corrective action plan to address data collection. Providers and programs will maintain eligibility throughout the corrective action process.

iii. The median earnings of all program participants who are in unsubsidized employment during the second quarter after exit from the program;

iv. The percentage of program participants who obtain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent (subject to indicators relating to credential in WIOA sec 116(b)(2)(iii));

v. The percentage of all program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and

vi. The indicators of effectiveness in serving employers established (pursuant to WIOA Sec116(b)(2)(iv)).

B. Insufficient Performance Information

Of those entities applying for eligibility, if the training provider does not have the required performance data, it must 1) show good cause and 2) provide alternate information that demonstrates compliance with State and Local eligibility criteria. “Good cause” should include:

1. The training program is new and data on past performance is not available;

2. Only partial performance data is available;

3. Collection of data will cause excessive costs and/or hardship for the training provider during the initial eligibility; and/or

4. Other reasonable circumstances that may cause data to be unavailable.

If the required and alternate information cannot be provided, DLT will provide technical assistance to allow the provider an opportunity to demonstrate its ability to meet eligibility criteria. DLT will assist the provider in developing a plan of action with an appropriate timeline to be determined on an individual basis. If the provider is not responsive or unable to meet the requirements set forth by the agreement, the provider may be found ineligible.

C. Alternate Performance Information

Until the performance data for each accountability measure is available, the State may take into account alternate factors related to performance for that accountability measure if the information is substantially similar to the information otherwise required. In considering alternate factors related to performance the State may set minimal performance criteria, use existing available data, or develop other proxies as appropriate. Once training providers have two years of performance outcomes using the WIOA performance indicators specified in section 116, the providers will be expected to supply the originally required information.

Supplemental data may include documentation on self-employment and self-reported earnings, a copy of a W-2 form or pay stub that documents employment during the time period in the measure.

V. Program Costs

An eligible training provider must make available to the prospective students its schedules of tuition and fees. The institution shall disclose all fees required to be paid by students (including tuition, required fees, books supplies, activities, etc.), and any non-refundable fees must be so identified. A reduction in tuition, fees or other charges may be implemented when there are specific criteria for student eligibility and selection procedures precisely disclosed within the policy at the institution. All students within the enrollment period that the reduction is offered shall be eligible to apply. The cost of the training to WIOA participants must not exceed the cost charged to any other student in the program. All costs necessary for successful completion of a program must be clearly stated. A breakdown of cost must be identified for publication on the ETPL. A breakdown may include the following:

- Tuition
- Fees
- Books
- Licensing cost
- Certificate fees
- Graduation fees
- Uniforms
- Tools
- Registration fees
- Supplies

VI. Notice of Ineligibility, Suspension, or Termination

A. Initial Eligibility Denials

A training provider or program may be denied initial eligibility for the following reasons:

1. The application is not complete or information was not provided in a timely manner;

2. The training provider does not meet the WIOA definition of an eligible training entity;

3. The training program does not meet the WIOA definition of eligible training services.

4. The training program does not result in a recognized credential;

5. Performance data is not included with the application.

6. The training program does not support in-demand occupations and/or sectors identified through labor market analysis;

7. The training provider is not in compliance with the WIOA statue, regulations, or any agreement executed under WIOA;

8. The State or LWDB determines that the training provider intentionally supplied inaccurate information.

Reapplication

When a training provider or program is denied for any reason other than lack of documentation or information, the provider must wait six months to reapply.

Denial Notice

Within 10 days after the State determines that a training provider's application does not meet the eligibility criteria, the State shall issue a denial notice to the training provider.

The notice shall be mailed to the training provider at the address listed on the application and to the attention of the contact person identified on the application. The notice shall clearly:

a. Display the "date mailed",

b. Identify the program that was denied or terminated;

c. State specific reason(s) for the action; and

d. State the training provider has the right to appeal to within 30 calendar days of the date the notice is mailed.

B. Suspension/Removal

a. Removal of Training Programs

A training program may be removed from the ETPL for the following reasons:

1. The State determines that the training provider supplied inaccurate information;

2. The training program no longer meets the WIOA definition of occupational skills training;

3. The program does not meet minimum performance standards once established. If there are no students enrolled in the training program during the past year, there will be no performance data to review for continued eligibility. The State must examine the demand for the related occupation to determine if there is still a demand for it and decide whether to keep the program on the ETPL for another year.

b.Removal of Training Providers

A training provider may be removed from the ETPL for the following reasons:

1) Intentionally supplying inaccurate or false information;

2) Substantially violating a provision of title I of WIOA or its implementing regulations;

3) Failure to meet required performance outcomes;

4) Failure to abide by the equal opportunity and nondiscrimination requirements under WIOA Section 188;

5) Failure to comply with monitoring and audits;

6) Failure to maintain required licenses and accreditation requirements;

7) Failure to comply with all applicable provisions in the ETPL contract; or

8) Other just cause.

c. Notification and Termination Letter

Within 10 days after the State determines that a training provider is in violation of any of the reasons indicated above a notice of violation or finding shall be issued by the State requiring the development of a corrective action plan. The letter should include what the violation or finding is, an invitation to develop a corrective action plan, and a specific timeframe of 14 days to respond to the notification. If the training provider fails to respond to the letter, a termination letter will then be issued.

The termination notice shall be mailed to the training provider at the address listed on the application and to the attention of the contact person identified on the application.

The notice shall clearly:

a. Display the “date mailed”,

b. Identify the violation or finding;

c. State specific reason(s) for the action; and

a. State the training provider has the right to appeal to within 30 calendar days of the date the notice is mailed. When a training program is removed from the State ETPL, WIOA participants currently enrolled in the program may complete their training as outlined in their WIOA Individual Employment Plan unless the program or provider has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency.

C. Corrective Action

a. Purpose of Corrective Action Plan

The State and the Eligible Training Provider must develop a corrective action plan if the provider is found in violation of their contract, or if the provider is requesting technical assistance to become compliant.

b. Prior to Plan Development

If the provider is found in violation of the contract, the State must identify the finding and how it was acquired. Examples include but are not limited to LWDB's monitoring report, State's compliance and monitoring report, continuing eligibility review, and information reported through an anonymous tip or random review; i.e. secret shopper, Secretary of State website check, or other means that provides evidence of potential non-compliance with ETPL contract provisions or ETPL policy.

Identify which law or provision is being violated. Gather supporting documents to determine if the finding is an allegation or a factual finding. This will determine whether the provider can continue to receive referrals during CAP process or not.

c. Notification Letter

The State sends a letter via mail notifying the Training Provider of the finding. The letter should include what the violation or allegation is, an invitation to develop a corrective action plan, and a specific timeframe to respond to the notification. If the training provider chooses not to respond to the letter, they are confirming their decision to withdraw participation from the ETPL.

d. Development of CAP

The training provider, with assistance from the State, must develop a corrective action plan (CAP). The CAP will serve as a reapplication and should contain the following:

- Details of discussion; date, time, method of communication (phone, meeting, etc.), persons involved in discussion, and any other relevant details;
- Description of circumstances;
- Description of steps that will be taken to rectify the situation, including procedural changes that prevent reoccurrence;
- Appropriate timeframe to completion/resolution
    - Depending on severity of issue timeframes may vary
    - An evaluation of progress must be periodically conducted

C. Repayment of Program Funds

A provider of training services whose eligibility is terminated due to the aforementioned termination causes shall be liable for the repayment of funds of all adult, dislocated worker, and youth funds received under Title I-B of WIOA or WIA during the period of non-compliance. [Ref. Act Sec 122(f)(1)(C)] No repayment funds should be collected from the training provider until the opportunity to appeal is over which is 90 days from the date of the initial denial notice.

D. Appeal Process

Following issuance of a denial of eligibility, determination of suspension or termination of eligibility the training provider will have 30 days in which to submit an appeal to the Governors Workforce Board. Within 30 days of the receipt of the appeal, the training provider will be notified of the date, time, and place where a due process hearing will be conducted. After that hearing a decision will be issued within 30 days. All appeals must be forwarded, in writing, to the following address:

Rhode Island Department of Labor and Training

Governor's Workforce Board RI

1511 Pontiac Avenue, Building 72-2

Cranston, Rhode Island 02920

Phone (401) 462-8860 Fax (401) 462-8865

VII. Opportunity to Submit Comments [Ref. - Act Sec. 122(e)]

In establishing criteria information requirements, procedures, and the list of eligible providers described in this policy, the State provided an opportunity beginning December 10, 2016 and ending December 24, 2016 for interested members of the public to make recommendations and submit comments regarding such criteria, information requirements, procedures, and list.

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

The state plans to utilize our existing monitoring functions which include conducting onsite reviews, providing technical assistance if priority is not met. Further, we will collaborate closely with our combined program partners to ensure those receiving public assistance are referred to programs and services available.

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

In an effort to promote the greatest innovation and to maintain the greatest responsibility, the only criteria established regarding the issue of local area transfers is that the request be made in writing and provide an explanation for why the transfer is being south. Local areas may request up to the full one hundred percent transfer and may make this request prior to expending the full amount initially provided to the program that will received the proposed transfer. Rhode Island recognizes the need for local areas to be responsive to the workforce needs of both employers and individual clients and the state can support this need by allowing the greatest flexibility to love workforce boards when it comes to transferring funding. Additional policy and guidance will be issued if needed.

C. YOUTH PROGRAM REQUIREMENTS

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

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

* Sec. 102(b)(2)(D)(i)(V)

In addition to ensuring the grantees have the fiscal and administrative capacity necessary for providing the contracted services, local boards will use the following criteria to award grants for youth workforce activities. The grantee must be able to create an Individual Service Strategy (ISS) for each youth, in align with the career pathway strategy described in the strategic elements section of this plan. The Individual Service Strategy identifies employment goals, achievable objectives, and a combination of services for the participant to reach the goals. These services must include but are not limited to the required WIOA elements. The ISS should be revised on a regular basis and include all services the participant may require, including supportive services (especially for youth with disabilities and/or basic skills deficient), that will lead to the achievement of an employment or education goal.

Also, the grantee must have the ability to connect youth to employment opportunities. This criteria aligns with the demand-driven sector strategy outlined in the strategic elements section of this plan. The grantee will engage with workforce intermediaries and employers to help youth find jobs with employers that: provide career exploration, skill development and positive adult role models; relate to the youth's interests, abilities, and career goals; include an overview of the company and specific job duties and responsibilities; and include rotation through different department within an organization during placement.

Other criteria the grantee must meet includes the ability to provide services related to media literacy, financial literacy, exposure to emerging career choices, linkages with local after school opportunities, links to post high school opportunities, connection to Regional Vocational Centers, disability service provider and all other required WIOA activities. The grantee must also be capable of providing such services for all youth populations, including younger in-school youth (ages 14-18), younger out-of-school youth (ages 16-18), and older youth (ages 19-24).

Meeting the performance accountability measures will be part of the contract between the local boards and the grantee. Regular reporting and monitoring will keep the local boards informed of the performance of the grantee and any grantee not performing will receive technical assistance to improve performance.

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

REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Introduction and Vision

Across multiple funding streams and initiatives, Rhode Island's vision is for all youth in need of career services to have access to: (1) High quality career guidance and workforce development services, (2) all necessary wrap-around services and supports to increase their likelihood of success and completion, and (3) high quality and career-relevant work experiences and work based learning opportunities to serve as a pathway toward meeting their personal career aspirations. This vision would be met through a cohesive, aligned, and high-functioning statewide workforce development system for youth that provides all youth multiple and scaled opportunities to gain work experiences and employment, is flexible to accommodate the winding career pathways and life circumstances that today's youth encounter, and is employer and demand-driven to ensure youth are prepared for the state's high-wage, high-demand employment sectors. Through such a system This effort does not fall on the WIOA youth system alone.

The Governor's Workforce Board, in collaboration and alignment with the RI Department of Education, Office of the Postsecondary Commissioner, and the Governor's Office, have designed an ambitious strategy and workplan focused on in-school youth called Prepare Rhode Island. The Prepare RI initiative is fully underway, and is partially funded by a 3-year "New Skills for Youth" grant from JP Morgan Chase; Rhode Island is one of only 10 states to have received this grant. The PrepareRI workplan includes a state commitment to the goal that all high school students have access to a work-based learning experience before they graduate and includes significant systems investments and guidance as follows:

- The incubation of a Statewide Career Readiness Intermediary - a centralized entity that would serve as a facilitator for employers, schools, and providers to develop youth work experiences and work-based learning opportunities, streamline and coordinate processes, eliminate duplication and confusion, and take the effort to scale statewide. The Intermediary will also manage a high-quality paid internship program for high school students at top Rhode Island companies, to be piloted in Summer 2018.
- Investments in "Real Skills for Youth" partnerships among schools, youth-serving organizations, industry, and others to develop and implement high-quality paid work-based learning experiences for youth in the summer and year-round career readiness programming for youth; while the focus is primarily on in-school youth, out-of-school youth with be served under these partnerships as well, with opportunities to braid WIOA funds.
- The State Workforce Board recently issued guidance on the state vision for work-based learning (WBL), including definitions of activities, standards of quality, essential skills needed for the workplace, and legal guidance. standards [viewable here: https://gwb.ri.gov/wp-content/uploads/2017/06/GWB-WBL-Guidance_COMBINED.pdf?189db0]. These standards currently focus on work-based learning opportunities for in-school youth but will help guide and inform efforts for expanding work-based learning opportunities to postsecondary and out of school youth as described below.

With the foundation and momentum of PrepareRI, the state now turns to the development an equally ambitious aligned plan to serve out-of-school youth and connect them to work experiences and work-based learning opportunities. The state was recently selected for the National Governor's Association (NGA) Center for Best Practices Policy Academy focusing on expanding work-based learning opportunities for postsecondary and out of school youth. The focus of that effort will be to:

- Determine ways to connect ongoing K-12 and postsecondary infrastructures and work-based learning opportunities to youth who have dropped out or left school and are unemployed/underemployed.
- Identify programs/opportunities locally and nationally that effectively support these populations.
- Investigate current and potential funding opportunities to support this work.

The results of PrepareRI and the NGA Policy Academy will enhance and operationalize the elements of our youth strategy described below and will guide WIOA policies and investments as it relates to youth, particularly out of school youth.

Rhode Island's WIOA Youth Strategy - Pathways and Partnerships

Rhode Island's decades long investment in our Youth Career Centers (branded as the "YouthWorks411") has resulted in a network of talented and responsive service providers that excel in meeting youth 'where they are' and providing the requisite referrals and wrap-around services that gird each youth for success in whatever career service or training that is appropriate for them. These services are provided in a contextualized way and in a manner that aligns with their career goals and prospects.

Due to the strategic co-deployment of WIOA Title I funding alongside state funds, services are available for all youth ages 14-24 years of age throughout the state regardless of income or socio-economic factors. Eligibility is determined on the 'back end' with WIOA dollars are prioritized to serve Out of School Youth. This wider service net helps build referral networks and 'word of mouth' among a much larger pool of youth and provides access and avenues to reach otherwise difficult to engage out of school youth.

The youth career center network is itself part of the larger workforce development network described earlier in the Executive Summary.

Youth career centers serve as an entry point and spring board that primes youth for success and then pipelines and connects to partner programs for placements into work experiences and work-based learning opportunities. Such partners could include but not be limited to:

- Real Jobs RI - Industry-sector partnerships lead by an intermediary that, collectively, have access to hundreds of potential work experience and employment opportunities within Rhode Island's high wage and/or high demand industries.
- Real Pathways RI - Service provider partnerships lead by an intermediary that specialize in meeting the needs of populations with barriers to employment and are provided resources and guidance to develop demand-driven programming with employers.
- Youth Career Readiness Intermediary - As previously mentioned, a centralized business-facing entity that would serve as a facilitator for employers, schools, and

providers to develop youth work experiences and work-based learning opportunities, streamline and coordinate processes, eliminate duplication and confusion, and take the effort to scale statewide.

The commitment to securing work experiences and WBL opportunities for youth aligns with WIOA's new emphasis on providing eligible youth with high-quality work experiences and requiring that at least 20% of youth funding be dedicated to this activity. Rhode Island recognizes how powerful WIOA funds can be in assisting low-income and out-of-school youth, particularly those with barriers to employment, with gaining valuable experience in work places that build work history, skills, and job-readiness.

All of these efforts will be coordinated closely with the state Office of Rehabilitative Services (ORS) to ensure access to services and programming to transition-age youth with disabilities. One such program is Project SEARCH, a work-readiness program for secondary school youth providing on-the-job work experience through rotational internships. The State Board is currently working with ORS on the potential expansion of Project SEARCH into more locations, and potentially for adults as well as transition-age youth. Additionally, Rhode Island intends to eventually connect ORS and its provider network with the afore-mentioned Youth Career Readiness Intermediary to help connect with employers to provide opportunities to students and youth with disabilities for career exploration that would lead to competitive, integrated employment. Given the complexity and additional services required to effectively serve and place youth with disabilities; this is a longer-term priority.

Title I Youth services can be used to provide tutoring and other academic supports for an older youth to compliment Title II education services provided to a client. In addition to complementary academic services, Title I funds for paid or unpaid work experience can be used to support occupational training for the same client. Further, the older youth may be co-enrolled as an Adult to receive additional training services when transitioning to a permanent position. Using funding in such a way allows participants to succeed in completing the employer-based training in a timely way and provides the employer with a trainee or employee that is achieving both academic and occupational skills attainment.

The need to expand career pathway planning into secondary and post-secondary institutions is especially critical when addressing the workforce needs of both in-school and out-of-school youth. While the Carl D. Perkins Career and Technical Education Act is not a combined program partner in this plan the relationship between the Career and Technical Education programs offered at the secondary level and the workforce development opportunities for youth are integral to the overall success of the state vision. Career pathway planning should start for CTE students currently enrolled in high school using existing student support mechanisms. In addition, CTE centers and programs should be included in sector-based intermediary partnerships to better align the education programs to the training requirements of industry. Such alignment will give CTE program administrators better insight into how to maintain program relevance to the employer community while providing employers a pipeline of talented new workers. Such alignment would promote the continuation of CTE students into industry training programs, such as registered apprenticeship or other workforce intermediary sponsored training. The youth funding available for in-school youth provided under Title I of WIOA, should be prioritized to support youth involved in CTE programs.

Career Pathway Planning for youth goes beyond the connection to the K-12 system and will include all programs and services necessary to assist the youth participating achieve their education and career goals. The career planning for participating youth should address all elements that effect their ability to meet their career and educational goals. Such elements include leveraging activates to support the success of youth populations with disabilities, such as those provided in partnership with the Office of Rehabilitation Services, while the youth pursue both the educational and career goals. In addition, the provisions of adult education for youth who are not attending school and who have not attained an equivalency credential will be included in the planning process. Ensuring those youth who receive TANF services are included in this planning is also imperative to the success of this strategy. This work is already underway in the Community Action Plans (CAP) that operate the youth centers around the state. Such inclusionary practices go beyond the scope of this plan to include other services outside those directly connected to career and education activities such as medical care. Overall, the career pathway strategy intends to eliminate silos among core programs and coordinate the services available to the youth in a way that is centered on helping the individuals meet their own goals. Such efforts will require the day to day collaboration of programs and partner staff across organizations both governmental and non-governmental. The mechanisms to be used to foster such collaboration are described in the implementation section.

An example of such alignment can be seen through the relationship of the Title I and Title II adult education literacy programs. This example illustrates how core and combined programs should identify services can be delivered in tandem to maximize the resources available to participant. For older youth over the age of 18, the career pathway plan should include those additional services provided under Title I for youth, such as activities leading to a high school diploma, high school diploma equivalency, or post-secondary credential, as well as additional services provided for Adult workers. Training services available to Adult and Dislocated Workers under Title 1 may be used for qualifying older youth. Career pathway planning for an older youth may span a longer timeframe and may include additional milestones than a similar plan for an Adult or Dislocated Worker. For example, an out-of-school youth may need job experience services funded under Youth services which may lead to a placement requiring additional support provided under the Adult and Dislocated Worker Training services. Such a transition may include a Youth summer internship that becomes the need for On-the-Job Training once the Youth is hired into a permanent position. Similar coordination should be taken among all core and combined programs.

Whether it be for services intended for a youth or adult client, the customer centered career pathway strategy should be implemented throughout all programs. Standards for career pathway planning will be developed under the leadership of the state board and will assist workforce, educational, and service partners engage in a coordinated conversation around serving shared clients and provide mechanisms partners can use to attach a particular resource or service to an individual's plan without having the responsibility of providing all the services and resources the client may need. This work has begun under the Career Pathways Advisory Committee convened under the Governor's Workforce Board. This committee is currently using the U.S. DOL career pathways readiness assessment tool to evaluate current initiatives in preparation for the implementation of the network-wide career pathway strategy outlined above.

Additionally, through the Office of Rehabilitation (ORS) an extensive infrastructure is in place with the Rhode Island Department of Education a (RIDE) and every local education authority (LEA) to provide transition services to in-school youth with disabilities. The intent of this partnership is to ensure that youth with disabilities have an opportunity to experience career exploration, real work experiences and a plan for employment after high school. Through a Cooperative Agreement between RIDE and ORS, a Masters level Vocational Rehabilitation Counselor from ORS works with every high school in the state of RI to provide technical assistance, case consultation and function as a referral source. Referrals to ORS occur while youth are still in high school so assessments, community based work experiences and transition planning can occur prior to graduation. This relationship between youth and ORS prior to graduation creates a link for youth to the world of adult services and ongoing movement toward employment.

Improved Outcomes for Out of School Youth

Using the PrepareRI work as a springboard; Rhode Island will seek to expand outcomes for out-of-school youth by sustaining and building partnerships with organizations and programs that have previously served out-of-school youth or are currently serving out-of-school youth, and that are able to refer out-of-school to WIOA Title I-B Youth programming. These partnerships will help to increase awareness of the WIOA Youth Program and services available in the community communities and increase the number of youth who apply for and receive services.

To expand and increase the vigor referrals, the State Workforce Development Board will examine other state programs that are providing services to out-of-school youth, such as Temporary Assistance for Needy Families (TANF) and the Department of Children, Youth, and Families, and establish informal, and potentially formal procedures for each program to refer youth clients to the WIOA Title I-B Youth Program.

Rhode Island will continue to expand partnerships with organizations that focus on youth with specific barriers to employment. For example, informational seminars and presentations may be provided to organizations that directly or indirectly serve runaways and homeless youth, pregnant and parenting youth, subjects of the juvenile justice system, youth in foster care, and organizations that provide services to youth with disabilities. Rhode Island hopes to focus efforts on serving youth most in need, and services provided will increase outcomes for these young adults.

Lastly, as mentioned previously- the State Education and Employment Subcommittee is undergoing a restructuring that will position it as a critical lead in oversight, coordination, and direction of WIOA partners, including programs focused on young adults, specifically out of school youth. This Committee will offer a forum for public accountability for performance and will continuously review and strategize on how to best achieve positive outcomes for out-of-school youth.

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

* Sec. 102(b)(2)(D)(i)(I)

The state of Rhode Island will ensure that all elements within section 129(c)(2) are effectively implemented by using progressive and innovative technical assistance to all program participants and stakeholders. It is highly important to the state that youth program partners have full assistance in providing effective services to eligible youth across the state. The Rhode Island state government will monitor and oversee all aspects of these services and programs to determine the most effective factors in providing employment training interventions to participants. Additionally, close monitoring of these programs will shed light onto those areas in which the state can reduce inefficiency and waste while recognizing where it can remove unnecessary red tape for program partners.

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.

Since the initial issuance and submission of this state plan, the state board, in concert with local boards, community advocates, and youth providers, developed an additional assistance policy that recognizes two 'types' of barriers a youth can face which requires additional assistance to overcome: Education and Employment barriers.

Education barriers include factors such as chronic absenteeism, below average academic performance, falling behind on graduation expectations, or financial/transportation challenges interfering with attendance.

Employment barriers include never holding a job (older youth), repeated failure to secure employment within a 60 day period, loss of employment in the last 30 day period, and family history of chronic unemployment or reliance on public assistance.

Additional Assistance - Educational Barriers

• Has missed 18 or more days of school in the most recent academic year (secondary only)

• In school (secondary or postsecondary) with a GPA of less than 2.0.

• Has left educational program because of transportation or financial situation (secondary only)

• One or more grade levels below age appropriate level

Additional Assistance - Employment Barriers

• Has never held a job

• Has had two or more employment interviews without being hired in past 60 days

• Has lost employment placement in past 30 days

• Has a family history of chronic unemployment, including long-term public assistance.

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

State of Rhode Island Education Act Title 16-19-1(a)(b) defines the criteria of compulsory attendance for Rhode Island youth. These criteria are as followed:

"(a) Every child who has completed or will have completed six (6) years of life on or before September 1 of any school year and has not completed eighteen (18) years of life shall regularly attend some public day school during all the days and hours that the public schools are in session in the city or town in which the child resides."

(b) A waiver to the compulsory attendance requirement may be granted by the superintendent only upon proof that the pupil is sixteen (16) years of age or older and has an alternative learning plan for obtaining either a high school diploma or its equivalent.

(1) Alternative learning plans shall include age-appropriate academic rigor and the flexibility to incorporate the pupil's interests and manner of learning. These plans may include, but are not limited to, such components or combination of components of extended learning opportunities as independent study, private instruction, performing groups, internships, community service, apprenticeships, and online courses that are currently funded and available to the school department and/or the community.

(2) Alternative learning plans shall be developed, and amended if necessary, in consultation with the pupil, a school guidance counselor, the school principal and at least one parent or guardian of the pupil, and submitted to the superintendent for approval.

(3) If the superintendent does not approve the alternative learning plan, the parent or guardian of the pupil may appeal such decision to the school committee. A parent or guardian may appeal the decision of the school committee to the commissioner of education pursuant to chapter 39 of title 16."

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

Rhode Island will be using the defininition of Baic Skills Deficient as contained in WIOA Section 3(5)(B)

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).)

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

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

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.

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.

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.

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:

LLLLL. SUPPORTING EMPLOYER ENGAGEMENT;
MMMMM. CONNECTING EDUCATION AND TRAINING STRATEGIES;
NNNNN. SUPPORTING WORK-BASED LEARNING;
OOOOO. IMPROVING JOB AND CAREER RESULTS, AND
PPPPP. 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:

QQQQQ. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
RRRRR. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
SSSSS. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
TTTTT. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
UUUUU. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER;

The state of Rhode Island intends to submit waiver requests at a future time.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

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 PROFESSIONAL STAFF DEVELOPMENT.

1. 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.

Employment Service Professional Staff Development

The State recognizes the value and importance of providing high quality customer service to both our employer and job seeker customers. The RI Department of Labor's Workforce Development Services Division (WDS) continually assesses and evaluates the current skills and abilities of One-Stop Staff in successfully performing their various job duties. Training is provided in an ongoing manner to meet the continuing professional development needs of our One-Stop Staff. WDS continues to provide in house training to the staff of the Business Workforce Center (BWC) on standard business service knowledge, programs and competencies across state agencies providing a variety of services and programs to the State's employer community. WDS continues to ensure that One-Stop management and staff have current knowledge and understanding of the local, state and national economic trends as it continues to implement demand-driven programs and services.

Specific areas of professional development are:

1. **Labor Exchange**: WDS continually reviews and evaluates the skills required to improve staff abilities to conduct job seeker and employer services such as workshops, one-on-one counseling, conducting public presentations and providing exceptional customer service. These skills are essential to providing job seekers the necessary understanding and utilization of the services available to them through the State's Workforce Development System.

2. **Labor Market Information (LMI):** WDS provides in house training in the area of labor market information to staff to better assist customers in understanding skill levels of in-demand jobs and how to identify transferrable skills or the need to upgrade current skills to meet the needs of employers. It also assists staff and customers in identifying salary demands and industry trends. Staff and customers will gain knowledge of how to research companies and better prepare for an interview or salary negotiation. The State had invested in tools to help in this effort.

3. **Effective Use of Tools**: One-Stop Staff have been trained and continue to be trained on utilization of the EmployRI (Virtual One-Stop System) including demonstration of how to better assist job seekers in job search methods, skills assessment and job matching as well as labor market information on industry trends and career growth and salary projections to help customers make more informed decisions on employment and training. Staff are trained to provide better understanding of identifying and highlighting skills in resumes as they relate to the demand-driven job descriptions.

4. **Business and Demand-Driven Technologies:** Professional staff development includes continuing on-line and classroom training in EmployRI usage. One-Stop Staff are trained to interact with employers to assist in job postings, resume search and recruitments. Staff are trained to disseminate employer needs to customers in a timely manner to meet the demand-driven needs of the employer. The latest tools and techniques are provided to enhance employer engagement and help to better direct job seekers to quality jobs.

5. **Technology:** WDS provides professional development to staff regarding upgrades in IT resources to be kept up to date regarding the most effective use of the latest technologies. This includes classroom training in the latest version of MS Office, continual webinars and classroom training on the most effective use of the EmployRI system and use of labor market information. All staff in the One-Stops have been trained on the use of Adaptive Technology (AT) and educated as to methods of communicating all services to individuals with disabilities. Adaptive Technology includes use of various AT devices and tools including TTY, Captel, Zoom Text, Magnifier, Pocket Talkers, Jaws and Magic.

6. **Social Media & Electronic Communication:** Staff are trained to assist job seekers with the latest technology and techniques such as enhancing their electronic communication skills including an understanding of appropriate email usage, applying to jobs through on-line applications, use of social media including LinkedIn and other related sites to market their skills to employers. Staff disseminate to job seekers the latest information regarding how an employer will review an applicant's Internet profile when applying to their company. Staff are trained to enhance their use of electronic communication to job seekers through the latest email techniques to improve staff's outreach to job seekers for the purposes of doing targeted recruitments and connecting those job seekers to the appropriate employers.

The State is committed to continuing to provide current professional development activities and training to all staff with in the Rhode Island Workforce Development System.

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

The RI Department of Labor and Training (DLT) is a fully integrated and interconnected workforce development system. DLT oversees or is contracted to manage most of Workforce Development programs including Unemployment Insurance (UI) Title I, Workforce Innovation and Opportunity Act (WIOA), and the Wagner Peyser/Employment Services funded through the U.S. Department of Labor (USDOL). DLT continuously works to improve internal and external communication and integration through the Rhode Island Workforce Development System. Rhode Island Department of Labor and Training has identified liaisons in each division that assists in training and development of all One-Stop Career Center staff.

DLT provides training to all One-Stop Career Center staff regarding the identification of potential UI eligibility issues. Career Center staff have been trained to recognize UI eligibility issues and refer if necessary to UI staff for adjudication. DLT has put protocols in place to instruct on how to report potential UI eligibility issues for adjudication. When One-Stop staff become aware of a potential UI eligibility issues that are outside of the RESEA process the Adjudication Division is notified immediately of an eligibility issue.

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.

The Unemployment Insurance Division currently funds half (1/2) an FTE within Workforce Development which allows for a presence at the One-Stop locations to assist claimants in filing claims for unemployment compensation. Each of the state's four (4) One-Stop locations have computers available in a resource area for individuals during business hours and these may be utilized to file unemployment compensation claims. The state accepts claims online and staff members are available in the resource area throughout the day to assist customers with questions and in completing the online UI claim form. Additionally, UI has a help website setup where customers can requests assistance beyond simple questions related to filing a claim and in the larger One-Stops, this online help site is accessible through a dedicated UI Help Kiosk that allows customers to send their questions and/or requests for callback or UI assistance to UI without having to wait for an available computer in the resource area.

The State has ensured that there has been and will continue to be on-site assistance at One-Stops to give meaningful assistance to individuals who are filing UI claims. One-Stops have a dedicated bank of computers and telephone lines that are available and accessible to any customer that needs assistance filing a UI claim. One-Stops have dedicated kiosks that connect to UI for customers to be able to request information and a call back. One-Stop staff will work with Rapid Response teams to provide services to employers and workers in mass layoff situations and disseminate claims filing information.

Effective services will be provided to Veterans who file for benefits under the Unemployment Compensation for Ex-Service members (UCX). The State is moving to create a collaboration between UI Programs and WDS services to ensure the State's Veteran's population has a smooth transition from the military to civilian life. This will insure that UCX claimants have better exposure to jobs and reemployment services and fully leverage existing resources. WDS will ensure that claimants are fully notified of deadlines and eligibility requirements associated with TRA, Alternative Trade Adjustment Assistance (ATAA), Reemployment Trade Adjustment Assistance (RTAA) programs, and that communication with case managers for TAA is seamless.

One-Stop staff are trained to provide information and meaningful assistance to all individuals in filing UI Claims. In addition, staff are trained to recognize individuals who lack computer skills and proactively offer one-on-one assistance in filing UI claims. Staff are also trained to recognize individuals with Limited English Proficiency (LEP) and individuals with disabilities and assist them in filing UI claims through the use of assistive tools and technology for LEP and individuals with disabilities.

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

The State has conducted the Reemployment Services and Eligibility Assessment (RESEA) program (previously REA) since 2005 and continues to do so. Currently under the program, all UCX claimants and UI claimants deemed most likely to exhaust benefits (based on profiling scores) are directed to report to the One-Stops for mandatory participation in RESEA. The program focuses on providing participants with an overview of and access to

the services available at the One-Stop Centers as well as through the state's Virtual One-Stop (EmployRI), a detailed review of the claimant's responsibilities while collecting UI, and assistance accessing the resources necessary to lessen the time on unemployment and to return to work as quickly as possible. The program also mandates each participant receives two one-on-one sessions with a One-Stop staff member in additional to participation in additional reemployment services. Over the course of the two one-on-one meetings, UI Eligibility Reviews are conducted, staff reviews the claimant's work search, provides detailed labor market information, assists with job matching, conducts a skills gap analysis, reviews claimant's resume, assists claimant in registering with and accessing the Virtual One-Stop, schedules each claimant for additional reemployment services including workshops and/or training, and makes referrals to UI adjudication as appropriate.

Since August 31, 2014, the UI Division has required claimants (except those meeting specific exemption criteria) to post their resume in the state's Virtual One-Stop (EmployRI) by the 6th consecutive week of collecting UI benefits. To comply, claimants are required to be registered on EmployRI and utilize the system to create or upload a resume. Posting a resume on EmployRI allows Employers utilizing the system to conduct talent searches of UI claimants and allows claimants access to additional features including skills assessments, LMI, an automated job search tool (Virtual Recruiter) that sends automated messages regarding potential jobs that are a match to the criteria the user has defined, and other job search and reemployment resources. Claimants are also advised through call center and website messaging as well as printed media that they may take advantage of services provided at the state's One-Stop Career Centers.

Additionally, for claimants not referred to the One-Stops through RESEA and any other unemployed individuals, the state uses various media formats including print, television, and social media to communicate job openings, job fairs and training opportunities. Messaging on specific job openings refer customers to the Virtual One-Stop to apply while job fair communications provide location information, including instructions to visit a One-Stop Center when appropriate, and each weekend the state has an advertisement in the local newspaper that details scheduled job fairs and training opportunities, directing those interested to the One-Stop center. These types of outreach provided the initial contact for individuals to interact with the state's One-Stop system and allow Staff, through face-to-face and electronic interaction to provide reemployment assistance to these individuals. Any individual may also register on EmployRI and take advantage of all of the self-service reemployment tools available on the site.

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;

After filing a claim, UI claimants are advised via mail of work search requirements and other pertinent information regarding their claim. The materials in this mailing advise claimants of the existence of the state's One-Stop offices and invites them to visit the office for job search assistance and reemployment services. Claimants are required to post their resume on EmployRI and use of that system to do so triggers the claimant's WP enrollment, after

which, their active enrollment and existence of a resume allows staff to conduct job matching and referrals to positions for the claimants. Additionally, claimants selected for RESEA are mandated to visit the One-Stop center for reemployment services and are informed of additional services the One-Stop provides that they can access under Wagner-Peyser. After completion of RESEA claimants who have not yet returned to work are encouraged to continue their interaction with the One-Stop system, both in-person and virtually which continues their participation in WP supported activities.

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

RI UI claimants are required to register with the state's employment service. In order to assist claimants in complying with this requirement, the state has set up an automated process by which claimants who do not already have an existing registration (account) with the state's virtual One-Stop (EmployRI) are pre-registered thereby allowing them to login and complete only the portions of the registration information not previously provided on their UI claim. Claimants are advised via a letter included in their information packet after filing a claim of the instructions to access their EmployRI account.

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

Claimants selected for RESEA are required to participate in the program which includes administration of the work test and two eligibility assessment reviews by One-Stop staff as well as individual job matching assistance, job referrals as appropriate, and mandatory individualized reemployment services designed to assist claimants in utilizing the One-Stop system for job finding and placement. RESEA serves a significant portion of the UI claim load starting with UCX claimants and those deemed most likely to exhaust UI benefits based on profiling score.

Non-RESEA claimants who enter the One-Stop for services including referrals to TAA and WIOA, evaluation for training suitability and other staff-assisted services (i.e. job search assistance and career counseling) meet with staff who administer the work test and make referrals to UI adjudication as appropriate. Additionally, any claimant who interacts with One-Stop staff and discloses a potential work test compliance or other eligibility issue are referred to UI adjudication as appropriate.

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

Claimants can receive W-P services through both self-service and staff-assisted interaction within the One-Stop and Virtual One-Stop system. Through staff-assisted interaction, Claimants are offered services that include job search assistance, career counseling, skills assessment, skills gap analysis, resume writing assistance, and interviewing skills workshops. Claimants determined, through provision of these services, to show interest and aptitude towards a specific field that would require training and subsequently provide them opportunities for sustainable reemployment are then assessed through various tools,

including TABE, CareerScope, Prove It!, and the Objective Assessment tool in our MIS (EmployRI). If determined to meet the appropriate minimum pre-requisite requirements set forth for a particular training program to be successful in the field of that training, Claimants are then referred to One-Stop WIOA staff for determination of eligibility for WIOA-funded training and education programs. Application assistance for these WIOA-funded programs is then provided to the Claimant by their assigned Counselor.

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--

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.

The unique needs of farmworkers in RI based on past and projected agricultural and farmworker activity are: career counseling, skills assessment, job search assistance, suitable job training program referrals, information about community resources that provide MSFWs with food and clothing, housing, and health care clinics. MSFWs are also in need of information regarding services for ensuring resolution of complaints related to wages, working conditions, housing, discrimination, and worker rights.

Review of the Previous Year's Agricultural Activity in the State

The top five labor intensive crops in RI are, apples, greenhouse/nursery, dairy, aquaculture and sweet corn. The bulk of the farms are located in the Northern end of the state, with some on Aquidneck Island.

During PY2013, the major labor-intensive crop in RI was apples. In 2013 there were twenty four apple farms in RI. The months of heavy activity are April through October. Most of RI's apple farms/orchards are located in the northern end of the state, with some on Aquidneck Island.

The "green" industry (i.e. nursery, horticulture and turf) remains vital and is the largest contributor to the economy of agriculture in RI.

Migrant Seasonal Farm Workers Activities in the State

Two farms placed job orders during FY 2013 with DLT for H2A VISA workers, accordingly, there were two requests H-2A VISA workers. There were no staff referrals that resulted in hires from One-Stop Career Centers, there were zero internet self-referrals made, and there were no hires from our One Stop Career Centers.

Total MSFW registrations in RI from PY2010 through the present indicate 27 Migrant Farm Workers and 34 Seasonal Farm Workers. NetWORKri One-Stop Career Center staff perform outreach to these individuals. Outreach revealed that many of the individuals who registered as Migrant Farm Workers and Seasonal Farm Workers in EmployRI were actually "Seasonal Farm Workers," because they did not work directly with crops, but rather retail functions at farm stands. There were also many who performed landscaping activities.

Regardless of their registration status, all participants were provided with information regarding netWORKri services and the MSFW Complaint System. It was noted that individuals who have accepted agricultural positions have been from Jamaica and speak primarily English-African Creole language known as Jamaican Patois. We approximated that the number of MSFWs in the State during peak season would be 27, while the actual quantity during peak season was 34 MSFWs.

Projection of Agricultural Activity in the State

The level of crop activity in RI in PY 2016 is expected to increase, as continued economic growth leads to a more active agricultural economy, resulting in expanding labor needs. Based on prior years, the majority of the crop activities will be vegetables, strawberries and apples.

Most RI farms are family run. They occupy 69,589 acres dedicated to farming in RI. The U.S. Department of Agriculture reports that from 2007 to 2012, the total number of farms in Rhode Island grew from 1,219 to 1,243.

The market value of agricultural production declined 9 percent from 2007, while revenues from crop sales declined 12 percent. There have been no changes from previous years' crop activities and there are no known changes in the number of MSFWs involved in crop activity.

The number of farmers' markets in RI continues to grow. There are now 55 farmers' markets statewide, at which a wide variety of locally-grown and produced products are available, two of which operate year round (known as "winter farmers' markets"). RI farms serve every school district with certain foods that are grown here within our state. Schools have purchased local milk, grass fed beef and eggs and continue to expand the amount and variety of locally grown, healthy foods they provide to students. In addition, over 200 culinary and hospitality businesses in RI currently purchase from local farms. Fresh, local food produced by RI agriculture complements the state's strength in not only tourism but culinary and healthcare, as locally grown food is distributed directly to participants and through RI's Farm Fresh Market Mobile to hotel chains, restaurants, hospital cafeterias and workplaces.

In terms of revenue generated RI's top five agricultural products are greenhouse and nursery products, dairy products, corn, potatoes and apples. Greenhouse and nursery products such as sod, ornamental trees, shrubs and other products account for more than half of the state's agricultural income. Rhode Island's most important agricultural asset, by a wide margin, is its greenhouse and nursery industry, accounting for 64.5% of the total agricultural production value. Sweet corn, potatoes, and apples are also important crops for the "ocean state." Rural areas support small-scale farming, including grapes for local wineries, turf grass and nursery stock. In terms of livestock, dairy products lead in Rhode Island. Other livestock products include cattle and calves, aquaculture (primarily clams and oysters), farm hogs, and farm chickens.

Three decades ago, many government officials and people in Rhode Island considered agriculture a dying sector. In recent years, however, we have seen a significant expansion in the Rhode Island agricultural industry. According to the RI's Agricultural Five-Year Strategic Plan, farmers are recognized as good stewards of 11 percent of RI's land base and will

continue to follow best management practices to ensure both natural resource conservation and food safety.

RI-grown food is helping to improve the nutritional health of the state's residents. Income-eligible seniors are given Senior Farmers' Market Tuition Program coupons that are redeemable at various farmers' markets/stands or the mobile farmers' market that visits senior meal sites. A similar farmers' market coupon program exists for the Women, Infants and Children Program which is part of the state's Special Supplemental Nutrition Program. Electronic Benefit Transfer (EBT) machines were installed at close to half of the RI's farmers' markets, enabling SNAP recipients to use EBT cards to purchase farm fresh foods (known as "Community Supportive Agriculture" or CSA). CSA is a prepaid subscription to a farm's produce for the season. Some cities in RI participate in "bonus bucks", a program offered by Farm Fresh RI and several additional partners. According to the 2012 RI Census, the number of MSFWs in the State for the coming year is projected to increase by approximately 10 percent. RI continues to seek new ways to identify MSFWs by performing outreach and will collaborate with the Unemployment Insurance Division to identify additional MSFW not included in EmployRI or not identified by outreach.

A. 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.

The top five labor intensive crops in RI are, apples, greenhouse/nursery, dairy, aquaculture and sweet corn. The bulk of the farms are located in the Northern end of the state, with some on Aquidneck Island.

During PY2013, the major labor-intensive crop in RI was apples. In 2013 there were twenty four apple farms in RI. The months of heavy activity are April through October. The bulk of the farms are located in the Northern end of the state, with some on Aquidneck Island.

The "green" industry (i.e. nursery, horticulture and turf) remains vital and the largest contributor to the economy of agriculture in RI.

Migrant Seasonal Farm Workers Activities in the State

In PY2016, three farms placed job orders in conjunction with requesting H2A VISA workers with DLT.

There were five requests for H-2A VISA workers. There were no staff referrals that resulted in hires from the One-Stop Career Center, there were zero internet self-referrals made, and there were no hires from our One Stop Career Centers.

Total MSFW registrations in RI from PY2010 through the present indicate 27 Migrant Farm Workers and 34 Seasonal Farm Workers. NetWORKri One-Stop Career Center staff outreach to these individuals revealed much incorrect self-identification as Migrant Workers/Seasonal Workers during the registration processed in EmployRI, RI's online

Labor Exchange instrument. Correct classification of the registered participants would fall under Seasonal Farm Workers, not necessarily working with crops, rather retail functions at farm stands, and also numerous landscaping activities.

Regardless, information was given regarding netWORKri services and the MSFW Complaint System.

Those that have accepted agricultural positions have been from Jamaica and speak primarily English-African Creole language known as Jamaican Patois. The approximate number of MFWs in the State during peak season is 27 and there were 34 MSFWs during peak season.

Projection of Agricultural Activity in the State

The level of crop activity in PY 2016 is expected to increase with a possibility that economic growth may lead to a more active agricultural economy resulting in expanding labor needs. Based on prior years the majority of the crop activities will be vegetables, strawberries and apples.

Most farms are family run occupying 69,589 acres dedicated to farming in RI. The U.S. Department of Agriculture reports that from 2007 to 2012, the total number of farms in Rhode Island grew from 1219 to 1243.

The market value of agricultural production declined 9 percent from 2007 and crop sales declined 12 percent. There have been no changes from previous years' crop activities and there are no known changes in the number of MSFWs involved in crop activity.

The number of farmers markets in RI continues to grow. There are now 55 farmers markets statewide and two operate year round, known as "winter farmers' markets" where a wide variety of locally-grown and produced products are available. RI serves every school district certain foods grown here within our state. Schools have purchased local milk to grass fed beef to eggs and continue to expand the amount and variety of locally grown, healthy foods. There are over 200 culinary and hospitality businesses in RI that now buy from local farms. Fresh, local food produced by RI agriculture complements the state's strength in not only tourism but culinary and healthcare as locally grown food is distributed directly and through RI's Farm Fresh Market Mobile to hotel chains, restaurants, hospital cafeterias and workplaces.

In terms of revenue generated RI's top five agricultural products are greenhouse and nursery products, dairy products, corn, potatoes and apples. Greenhouse and nursery products such as sod, ornamental trees, shrubs and other products account for more than half of the state's agricultural income. Rhode Island's most important agricultural asset, by a wide margin, is its greenhouse and nursery industry, accounting for 64.5% of the total agricultural production value. Sweet corn, potatoes, and apples are also important crops for the "ocean state." Rural areas support small-scale farming, including grapes for local wineries, turf grass and nursery stock. In terms of livestock, dairy products lead in Rhode Island. Other livestock products include cattle and calves, aquaculture (primarily clams and oysters), farm hogs, and farm chickens.

Three decades ago, many government officials and people in Rhode Island considered agriculture a dying sector. In recent years, however, we have seen a significant agricultural

upturn in Rhode Island. According to the RI's Agricultural Five-Year Strategic Plan, farmers are recognized as good stewards of 11 percent of RI's land base and will continue to follow best management practices to ensure both natural resource conservation and food safety.

RI-grown food is helping to improve the nutritional health of the state's residents. Income-eligible seniors are given Senior Farmers Market Tuition Program coupons that are redeemable at various farmers' markets/stands or the mobile farmers market that visits senior meal sites. A similar farmer's market coupon program exists for the Special Supplemental Nutrition Program for the Women, Infants and Children Program. Installing Electronic Benefit Transfer (EBT) machines to almost half of the RI's farmers markets has enabled SNAP recipients to use EBT cards to purchase Community Supportive Agriculture (CSA). CSA is a prepaid subscription to a farm's produce for the season. Some cities in RI participate in "bonus bucks", a program offered by Farm Fresh RI and several additional partners.

In accordance to the 2012 RI Census, the projected number of MSFWs in the State for the coming year would increase by approximately 10 percent. RI continues to seek new ways to identify MSFWs including outreach and will collaborate with the Unemployment Insurance Division to identify additional MSFW not registering in EmployRI or not identified by outreach.

B. 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.

Assessment of Available Resources

DLT has available 50% of an FTE (Full Time Equivalent) to provide outreach services to MSFWs. If continued outreach identifies the need to increase this percentage, DLT will allocate the necessary funds to meet the needs and demands identified.

The SMA will document and maintain a file of on-going and regular reviews of services provided to MSFWs by the netWORKri One Stop Career Centers. The SMA will ensure that the netWORKri One Stop Career Centers staff are trained in the requirements of the regulations in respect to services offered to MSFWs.

Outreach contacts are conducted by the SMA during the peak harvest season. As many MSFWs as possible will be made aware of the full range of services, benefits and protection provided under 20 CFR653, Subpart B. The majority of contacts with MSFWs will be conducted between the peak harvest season and during routine agricultural employer's visitations.

For the quarter ending June 30, 2015 the RI DLT's SMA conducted 14 days of outreach. The plan for PY 2016 is to increase the level of outreach activity to twenty days. Outreach to ten farms was conducted for bruising, Immigration Ministry, and three farms and prevailing/practice surveys were mailed.For PY2015-2016, so far, the SMA has conducted nineteen outreach activities trying to identify MSFW's. These have included eleven field visits to local farms explaining the system to local agricultural employers. Also, three field checks took place to inform MSFWs of netWORKri services. No violations or complaints were found. Field conditions were checked, a house inspection was conducted, and three farms workers were interviewed. Joint outreach took place with an Outreach worker from NEFWC. Additionally, the SMA met with four Community Based Organizations to explain services available and to promote cooperative working relations between the DLT and farm worker groups.SMA in conjunction with the New England Farm Worker's Council representative, located in the Providence netWORKri Career Center, will develop a schedule for the purpose of coordinating outreach efforts. Visits will be made to address the noted increase of fruit farms to provide farm workers with information regarding employment and training services at the DLT One Stop Career Centers in addition to their legal rights pertaining to wage and hour. Sanitary working conditions in and outside of their living quarters and also the effects of heat exhaustion are always brought to the farm workers attention. Farm workers are also provided with information pertaining to supportive services that the NEFWC can assist with such as heating assistance and additional training programs. Printed netWORKri promotional material is distributed as appropriate. Outreach will be accomplished through personal contact. The DLT and the One-Stop Career Centers will continue to establish new and existing relationships with local and statewide networking groups on how to better serve the MSFW population.

2. 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:

RI's SMA serves as the outreach worker in the state. The SMA/Outreach worker has had the opportunity to discuss the MSFW program with the Regional Monitor Advocate regarding Outreach techniques including: how to create the Agriculture Outreach Plan, how to identify and locate MSFWs, conducting joint outreach with NJWP, how to conduct Local Office Reviews, Field visits/checks, correct resolution of complaint procedures, and the proper preparation of the MSFW Annual summary. Additionally, RI's SMA has attended two Monitor Advocate National Trainings. The first conference was held in July 2015 in Virginia and the second conference was held in July 2016 in Tampa, Fla.

RI's DLT SMA/Outreach worker has extensive knowledge across core programs - she is a former employment counselor, with two additional years of experience managing W/P and Unemployment Insurance programs at a local One-Stop Center.

Professional development is achieved thru telephone conferences, webinars and attendance at national training events.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

The DLT plans to conduct outreach activity to MSFWs throughout the State during the peak harvest season of April through October offering information on our programs and services available in PY2016. The RI State Monitor Advocate has conducted MSFW outreach activities to 14 farms in order to make sufficient amount of information available in the temporary farm worker community.

The DLT would like to see these efforts increased to reflect a minimum of 20 days of outreach to MSFWs and more if the need is determined. The DLT will continue to offer information on services and programs for MSFWs and business services to promote growth and retention. To support this effort, a Business Service Representative will accompany the SMA on all outreach visits.

The RI DLT will conduct outreach activities to locate and to inform migrant and seasonal farm workers about the core, intensive training services available through the netWORKri One-Stop Career Centers. The State Monitor Advocate (SMA) is available to assist the netWORKri staff in the conduct of outreach activities.

RI has a collaborative atmosphere between state agencies, nonprofits and the farming community. Continued coordination is critical to maintain a flourishing agricultural region. We will continue to work cooperatively to improve existing employment and training programs to emphasize the quality of service and customer satisfaction. The NFJP is an integral part of the public workforce system. The NFJP also partners with community organizations and state agencies to counter the chronic unemployment and underemployment experienced by farmworkers who depend primarily on jobs in agricultural labor performed across the country.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. 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 COMPLAINT SYSTEM, 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.

RI's SMA serves as the outreach worker in the state. The SMA/Outreach worker has had the opportunity to discuss the MSFW program with the Regional Monitor Advocate regarding Outreach techniques including: how to create the Agriculture Outreach Plan, how to identify and locate MSFWs, conducting joint outreach with NJWP, how to conduct Local Office Reviews, Field visits/checks, correct resolution of complaint procedures, and the proper preparation of the MSFW Annual summary. Additionally, RI's SMA has attended two Monitor Advocate National Trainings. The first conference was held in July 2015 in Virginia and the second conference was held in July 2016 in Tampa, Fla.

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.

RI's DLT SMA/Outreach worker has extensive knowledge across core programs - she is a former employment counselor, with two additional years of experience managing W/P and Unemployment Insurance programs at a local One-Stop Center.

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.

Professional development is achieved thru telephone conferences, webinars and attendance at national training events.

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

The RI DLT has partnered with the New England Farm Workers Council to provide increased services to identified MSFWs/SFWs and farm employers. A representative from the New England Farm Workers Council maintains a presence in the Providence NetWORKri One-Stop Career Center to work with staff to identify MSFWs/SFWs and to refer to New England Farm Workers Council as an additional resource to meet their needs. This representative will accompany the Business Workforce Center representatives and the SMA on outreach visits to farm businesses.

One Stop staff will provide all career and job services, including navigating the labor exchange system and refer businesses to the Business Workforce Center to participate in the Agricultural Recruiting System (ARS) and utilize the recruiting available in EmployRI. The labor exchange system provides job openings in both agricultural and non-agricultural employment. There have not been significant numbers of agricultural job opportunities in the past. However, with continued outreach and collaboration with other agricultural organizations, the numbers may increase.

Other services, such as training or supportive services, through the One-Stop Career Center and New England Farm Workers Council and WIA funding will provide a pathway for MSFWs/SFWs to transition to high wage jobs and permanent year round employment in both the agricultural and non-agricultural industries.

All complaints from MSFWs/SFWs regarding violations of employment related standards and laws shall be taken in writing by designated representatives in each One-Stop Career Center and referred to the SMA for timely resolution. The SMA will make referrals as appropriate and cooperate with the US Department of Labor Wage & Hour Division or other appropriate agencies involved in addressing and resolving complaints.

RI DLT SWA and SMA attended the MSFW Monitor Advocate and FLV Coordinator Annual Conference Agenda from September 15th thru 1 September 18th, 2015 in Leesburg, VA. This conference focused on Foreign Labor Certification and the Monitor Advocate roles and responsibilities. In addition, on September 28, 2015, the SWA and SMA, in conjunction with the New England Farm Worker's Council representatives located in the Providence NetWORKri Career Center developed a schedule for the purpose of coordinating outreach efforts. A schedule of contacts and visits was made to provide farm workers with information regarding employment and training services, supportive services and distribute printed NetWORKri materials. Outreach is being accomplished through personal contact, DLT, and the One-Stop Career Centers

3. 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:

CXXVI. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;

CXXVII. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

The DLT will ensure that the netWORKri staff members are trained in the requirements of the regulations in respect to services offered to MSFWs. In an effort to align and integrate workforce development services and to increase outreach to MSFWs, DLT and the New England Farm Worker's Council (NEFWC) have entered into a non-financial cooperative agreement. The NEFWC representative is located in the Providence netWORKri Career Center, the state's largest comprehensive One-Stop Career Center. DLT in cooperation with the New England Farm Worker's Council will work expeditiously to identify and assure maximum services to MSFWs.

The SMA will ensure that all services and programs that are provided in the netWORKri Centers are available for MSFWs. The One-Stop Career Center system ensures the needs of migrant and seasonal farm workers are met through universal access and full integration of services either on-site or through electronic access. The employers most likely to utilize MSFWs or seasonal farm workers are the small fruits, vegetable and apple growers. These employers have a historical timeframe of when they need workers and are contacted when those times arrive.

Services are available statewide and MSFW customers have access to a broad range of employment, training, and educational services including Adult Basic Education and ESL as this is a prerequisite to occupational skills and training. Information is provided to Partners and front line staff at the One Stop Career Centers on how to identify a MSFW in an effort to correctly identify a MSFW and code an individual appropriately in order to be referred to the NJFP. Training continues to be provided to the netWORKri staff regarding services available to MSFWs through NEFWC and the netWORKri staff has provided NEFWC with information regarding all services and activities available in the One-Stop Centers. The Monitor Advocate is available to assist offices in outreach, aside from independent activities with farm workers.

DLT will continue to work with and expand if possible contacts with non-profit organizations that have a special focus on or generally serve farm workers. Bilingual staff is also available to effectively assist MSFW customers with the use of job order information and job opportunities. Assistance is provided in the use of the computer terminals, self-registration access to Unemployment Insurance and any training opportunities. Federal and State mandatory posters are visibly displayed in the lobby area of each local office for public viewing. All posters are in English and Spanish.

Information about the available services and how to access them is provided through outreach to MSFWs. The SMA and the Business Service Unit will continue to perform outreach and inform employers of the benefits provided by the DLT in an effort to recruit locally within the state and through interstate worker recruitments. The SMA will work with areas without network meetings which would be interested in establishing them and explore opportunities for strengthening partnerships in such activities. Staff assistance is available to all MSFWs for learning the EmployRI system. Based on the customer's needs and desire an appropriate next step is determined such as self-service resource area, direct referral to partner program staff, orientations, one-on-one assistance, career counseling, Veteran's employment and training services, resume writing, job search assistance, vocational testing, reemployment workshops and job referrals.

The integration of services is intended to increase the quality of services, focus on skills of both unemployed and current workers. This assessment is critical to ensure appropriate and seamless referrals to partner programs and services.

Computers in the resource areas are designed to provide a multitude of employment and reemployment resources in each One-Stop. Customers may use job boards, Internet access, printers, telephones and faxes to conduct a job search free of charge with or without staff assistance, however, resource specialists knowledgeable in technology and partnership services are available in the resource area to assist customers.

Customers interested in gaining new job skills or verifying their existing skills may access Alison online training. Also included are: various job banks, workforce information for job seekers and employers, cover letters, resumes, telephones and fax machines.

Comprehensive assessments, development of individual employment plans, individual and group counseling, workshops, testing and case management are examples of intensive services that could be provided.

In addition the One-Stop delivery system will address the needs of all farm workers, including those in need of Adult Basic Education and ESL as a prerequisite to occupational skills training in order to become gainfully employed and achieve upward mobility in the workforce. Services can be provided directly to customers either on site or through electronic access. Services are available statewide, at four strategically located One Stop centers. Each center offers interpretation services to individuals who require language assistance. All individuals will be able to access the core services.

In order to improve services and meet the minimum requirements, this agency will ensure that all One-Stop netWORKri staff has been properly trained in the proper identification and coding of MSFWs as well education on the multiple barriers of employment many MSFWs confront. The SMA will continue to conduct on-site monitoring of the netWORKri Centers to ensure compliance with federal requirements and to offer technical assistance to staff as needed. RIDLT is committed to achieving full compliance with the federally mandated minimum requirements for providing services to MSFWs during the coming year.

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

The State MSFW outreach officer disseminates information about the RI MSFW Complaint system to all One Stop Staff, advocacy group and farmer workers in person. The coordinator

meets frequently with representatives of worker advocacy organizations, local one stop offices, and farm workers to receive complaints and to assist in referrals of alleged violations to enforcement agencies. Information is given out in the form of brochures and posters which are bi-lingual with the necessary contact information to file a complaint. The brochures and posters are also posted in all of the states One Stops. The brochures inform in detail about all the employment services that are available and the rules and regulations that govern them.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

The DLT plans to conduct outreach activity to MSFWs throughout the State during the peak harvest season of April through October offering information on our programs and services available in PY2014. The RI SMA has conducted MSFW outreach activities to five (5) H2A workers in order to make sufficient amount of information available in the temporary farm worker community. The RI SMA also outreached to eight (8) farms located throughout RI to make them aware of the services available to MSFWs. The SMA attended the RI Spring Flower Show to interact with the nursery and farm owners who were in attendance and also the Women in Agriculture Conference along with a Business Service Representative from the DLT Business Workforce Center. The DLT would like to see these efforts increased to reflect a minimum of 10 days of outreach to MSFWs and more if the need is determined. ? Quarterly reviews have been scheduled for each of the four local netWORKri Career Centers to review MSFW activity and to continue to keep staff informed of MSFW activity and the necessary posters that must be displayed. ? The DLT will continue to offer information on services and programs for MSFWs and business services to promote growth and retention. To support this effort, a Business Service Representative will accompany the SMA on all outreach visits. 5 ? The RI DLT will conduct outreach activities to locate and to inform migrant and seasonal farm workers about the core, intensive training services available through the netWORKri One-Stop Career Centers. The State Monitor Advocate (SMA) is available to assist the netWORKri staff in the conduct of outreach activities. ? RI continues to establish collaborative atmosphere between state agencies, nonprofits and the farming community. Continued coordination is critical to maintain a flourishing agricultural region. ? We will continue to work cooperatively to improve existing employment and training programs to emphasize the quality of service and customer satisfaction. ? Prevailing wage and Prevailing Practice surveys will be done in the beginning of May to determine

The RI DLT uses the ETA Form 8429 to report all complaints to the Regional Monitor Advocate. All complaints from MSFWs regarding violations of employment related standards and laws are documented in writing by local office managers in each One-Stop Career Center and referred to the SMA for timely resolution. The SMA will make referrals as appropriate and cooperate with the US Department of Labor Wage & Hour Division or other appropriate agencies involved in addressing and resolving complaints.

4. 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).

It will be the responsibility of the Rhode Island Department of Labor and Training (RIDLT) and the New England Farm Workers' Council (NEFWC) to contract and make employment and training services available to farm workers in Rhode Island. Both parties agree to the following responsibilities, which will enhance and facilitate the cooperative working relationship:

a. It will be the responsibility of the RIDLT and NEFWC to ensure that data gathered regarding MSFWs and Labor Market Information is shared for planning purposes;

b. It will be the responsibility of the RIDLT and NEFWC management to develop cooperative efforts, which are mutually beneficial in serving MSFWs, and to pursue avenues on how to avoid duplication of services and maximize each other's effectiveness in meeting MSFWs' needs;

c. It will be the responsibility of the RIDLT and NEFWC staff to ensure that the staff of other agencies is provided the opportunity to participate in workshops each organization may sponsor on topics including job search, labor market information, Migrant and Seasonal Farm Worker Programs under Title I of the Workforce Innovation and Opportunity Act regulations, outreach, etc.

d. Outreach workers from RIDLT and NEFWC will meet on a regular basis for the purpose of coordinating their outreach activities. Through better communications and coordination, duplication of services can be minimized and the number of MSFWs contacted can be maximized.

1. A RIDLT designee will distribute NEFWC information on training and support services.

2. The NEFWC outreach workers will provide information to one-stop career center staff on the services available to MSFWs through the NEFWC and distribute informational pamphlets on labor exchange services, unemployment insurance and training programs.

e. NEFWC operator will develop referral tracking systems designed to provide mutual feedback.

1. Local Career Center or RIDLT will provide, on request, information on services provided to customers referred by NEFWC. This will include:

a. Counseling

b. Employment and training

c. Job referral

d. Job placement

e. Job development

f. Unemployment Insurance

2. NEFWC will provide, on request, information on services provided to referrals from the Local Career Centers. This will include:

a. Training

b. Supportive services

The RI DLT has partnered with the New England Farm Workers Council to provide increased services to identified MSFWs/SFWs and farm employers. A representative from the New England Farm Workers Council maintains a presence in the Providence NetWORKri One-Stop Career Center to work with staff to identify MSFWs/SFWs and to refer to New England Farm Workers Council as an additional resource to meet their needs. This representative will accompany the Business Workforce Center representatives and the SMA on outreach visits to farm businesses.

One Stop staff will provide all career and job services, including navigating the labor exchange system and referring businesses to the Business Workforce Center to participate in the Agricultural Recruiting System (ARS) and utilize the recruiting tools that are available in EmployRI. The labor exchange system lists job openings in both agricultural and non-agricultural employment. There have not been significant quantities of agricultural job opportunities in the past. However, with continued outreach and collaboration with other agricultural organizations, the numbers may increase.

Other services, such as training or supportive services, through the One-Stop Career Center and New England Farm Workers Council and WIA funding will provide a pathway for MSFWs/SFWs to transition to high wage jobs and permanent year round employment in both the agricultural and non-agricultural industries.

All complaints from MSFWs/SFWs regarding violations of employment related standards and laws shall be taken in writing by designated representatives in each One-Stop Career Center and referred to the SMA for timely resolution. The SMA will make referrals as appropriate and cooperate with the US Department of Labor Wage & Hour Division or other appropriate agencies involved in addressing and resolving complaints.

On September 28, 2015, the SWA and SMA, in conjunction with the New England Farm Worker's Council representatives located in the Providence NetWORKri Career Center developed a schedule for the purpose of coordinating outreach efforts. A schedule of contacts and visits was made to provide farm workers with information regarding employment and training services, supportive services and distribute printed NetWORKri materials. Outreach is being accomplished through personal contact, DLT, and the One-Stop Career Centers

B. REVIEW AND PUBLIC COMMENT.

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

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

The plan was sent out to the New England Farm Worker's Council on March 28, 2014 and accepted with no comment. Additionally, the plan was sent out to the following Agricultural Organizations on April 9, 2014:

1. RI Department of Environmental Management-Agricultural Division

2. RI Farm Bureau http://rifb.org/

3. Farm Fresh RI http://www.farmfreshri.org/

4. UDA Farm Service Agency

http://www.fsa.usda.gov/FSA/stateoffapp?mystate=ri&area=home&subject=landing&topic=landing

There were no comments. The plan was reviewed for modification to the State Integrated Plan at the Strategic Investment Committee of the Governor's Workforce Board. The Governor's Workforce Board's Strategic Investment Committee approved the plan on June 3, 2014 and forwarded to the full Board for approval. The full Board approved the plan on June 19, 2014.

Most of the demographic information was based on the RI Department of Environmental Management's Division of Agriculture's website.

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.

(i) Previous Years History

	PY13	PY14	PY15	PY16
Number of agricultural job orders received	3	4	4	5
Number of agricultural job orders filled	0	4	4	5
Percent filled	0	100%	100%	100%

	PY13	PY14	PY15	PY16
Number of H-2A interstate clearance job orders received	0	3	0	0
Number of H-2A interstate clearance job orders initiated	1	3	0	0
Number of non H-2A interstate clearance job orders received	0	0	0	0

(ii)

	PY17
Number of agricultural job orders expected to be received	4
Number of agricultural job orders projected to be filled	4
Percent filled	100%
Estimated number of interstate clearance orders received	0
Estimated number of interstate clearance orders initiated	0

The previous four years of W/P data reports on performance shows that the State of RI has met an average of 3 out of 5 Equity Ratio Indicators due to the fact that there has not been any increase in the number of MSFWs coming into the centers for services. Past outreach to the local farms has proven to be ineffective. The State intends to improve its provision of services by creating new strategies for outreach. These include: Joint meetings with NFJP RI outreach worker and the recently appointed new State Monitor Advocate to visit Community Health Centers, local food banks, farmer's markets, churches, and Latino radio stations. The new SMA has bilingual Spanish capabilities and a previous work experience interacting with Migrant workers. It is anticipated that this may assist in more effective communication and response to outreach than previously experienced, therefore, suggesting a better outcome for the next four years.

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.

RI DLT SWA and SMA attended the MSFW Monitor Advocate and FLV Coordinator Annual Conference Agenda from September 15th thru 1 September 18th, 2015 in Leesburg, VA. This conference focused on Foreign Labor Certification and the Monitor Advocate roles and responsibilities. In addition, on September 28, 2015, the SWA and SMA, in conjunction with the New England Farm Worker's Council representatives located in the Providence

NetWORKri Career Center developed a schedule for the purpose of coordinating outreach efforts. A schedule of contacts and visits was made to provide farm workers with information regarding employment and training services, supportive services and distribute printed NetWORKri materials. Outreach is being accomplished through personal contact, DLT, and the One-Stop Career Centers.

E. STATE MONITOR ADVOCATE

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

The SMA has been afforded the opportunity to review and provide input into the PY 2014 Agricultural Outreach Plan. The SMA comments and recommendations have been incorporated into the Plan, and she will be kept informed of further plan development.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

1. The Wagner-Peyser 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. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; 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 services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

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 under title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align 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)).

In 2010, the Rhode Island Board of Education adopted the Common Core State Standards (CCSS) for use in the K-12 system. On January 13, 2014, the Board adopted the national College and Career Readiness Standards for Adult Education (CCRS) (a subset of the CCSS) to be used within Rhode Island's adult education system, effective as of January 14, 2014 and in alignment with the RI K-12 system's requirement to use the CCSS to align instruction.

The CCRS benefit Rhode Island in a variety of ways, including the promotion of consistent expectations between the K-12 and adult education systems so all students, whatever their pathway to graduation, will have access to the preparation they need to enter credit-bearing freshman courses without the need for remediation.

The CCRS implementation continues to be embedded in the Proficiency-Based Teaching and Learning (PBTL) initiative. This work brings together the research-based practices of Understanding by Design, Competency Education, and Quality Performance Assessment and supports standards-based instruction. It is also in line with CCSS standards work underway in K-12 in Rhode Island. The major focus of this initiative has been the development of a system of instruction and assessment that is based on students demonstrating that they have learned the knowledge and skills they are expected to learn using the CCRS and entails making students aware of their own learning as they progress into mastery of these standards. As programs are funded in the next RFP cycle beginning on July 1, 2018, they will be required to establish and maintain professional learning communities (PLCs) to support the embedding and scaling of standards based PBTL practices for all content areas.

During the July 2018 to June 2021 RFP cycle, a micro-credentialing component will also be more formally added to this system which will allow for practitioners to become credentialed in the design, development and validation of performance assessments and other related skills. Outcomes within this process will include the development of exemplar tasks for corresponding NRS levels including ESL, ABE and ASE for sharing statewide.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
    1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
    2. Is for the purpose of educational and career advancement.

RIDE will provide funding to eligible local providers for adult education and literacy activities through a competitive Request for Proposal process in the spring of 2018. The RFP will be advertised on social media and distributed through social networks. All current

providers and all other agencies that have requested information prior to the announcement will receive the information on the same day as the social media notice. All eligible agencies will go through the same application and review process and have direct and equitable access to apply and compete for Title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (IEL/Civics). Through this process, RIDE will identify, assess, and award three-year grants to eligible providers throughout the state. The grant period runs from July 1, 2018 until June 30, 2021.

The application process is uniform to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. Two bidders conferences and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

An "eligible provider" is one that has demonstrated effectiveness in providing adult education activities and may include: a local education agency, a community-based or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private nonprofit agency, a library, a public housing authority, a nonprofit institution with the ability to provide adult education and literacy services, a consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above, and a partnership between an employer and an entity described above.

Programs may "demonstrate effectiveness" by providing performance data on its record of improving the skills of eligible individuals, in meeting the state-adjusted levels of performance, particularly those individuals with low levels of literacy, in the content areas of reading, writing, math, and English language acquisition. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diplomas or equivalents, and transition to postsecondary education and training.

Eligible providers who were previously funded with RIDE funds must provide performance data from the state adult education database (Comprehensive Adult Literacy Information System - CALIS), including, but not limited to, NRS Table 4 and Table 5. Eligible providers who were not previously funded by RIDE must provide performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving the outcomes listed above (content area educational gains, employment, high school diplomas or equivalents, and transition to postsecondary education and training).

Eligible programs may provide some or all of the following allowable activities; programs may also provide these services concurrently:

- 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

Past needs statewide have focused on providing English language acquisition activities, as more than 50 percent of all students have been English language learners during the last five years. The remaining adult population enrolled in either adult education or literacy activities, and a small portion of students have been served in family literacy programs. Following state priorities to increase employment outcomes, RIDE encourages eligible providers to offer adult education, literacy, and English language acquisition activities concurrently with workforce preparation activities and integrated education and training activities.

The state currently has two RI Department of Labor and Training initiatives, "Real Jobs Rhode Island" and "Real Pathways Rhode Island," both of which include several adult education and literacy providers in partnerships with local businesses and industries. These providers are contextualizing the adult education, literacy and English language acquisition activities to meet the needs of their industry partners. Examples of these partnerships in high-demand occupations in Rhode Island include hospitality, health care, construction, and aquaculture. Programs that offer concurrent activities of adult education, literacy, and English language acquisition with integrated education and training will follow a combination of adult education content standards (College and Career Readiness Standards for Adult Education - adopted by the Rhode Island Board of Education), the Employability Skills Framework (OCTAE, or similar framework of workforce skills), and the industry-recognized occupational standards and credentials.

As required by WIOA section 107 (d)(11)(B)(i), all of the Title II adult education grant proposals will be reviewed by the appropriate Local Workforce Development Board (RI has two local boards: Providence/Cranston and Greater Rhode Island) to determine whether the Title II applications are consistent with the proposed local plan for the local area. The local board will then make recommendations to RIDE to promote alignment with the local plan.

In awarding grants or contracts, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;

5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ¬uals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

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.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and

- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

  Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

From funds made available under Section 222(a)(1), funds will be awarded through an open and competitive RFP process in FY18 to correctional institutions for adult education and literacy activities, high school equivalency preparation (GLE 9-12) and career pathways to support students in their next steps including their transition to re-entry. Additional services may include: integrated education and training, peer tutoring and transition to re-entry initiatives, and other post-release services with the goal of reducing recidivism.

The Rhode Island Department of Education will use no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for activities under Section 225 to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals. Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The application process is uniform to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder's conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

In awarding grants or contracts under Section 225, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;

5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ¬uals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

1. DESCRIBE HOW THE STATE WILL ESTABLISH AND OPERATE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAMS UNDER SECTION 243 OF WIOA, FOR ENGLISH LANGUAGE LEARNERS WHO ARE ADULTS, INCLUDING PROFESSIONALS WITH DEGREES AND CREDENTIALS IN THEIR NATIVE COUNTRIES.

RIDE will fund IELCE eligible providers in the next RFP cycle beginning on July 1, 2018. Agencies must be able to provide this service delivery independently or in collaboration with others through a consortium approach that includes partnerships that are aligned with specific career pathways within key Rhode Island industry sectors. Requirements for IELCE funding will also include rigorous academic programming that is aligned to and embedded in work training opportunities and job related experiences that align with given pathways and yield industry-related credentials.

Each program that receives funding under section 243 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 and integrate with the local workforce development system and its functions to carry out the activities of the program.

IELCE programs will be located in communities with significant concentrations of adult English language learners, and will operate in partnership with established programs and other community agencies. Those programs funded for IELCE funds will be required to deliver programs in combination with other integrated education and training activities. Students will receive IELCE instruction at the funded program including literacy and English language acquisition integrated with civics education and instruction in the rights

and responsibilities of citizenship and civic participation. Then, as appropriate, be referred to well-aligned occupational skills training at the partner agency. Upon completion of such training, students will be placed in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. The local One-Stop center is also a key partner in this model as programs will carry out the job placement activities of the program by engaging employers through these centers.

The state's application for section 243 IELCE funds, which will be competed along with the same application for 225 and 231, will require eligible agencies to provide evidence of capacity for IELCE and a detailed plan for how English language acquisition and civics education will be delivered on a concurrent and contextualized basis. For example, agencies will need to demonstrate the ability to work with partners to accomplish the purposes of IELCE in the funding competition, including evidence of established partnership with industry.

The 13 considerations, as specified in section 231(e) of WIOA are integrated into the narrative portion of the application. Eligible agencies must provide narrative detail on how they will meet the considerations, along with a supporting budget. Only those applications that include activities and budgets that meet the statutory requirements will be approved by the state agency.

The application process is uniform to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder's conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

In awarding grants or contracts under Section 243, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;
5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial

learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;
7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;
8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;
10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;
11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;
13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, AN INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM AND HOW THE FUNDS WILL BE USED FOR THE PROGRAM.

In addition to these considerations for funding are the 13 considerations that are common to all AE providers as pertinent to WIOA Title II and described in the state's response to Section (b) above.

Transitioning to the WIOA model of Integrated English Literacy and Civics Education will require funded programs to develop and deliver ELA services concurrently and contextually with workforce preparation activities and workforce training with the goal of placing adults into unsubsidized employment in high demand occupations, ultimately leading to economic self-sufficiency.

Local programs funded for Integrated English Literacy and Civics Education activities will be required to provide the OAE:

1. An implementation plan detailing the IEL/CE WIOA activities.
2. A description of how IEL/CE funds awarded under AEFLA will be allocated.
3. A description of cooperative arrangements the eligible provider has with local one stops and other agencies, institutions, employers or organizations for the delivery of adult education and literacy activities.

In order to support implementation of this newer, integrated model, all providers will have access to system-wide professional development on program design, evaluation and continuous improvement.

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 shall use funds made available under section 222(a)(2) for adult edu¬cation and literacy activities to develop or enhance the adult education system. Not more than 12.5 percent of the grant funds made available will be used to carry out State Leadership activities under section 223. The Rhode Island Department of Education will use these funds to cover RIDE personnel costs and outside consultant salaries to carry out the following required State Leadership activities:

A. Align adult education activities with core and one-stop partners;

Eligible adult education providers will be required to detail, as part of the 2018-2021 RFP and as part of their annual funding renewal application plans, how they collaborate with workforce development programs and how they align adult basic education programming with partners named in the unified state plan. Programs will be required to develop a detailed plan to provide services which will promote concurrent enrollment with Title I and other WIOA core programs and activities in order to meet the state performance targets and collect data to report on performance indicators. RIDE personnel will assist programs in making these connections with the core and one-stop partner programs.

The adult education staff members whose salaries are supported with State Leadership funds also attend a WIOA Interagency Workgroup. This workgroup has been meeting on a monthly basis to discuss further alignment of adult education activities with core and one-stop partners, including the design and implementation of common assessments, intake forms, data sharing agreements, and general work around the statewide implementation of WIOA. This workgroup is made up of the adult education staff, members of the state and local workforce boards, Department of Labor and Training representatives, Department of Human Services representatives (including TANF, the Office of Rehabilitation Services, and SNAP), and Behavioral Health representatives.

Adult Education staff members supported with State Leadership funds also attend the monthly Workforce Alliance meetings. This group is made up of several adult education agency directors as well as outside constituents from several other agencies. This group has been providing feedback on a statewide basis for several WIOA activities including the choice of the One-Stop Operator, the development of the two Local Plans, and a new Working Cities Challenge Grant for the city of Providence through the Federal Reserve Bank of Boston. This grant establishes four One-Stop Community Connection Sites at adult education agencies to be staffed by One-Stop personnel at regular intervals.

B. Establish or operate high quality professional development programs to improve instruction, 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, and dissemination of information about models and promising practices related to such programs.

RIDE has supported a statewide literacy resource center, the RI Adult Education Professional Development Center (the PDC), established to improve instruction at all of the AEFLA-funded agencies in the state. The PDC has developed, in collaboration with RIDE, a statewide system of professional development programs, including a specific focus on reading instruction, contextualized curriculum as a component of a statewide career

pathways system, and the development of literacy volunteer training. The state has also increased its ability to share promising practices and research-based models virtually online.

Professional development programs funded by State Leadership will include the continuation of the implementation of standards based curriculum. This work builds upon seven years of scientifically researched standards-based professional development institutes and trainings (TEAL Writing, ANI, Standards In Action, and 3 cohorts of STAR). The pilot work, begun in 2014-15, has brought the research-based practices of Understanding by Design, Proficiency Based Teaching and Learning, and Quality Assessments to programs who had already been trained in standards based instruction, and combines the workshop activities with a wrap-around professional development design that delineates the intensity and design of how practitioners and their programs enroll in the professional development, communicate virtually throughout, and take part in site-visit coaching to address all of the large and miniscule barriers to implementing research based change in their practice.

A professional development website will be built out to align with the new required activities under WIOA. This will include the Tutor Ready Learning Plans resources which OCTAE has made available for the training of volunteers, as well as references to the local expertise of the Literacy Volunteer agencies that have experience implementing the effective research-based professional development from ProLiteracy. Also available will be the robust online state and national resources for developing career pathways and partnerships with employers, as well as with the nine RI Industry Partners representing and working with identified high wage and high demand industries in the state.

C. Provide technical assistance to adult education providers including:

1. The development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs (ESOL), distance education, and staff training;

As a small state, with limited state level resources, it is important to research and curate instructional and programmatic practices from around the country to identify and disseminate those that are the most rigorous and scientifically researched and validated. Two locally developed initiatives are the implementation of standards-based curriculum project, and the eight-year long Transitions to College and Careers Initiative. These programs have continued to improve outcomes through sharing best practices and research in a strong Professional Learning Community (PLC) that meets every six weeks, and communicates virtually in between.

In addition, State Leadership funds support RIDE's Adult Education staff in facilitating four quarterly Leadership Institutes. Participation is mandatory from each RIDE-funded adult education agency. During these staff training institutes, the state staff provides WIOA sessions to review statutory requirements and to provide technical assistance for the implementation of required activities. The sessions feature panel discussions and presentations by local programs to highlight best and promising practices related to contextualized education, occupational skills training, and other WIOA transition activities.

The sessions also include the most up-to-date information and guidance from OCTAE that is available at the time.

After several years of investing in programs basic technology infrastructure and the technology skill development of staff, the state continues to support programs in the use of technology to increase the amount, quality and effectiveness of learning. This will include investments in professional development for teachers and other key program staff and the establishment of a Google Domain site for Adult Education. The goal of the professional development, which continues to focus on best practices in instructional technology (through the LINCs TIPS program, Tech Camps and coaching) as well as skill development around various tech tools - including Google apps for Education, is to ready programs to transition to the statewide Google Domain in the coming years. The purpose of the Domain is to provide the field an online shared space, to support better communication between and within programs, and to build repositories of best practices and content/reusable learning objects for sharing among staff statewide. Additionally, the PD will focus on having program staff increase their use of Google Classroom to offer blended models, thereby increasing instructional time for students through distance learning opportunities and providing increased access to material covered in the face-to-face classroom.

In addition, there have been three cohorts of adult education program administrators who completed the Leadership Excellence Academy (offered by the National Adult Education Professional Development Consortium), which highlights the use of data and research in continuous program improvement.

2. The role of adult education providers as one-stop partners to provide access to employment, education, training, and postsecondary guidance services;

The adult education staff at RIDE will collaborate with the One-Stop partners to provide technical assistance to local eligible providers to make them aware of their responsibilities to provide access to employment, education and training services with an attempt to avoid duplicating services in order to create a more efficient delivery system. The office will work with the state workforce development boards and one-stop system to determine appropriate training needed across partner organizations. RIDE will host statewide technical assistance workshops for adult education providers to enhance and align partnerships in the delivery of services. The new One-Stop Operator has already been and will continue to be successful in making these important connections and referrals between adult education providers, One-Stop Centers and one-stop partners to increase access to employment opportunities for adult learners.

RIDE provides assistance to an adult education provider in establishing an adult education presence in two of the state's One-Stop Centers. This provider assigns teachers to classrooms within the One-Stops on a regular basis to serve One-Stop clients who need basic academic skills, English as a second language instruction, and digital technology skills. This is a successful arrangement, with many of the clients improving their educational functioning levels and therefore becoming eligible for further training through the One-Stop system

3. Assistance in the use of technology, including for staff training, to adult education providers, especially the use of technology to improve system efficiencies;

The award of Incentive Funds under the Workforce Investment Act was the stimulus to focus technology integration efforts into a Technology Advisory Committee which created a set of recommendations for system improvement and the awarding of small "Breakthrough" grants to support local providers' efforts to upgrade technology and participate in new blended learning and basic digital literacy professional development. Perhaps most importantly, all local providers are required to identify a Technology Point Person who attends quarterly professional development events, and transfers technology information between their program and RIDE. There is now an understanding among providers about integrating technology into instruction and real progress towards utilizing technology to improve not only program and staff performance but also learner outcomes. One local provider, the Rhode Island Family Literacy Initiative, has lead the way in creating and co-locating technology and digital trainings and coaching in two public libraries and at two local one-stop centers. This training includes a digital literacy component leading to North Star Certification for learners and practitioners alike.

State Leadership funds support a RIDE staff member that assists local providers that are now required to integrate digital literacy assessment and training for all learners, as it has become a key employability and life skill and a statewide requirement that all staff be proficient with technology in order to help improve program efficiencies.

The Adult Education staff also provides monthly technical assistance and CALIS Users Group meetings on high quality data collection, data reporting, NRS, and data use for program and class level improvement towards meeting statewide federal targets.

D. Monitor and evaluate the quality of and the improvement of adult education activities and disseminate information about models and proven or promising practices;

RIDE State Leadership funds will be used to support state staff who will continue to monitor and evaluate programs quarterly through a desk audit by collecting data from its web-based database, the Comprehensive Adult Literacy Information System (CALIS). The data which is analyzed includes student demographics, attendance hours, posttest rates, educational functioning level gains, measurable skill gains, employment outcomes, high school credentials, and transitions to postsecondary education or training. Programs that are performing below 80 percent in achieving the federally negotiated outcome measures are targeted for site visits. The state office and local programs design corrective action plans based on findings and recommendations that lead to program improvement (see next section for details on monitoring).

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

At this time, RIDE has many on-going initiatives that it may use these funds to carry out, including a transitions to college initiative, instructional technology, identifying curriculum frameworks and aligning rigorous content standards, improving teacher quality through professional development, and developing services to meet the needs of adult learners with learning disabilities or English language learners.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

RIDE evaluates programs quarterly through a desk audit by collecting data from its web-based database, the Comprehensive Adult Literacy Information System (CALIS). The data which is analyzed includes student demographics, attendance hours, posttest rates, educational functioning level gains, measurable skill gains, employment outcomes, high school credentials, and transitions to postsecondary education or training. RIDE has a data sharing memorandum of agreement with the RI Department of Labor and Training for employment outcomes. RIDE also conducts data matching with the National Student Clearinghouse database for the postsecondary education outcome and with the GED Testing Services database for GED attainment. The RIDE finance office provides the adult education office with a financial analysis of the amount and percentage of funds expended.

The CALIS database has the full array of National Reporting System (NRS) tables for adult education as well as several customized reports that both the state office as well as local program providers can run to check performance at the state level, program level, teacher level, and student level. These reports can determine areas of both strengths and weaknesses. The state office uses an Educational Functioning Level (EFL) Performance Review spreadsheet as a program-level report card that captures the real time EFL data from local providers in relation to the federally negotiated EFL targets. This spreadsheet allows the state office to determine how programs are doing at any moment in meeting and exceeding the state's negotiated core indicator of EFL performance. Results for educational gains and follow-up outcome measures are calculated and then weighted by the number of students in each level, or cohort group, and converted into a final percentage expressing the provider's ability in meeting or exceeding the core indicator targets.

The state has set a minimum of 80% achievement on the EFL Performance Review on the program's final annual performance results. The EFL Performance Review is also checked in the middle of the fiscal year after the first semester posttests have been administered. Programs that fall below 80% receive technical assistance from the state office to ensure quality improvement. The lowest performing programs are targeted for two-day on-site program reviews, which include a review for compliance with federal and state laws and policies, classroom observations, interviews with program staff and students, and a full financial review. Following the site visit, the programs receive a report from the state office that indicates findings, recommendations, and commendations. Programs that receive any findings are required to submit a Corrective Action Plan on their process for correcting the findings. The Corrective Action Plan is tracked by the state office on a regular basis until all findings are addressed and corrected, the quality of the program improves, and the Corrective Action Plan is closed. The state offers high quality professional development opportunities to assist program directors to ensure program quality improvement and data analysis. Quarterly Leadership Institutes (all directors meetings) and monthly CALIS Users Group meetings are both facilitated by the state office.

The office of adult education also supports a statewide literacy resource center, the RI Adult Education Professional Development Center (PDC), established to improve instruction at all of the AEFLA-funded agencies in the state. The PDC has developed, in collaboration with the state office, a statewide system of professional development to support local activities,

including specific focus points on reading instruction, contextualized curriculum as a component of a statewide Career Pathways system, the development of literacy volunteer training, and the increasing ability to virtually share promising practices and research based models. The PDC conducts several Professional Learning Community opportunities for program directors, instructors, and volunteers. Particular attention is given to program quality, proficiency based teaching and learning, transitions to college, learning disabilities, reading strategies and English language teaching strategies.

The PDC uses various evaluation methodologies, both formative and summative, depending on the activity type, to determine the effectiveness of programming. Use of these methodologies also ensures that continuous improvement remains a priority.

Activity Types and Evaluation Methods

Activity Type	Formative Assessment Tools	Summative Assessment Tools	Guskey/ AALPD alignment
Professional Learning Communities (PLC's)	Ongoing feedback through direct questioning throughout activities	Annual Survey to evaluate the past year's curriculum, and to plan for following year's agenda and curriculum	Guskey: 1 & 2 AALPD Standards: 1, 2, 3, 5, 6, 8, 9, 10 (and 11 for the Directors')
One Time Workshops & Annual Conference	Ongoing feedback through direct questioning throughout activities	• PD Center evaluation forms to assess reactions, learning, plans for implementing, and future needs for PD	Guskey: 1, 2, 3 AALPD Standards: 1, 3, 5, 7, 8
Institutes (STAR, LEA*, etc.)	• Ongoing feedback through direct questioning throughout activities • Evaluation after each f2f session	• Minutes from follow-up meetings • Questionnaires • Structured interviews with participants and directors/managers • Participant portfolios • Video or audio tapes	Guskey: 1, 2, 3, 4 (and 5, if participants track the classroom outcomes of students through CALIS) AALPD Standards: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11

Activity Type	Formative Assessment Tools	Summative Assessment Tools	Guskey/ AALPD alignment
Agency-based TA/ PD	• Setting agenda beforehand to identify targeted needs • Direct questioning of participants throughout	• PD Center evaluation forms to assess reactions, learning, plans for implementing, and future needs for PD	Guskey: 1, 2, 3 (and 4 if follow-up sessions occur- implementation can then be identified and assessed) AALPD Standards: 1, 2, 3, 4, 5, 7, 8, 9 (and 6 if follow-up sessions occur)
On-line surveys/ reports: • **Annual Needs Assessment** • **Annual Survey of Deeper Learning by participants** • **Questions on Quarterly Reports to RIDE**	• Using self-assessment tool aligned with Practitioner Standards, agencies develop priorities for PD for the coming year and submit	Guskey: 1, 2, 3, 4 AALPD Standards: 3, 8, 10, 11	

*Student Achievement in Reading, Leadership Excellence Academy

The current plan on resource sharing includes an annual dissemination and continual curation of proven models - primarily through an annual calendar which includes standards based initiatives, trainings on required standardized assessments and contextualized curriculum, New Practitioner Orientations, and professional learning communities among many other offerings.

CERTIFICATIONS

States must provide written and signed certifications that

1. The plan is submitted by the State agency that is eligible to submit the plan. Yes

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

3. The State legally may carry out each provision of the plan. Yes

4. All provisions of the plan are consistent with State law. Yes

5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. Yes

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan. Yes

7. The agency that is submitting the plan has adopted or otherwise formally approved the plan. Yes

8. The plan is the basis for State operation and administration of the program. Yes

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.

Applicant's Organization **Rhode Island Department of Elementary and Secondary Education.**

Full Name of Authorized Representative: **Dr. Ken Wagner**

Title of Authorized Representative: **Commissioner of Education**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

ASSURANCES

The State Plan must include assurances that:

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 supplement and not supplant provisions). Yes

2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. 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

7. 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

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent

with the instructions posted at
https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

In accordance with Section 427 of the US Department of Education's General Provision Act (GEPA), The Rhode island Department of Education (RIDE) ensures equal access and participation to all persons regardless of their race, color, ethnicity, religion, national origin, gender, age, citizenship status, or disability to the programs and services offered.

For state-level adult education activities as well as all other activities supported by federal assistance, the Rhode Island Department of Education will fully enforce all federal and state laws and regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation. RIDE will take all steps necessary, whether by required notices, complaint procedures, appointment of liaisons, outreach activities, pursuit of conforming state legislation, or otherwise, to achieve these goals.

RIDE will take all necessary steps to ensure equitable access to, and equitable participation in, adult education programs. Steps to eliminate these barriers include, but are not limited to:

§ Inclusion in all Requests for Proposals and subsequent funding applications of provisions to remove barriers to full participation. Specifically, applicants must address how the adult education program addresses barriers to participation through recruitment and service provision via a signed attestation;

§ Provision of professional development opportunities so that barriers to full participation of teachers are removed;

§ Collaborative planning and service provision at both the state and local levels with other agencies that serve the same client. For example, collaborative planning at the state and local levels with workforce development entities helps remove barriers to participation of economically disadvantaged adults, single parents who are usually female heads of households, and older adults;

§ Support of specific activities to increase access for limited English proficient adults to participation in adult education and family literacy activities.

§ Encouraging, through the application process, practical techniques for recruitment of limited English proficient adults, including bilingual advertising and outreach through other agencies that serve the same client. Such practical techniques can also serve to reduce barriers for older adults and for adults with disabilities;

§ Continued encouragement of collaboration between adult education programs and Family Literacy programs to reduce barriers to access for economically disadvantaged parents.

§ Supporting professional development and technical assistance, through State Leadership Activities, in working with learning disabled adults in the adult education classroom.

Special education services shall be provided to eligible students in accordance with all applicable federal law and regulations, state statutes, rules of the State Board of Education and commissioner of education, and the State Plan under Part B of the Individuals with Disabilities Education Act (IDEA).;

§ Coordination with other federal programs as applicable; For example, continued collaboration with the state Office of Rehabilitative Services to coordinate service delivery to learning disabled adults;

§ Development of professional development capacity in regard to transition skills, specifically skills needed in the workplace and post-secondary education;

§ All workshops and conferences sponsored by RIDE are located in accessible facilities; and;

§ All RIDE-funded local provider signs assurances regarding equitable access to and participation in federally assisted programs as part of its overall assurances.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

_____

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The Office of Rehabilitation Services held their State Plan Public Hearing on March 8, 2018. There were two parts to this Public Hearing. The first part focused on the Comprehensive Needs Assessment. The second part focused on the changes of how ORS would be determining what priority category an applicant would be placed in. To be determined Priority 1, a consumer would be one who has the most significant disability that limits four or more functional capacities; for Priority 2, a consumer would be one who has the most significant disability that limits two to three functional capacities; and for Priority 1, consumer would have most significant disability that limits one functional capacity. The following comments were received from the State Rehabilitation Council on March 29, 2018.

On behalf of the State Rehabilitation Council (SRC), we offer the following comments regarding the 2018 Two-Year Modifications for the Vocational Rehabilitation Services Portion of the WIOA Unified or Combined State Plan.

The SRC acknowledges and commends ORS' efforts to respond to a rapidly changing landscape created by changes to the Rehabilitation Act as amended by the Workforce

Investment and Opportunity Act (WIOA), as well as by the continued implementation of the Department of Justice consent decree.

From the Council's perspective, these two-year updates are mainly clerical tasks since the update is primarily incorporating the data from the 2017 CNA into the existing State Plan document. Since the State Plan, Policy and Quality Assurance committee has had considerable input into both the State Plan and the CNA, we have few comments on the updates.

Specifically, the SRC comments will focus on six areas of the State Plan, including coordination with the State Department of Education, the Comprehensive System of Personnel Development, coordination with employers, and the Order of Selection, the PRE-ETS services and the relationship to the Consent Decree.

1. V-VR(d) Coordination with Educational Officials

SRC Comment: The Cooperative Agreement (CA) between ORS and RIDE provides the foundation for ORS Counselors' presence within each public high school in the state. Under the CA, ORS assists in-school youth with disabilities in collaboration with each Local Education Authority (LEA). The transition and Pre-Employment Services prepare students for employment after high school and fall under the regulations as outlined in the 2014 version of WIOA. However, more recent State fiscal concerns and budgetary matters has required ORS to implement a more stringent Order of Selection (OOS), as of 12/19/2017, resulting in a Waitlist for services. As of the date of this letter, approximately 400 individuals with disabilities are on this waitlist, 27 of whom are covered by the Consent Decree. The implementation of the Waitlist has impacted Pre-ETS service delivery. Counselors will meet with potentially eligible students with disabilities to give them information regarding their choice of options.

The SRC encourages the Office of Rehabilitation Services to remain committed to assisting all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. The ORS Transition and Pre-Employment Transition Services Program requires that all students who are found eligible in Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility after coming off the Wait List, and updated as appropriate, and again prior to graduation. The SRC is supportive of this requirement and encourages ORS to continue the success of this program by maintaining the development of the IPE within the 90-day timeframe. Additionally, the SRC encourages and supports ORS' continued commitment to dedicate the required 15% of funding to this program.

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the three state institutions of higher education: Community College of Rhode Island (CCRI), Rhode Island College (RIC), and the University of Rhode Island (URI). This agreement clarifies the role of each partner in fostering a seamless delivery system intended to support ORS' customers attending post-secondary programs. It also defines the financial parameters for each partner by a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS. The SRC is supportive of these Agreements and encourages ORS to continue these relationships to provide education and

training opportunities for students in transition, along with individuals who may be qualified for educational funding based on their IPE.

Additionally, the SRC supports ORS's work with RIDE and the local school systems. In spite of cuts in funding, we encourage ORS to continue to provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities, including VR services. Also, the SRC supports continued transition planning by personnel of the designated State agency and educational agency through the following activities: 1) continuing to facilitate the development and implementation of students' individualized education programs; 2) continuing to define 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 finally, 3) by continuing to adhere to procedures for outreach to and identification of students with disabilities who need transition services.

2. VI-VR (i) Comprehensive System of Personnel Development; Data System on Personnel & Personnel Development

Personnel Development

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI. These two programs are the primary educators to provide qualified MA level rehabilitation counselors for ORS. The SRC would support ORS developing a similar relationship with other nationally accredited higher education programs at local colleges that could prepare MA-level counselors for employment with ORS. However, as of the date of this letter, no state-funded programs exist in RI.

Additionally, the SRC recommends that ORS to continue to participate on Advisory Boards for both programs and to support and require that all state VR counselors get and maintain the national Certified Rehabilitation Counselor designation. The designation of Certified Rehabilitation Counselor (CRC) is an indication of an advanced level of specialized education and training, an adherence to rigorous standards of ethical practice, and an ongoing commitment to lifelong learning through continuing education credits. Rehabilitation counselors who have earned the CRC designation possess a marketable and valued credential that distinguishes them from other counseling professionals. The CRC certification also establishes a recognizable point of differentiation with employers and clients that promotes consumer confidence and protection in the workplace.

The Council strongly encourages ORS to continue to provide professional development training to its counselors. Counselors have identified specific areas in which they would like to update and expand their knowledge and counseling skills. These topics included Supported Employment, physical disabilities and employment, understanding ethics and Vocational Rehabilitation and Pre-ETS. The Council sees these professional training experiences as important opportunities to improve the quality of services to individuals with disabilities, and to continue to support and develop the competencies of ORS's counselors.

3. VI-VR(i)(6) Coordination of Personnel Development under the Individuals with Disabilities Education Act

The SRC supports the ongoing collaboration between the VR Administrator and/or Assistant Administrator for Transition facilitates with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. This collaboration is critical for both agencies to regularly share information about current and changing trends, regulations, and practices.

The Council is encouraged that ORS continues to work toward providing training, 21st century learning, and outreach for individuals who have hearing and/or visual impairments. However, the SRC is concerned that the recent loss of funding will have an adverse impact on the ability of ORS to serve the more severely disabled since the resources for providing assistive technology may not be available due to federal budget cuts.

4. Vi-VR(g) Coordination with Employers

ORS continues to partner with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS has identified two businesses, CVS and Alex and Ani, with whom to partner. The programs that have been developed prepare job candidates for the skills specifically required by the employer, and results in successful job matches. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but is also producing a qualified and specifically trained pool of candidates for two nationally and internationally known businesses located in Rhode Island.

The SRC recommends that ORS include the number of individuals that have participated in these training opportunities and the number of individuals who have obtained employment from these partnerships be included in the State Plan data.

Additionally, the Workforce Development Supervisor has developed more than 30 partnerships with a range of companies in Rhode Island. Job openings from these partners are shared with the 45 counselors who pass this information to appropriate job seekers who are ready to work and are potential candidates for the position. Once a qualifed job seeker has applied for a position, and after a confidential release has been obtained, ORS contacts the employer to further develop the opportunity on behalf of the job seeker, including the offer of assistance in job modification, technology support and/or on the job training supports. The Council feels the Workforce Development Supervisor's position is a key component of ORS' ability to outreach to employers, and to assist customers with finding and keeping employment. The Council is determined that this position must be filled, despite recent retirements and hiring freezes in the State workforce, and will provide advocacy and support to ensure this happens.

Marketing Outreach Strategy

Over the next year, ORS will enlist its state partners and the SRC to develop a marketing plan that targets specific business sectors. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is essential as the State implements the Comprehensive System Change Plan (CSIP).

The SRC is encouraged by ORS's plan to develop a marketing strategy with its partners. The Council would like to work more closely with the Governor's Workforce Investment Board (WIB) by recruiting a new member from the WIB to sit on the Council. This position has

been vacant for over a year and needs to be filled. This position is strategic in that the SRC wants to have greater input from employers and the DLT regarding the needs of employers in the State. The SRC supports ORS developing more innovate programing so that this collaboration will increase outreach to minority employers and to employers who have unmet labor needs that could be met through hiring people with disabilities.

Pre-Employment Transition Services (Pre-ETS)

As a component of the Pre-ETS program, ORS collaborates with partners developed several Project Search programs within the health care industry and funded summer work experiences for youth since 2010. Also, ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment, which are programs for work experiences for potentially eligible students with disabilities. These work experiences are in integrated community-based work settings at minimum wage or above. The Council strongly recommends including the numbers of individuals who received these services and the number that led to employment for the students in the State Plan data.

5. VI-VR(m) Order of Selection

In the past, ORS was able to serve all eligible individuals. However, the need for services has grown along with the need to have better employment outcomes for eligible customers. This has resulted in ORS implementing an Order of Selection (OOS) and placing individuals on a wait list. The SRC has discussed many concerns with ORS regarding the implementation of the OOS including 1) how frequently customers will be notified regarding their Wait-List status; 2) will PRE-ETS services and transition services be impacted by the OOS and will the 15% obligation of funds for PRE-ETS be met; 3) will customers be directed to other options such as DLT, and whether these referrals will result in employment; and 4) how will the change in the number of supports needed to qualify for services impact the eligibility of customers for needed services.

The SRC is looking forward to working closely with ORS regarding the OOS per regulation 34 CFR 361.36. The Council will work to assist ORS in ensuring that re-evaluations of priority categories will take place and that the criteria used to determine who is eligible for services on the OOS will be disseminated clearly to customers and administered with transparency.

The SRC strongly urges ORS to develop and implement a viable method for providing customers with status updates that is more automated, real-time based, and maintains regular contact with customers who need the services. Additionally, the SRC encourages ORS to maintain the commitment to 15% of funding being applied to PRE-ETS programming per the requirements outlined in WIOA. Finally, the SRC urges ORS to collect data regarding the number of clients referred to DLT and the employment outcomes of these referrals, along with data tracking the number of customers who were deemed not eligible for services based on not meeting the criteria of three or more services needed.

The State Rehabilitation Council appreciates the opportunity to provide comments and feedback to the 2018 Two-Year Modifications for the Vocational Rehabilitation Services Portion of the WIOA Unified or Combined State Plan.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

ORS Response to Council's Input on State Plan Update: ORS wants to thank the Rhode Island State Rehabilitation Council for having members attend the State Plan Public Hearing on March 8, 2018, for reviewing the 2018 Two-Year Vocational Rehabilitation Services portion of the WIOA Combined State Plan Update, and for providing comments and formatting/grammatical edits to the descriptions. ORS has incorporated the formatting/grammatical edits as noted in the respective descriptions. ORS responses to those comments are listed below in the ORS response.

1. VI-VR(d) Coordination with Educational Officials

ORS concurs with the SRC that provision of services to transition-age youth who meet eligibility is important and will continue to serve those currently receiving services. Additionally, students who apply and are determined eligible for individualized VR services, but placed in a closed priority group, may continue to receive Pre-Employment Transition Services (Pre-ETS) as long as those activities were started prior to being placed in a closed category. Of the 473 individuals on the wait list, 154 are identified as transition-age youth, of which 88 are receiving Pre-ETS services. There are 286 additional transition-age youth who are identified as Pre-ETS in services and who are reportable under WIOA, of which 120 have authorized services. When ORS is financially able to move individuals off the wait list, the Individualized Plan for Employment will be developed within 90 days.

2. VI-VR(i) Comprehensive System of Personnel Development

ORS continues to value the benefits of having interns seeking their MA in Rehabilitation Services and will continue to reach out to institutions that provide MA in Rehabilitation Counseling.

ORS continues to require that all Vocational Rehabilitation Counselors (VRC) have an MA in Rehabilitation Counseling. While a Certified Rehabilitation Counselor certification (CRC) has never been a requirement of staff working for ORS, we do encourage and support staff in obtaining their CRC. Presently ORS has 32 VRC, Supervisors, and Administrators who are CRC certified. The Qualified Rehabilitation Counselor approval through the DLT Workers Compensation Unit enables an individual to accept cases from the DLT Workers Compensation Unit. ORS staff who choose to maintain the QRC, and accept cases from the DLT Workers Compensation Unit, do so independently of ORS.

ORS concurs with the SRC that continued staff development is important. To that end ORS continues to seek out training opportunities that meet the ongoing professional growth of agency staff, agency professional developmental needs, and the mission of the agency.

3. VI-VR(i)(6) Coordination of Personnel Development under the Individual with Disabilities Act

ORS appreciates the support and feedback from the SRC related to the agencies Transition services, which includes Pre-Employment Transition Services. SRC concerns related to budget cuts and ability to serve individuals with hearing and/or visual impairments, as well as all individuals with disabilities who are eligible for VR services, is shared by ORS.

4. VI-VR(g) Coordination with Employers

ORS concurs with the recommendation of including in description (g) Coordination with Employers, the numbers of individual who received services through the business partnerships ORS has developed with RI businesses. One of the business partnerships is in the initial phase of accepting referrals, so data is not available now. The other RI business has accepted 17 individuals, of which 9 completed the on-site training, with 8 becoming and maintaining competitive integrated employment.

ORS concurs that the duties of the Workforce Development Supervisor are important to our continued work as a WIOA partner; therefore, effective 2/4/18 ORS incorporated those duties with the Community Rehabilitation Program Supervisor duties. ORS sees this alignment as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts.

Marketing Outreach Strategies

ORS appreciates SRC interest and support of further developing marketing strategies to reach minority employers. ORS will keep SRC apprised of further developments in this area with Governor's Workforce Board and workforce partners. SRC recruitment of a Workforce Investment Board member to sit on the SRC is by ORS.

Pre-Employment Transition Services (Pre-ETS)

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Curren ORS census has 1,262 identified Pre-ETS individuals.

5. VI-VR(m) Order of Selection

ORS and the SRC continue to have discussions regarding the OOS changes, impact on individuals with disabilities seeking VR services, and the implementation and monitoring process. With the goal of ensuring transparency to individuals with disabilities seeking VR services and the Community Rehabilitation Programs, the SRC feedback, guidance, and support throughout the process has been appreciated by ORS.

ORS appreciates the feedback and guidance received from the SRC regarding the two-year state plan update.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Explanations, if applicable, are listed in ORS response section.

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

N/A

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

N/A

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

N/A

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS collaborates with include: hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, state agencies, federal agencies, private businesses, and advocacy groups.

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) expired in September 2015, but both agencies have agreed to an extension of the CA through 2018, as allowed by the original agreement. A new MOU for 2019 and beyond is in the process of development.

In order to enhance the recruitment of qualified rehabilitation counselors, ORS has a Memorandum of Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate level Rehabilitation Counseling students.

ORS has cultivated a strong working relationship with independent living centers to augment the services provided by ORS. RI has one IL center that provides support services, transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school and in-school youth.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance.

ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP's strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential.

ATAP, in conjunction with the ATAP Partners and State Independent Living Center (OSCIL), provides training to ORS Vocational Rehabilitation Counselors about assistive technology and the services of the program. The ATAP Partners also participate in the Assistive Technology Conference of New England, which is held each Fall.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

ORS does not have such cooperative agreements at this time.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

ORS has cultivated a strong working relationship with the one RI independent living center to augment vocational rehabilitation services. The IL center has the ability to provide support services, transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. The IL center is exploring how to expand services to transition-aged populations: out-of-school and in-school youth. ORS participates with the DLT Youth Centers in their reviewing requests for proposals for Youth Center Summer Work programs. In addition, the Office of Rehabilitation Services and one of the Youth Centers, has a project of jointly working with the youth in the South County area. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS is a participant.

5. STATE USE CONTRACTING PROGRAMS.

The Vocational Rehabilitation program relies primarily on a fee-for-service model to purchase/obtain goods and services for clients. Goods and services are authorized according to the client's Individualized Plan for Employment (IPE).

Vendors authorized to provide services are approved by ORS via an application process and review by RI Accounts and Control, plus a federal SAM check at application and annually thereafter.

RI had four contracts that expired 6/30/16 with educational collaboratives to provide an array of transition services to in-school and out-of-school youth. These contracts were established to assist these programs that formally had long-term contracts with ORS to provide only vocational evaluations, and to build their capacity to provide more comprehensive services such as assessment, community-based work experiences, and summer work to youth. The educational collaboratives are now reliant on a fee-for-service model, as are all other ORS Community Rehabilitation Programs (CRPs).

In addition, ORS is the lead and implementing agency for the Assistive Technology Access Partnership (ATAP) program. The program is structured into contracts with deliverables, such as information and assistance, public awareness, device loans, device demonstrations, and device reutilizations.

The VR program also has a contract with the Sherlock Center of Rhode Island College to build Rhode Island's capacity of Certified Benefits Counselors for individuals receiving SSI and/or SSDI.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

ORS has several formal agreements with Education Officials: (1) RI Department of Education (RIDE), and (2) RI Institutions of Higher Education.

I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)

- INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. This CA between ORS and RIDE expired September, 2015, but both agencies have agreed to an extension of the CA through 2018, as allowed by the original agreement. An updated MOU is in development. The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over 16 years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation

Counselor at each high school to provide an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services in addition to the new WIOA Pre-Employment Transition Services.

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

The CA between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation Counselors' presence within each public high school in the state.

The referral to ORS from the LEA, with parental consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-Employment Transition Services (Pre-ETS). Under the auspices of the Cooperative Agreement, ORS is able to assist in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services and Pre-Employment Services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to prepare students for employment after high school. However, due to State fiscal concerns and budgetary matters, ORS has had to implement a more restrictive OOS, as of 12/19/2017; and as a result, a Wait List for services has been implemented. This has impacted Pre-ETS service delivery. Counselors will meet with potentially eligible students with disabilities to give them informed choice options. Still, the Office of Rehabilitation Services strives and is committed to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-Employment Transition Services Program is an expectation that all students who are found eligible Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility (Status 10) after coming off the Wait List, and updated as appropriate, and again prior to graduation.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for in-school youth is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Vocational Evaluations/Exploration and Assessments,

Community-Based Work Experiences, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of trial work experiences prior to work. Therefore, ORS services incorporate a review of the Career Development Plan with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the team and the ORS Counselor in achieving the 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

The student and his/her family's involvement with ORS will provide a seamless transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

II. COOPERATIVE AGREEMENT (CA) WITH INSTITUTIONS OF HIGHER EDUCATION

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the three state institutions of higher education: Community College of Rhode Island (CCRI), Rhode Island College (RIC), and the University of Rhode Island (URI). The MOU clarifies the role of each partner in fostering a seamless delivery system intended to support ORS customers attending post-secondary programs. It also defines the financial parameters for each partner in a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

RIDE has contracts with the Regional Educational Collaboratives to support transition, planning, and information about adult services within each high school. So each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Educational Collaboratives and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS (including information about potential Wait List).

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region's Transition Advisory Committee (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Wait List, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Waitlist, and accept referrals.

The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Vocational Evaluations and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training. The results of these interventions are shared with the student, families, and school personnel so that planning and academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience 120 days of trial work experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD

AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees 36 different state Local Education Authority (LEA) responsibilities for oversight over IDEA transition requirements, and transition activities. RIDE conducts periodic monitoring visits with each LEA. ORS counselors may sign up to be part of the RIDE school support visits.

Rhode Island Department of Education (RIDE) and ORS, in collaboration with Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), utilize and follow the Transition Timeline, which spells out each agency's roles and responsibilities (and at what age) for all transition-age youth and students with disabilities. It also lays out processes and services to be available at each juncture in transition. The Cooperative Agreement between ORS and RIDE does not entail any financial interchange or responsibilities. ORS is the lead agency in this CA.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The LEA identifies students with disabilities who may be eligible for transition services with ORS, and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection/Wait List, and provide informed choice options, including whether to apply for services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility Category I.

At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts & Control, and the federal SAMs web-site prior to approval by ORS. CRPs/vendors requesting approval to provide services on fee-for-service basis will be evaluated based on ORS's need for that

service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, labor market, and/or client feedback. Based on these findings, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

- CRP staff must meet certain credentialing criteria to provide Job Coaching & Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to in-school youth and obligates ORS to set aside 50% of SE grant for youth with significant disabilities age 14-24. ORS will be exploring how to integrate these SE services into the existing transition service delivery system.

In FFY2017, ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences. ORS sponsors and provides ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, and core values has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that sustain employment for individuals with significant disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP accepting responsibility to provide long term and intermittent support services to the individual with a disability. This shift in service delivery

responsibility is well coordinated by the ORS counselor and CRP/long-term support provider so that there will be seamless access to the supports needed to sustain employment.

The time frame for transitioning an individual from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. Although RSA has established SE caps of 24 months for adults and 48 months for youth with disabilities, ORS will be working with CRPs who provide Supported Employment Services to improve the quality and availability of employment-related services.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. A new service delivery model and fee structure was designed and implemented on 4/1/2013 and will be modified in FFY2017.

The State of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The CD obligates ORS to (1) provide in-school youth with I/DD a 120-day Trial Work Experience prior to leaving high school, (2) CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and (3) establishment of a Continuous Quality Improvement review of each agency providing SE services.

Considerable CRP development will be necessary to meet the needs of all ORS adult and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as Ticket to Work.

G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer clients paid, community-based, integrated work experiences consistent with client interests. This service provides a unique opportunity for ORS to assess an individuals' work skills and behaviors within a business environment. The employer provides feedback to the agency and the client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities.

In addition, ORS partners with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS has identified two businesses, CVS and Alex and Ani, to partner with. The trainings, almost a boot camp model, provides two weeks of classroom work, followed by a third half week classroom and half week in employment setting, and nine weeks of paid work-based training within the actual business facilities. This prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but it is also producing a qualified and specifically-trained pool of candidates for two nationally and internationally known businesses located in Rhode Island. One of the business partnerships is in the initial stage of accepting referrals, so no data is available at this time. The other RI business has accepted 17 individuals, of which 9 completed the on-site training with 8 becoming and maintaining competitive integrated employment.

The Workforce Development Supervisor has developed more than 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts the employer and job develops on the qualified job seeker's behalf. Upon the retirement of the Workforce Development Supervisor, ORS incorporated the duties with those of the Community Rehabilitation Program Supervisor. ORS sees this alignment as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts.

COMPREHENSIVE NEEDS ASSESSMENT:

ORS conducted a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2016. This CNA incorporated a component related to the needs of the business community in order to create a foundation for developing new and innovative training and services specific to those needs.

MARKETING/OUTREACH STRATEGY:

Over the next year, ORS will enlist its state partners and the SRC to develop a marketing plan that targets specific business sectors. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education

(RIDE), and Rhode Island Department of Labor and Training (DLT) will be critical as the state moves to implement the Comprehensive System Change Plan (CSIP).

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The State emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search - 2014, was a success, and the program was replicated with Blue Cross in 2015, and an additional site in 2016 at Newport Hospital.

In addition, ORS funds summer work experiences for youth since 2010. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community-based work settings at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,262 identified Pre-ETS individuals.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

ORS has a working relationship with each of the entities referenced in this attachment.

THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT:

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services (DHS). However, the complexities of increased income on other benefits such as the Developmental Disability agency's service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive a complete Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Law Center, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities.

ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities.

ORS sponsors and participates in the Developmental Disabilities Supported Employment Advisory Council and Mental Health Supported Employment Council, for Developmental Disabilities, and has a representative on the Developmental Disabilities Council.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP. A Performance Based Supported Employment pilot began in 2017 and will end in mid-2018, and outcomes will be assessed. The objective of the SE services is in integrated competitive employment as an outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support.

The State of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services in order to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-

delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH).

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, RSA has established time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

4. THE STATE AGENCY RESPONSIBLE FOR OPERATION OF ONE STOP CENTERS:

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKri One-Stop Centers. ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI.

ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. ORS will provide One Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One Stop Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence/Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend, and also participate in annual Request for Proposal reviews.

RI has two Workforce Investment Boards (WIBs). Recently ORS became an active participant in the Disability Committee required by WIOA - both WIBs agreed to combine their Disability Sector Committee into one state-wide entity in order to maximize resource involvement.

Recent budgetary issues have resulted in ORS implementing a change in Order of Selection to a stricter eligibility standard as of December 19, 2017. This will result in increased collaboration and interaction with One-Stop Centers and DLT programming.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

ORS has sought to recruit and retain qualified staff for all positions within the agency. Such incentives as assistance with CRC maintenance credits and ongoing professional training and support are intended to retain the staff. In addition, ORS has cultivated a relationship with local colleges and universities for Rehabilitation Counselor internship opportunities.

QUALIFIED PERSONNEL NEEDS:

In FFY 2017, ORS provided services to approximately 3,985 individuals, with an average caseload of 92. ORS has a total of 94 full-time equivalent (FTE) positions, which includes 44 MA level Vocational Rehabilitation Counselor positions. When approved ORS has continued

to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All new counselors have Master's Degrees in Vocational Rehabilitation Counseling. During FFY 2017, 6 ORS staff retired or left the agency. Promotions resulted in vacancies in the following positions: VR Counselor I, VR Counselor II, Rehabilitation Counselor position, Human Services Business Officer, and Food Service Administrator. Already in FFY 2018, due to retirements and a promotion, the following positions are currently vacant: two Assistant Administrator positions, one VR Supervisor position, one VR Counselor I position, and one Senior Casework Supervisor. Over the next 3- to 5-year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

Vocational Rehabilitation Counselor I - 29

Vocational Rehabilitation Counselor II - 14

Supervisory - 11

Administrative - 7

Fiscal - 6

Case Aide - 3

Support Staff - 11

Social Services - 6

Direct Services - 4

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Vocational Rehabilitation Counselor I - 1

Vocational Rehabilitation Counselor II - 1

Supervisory - 2

Administrative - 2

Fiscal - 0

Case Aide - 0

Support Staff - 0

Social Services - 1

Direct Services - 0

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Vocational Rehabilitation Counselor I - 3

Vocational Rehabilitation Counselor II - 3

Supervisory - 2

Administrative - 1

Fiscal - 4

Case Aide - 1

Support Staff - 2

Social Services - 1

Direct Services - 1

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

As of 1/2018, there are 138 students enrolled in the graduate programs (83 at Assumption College and 55 at Salve Regina University) to obtain their MA in Rehabilitation Counseling..

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Assumption College - 32 Graduates from previous year with a MA in Rehabilitation Counseling

Salve Regina University - 16 Graduates from previous year with a MA in Rehabilitation Counseling

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

ORS has ongoing communication with Assumption College and Salve Regina University to ensure that the present and projected needs of ORS are considered in the program planning. Both offer a MA in Rehabilitation Counseling via a combination of on-campus and distance learning.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

1. ADEQUATELY PREPARED AND TRAINED STAFF

Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. The Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's Degree in Rehabilitation Counseling.

All new Vocational Rehabilitation Counselors are required to meet the standard of a Master's Degree in Rehabilitation Counseling from an accredited program.

ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a Master's Degree in Rehabilitation Counseling, and expects to be able to continue to meet this standard.

Through the practicum/internships, involvement on Advisory Boards, and speaking with students in MA Rehabilitation Counseling programs, ORS has worked aggressively with the institutions of higher education to recruit qualified individuals to fill vacancies.

ORS will continue to fill all fiscal and support staff vacancies with individuals who meet state requirements for education and experience.

ORS will continue to seek Commission on Rehabilitation Counselor (CRC) Certification Approval for training provided by ORS. Currently ORS has 32 VR Counselors, Supervisors, and Administrators who are CRC certified.

2. ANNUAL PERSONNEL NEEDS ASSESSMENTS

The 2017 Comprehensive Needs Assessment indicated the following training needs: Workforce Innovation and Opportunity Act, Effective Time Management, and Motivational Interviewing.

The Training Coordinator of ORS elicited information from staff, to establish a list of training topics and concerns.

Top areas of training needs self-reported by VR Counselors, Supervisors and Administrators included: Supported Employment Training for VR Counselors and VR Vendors, Policy and

Procedure updates, Physical Disabilities and relationship to employment, Ethics and Vocational Rehabilitation, Order of Selection and Eligibility Determination, Workforce Innovation and Opportunity Act in the area of data collection/electronic case management system, Pre-ETS, Supported Employment, etc.

Training will also incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA.

Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc.

A training schedule is developed based upon the identified needs and will be implemented throughout the year. This year, ORS anticipates a focus on Order of Selection and Eligibility Determination and the Workforce Innovation and Opportunity Act.

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.

Training opportunities are provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices, and assistive technology.

Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Master's level in Rehabilitation Counseling. All field VR Supervisors and Administrators meet the CSPD standard.

ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan.

ORS is structuring mentoring activities around specific specialization areas in anticipation of future retirements.

All existing fiscal and support staff meet or exceed state requirements for education and experience

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of areas

identified for training included: Motivational Interviewing, Substance Abuse, Ethics in Rehabilitation Counseling, disability specific training, Cultural Diversity, Supported Employment, Ticket to Work, Relationship Building with the Business Community, Social Security Reimbursements, Employment Networks Partnership Plus, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors.

In order to retain qualified staff and in anticipation of additional staff retirement, ORS has and will continue to offer leadership development training, succession planning, and capacity building opportunities to interested staff.

Management staff continues to include interested personnel in activities such as: assistive technology, transition, training, Community Rehabilitation Program (CRP) development, quality assurance, and strategic planning as a means of expanding agency knowledge base about these content areas.

Eight of the forty-three ORS Vocational Rehabilitation Counselors have been on the job for less than 5 years; thus necessitating the training on vocational rehabilitation assessment, guidance and counseling, best practices, and ORS policies and procedures.

ORS believes that the next three- to four-year period is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements.

ORS sponsored 21 staff to attend the Annual Assistive Technology Conference in order to learn about new AT devices and services that are available. The 2017 conference had forty-four vendors available to provide information, as well as multiple presentations held over 2 days.

ORS has developed an Employment CADRE to function as Business Ambassadors, agency marketers, advocates, and educators to the business community. The Employment CADRE members also provided employment and labor information back to their regions at monthly regional meetings.

ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.

The Training Coordinator elicits input from counselors, supervisors, support staff, and administrators regarding their training needs.

If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS policy & procedures, and union regulations.

ORS will explore feasibility of working with Human Resources on how to develop a more formalized mechanism to document supervisory feedback and professional growth goals of staff.

ORS will enlist the Employment CADRE to assist with enhancing staff competencies in addressing the needs of business community.

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

ORS will utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC/Workforce Innovation Technical Assistance Center (WINTAC) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocation Rehabilitation services.

ORS has enlisted the Workforce Innovation Technical Assistance Center (WINTAC) to assist ORS in addressing the following WIOA requirements: (1) Establish performance measure data collection; (2) Establish relationship with DLT; and (3) Establish relationship with Business Community.

Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. ORS has two Video Relay stations to enable communication in ASL between staff who are Deaf or Hard of Hearing, their colleagues, and customers. ORS utilizes a UBI Duo in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.

The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies.

The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and whom serve as a resource for staff development and training in addition to their direct service responsibilities.

The Deaf and Hard of Hearing Region at ORS has developed and produced an ASL video that explains ORS services and is available on the ORS website.

Access to ORS information and services is provided through the use of the Language Line - The Big Word, interpreters from a variety of resources, and bilingual staff.

ORS brochures are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration, and service delivery planning between the VR Counselors assigned to the LEA, teachers, and special education staff.

ORS has about 30 Vocational Rehabilitation Counselors who have Transition responsibilities for providing services to in-school youth with disabilities, technical assistance to school personnel, and outreach to families.

On a monthly basis, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. At least annually, RIDE is invited to provide information about current and changing trends, regulations, and practices.

STATE REHABILITATION COUNCIL

Pursuant to the Act, ORS offers to the State Rehabilitation Council (SRC) the opportunity to review and comment on the CSPD. Additionally, members of the State Plan, Quality Assurance Policy Committee met with ORS representatives to provide input into the CPSD.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

RESULTS OF COMPREHENSIVE STATEWIDE ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES AND NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, minorities with significant disabilities, underserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs (CRPs). ORS views the CNA as a dynamic and evolving process that incorporates information from several diverse sources rather than from any one event or data source.

ORS and the State Rehabilitation Council (SRC) will be initiating a CNA in FFY 2016/17 for the 2018 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

- With the most significant disabilities, including their need for supported employment services;
- Who are minorities;
- Who have been unserved or underserved by the VR program;
- Who have been served through other components of the statewide workforce development system; and
- Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

During FFY 2016/17, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

- Community Comprehensive Needs Assessment Survey
- Customer Satisfaction Survey
- Environmental Scan of Data including: Comprehensive System Improvement Plan, Department of Labor & Training data, Bureau of Labor Statistics, Disability employment statistics, US Department of Labor Bureau, US Census Bureau, RI Department of Education and the Office of Disability Employment Policy
- Rhode Island Governor's Commission on Disability Public Forums
- Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
- Focus group with key staff informants

The 2017 survey conducted by ORS and the SRC was sent to 492 individuals, which included CRPs, employers, ORS staff and ORS consumers. 155 individuals completed the survey which represents a 31.5% return rate based on the 492. A broader range of the community, along with more individuals, received and answered the surveys, thus providing ORS with more information on the needs of individuals with disabilities.

The CRP survey yielded the following:

- When obtaining employment, social skills, fear of losing Social Security benefits, expectations from family and transportation are the most common challenges faced by individuals with disabilities.
- When maintaining employment, social skills, personal/home life barriers, transportation, expectations from family, fear of losing Social Security benefits and personal expectations are the most common challenges faced by individuals with disabilities.
- When obtaining employment for individuals, job availability, job matching, CRP time & resources, availability of retention & supports, insufficient job search preparation and availability of job development are the most frequent challenges faced by CRP's.

- When maintaining employment for individuals, job matching, CRP time & resources, insufficient job search preparation and availability of job retention & supports are the most frequent challenges faced by CRP's.
- Benefits counseling, long-term supports, case management, job coaching, work trial/internships/situational assessments and on-site job retention support are the most frequent challenges faced by CRP's.
- 58% of CRP respondents hold the credentials to provide supported employment services.

The Employer survey yielded the following:

- Giving individuals a fair chance and helping out the community was the primary motivation in employing people with disabilities.
- Communication and the ability to effectively provide accommodations were the largest challenges faced when hiring a person with a disability.
- Accommodations, reliability, performing the necessary job duties and adaptability were the largest concerns in hiring people with disabilities.
- Joy, helping, watching employee growth and gaining valuable employees were the largest rewards in hiring individuals with disabilities.

Respondents identified the following disabilities as least served by ORS:

- Substance Abuse Related Disorders
- Intellectual Developmental Disability
- Behavioral Health

Respondents identified the following ethnic populations as least served by ORS:

- American Indian/Alaska Native
- Pacific Islander/Native Hawaiian
- Asian

Employers and consumers indicated that ORS could:

- Promote awareness of ORS
- Incorporate job postings on the ORS website that matches individuals to well-suited jobs.

CUSTOMER SATISFACTION SURVEY

ORS maintained utilization of the Customer Satisfaction Surveys designed in 2012 with input from the SRC State Plan, Policy and Quality Assurance sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers with successful case closures, those whose cases closed unsuccessfully following receipt of services and those who are receiving some type of training provided by ORS.

The following conclusions were formulated based on the results of the surveys.

Successful Closure Satisfaction Survey:

- More networking with employers and knowledge of labor market.
- More training opportunities.
- Strengthening timely communication between themselves and their ORS counselor.
- Physical location of CRP's.

ENVIRONMENTAL SCAN

The environmental scan included information from a variety of sources such as: Comprehensive System Improvement Plan, RSA data, RI Department of Labor & Training (DLT) and Department of Labor - Bureau of Labor Statistics, Disability Employment Statistics-U.S. Department of Labor's Bureau of Labor Statistics, US Census Bureau, RI Department of Education, and Office of Disability Employment Policy. The sources indicated the following:

- Need for stronger coordination across Government and non-Government entities in the workforce system, including businesses.
- Need for better training opportunities.
- Need for more opportunities for job seekers to gain experience through internships and apprenticeships.
- RI was ranked 29th in the nation for employing people with disabilities; 34.3% of individuals with a disability in RI were employed; 76.3% of individuals without a disability in RI were employed; RI was ranked 36th in the nation in regard to employment gap between individuals with disabilities and individuals without disabilities.
- Since the last CNA, jobs in RI fluctuated: Professional & Business positions increased by 2,900; accommodation & Food Service increased by 1,600; Entertainment & Recreation increased by 200; Information jobs were unchanged; Manufacturing, Retail, Transportation and Educational Service all showed a slight decrease; Government employment decreased by 500; Health Care & Social Assistance decreased by 1,000; Construction decreased by 1,800.
- Nationally: 17% of individuals with disabilities were employed; 64.6% of individuals without a disability were employed; Unemployment rate for individuals with a disability was 12.5%; Unemployment rate for individuals without a disability was 5.9%.
- Disability in the National Workforce: 18.2% worked in the service fields (excluding protective service); 15% worked in Administrative support; 10.4% worked in Sales; 9% worked in Management, Business and Finance.
- According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers

and internship providers to partner with school districts to complete employability skills assessments and transcripts.

VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

Behavioral Health/Emotional Impairments, Cognitive Impairments, Physical Disabilities, Intellectual/Developmental Disabilities and Substance Abuse disorders comprised the majority of ORS caseloads.

Services for the South East Asian community, Native Americans, and Students with 504 plans ranked as the top opportunities to improve outcomes for underserved groups.

Workforce Innovation & Opportunity Act (WIOA)

Motivational Interviewing.

Effective time management.

Needs of Individuals with Most Significant/Significant Disabilities and Supported Employment Services:

- Increase the capacity and knowledge base of CRPs who provide Supported Employment services
- Improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking.
- Transportation to services that are available
- Increase the capacity of CRPs who work with individuals with Developmental Disabilities to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
- Need for a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities.
- Need for CRP's to have qualified personnel to provide a continuum of services.

B. WHO ARE MINORITIES;

Rehabilitation Needs of Minorities:

- Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the state
- Incorporate interpretation and communication needs into the IPE Underserved and Unserved Populations
- Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
- Incorporate access to services for individuals who are not English-speaking.
- Ensure services are readily available for emerging populations/minorities.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The Comprehensive Needs Assessment (CNA) completed in 2017 identified the following as the most unserved/underserved populations served by the VR program:

- Physical Disabilities
- Intellectual and Development Disabilities
- Behavioral Health
- Mental Health

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The Comprehensive Needs Assessment (CNA) conducted in 2017 did not identify unserved populations for that component. However, surveys from ORS staff identified that the following areas needed to improve services:

- Prepare consumers for emerging employment driven by employer needs
- ORS should be an active partner with the DLT and the employment community to promote access to employment for individuals with disabilities
- There is difficulty in gaining access to the statewide workforce development system
- High level of difficulty in knowing which programs and services are the best for consumers

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The 2017 Comprehensive Needs Assessment (CNA) identified that students with 504 plans are underserved.

There were 8,400 in RI with IEP's. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc.

"At-risk" students with learning disabilities do not want to be identified as having a disability; and therefore, are not potentially accessing services.

Students indicated a positive experience with ORS, and that the referral process was seamless.

Students (and their parents) indicated they are unaware of the full scope of services available to them, and had difficulty understanding written materials provided by ORS.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Need to further remove the following barriers in order to strengthen the quality of services from CRPs:

- Transportation barriers, maintaining staff, access to benefits counseling and community based job availability were challenges to delivering services and employment outcome
- Fear of losing Social Security benefits, medical coverage, family expectations, individual expectations, home life and lack of social skills are the most common personal barriers for individuals with disabilities who are seeking employment.

- Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
- Assess CRPs' ability to work with varying populations and disabilities.

Meeting the needs of the Business Community:

- Increase marketing and awareness of ORS services.
- Enhance presence at business expos and job fairs
- Provide Business Community with information on ADA and work place accommodations

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT .

Develop materials about ORS that are easier to comprehend for both students and parents

Consider strategies on how to better connect to "at-risk" students outside of the schools, as students report feeling stigmatized

Expand outreach to other programs, such as youth centers, family resource centers, and career & education programs

Strengthen connections to higher education, particularly disability support service coordinators, to increase access to underserved youth and students with disabilities

Assist schools in increasing communication and coordination for "at-risk" youth and students with disabilities

K. ANNUAL ESTIMATES

Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

For FFY 2017, there were 2,173 new applicants, and 1,730 individuals were deemed eligible. There was a total of 1,591 individuals who developed their Individualized Plan for Employment (IPE), and 703 individuals who obtained successful employment outcomes.

For FFY 2018, ORS has a goal of 2,174 new applicants, and expects 1,731 individuals to become eligible. ORS anticipates that 1,559 new Individualized Plans for Employment will be developed, and 652 successful outcomes achieved.

For FFY 2019, ORS projects 2,175 new applicants, with 1,732 individuals to become eligible for ORS services. ORS anticipates that 1,560 individuals will develop Individualized Plans for Employment, and projects 653 successful outcomes.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

As of 12/19/17 all OOS Categories I, II, and III were closed. As money and staff resources become available, individuals will be taken from the Category I Wait List by date of application. During the months of October, November, and December 2017, ORS admitted 298 more clients in Category I to active status. It is not anticipated that clients in Category I on the Wait List will be moved into services during FFY 2018 or FFY 2019.

OOS Category I - 3,318

OOS Category II - 18

OOS Category III - 0

Maintain Employment - 0

Total - 3,396

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

In FFY 2019, the projected number of Title VI to be served under an IPE is 687

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

OOS Category I - Title VI: 677

OOS Category II - Title VI: 0

OOS Category III - Title I: 0

ORS will take individuals off the Category I wait list as funds are available for services by date of application, and will continue to assign to the wait list eligible clients who meet criteria for Category II or Category III, however ORS does not anticipate opening the waitlist for any category during FFY 2018.

For FFY 2018 through FFY 2019, ORS will serve individuals with the most significant disabilities Priority Category 1 first and individuals with a significant disability Priority Category 2 second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category 3.

In FFY 2018 and FFY 2019, ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the wait list and in Category I needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available and ORS is able to open Category I.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

As of 1/26/18 the OOS Wait List is 388. Of this number, 335 are OOS Category I, 50 are OOS Category II, and 3 are OOS Category III. Each month, ORS averages 200 Category I admissions and 20 Category II admissions, so 220 clients will be admitted to the Wait List

for each month of FFY 2018. For FFY 2019, it is anticipated that by 10/30/18, 2,640 clients will be on the Wait List. It is not anticipated that clients in Category I on the Wait List will be moved into services during FFY 2018 or FFY 2019. ORS will monitor funding and staff resources quarterly for availability to move clients in Category I off the Wait List based on date of application.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

For FFY 2019, OOS Category I - Title I: $5,600,784.00 based on following calculation:

$1,687.91 X 3,318 = $5,600,784.00

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Performance Measures as stated in WIOA, monitoring reviews, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

ALL OF THE FOLLOWING GOALS ARE FOR FFY2019

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENTCLOSURES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with an additional two to three sector businesses to address personnel recruitment and training needs

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to devote 7% of grant to partnership with ORS and target individuals with disabilities in Request for Proposal (RFP) requirements
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)
- Explore opportunities with all State Partners for braiding and blending of funding for service delivery.
- Explore options under Science, Technology, Engineering and Math (STEM) for business sectors.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- Implement and coordinate Project Search sites already in process and new one in development for adults with IDD. Utilize Viability, a current ORS vendor, to coordinate the two Business/ORS training-employer partnerships.
- Partner with an emerging, high wage business sector

GOAL 2: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

- In-School Youth with Disabilities: enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify "at risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State

Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis and will provide documentation to DOJ court monitor.

- Implement training opportunities for SE vendors in assessment, job development, and coaching.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
- Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training program that result in competitive integrated employment outcomes.

- Replicate the Continuous Quality Improvement (CQI) process for training and rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.

OBJECTIVE 1: Meet WIOA performance accountability measures

- Participate on the RI Department of Administration (DOA) Common Performance Measures Committee
- Determine the "what and how" of contributing ORS data to state reporting requirements
- Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate
- Obtain guidance from RSA to establish specific numerical targets
- Determine how to collect baseline data on performance measures
- Participate in Technical Assistance opportunities on capturing performance measures

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development

- Determine eligibility within 60 days of application

- Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination
- Utilize MIS to track adherence to these standards on a monthly basis

OBJECTIVE 3: Monitoring Wait List

- Provide weekly updates to Administration and Office of Health and Human Services (OHSS) to identify Wait List number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
- Maintain and update ORS website to report on Wait List size by Category and develop process for reporting an individual's placement on Wait List
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on Wait List
- Continue to monitor Wait List on a quarterly basis

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

Goals and priorities established were based on results of FFY 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys.

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

Goals and priorities established were based on results of FFY 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the new WIOA performance measures and RSA standards of practice. ORS is currently in Year 1 of building the baseline for new WIOA performance measures. Year 2 will begin 7/1/2018. In order to meet this goal, ORS plans to continue to participate on the RI DOA common performance measures committee, to determine the "what and how" of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

ORS will continue the past practices of providing Performance Measure Indicators to OHHS.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

Order of Selection Description The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability -(i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and(iii) who has one or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations.

First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits two or three functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Third priority will be given to other eligible consumers who have a disability that seriously limits one functional capacity in terms of an employment outcome and requires two or more services over an extended period of time.

Extended period of time: Six months or more.

Multiple services: Requiring two or more primary services.

ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I , and will continue to assign to the Wait List eligible clients who meet criteria for Category II or Category III.

For FFY 2018 through FFY 2019, ORS will serve individuals with the most significant disabilities Priority Category I first and individuals with a significant disability Priority

Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the Wait List and in Category I needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available, and ORS is able to open Category I.

B. THE JUSTIFICATION FOR THE ORDER.

In FFY 2010 due to retirements, budget constraints, promotions, sick leaves, and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities. All Category II and Category III individuals were placed on a Wait List for services. When resources have become available, Category II eligible clients have been moved off the Wait List. It was anticipated, at the time, that this restriction would continue through FFY2019.

At the conclusion of FFY 2017, ORS was confronted with additional budget constraints, increased costs of services, and agency obligations to comply with a Department of Justice Consent Decree. ORS requested $5,000,000 in re-allotment VR funds and received $532,198, as a portion of the funds was used to assist hurricane-affected states. The culmination of these factors is impeding the Agency's ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection.

The Order of Selection does not discriminate against any person by type of disability, economic status, race, color, national origin, disability, political beliefs, sexual orientation, age, religion, sex, or protected class.

C. THE SERVICE AND OUTCOME GOALS.

Projections for numbers to be served in FFY 2019 are based on the current census. These numbers reflect those currently being served or projected to be served prior to the closure of Category I. All categories will be closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible, but have not begun to receive services under an IPE.

Order of Selection (OOS):

OOS Category I: 3,318

OOS Category II: 18

Maintain Employment Clients: 0

The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual's informed career choice that has evolved from information about skills, interests, preferences, abilities, and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the specific services/interventions needed by the individual to reach that

employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

Quantifying the length of time an individual is active with ORS is difficult as the necessary services, duration, and outcome is individualized to the needs of each customer. Projections based on recent performance:

Priority Category I - 36 Months Priority Category II - 13 Months Maintain Employment Clients- N/A

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the most significant disabilities, Priority Category I. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to prepare for and engage in gainful employment in an integrated setting. Beginning 12/19/17, ORS closed all categories and will take individuals off the Category I Wait List as funds are available for services by date of application. ORS does not anticipate opening the Wait List for any category during FFY 2018/FFY 2019.

ORS notifies all individuals who do not meet the current Order of Selection, and provides information and referral services. These alternative resources are intended to assist in obtaining employment and related services through such Workforce Development resources as the American Job Centers. Individuals are re-assessed when additional information about their functional limitations is received following the OOS classification decision.

One exemption to placement on the Wait List follows:

Pre-Employment Transition Services (Pre-ETS): These ORS services are provided to students with disabilities in collaboration with each Local Education Authority (LEA) or other school program. Students receiving Pre-ETS prior to application and/or eligibility determination may continue to receive Pre-ETS services. Conversely, students determined eligible prior to beginning of receiving receive Pre-ETS will not receive them until they are taken off the wait list according to the priority category assigned. These Pre-Employment Transition Services, which fall under the regulations implementing the 2014 Workforce Investment Opportunities Act (WIOA) amendments to the Rehabilitation Act of 1973 to help to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities who choose to work, to gain the necessary skills, preparation, exploration, and supports to enter the workforce.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

No. ORS and the SRC continue to have discussions at the SRC meetings regarding Order of Selection changes, impact and implementation. The SRC has offered feedback, guidance, and

support throughout the process with the goal of ensuring transparency to individuals seeking VR services, and educating the Community Rehabilitation Programs.

ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I , and will continue to assign to the Wait List, eligible clients who meet criteria for Category II or Category III.

For FFY 2018 through FFY 2019, ORS will serve individuals with the most significant disabilities Priority Category I first, and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services, and who are currently employed and at risk of job loss due their disability, and who could benefit from VR services to maintain employment. ORS believes consumers who are on the Wait List and in Category I needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available, and ORS is able to open Category I.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

STATE'S GOALS AND PLANS FOR TITLE VI FUNDS

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

ALL OF THE FOLLOWING GOALS ARE FOR FFY 2019 TITLE VI

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE SUPPORTED EMPLOYMENT OUTCOMES FOR ORS CUSTOMERS WITH THE MOST SIGNIFICANT DISABILITIES COMPARED TO SUCCESSFUL SUPPORTED EMPLOYMENT OUTCOMES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two to three sector businesses to address personnel recruitment and training needs.

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to include a requirement in RFPs that devotes 7% of grants to a partnership with ORS and targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- Expand Project Search, targeting in-school youth with the most significant disabilities, from three to four sites
- Enlist Viabilities, a current ORS vendor, to develop an additional Business/ORS training-employer partnership

GOAL 2: TO PROVIDE A FLEXIBLE SUPPORTED EMPLOYMENT SERVICE DELIVERY SYSTEM, BASED ON EMPLOYMENT FIRST PRINCIPLES AND PRACTICES THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY INCREASED COMPETITIVE EMPLOYMENT OUTCOMES.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

- In-School Youth with Disabilities: enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify "at risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.
- Adults with Disabilities: ensure a wide array of service providers and training programs to enable customers to obtain meaningful, quality employment as rapidly as possible, considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis.

- Implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practices.
- Support and participate in the SE Developmental Disability (DD) and SE Behavioral Health (BH) vendor meetings.
- Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training program that result in integrated competitive employment outcomes.

- Replicate the Continuous Quality Improvement (CQI) process for training and rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS

OBJECTIVE 1: Meet WIOA performance accountability measures.

- Participate on the RI Department of Administration (DOA) Common Performance Measures Committee.
- Determine the "what and how" of contributing ORS data to state reporting requirements.
- Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate.
- Obtain guidance from RSA to establish specific numerical targets.
- Determine how to collect baseline data on performance measures.
- Participate in Technical Assistance opportunities on capturing performance measures.

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development.

- Determine eligibility within 60 days of application.
- Develop the Individualized Plan for Employment within 90 days of eligibility determination.
- Utilize MIS to track adherence to these standards on a monthly basis.

OBJECTIVE 3: Monitoring Wait List

- Provide weekly updates to Administration and Office of Health and Human Services to identify wait list number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization.
- Maintain and update ORS website to report on Wait List size by Category, and develop process for reporting an individual's placement on waitlist
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on wait list.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

WIOA obligates ORS to set aside 50% of the Title VI grant for youth with the most significant disabilities age 14-24. ORS anticipates that each population of youth will need different SE services and approaches to engage, explore, and prepare for employment.

Youth In-School in need of SE Services:

- Enhance the Transition program and service options within each high school to coordinate and deliver Transition that provide services and work experiences to youth and students with disabilities in order to reach a competitive integrated employment outcome.
- Implement Project Search, targeting in-school youth and students with disabilities with the most significant disabilities, at three sites.
- Increase the number of Summer Work experiences.
- Refine the Vocational Evaluation service to utilize discovery principles and career exploration opportunities.
- Develop the capacity and process for providing Job Coach supports for community-based work experiences.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis, despite RSA's recent rescinding funding of Title VI grant monies.

Youth Out-of-School in need of SE Services:

- Engage Department of Labor and Training (DLT) Youth Centers, One-Stop Centers, Adult Education Programs, Mental Health agencies, and DD Agencies to identify out-of-school youth in need of SE services.
- Build SE agency capacity to provide a continuum of services.

- Facilitate referrals to Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH) of youth in need of SE services so that long term supports can be available to sustain employment.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis, despite RSA recent rescinding Title VI grant monies.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Enlist Rhode Island Department of Education (RIDE), BHDDH, Department of Human Services (DHS), and ORS to braid funding to support the provision of SE services as part of Transition and Pre-ETS.

Establish increased knowledge about each state agency's responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community.

Maximize existing youth resources, such as DLT Youth Centers.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

The goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title VI Funds will be realized through the following strategies:**METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES**:

ORS plans to expand and improve services through: (1) improved relationships with the business community, (2) staff training focused on client preparation for an employment outcome, (3) increased marketing and accessibility of information about the agency; (4) analysis of internal processes and methods to improve operational systems and overall services to clients; and (5) Continuous Quality Improvement Activities.

The overall purpose of ORS, as reinforced by WIOA and the RI Governor's Workforce Board (GWB) system-change initiatives, is to increase the competitive employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next year will include collaboration with other state agencies to develop a coordinated approach to implementing a business needs and customer driven service delivery system, as described in the GWB's Comprehensive System

Improvement Plan (CSIP). This revised service-delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer.

- ORS will enlist its partners to identify local businesses to develop targeted training programs to meet the specific needs of local business sectors.
- ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), Common Performance Measures Task Group, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS will advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources.
- ORS will encourage WIOA partners to include an RFP requirement that 7% of grants must be devoted to partnership with ORS and target individuals with disabilities.
- Several successful business partnerships, Project Search, and Viability will continue to be supported by ORS.

The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three-year increments, will incorporate the findings of the CSIP and identify additional assessment areas.

- ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success.
- Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, incorporating work experiences into employment plan development will increase the client's ability to make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors.
- Participation in employment experiences for individuals needing Supported Employment, in-school youth, and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE).
- ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage.
- ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery Principles and Practices into service delivery in order to increase expectations that individuals with significant intellectual and behavioral health disabilities can obtain quality employment outcomes in integrated settings at competitive wages.
- ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment decisions.

- ORS will continue to update its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development.
- Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will expand their communication through social media outlets. In addition, orientation groups, literature distribution about the agency, presence at the netWORKri One-Stop Centers, and participation in resource education events around the state will enhance referrals and visibility.
- The ORS Continuous Quality Improvement (CQI) committee will continue to monitor the CQI plan to ensure a continuous QI system for monitoring, evaluating, and providing timely information for staff and administration about the agency's progress in meeting the goals outlined in the State plan. Monitoring via monthly reports to ORS Administration and staff about status of performance measures will occur. Additionally, quarterly reporting to the Governor's office on the status of the deliverables (eligibility, IPE development, and I/DD Supported Employment services) that are included in the RI Strategic Plan Vocational Rehabilitation objectives.
- ORS will continue to elicit feedback from customers through satisfaction surveys, waitlist outreach, and follow-up as well as ongoing case reviews.

The DOJ/State Consent Decree requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot, and modify the process for CQI review of CRPs. The DOJ Consent Decree CQI efforts continue to be a strong point of emphasis.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

PROVISION OF A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

ORS utilizes a broad range of assistive technology services, such as the ATAP Partners that are funded through State Grants for Assistive Technology, ORS Assistive Technology fee-for-services, and purchasing devices through approved vendors. Assistive Technology needs are person-centered and on a case-by-case basis.

ORS utilizes the ATAP Partnership for demonstration, information and assistance, device reutilization, and device loan to explore if assistive technology would be appropriate for acquisition to assist individuals with disabilities in the rehabilitation process. Device Loan can also be utilized for vocational assessment, as well as the bridge from one device to acquiring another.

ORS has vendor-approved services through fee-for-services to provide detailed assistive technology services, such as assistive technology assessment, assistive technology installation and repair, assistive technology training, worksite assessment, and device acquisition.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults and youth with disabilities. The Deaf & Hard of Hearing unit and Services for the Blind and Visually Impaired (SBVI) unit are especially knowledgeable about assistive technology. Services for the Blind and Visually Impaired rehabilitation teachers review assistive technology needs of individuals with visual impairments or legal blindness. ORS also houses the ATEL program that operates an assistive technology lab for individuals who are Deaf or Hard of Hearing and/or have other speech and neurological impairments to have the opportunity to trial assistive technology equipment.

The provisions above continue to assist in making informed choices about equipment, and for using try-outs prior to making appropriate purchasing decisions. ORS has been mindful of working with individuals that are multi-layered in their needs for assistive technology, and continues to work with both fee-for-service vendors and ATAP Partners in identifying the needs of individuals with disabilities.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

ORS monitors outcome ratios for minority populations in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging minority populations.

Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes.

ORS ensures all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternate formats, as needed.

Establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities and youth adults who are no longer in school.

Staff attend in-service trainings on cultural sensitivity and competence, including instruction on use of interpreters; etc.

Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome.

ORS identified needs of minority population and developed new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES,

POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school-to-work transition for over 16 years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services not subject to Order of Selection (OOS) will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plans. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD).

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. A referral system is in place for students with disabilities, and each fall ORS, in collaboration with the Regional Educational Collaboratives, provides an orientation to Special Education staff at each Rhode Island High School. Transition and Pre-ETS services include: Counseling & Guidance, Vocational Evaluations and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any work activities already completed by the LEA such as volunteer positions, work tryouts, and internships provide valuable information to the discussion and planning process. These activities are considered trial-work experiences, so are important to vocational planning.

Transition and Pre-ETS incorporates services for the DOJ/State Consent Decree identified youth with significant intellectual disabilities, as well as for all in-school youth potentially eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all in-school youth with I/DD beginning at age fourteen and reviewed annually. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities for in-school youth may include such services as: Vocational Evaluations and Assessments; Community-Based Work Experiences; Participation in Transition Academies; Summer Work Experiences for In-School youth (Employment Alliance - an extended school year paid work experience supported by ORS & an LEA as well as the four-week paid work experience funded by ORS to an ORS approved provider); Project Search, and a pilot of a summer internship program specifically designed for young adults in 2 year and 4 year degree programs.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

The CRP Supervisor continues to hold quarterly meetings with the Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation on the ORS Continuous Quality Improvement Team, the agency has developed a Quality Assurance program initially for Supported Employment providers.

The Continuous Quality Improvement Committee works with the CRP Supervisor to develop increased options for individuals with disabilities who are considered underserved and/or minority populations based on the CNA findings. In addition, ongoing Quality Improvement activities such as the quarterly satisfaction survey are developed and implemented by the SRC State Plan and Continuous Quality Improvement Committee. These studies, organized by the ORS Strategic Planning Supervisor, provides ongoing information that is relevant to customers' vocational rehabilitation needs and planning.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to modify a fee-for-service structure with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities utilizing the information from the FFY 2017 Statewide Comprehensive Needs Assessment (CNA).

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

ORS is participating on a RI Department of Administration (DOA) Performance Measure Committee that is part of the Governor's system-change efforts. The Committee is examining methods to gather and track employment outcomes, educational, and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.

In addition, monthly monitoring of timeline requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applications, and successful employment outcomes. This year will provide an opportunity to gather baseline performance information that will provide the basis for improvement strategies moving forward.

ORS will seek guidance from the RSA to establish WIOA performance measures.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Workforce Development Supervisor/Community Rehabilitation Program Supervisor interacts with the business

community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women's Business Enterprise (WBE), and Minority Business Enterprise (MBE) trade organizations. The Department of Human Services (DHS) will be represented on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Sub-committee. ORS staff review RFPs of Rhode Island's two Workforce Investment Boards, Youth Councils, and Youth Centers; and advocates strategies for the inclusion of youth with disabilities in the Governor's Workforce Investment initiatives.

ORS, through its parent agency, Rhode Island Department of Human Services, and as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKri One-Stop Centers. ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston One-Stop Career Center/netWORKri.

ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. ORS will provide One-Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to One-Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One-Stop Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and participate in annual Request for Proposal reviews.

ORS provides leadership and consultation to the vendor community. Vendors have historically viewed themselves as "social service"-oriented, rather than as part of the workforce development community. Providing case-specific consultation, as well as education about business practices, employment outcomes, and accountability, has become a focus of the dialogue between ORS and its approved vendors.

At this point, it is not clear how ORS, Adult Education, and Department of Labor and Training will be collaborating on adult education and apprenticeship programs. ORS could use some technical assistance from RSA on this topic.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The goal and objectives outlined by ORS to increase competitive employment opportunities for ORS customers and to provide a flexible service-delivery system that prepares customers for employment align with the 2017 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2017 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities.

ORS will continue to assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan.

ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS' collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services.

ORS will encourage assessment activities and plan development that promotes informed choice, self-determination, and case movement toward integrated competitive employment, enhance Supported Employment services with emphasis in integrated and competitive goals, maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits), emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses and coordinate staff resources to work in collaboration with the SRC sub-committees as warranted example, QI/State Plan.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

ORS will utilize Innovation and Expansion (I & E) funds during FFY 2018 to support the activities of the SRC. The SRC and ORS will conduct a state-wide Comprehensive Needs Assessment, as required by RSA in FFY 2020. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing reports from the Governor's Workforce Board, the results of the Governor's Commission on Disabilities, as well as DLT reports to frame and structure the CNA.

ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Such efforts as Project Search, business based training, and expansion of OJT will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes funding will be encouraged.

I&E funds will be used to generate a service-delivery response that increases the number of minority and underserved populations who participate in services, stay engaged, and who obtain quality employment outcomes.

ORS will use I&E funds to cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Asperger's and Autism, and individuals with sensory impairments

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

ORS will increase the number of minority and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.

ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers.

ORS will enlist the resources of interpreters, and ensure forms and information is accessible. Orientation groups are provided for potential applications to attend and apply for services, this includes an orientation group monthly with Hispanic bilingual staff.

ORS maintains the ability to access information and the application for services on our website.

Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

STATE PLAN FOR VR TITLE I FFY 2016 AND FFY 2017:

The State Plan for FFY 2016 and FFY 2017 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the Department of Justice (DOJ) Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

Accomplishments:

Several new initiatives, fee-structure adjustments, performance-based supported employment programming, and expanded training programs had been developed in response to the data analysis, Comprehensive Needs Assessment (CNA), and feedback from customers, vendors, and staff.

ORS continues to utilize a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. This process enabled ORS to continue to meet 60-day eligibility and 90-day plan development requirements.

Several of the other initiatives included: development of three Project Search sites in collaboration with three local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), and Local Education Authorities (LEAs); a partnership with two local businesses to provide on-site training and resultant employment for ORS customers; and development of a summer work experience specific to the career goals of customers attending college.

ACTUAL EMPLOYMENT OUTCOMES IN COMPETITVE SETTINGS:

FFY 2016 - Successful Closures 651

FFY 2017 - Successful Closures 703

Variance - Successful Closures 52

Successful Transition Closures for FFY 2016 and 2017 -60

Successful Minority/Underserved was 200

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Obstacles for FFY 2016 and FFY 2017 for Title I, VR, include the focus on in-school youth and Pre-ETS service delivery, and adult mandates from DOJ Consent Decree, which has compromised the agency's focus on other transition and adult populations.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

STATE PLAN FOR SE Title VI FFY 2016 and FFY 2017:

The State Plan for FFY 2016 and FFY 2017 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the DOJ Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two to three sector businesses to address personnel recruitment and training needs

- CRP Supervisor and ORS staff continued work with Alex and Ani for a "boot camp" style training program leading to competitive integrated employment.
- A second business was developed with this model for CVS and is in process.
- ORS began discussion utilizing current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with IDD and Autism/Asperger's via a collaboration with BHDDH and DLT Real Jobs RI initiative. The site in development is RI Hospital, as part of the Lifespan Network.

OBJECTIVE 2: Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses:

- ORS continues to have a consistent presence on the Governors Workforce Board, WIOA Interagency Workgroup, and other advisory groups.
- ORS has an internal Employment Cadre, headed by the Workforce Development Supervisor consisting of VR Counselors, to address employment and job development needs of the agency as a whole.
- As of December 2017, the MOU's have been updated for the Providence Cranston and Greater RI Workforce Boards, and ORS met with the System Director of The Work Place, the One-Stop System Operator for both boards. ORS identified a liaison to facilitate dissemination of information about business sector needs to agency staff. As the MOUs of each partner are implemented, ORS anticipates further opportunity to engage in discussions on Request for Proposals (RFPs), and On-the-Job Training processes and methodology.
- ORS maintains a daily presence at the One-Stop Centers, which provides the foundation for a cohesive service delivery system to ORS customers. Recent ORS staff retirements have resulted in ORS identifying new staff liaisons to the various advisory groups.
- The ORS Workforce Supervisor disseminates job leads from businesses looking for applicants, and VR Staff also disseminate job leads and participant training opportunities from LinkedIn and Skills for RI.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating:

- Two ORS Vocational Rehabilitation Counselor IIs presented with the Providence School Department and The Miriam Hospital at the 2017 Project Search Conference held in Pennsylvania. Additionally, Project Search data was presented at the 2017 Rhode Island College Transition Institute and Conference for Special Education Directors at Northern RI Collaborative. Several VRCs presented "What Teachers Need to Know" at the 2016 Rhode Island College Transition Institute.
- In expanding Project Search from two to three sites, ORS has total of three sites presently, Miriam Hospital, Blue Cross Blue Shield RI, and Newport Hospital. ORS continues to enlist Viability, a current ORS vendor, to develop an additional Business/ORS training-employer partnership; CVS was identified. CRP Supervisor and Regional Supervisor identified VR Counselors liaison to begin development of referral process and program start. ORS has and will continue to explore partnering with emerging high wage business sectors.

GOAL 2: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into integrated competitive employment.

<u>In-School Youth with Disabilities</u>:

- ORS has a VR Counselor assigned to every high school and developed and enhanced the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. Fact sheets and FAQs pertaining to Pre-ETS were disseminated at Transition Nights, Individualized Employment Plan (IEP) meetings, Career Development Plan (CDP) meetings, and State Agency "Introduction to State Services" meeting with every high school.
- ORS completed a CNA in 2017 and identified trends and needs for Transition-Aged Youth and Adults, such as student and family awareness of the scope of services about the transition-to-adult services.

Adults with Disabilities:

- ORS ensured a wide array of service providers and training programs enabled customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- ORS completed a CNA in 2017 and identified trends and needs of Adults, and identified areas of need, such as services for individuals with Autism/Asperger's to design programs and services.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that integrated competitive employment is the goal from services.

- ORS developed and implemented a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS has evaluated seven providers presently and will continue to collaborate with BHDDH to review at least six agencies per year.
- ORS implemented training opportunities for SE vendors in assessment, job development, and job coaching.
- ORS has identified training needs for providers, as a result of CQI reviews, such as fading strategies and identifying employment goals.
- ORS continued to conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- ORS continued to support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings on a monthly basis to identify obstacles and training needs.
- ORS continued to examine and modify, as needed, the VR fee structure to ensure it rewarded integrated employment outcomes.
- ORS developed and implemented a pilot with seven Developmental Disability providers for a performance-based supported employment program with focus on employment and increased staff capacity.

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.

- Replicated the Continuous Quality Improvement process for training and rehabilitation services vendors. The model developed from Developmental

Disabilities provider QI reviews has been utilized, and can be replicated for reviews with other service providers.

- As part of CQI reviews, ORS researched and evaluated specific services and correlation with employment outcomes. As part of reviews, ORS tracks the placements and services as part of the report which leads to QI Plan with provider.
- As part of the Consent Decree, ORS collaborated with other State Agencies, as part of the State Training Committee, focused on approving curricula for training to DD providers. This purpose for this training was to increase skill level and knowledge base of provider staff supporting individuals with disabilities. One curriculum under consideration increased in a 93% Certified Employment Support Professional (CESP) passing rate.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.

OBJECTIVE 1: Meet WIOA performance accountability measures:

- ORS maintains a consistent presence on the RI Department of Administration (DOA) Common Performance Measures Committee. Partners have focused on their readiness to capture the new WIOA requirements, therefore discussions have been ongoing among the WIOA partners in the state as to what data and how the data will be reported to state partners.
- Upon readiness of the agency electronic case management system, ORS began collecting WIOA performance measures as defined by RSA in July 2017.
- ORS has held several large staff trainings focused on the WIOA reporting requirements. Supervisory training has been provided on the new requirements and entry into the ECM system, guidance documents have been developed, revised as needed and disseminated to staff. Training will continue to be provided as needs arise.
- ORS continues to utilize technical assistance opportunities provided through WINTAC and U.S. Department of Labor WorkforceGPS. ORS will benefit from ongoing technical assistance and guidance from WINTAC, WorkforceGPS, and RSA will be critical to ORS's further understanding the establishment of the performance measure targets.

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development:

- ORS still tracks and monitors monthly the 60-day eligibility and 90-day to individualized plan for employment compliance. Regional Supervisors review this data with counselors to determine obstacles towards compliance.

Accomplishments:

- The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long-standing

commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued financial support by other state agencies of sheltered workshops impeded resources being re-directed to employment and long-term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding, and collaboration among state agencies.

- In the interest of overcoming some of these obstacles, ORS developed and implemented a pilot in 2017 with seven Developmental Disabilities providers for a performance-based supported employment program with focus on employment and increased staff capacity.
- ORS also developed two separate programs targeting persons with Asperger's with an eye on employment and social skills development. The two programs began as pilots in 2017, and have recently begun the second phase.
- ORS also has expanded its Pre-ETS programming and service delivery, and created new innovative summer work experiences, work based learning opportunities, and educated staff, schools, and families about options.

STATE PLAN FOR Title VI FFY 2017:

ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

FFY 2016 Successful Supported Employment Closures 113

FFY 2017 Successful Supported Employment Closures 129

Successful Minority and Underserved Closures 36

Variance

Successful Supported Employment Closures 16

Successful Minority and Underserved Closures 18

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems, and change models to meet goals and priorities.

The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.

ORS' own budgetary constraints have led to a significant change in Order of Selection categorization, and moved more towards placement on Wait List.

STATE PLAN FOR SE Title VI FFY 2016 and FFY 2017:

Obstacles:

- The obstacles for Title VI program for FFY 2016 and FFY 2017 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment, and long-term supports for individuals with other behavioral health (BH) issues has seen a decrease in funding, CRP, and

supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports. Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.

- Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems, and change models to meet goals and priorities.
- The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.
- ORS' own budgetary constraints have led to a significant change in Order of Selection categorization, and moved more towards placement on Wait List.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

The WIOA performance accountability indicators are a new requirement for ORS. The agency began tracking the performance accountability data elements via the Electronic Case Management system 7/1/17. It is anticipated ORS will have the ability to report on the new indicators in the next State Plan update.

During FFY 2016 and FFY 2017, ORS monitored the number of new applicants, number of new IPEs that were written, and number of competitive integrated employment outcomes achieved.

In FFY 2016 there were 2,383 new applicants for services; 1,598 new IPEs developed; and 651 employment outcomes.

In FFY 2017 there were 2,173 new applicants; 1,591 new IPEs developed; and 703 employment outcomes.

In the first quarter of FFY 2018, ORS had 563 new applicants; 265 new IPEs; and 210 individuals obtained employment.

In FFY 2016 ORS met Standard 1 and 2.

For FFY 2016 ORS again met Standard 1 with positive outcomes for Performance Indicators 1.1, 1.2, 1.3, 1.4 and 1.6 and met standard 2.1.

ORS maintained a focus on increasing quality employment outcomes as per the CNA, Strategic Plan, and RSA 107 monitoring report. In September of 2016, R.I. along with one other state had the 8th highest unemployment rate in the nation at 5.6%. While Indicator 1.5 was not met, improvement was noted for the third consecutive year with an average hourly wage of $12.15 for FFY 2016. This represents an increase from the FFY 2015 hourly wage of $12.05.

FFY 2016, ORS met RSA Standard I - VR's impact on employment and Standard II - Minority Service Rate.

Performance Indicator 1.1: In FFY 2016, ORS achieved 651 successful employment outcomes. This is an increase from the FFY2015s 643 successful employment outcomes.

Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate in FFY 2016 with 61.6%. The 61.6% was a decrease from the FFY2015 rehabilitation rate of 69.2%.

Performance Indicator 1.3: ORS exceeded the Federal Standard earnings ratio of 72.6% in FFY 2016 with a rate of 99.8%, which represents an increase from FFY 2015 rate of 99.7%

Performance Indicator 1.4: ORS exceeded the Federal Standard of 62.40%, with a rate of 100% for both FFY 2016 FFY 2015.

Performance Indicator 1.5: In FFY 2016 ORS continued to face challenges in meeting this indicator in part due to the RI economy and did not meet the Federal Standard of .52%. An additional challenge is the Bureau of Labor Statistics (BLS) data runs about three quarters behind, which impacts the ability to accurately calculate and monitor progress toward this goal.

Performance Indicator 1.6: ORS continued to exceed the federal standard of .53%. The number of individuals whose own income at the time of exit from services was their largest source of support was 62% in FFY 2016. This result represents a decrease from FFY 2015 rate of 64.3%

Evaluation Standard 2 - Equal Access to Services:

Performance Indicator 2.1: ORS met the standard of .80% for services and employment outcomes for minorities who are disabled for FFY 2016 with a rate of .85%. This also represents an increase from the FFY 2015 with a rate of .84%.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

I & E funds were used to support the Dare to Dream conference attended by ORS Transition Counselors, Transition-Age Students (573 participants ranging from 9th grade to post-high school youth), and Teachers

ORS utilized I & E funds to support the contract with the Paul V. Sherlock Center on Disabilities

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (DOJ/CD), as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health,

representation on the Developmental Disabilities (DD) Council, and the RI Transition Council.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting customers' individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support/vendor who will continue to provide support services to the individual with disability on a long-term basis. These long-term support providers are identified in a signed agreement of understanding, which is signed by the vendor agency and ORS.

In 2017, ORS developed a performance-based service agreement with seven DD providers that tied quarterly payments to services leading to community-based integrated employment with a provision that dedicated employment teams be assigned towards that end. An additional performance-based feature tied an incentive bonus for an individual attaining a placement for at least 20 hours per week. The year-long pilot will be ending by May 2018, and outcomes will be assessed.

SUPPORTED EMPLOYMENT SERVICE DELIVERY:

ORS has employment services that are available to adults and in-school youth found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. The Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor's proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services. Although usage of workshop settings has markedly decreased since the initiation of the Consent Decree, other funding streams continue to direct resources to segregated workshops and day programs. Staff resources were therefore unavailable to support integrated competitive employment efforts for adults and transition-age youth with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems' change.

The three state entities continue to utilize a Transition timeline for staff, families, and school personnel to clarify each agency's obligations to implement the DOJ/State Consent Decree requirements for in-school youths' access to employment exploration and work experiences. An annual "Introduction to State Services" meeting with each high school, continues to be held.

ORS recently extended a Cooperative Agreement with RIDE and is in process of working on a new one. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 17 years. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of Transition Services and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Vocational Evaluations and Assessments; Community-Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences, Summer Work, Project Search, and other Pre-ETS transition and work activities. The array of ORS transition services in place for both in-school youth with disabilities and those youth eligible for Supported Employment services meet the requirements of WIOA and the DOJ/State Consent Decree. In 2017, ORS developed a performance based service agreement with seven DD providers that tied quarterly payments to services leading to community-based integrated employment with a proviso that dedicated employment teams be assigned towards that end. An additional performance-based feature tied an incentive bonus for an individual attaining a placement for at least 20 hours per week. The yearlong pilot will be ending by May 2018; outcomes are being assessed, but initial hopes of increased provider staff capacity did not materialize.

SUPPORTED EMPLOYMENT AGENCY NETWORK:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental disabilities and behavioral health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.

ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer selected CRP. The objective of the SE services is an integrated competitive employment outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer's ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: (1) to individuals with disabilities found eligible for SE Services and a limitation of extended services to 24 months for adults and 48 months for youth with disabilities. The IPE also identifies the CRP that is accepting responsibility for

long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the time restrictions of ORS (as per RSA) and the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

Due to the complexities of implementation of the DOJ/State Consent Decree, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRP. Those meetings focus on service delivery, a target of 20 hours/week as an expectation of employment goal, and offer support and guidance to the providers.

ORS has taken the lead on identifying and establishing qualifications for employees of mental health agencies and developmental disability agencies to ensure that staff have the expertise appropriate for the vocational services being provided to ORS clients. ORS has been working with the Sherlock Center for Disabilities and VocWorks in order to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment. The CRP Supervisor actively meets with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. The CRP Supervisor, in collaboration with field supervisors, counselors, and ORS administrators, is actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for and included in the ORS customers' Individualized Plan for Employment (IPE). The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services.

ORS, according to RSA and WIOA, limits extended SE funding to 24 months for adults and 48 months for youth with disabilities age 14-24 with most significant disabilities.

The IPE also identifies that the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the extended supports provided solely by the CRP is defined by RSA, despite the recent elimination of funding of this years' Title VI Supported Employment grant.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Rhode Island Department of Human Services/Office of Rehabilitation Services**

Name of designated State agency **Office of Rehabilitation Services**

Full Name of Authorized Representative: **Ronald Racine**

Title of Authorized Representative: **Associate Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. 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 listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , 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;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** 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; Yes

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

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. Yes

FOOTNOTES

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Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 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.

*** 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 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

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.

Applicant's Organization **Rhode Island Department of Human Services/Office of Rehabilitation Services**

Full Name of Authorized Representative: **Ronald J. Racine**

Title of Authorized Representative: **Associate Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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.

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Full Name of Authorized Representative: **Ronald J. Racine**

Title of Authorized Representative: **Associate Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. 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:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

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.

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).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

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.

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.

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:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

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 .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above **No**

D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.

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.

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.

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14)OF THE REHABILITATION ACT.

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

J. WITH RESPECT TO STUDENTS WITH DISABILITIES, THE STATE,

CCXXVIII. HAS DEVELOPED AND WILL IMPLEMENT,

. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

A. 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

CCXXIX. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

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.

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.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL EXPEND NO MORE THAN 2.5 PERCENT OF THE STATE'S ALLOTMENT UNDER TITLE VI FOR ADMINISTRATIVE COSTS OF CARRYING OUT THIS PROGRAM; AND, THE DESIGNATED STATE AGENCY OR AGENCIES WILL PROVIDE, DIRECTLY OR INDIRECTLY THROUGH PUBLIC OR PRIVATE ENTITIES, NON-FEDERAL CONTRIBUTIONS IN AN AMOUNT THAT IS NOT LESS THAN 10 PERCENT OF THE COSTS OF CARRYING OUT SUPPORTED EMPLOYMENT SERVICES PROVIDED TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES WITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

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:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT:

CCXXX. 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

CCXXXI. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

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 includes 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.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

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* 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 and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 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.

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

A. CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT).

RHODE ISLAND WORKS PROGRAM

The R.I. General Assembly revised the state TANF law in June 2008 (RIGL 40—5.2). Entitled the Rhode Island Works Act, it was designed to help low income families toward independence while at the same time improving the State's efforts to achieve the required TANF Work Participation Rates. Since 2008, the General Assembly has made two clarifying adjustments to the law. The first occurred in June 2009. It clarified that the start date of the intermediate time limit (24 months in any 60 month period) was July 1, 2008. The second occurred in June 2010 and affirmed that any RI Works' approvable activity could follow from the assessment of RI Works participants. This was broadening, as the original iteration of the RI Works Act required that almost all RI Works participants be required to Job Search as the first activity of the employment plan.

Most significant among the changes were: new time limits on receipt of cash assistance, new work activities consistent with TANF requirements, full engagement of families in activities leading to economic independence from public assistance {including appropriate and realistic employment plans for individuals with disabilities}; and a formal collaboration with the R.I. Department of Labor and Training which coordinates with the one—stop career centers.

Eligibility for R.I. Works/TANF Program:

A "family" is defined for the RI Works/TANF cash assistance program as (a) a pregnant woman from and including the seventh month of her pregnancy; or (b) a child and the following eligible persons living in the same household as the child: (A) each biological, adoptive or stepparent of the child, or in the absence of a parent, any adult relative who is responsible, in fact, for the care of such child, and (B) the child's minor siblings (whether of whole or half blood): provided, however, that the term "family" shall not include any person receiving benefits under title XVI of the Social Security Act, 42 U.S.C. _ 1381 et seq. A family may be the same as the Assistance Unit.

A low—income family includes a child under the age of 18, or 19 if a full—time student, and family income is 225% of the federal poverty level or below.

An eligible family must meet age, relationship, citizenship/alienage, residency, and cooperation requirements, as well as remain within the income and resource limits of the program. As long as single parents and two (2) parent families meet income and resource limits of the program and are otherwise eligible, they qualify for cash assistance, child care, supplemental nutrition assistance (formerly referred to as food stamps); and health care coverage.

Eligibility is limited to families whose available resources (reduced by any obligations or debts with respect to such resources) total less than one thousand dollars ($1,000). With regard to vehicle ownership, the State has chosen to exclude as a resource one (1) vehicle for each adult household member, not to exceed two (2) vehicles per household. Eligibility is denied or terminated if the value of non—exempt resources exceeds the one thousand dollar limit.

To determine eligibility for cash assistance, the total of a family's countable earned income (after an earned income disregard of the first $180/month and one half the remainder of earnings) and unearned income is compared with the appropriate assistance payment standard for the unit. The payment standard is equal to the sum of the following:

§ For the first person: three hundred twenty—seven dollars ($327) or two hundred seventy—seven dollars ($277) for a family residing in subsidized housing;

§ For the second person: one hundred twenty—two dollars ($122)

§ For the third person: one hundred five dollars ($105), and

§ For each additional person: eighty dollars ($80) for each additional person.

Cooperation with the child support enforcement agency is required as a condition of eligibility for cash assistance.

To continue to be counted as a family member for the purpose of cash assistance, a child is allowed temporary absences from the home for no more than ninety (90) days per episode, with a second ninety (90) day renewal authorized only through supervisory approval. The program requires minor parents to live with a parent, relative, or in a supervised setting and remain in school, unless otherwise authorized by the Department for specific good cause reasons and the minor resides in an approved supervised supportive living arrangement.

Rhode Island Works Program Time Limits: The Rhode Island Works law (RIGL 40—5.2) provides cash assistance for twenty—four (24) months in any sixty (60) month period with a maximum total of forty—eight (48) months on cash assistance. The new R.I. Works time limits applied 7/1/2008 to all new applicants, but recipients on 7/1/2008 were given a one—year grace to 7/1/2009 at which time the time limits were to take effect. The exception was that any recipient who sooner than 7/1/2008 reached their respective 60 months of cash assistance would have his/her cash assistance case closed at 60 months. In June 2009, the General Assembly amended RIGL 40—5.2 to set the effective date for "24 months in 60 months" time limit to begin at 7/1/2008, therefore, no family reached this 24 month time limit until 6/30/2010.

Time limits begin with the first issuance of cash assistance. An applicant is required to sign an Employment Plan as a condition of eligibility for cash assistance. Some recipients are exempted from immediate work activities such as parents who are waived under the Domestic Violence Waiver process.

Time limits apply to families in which citizen children receive assistance although their non—citizen parents do not.

Exceptions to time limits apply in the instances of: (1) a minor child(ren) living with a single parent who receives SSI benefits, or with two—parents who both receive SSI benefits, and (2) a minor child(ren) living with a legally responsible non—parent caretaker relative who is not in the cash assistance payment.

Hardship Extension to Time Limit: Any individual approaching either time limit is notified that s/he may request a reassessment to determine whether or not s/he meets the criteria for an extension to time limit. Additionally, any parent who has met or exceeded the time limit may reapply and be assessed to determine if s/he meets any of the criteria for an extension beyond the time limit.

A parent who is undocumented, who has received benefits for his/her citizen child(ren), may request a hardship extension for the child(ren) at either time limit. A parent who does

not meet the alienage requirements required for eligibility for cash assistance under federal PRWORA (e.g., those Legal Permanent Resident families in which the parent has been in the United States less than five (5) years), who has received benefits for her/his citizen child(ren), may also request a hardship extension for the child(ren).

A hardship extension may be granted to all otherwise eligible families who meet at least one of the following criteria:

- has a documented significant physical or mental incapacity and can verify/document a pending application for SSI or SSDI and has submitted an application for or is active and making progress in her/his Employment Plan with the Office of Rehabilitation Services (ORS); or
- is caring for a significantly disabled family member who resides in the home and requires full time care; or
- is homeless—meaning a lack of a fixed and regular nighttime residence or a primary nighttime residence, such as a supervised shelter, a halfway house, a temporary residence, a temporary accommodation (e.g., hotel/motel), a residence of another for not more than ninety days, or a place not designed for regular sleeping accommodations (e.g., bus station);
- is unable to pursue employment because of a current, documented domestic violence situation; or
- is unable to work because of a critical other condition or circumstance, other than citizenship or alienage status.

For TANF program purposes, families extended beyond sixty (60) months of TANF cash assistance under the categories listed above will be included in the federally—funded twenty percent (20%) hardship exceptions.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

ONE PARENT FAMILY

Single parents shall participate for a minimum of twenty (20) hours per week for parents whose youngest child in the home is under the age of six (6), and for a minimum of thirty (30) hours per week for parents whose youngest child in the home is six (6) years of age or older, in one or more of the following work activities, as appropriate, in order to help the parent obtain stable full-time paid employment. For teen parents, the first activity must be secondary education or completion of a GED program, if either certificate has not yet been obtained.

Core Activities for One Parent Families:

- Unsubsidized employment;
- Subsidized private sector employment;

- Subsidized public sector employment;
- Work experience. A parent participating in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required twenty (20) core hours if actual participation falls short of the required minimum hours per week (RI has a mini-simplified Food Stamp waiver). For parents whose youngest child is six (6) or more years old and whose required minimum hours per week are thirty (30), any hours permissible by FLSA that are short of thirty (30) hours must be satisfied in some other TANF work activity;
- On-the-job training;
- Job search and job readiness. Except in the context of rehabilitation employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period.

The DHS, in consultation with the DLT, shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;

- Community Service;
- Vocational educational training not to exceed twelve (12) months. Participation in a two-year degree program, a vocational certificate program, or a BA degree or advanced degree program may count as vocational educational training. Those participants who are in programs longer than twelve (12) months may use this activity as counting toward participation in a non-core job skills training, if they meet the requirement for a different core activity for sufficient hours.

All supervised homework plus up to one hour of unsupervised homework per each hour of class time may count as meeting part of the total hours required for compliance with the RI Works employment plan. However, total homework time cannot exceed the hours required or advised in writing by the educational program;

- Adult education in an intensive work readiness program
- Child care for an individual participating in a community service program.

Non-core Activities for One Parent Families:

- Job skills training directly related to employment (allowable in addition to participation for twenty (20) hours per week in one of the above core activities);
- Education directly related to employment (allowable in addition to participation for twenty (20) hours per week in one of the above core activities);
- Satisfactory attendance at a secondary school or in a course of study leading to a GED. In the case of a parent under the age of 20, such satisfactory attendance in secondary school or in a GED program is countable as a core activity.

Other Required Work Activities for One Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the twenty (20) hour requirement for parents with a child under age six (6), or for an equivalent number of hours toward the thirty (30) hour requirement for parents whose youngest child is age six (6) or older. The DCYF Social Caseworker II provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The RI Works Social Caseworker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

TEMPORARY EXEMPTION FOR SINGLE PARENTS

Work requirements outlined above shall not apply to a single parent if (and for so long as) the Department finds that s/he is:

- Caring for a child below the age of one, provided that a parent may opt for deferral for a maximum of twelve (12) months during any twenty-four (24) months in sixty (60) month period of eligibility for cash assistance, but noting that a minor parent without a high school diploma or the equivalent, shall not be exempt for more than twelve (12) weeks from the birth of the child;
- Caring for a child or family member with a significant documented disability who resides in the home and requires full-time care;
- A recipient of SSI or RSDI/SSDI or other disability benefit that has the same standards of disability as defined by the Social Security Administration;
- An RIW applicant or recipient who has completed an application for SSI or SSDI who has been determined by a designated DHS provider to be likely to become eligible for SSI or SSDI;
- An individual receiving assistance who is a victim of domestic violence; and
- An applicant for assistance in her third trimester of pregnancy or a pregnant woman in her third trimester who is a recipient of assistance and who has medical documentation that she cannot work.

TWO PARENT FAMILY REQUIREMENTS

In families consisting of two parents, one parent is required and shall be engaged in work activities as defined below, for at least thirty-five (35) hours per week during the month, not fewer than thirty (30) hours per week of which are attributable to one or more of the following listed work activities. Two parent work requirements shall be defined as follows:

Core Activities for Two-Parent Families:

- Unsubsidized employment;
- Subsidized private sector employment;
- Subsidized public sector employment;
- Work experience;
- On-the-job training;
- Job search and job readiness. Except in the context of rehabilitation employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS, in consultation with the DLT, shall extend job search and job readiness assistance for up to twelve (12)

weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;

- Community service program;
- Vocational educational training not to exceed twelve (12) months;
- The provision of child care services to a participant individual who is participating in a community service program;
- Adult education in an intensive work readiness program not to exceed six (6) months.

Above thirty (30) hours per week, the following three (3) activities may also count for participation:

Non-Core Activities for Two-Parent Families:

- Job skills training directly related to employment;
- Education directly related to employment; and
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence. Satisfactory attendance in secondary school or in a GED program is countable as a core activity in the case of a parent who is married and is under twenty (20) years old.

Other Required Work Activitiesfor Two-Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the thirty-five (35) hour requirement. The DCYF Social Caseworker II provides the actual number of hours

of participation per week required in order for the parent to comply with their service plan. The RI Works Social Caseworker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

- Housing search, if the family is homeless (or about to become homeless), may be approved for the second parent in a two parent family, if the first parent is participating in a core activity at least thirty (30) hours per week. This activity may be approved for the first parent, if the second parent receives SSI/RSDI/SSDI. Housing search is classified as job readiness, which is a core activity.

In a two parent family in which one (1) parent is engaged for at least thirty-five (35) hours per week in the work activities specified above, the other, second, parent may also participate in and have an assessment completed. The second parent must sign the employment plan.

A family with two parents, whether or not receiving child care, in which one or both parents participate in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required thirty (30) core hours if actual participation falls short of the required minimum hours per week (RI has a mini-simplified Food Stamp waiver). For

families that need additional hours beyond the core activity requirement, these hours must be satisfied in some other TANF work activity.

Except in the instance of a work experience or community service program which must meet the requirements of the FLSA as described above, if the family receives child care assistance and an adult in the family is not disabled or caring for a severely disabled child, then the work-eligible individuals must be participating in work activities for an average of at least fifty-five (55) hours per week to count as a two-parent family engaged in work for the month. At least fifty (50) of the fifty-five (55) hours per week must come from participation in the activities listed in the Core Activities above. Above fifty (50) hours per week, the three (3) activities listed in Non-Core Activities above may also count as participation.

Teen Two-Parent Family Requirements

In a two-parent household in which both parents are under age twenty (20), the DHS social caseworker should assess the educational history of both parents. For either parent who has not completed high school or obtained a GED, as a first activity in the RI Works program the screening social caseworker should approve an employment plan and enter an employment plan for that parent (or for both parents if neither have the high school diploma or GED) that shows full time attendance in secondary education (high school) or completion of a GED program as the first activity. When both have either reached the age of twenty (20) or completed the first activity of education as described above, all two parent family rules will come into full force and effect.

EXEMPTIONS FOR TWO-PARENT FAMILIES

The work requirements shall not apply if (and for so long as) the Department finds that:

- both parents receive Supplemental Security Income(SSI) or Social Security Disability Insurance (SSDI); or
- both parents have completed applications for SSI or SSDI and both have been determined by a designated DHS provider to be likely to become eligible for SSI or SSDI; or
- one parent is caring for a child or family member with a significant documented disability who resides in the home, and who requires full time care and the other parent receives SSI/RSDI/SSDI and is medically documented to be unable to provide care for the disabled family member.

Electronic Benefits Transfer (EBT)

The term 'electronic benefit transfer transaction' means the use of a credit or debit card service, automated teller machine, point-of-sale terminal, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service. Payment of RI Works Program cash benefits through an electronic benefit transfer (EBT) system is authorized by R.I.G.L. 40-5.2-31. Cash benefits are credited to an EBT account in the recipient's name by 5:00 a.m. on the first and sixteenth of the month including weekends and holidays.

Recipients and authorized payees access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs) which display the NYCE logo. Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store.

Each month, recipients can make a total of four (4) free cash withdrawals from ATMs. For each additional ATM cash withdrawal in the month, a fee of 85 cents is charged. The fee is automatically deducted from the recipient's cash benefit account. No fee is charged when cash benefits are accessed at POS terminals.

RI EBT cards are issued in all RI Works district offices using special card embossing and PIN selection machines. Cardholders must report lost, stolen, or damaged RI EBT cards to the Deluxe Customer Service Help Line at 1-888-979-9939. A Customer Service Representative invalidates the card thereby protecting the unused benefit amounts. If someone uses the card before its status has been changed, the benefits cannot be replaced. No fee is charged for the replacement of any lost, stolen, or damaged RI EBT card. Cardholders may request a new card by contacting the local DHS office and completing a DHS EBT-10, EBT Replacement Form. Replacement RI EBT cards are mailed by noon the next business day after the authorization file has been successfully transmitted.

EBT Brochure

The following verbiage is on the EBT usage brochure provided to each RI Works client and available at all DHS field offices:

There is never a transaction fee for using your Cash Benefits to get cash at a POS machine. At ATMS, after your fourth cash withdrawal in a month, a 50-cent transaction fee is automatically taken out of your Cash account each time you withdraw cash. A surcharge is an additional fee that can be charged by the owner of an ATM or POS for using that machine. Surcharges will be taken from your account automatically. If you do not want to pay the surcharge, cancel the transaction and go to another ATM or POS location that does not charge a surcharge.

<u>EBT Restrictions</u>

Pursuant to Section 4004 of Public Law 112-96, it is prohibited for a TANF recipient to use their TANF cash assistance benefits received under RI Works, Rhode Island General Laws 40-5.2 et seq., in any electronic benefit transfer transaction (EBT) in --

any liquor store;

any casino, gambling casino, or gaming establishment; or

any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

DEFINITIONS- For purposes of above--

LIQUOR STORE- The term 'liquor store' means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store

which sells both intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(r))).

CASINO, GAMBLING CASINO, OR GAMING ESTABLISHMENT- The terms 'casino', 'gambling casino', and 'gaming establishment' do not include--

-a grocery store which sells groceries including such staple foods and which also offers, or is located within the same building or complex as, casino, gambling, or gaming activities; or

-any other establishment that offers casino, gambling, or gaming activities incidental to the principal purpose of the business.

It is illegal to withdraw TANF benefits from an ATM located in one of the prohibited locations, or to use TANF benefits at a point of sale (POS) terminal located in a prohibited location.

Rhode Island will compile a report of the EBT restricted transaction quarterly. Any person receiving cash assistance through the RI Works program who uses an EBT card in violation shall be subject to the following penalties:

- For the first violation, the household will be sent a warning that a prohibited transaction occurred;
- For the second violation, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location;
- For the third and all subsequent violations, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location AND for the month following the month of infraction, the amount of cash assistance to which an otherwise eligible recipient family is entitled shall be reduced by the portion of the family's benefit attributable to any parent who utilized the EBT card in a restricted location. For a family size of two (2), the benefit reduction due to noncompliance with use of EBT at a restricted location shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred five dollars ($105).

If an individual believes that the intended action regarding usage of EBT cash at restricted locations is incorrect, s/he may request a hearing before the Executive Office of Human Services Hearing Officer within thirty (30) days of the mailing of the notice of adverse action.

The individual may request that benefits be continued pending the outcome of the hearing if the request is made within ten (10) days of the mailing of the notice.

Description of Public Involvement in the Administration of Rhode Island TANF Program:

Since passage of PRWORA in August 1996 and the implementation of Rhode Island's own welfare reform legislation in May 1997, R.I. DHS has maintained a strong and viable partnership with the initial Welfare Reform Implementation Task Force (WRITF).

With the recently enacted Rhode Island Works Program, the WRITF group is now known as the Rhode Island Works Advisory Committee. The membership consists of representatives

of state agencies, anti-poverty organizations, and community-based organizations that are committed to assisting the State and the Department in efforts to deliver an effective program for low-income families.

As defined by the Administrative Procedures Act (APA) and HHS Administration for Children and Families TANF State Plan requirements, draft rules on the R.I. Works Program were published on November 9, 2011, comments were formally heard and submitted to the Department for consideration by December 8, 2011. The Department has used the promulgation period to inform and support updates to the TANF State Plan.

The Rhode Island Works Program Advisory Committee has met monthly or bimonthly and receives progress reports, reviews and comments on policy and regulations, and offers recommendations to the Director on best practices and effective solutions to challenges and opportunities facing the State of Rhode Island.

Through both the formal public hearing process as well as the ongoing advisory committee meetings, the State of Rhode Island continues its commitment of transparency and openness with regard to its public assistance programs. The Department will continue to work closely with the community to ensure continuous improvement in our progress toward helping families out of poverty.

Maintenance of Effort (MOE) Funded Services:

The State of Rhode Island expends funds to administer and support a range of benefits and services to assist low income needy children and families. For purposes of Rhode Island's TANF State Plan, the definition of low income needy family means a family which includes a dependent child(ren) under age 18, or 19 if full-time student, and a parent/caretaker relative with a gross household income level which is at or below 225% of the Federal Poverty Level (FPL). While it is recognized that income and resource limits may differ somewhat from program to program, in order to receive benefits or services through programs described in this section of the R. I. TANF State Plan, a family must meet this state's definition of low income.

For purposes of the subsidized employment programs supported by the TANF Emergency Contingency Fund under ARRA, a low-income family also meant a non-custodial parent who is responsible for child support for a child under the age of 18 who is living in the home of the custodial parent or relative who is receiving some form of public support on behalf of the child, including cash assistance, SNAP, Medical Assistance, or Child Care subsidies. Both the non-custodial parent and the custodial family must have been low-income. In addition, low-income family also meant older youth, ages 18, 19, and 20, who were members of a low-income family which included a child under the age of 18.

The following outlines those benefits and services which are/were funded as either a Segregated State Program or Separate State Program and meet/met one or more of the four purposes of TANF and thus qualify as state maintenance of effort (MOE) expenditures, claimable under TANF regulations.

SEGREGATED AND/OR SEPARATE STATE PROGRAMS:

· CHILD CARE ASSISTANCE FOR BOTH CASH ASSISTANCE AND NON-CASH LOW INCOME WORKING FAMILIES - CHILD CARE SUBSIDIES ARE PROVIDED TO ACTIVE R.I. WORKS PARENTS ENGAGED IN WORK ACTIVITIES AND FOR ALL LOW INCOME WORKING FAMILIES ENGAGED IN EMPLOYMENT FOR 20 OR MORE HOURS PER WEEK, AS WELL AS LOW INCOME YOUTH ENROLLED WITH THE YOUTH SUCCESS PROGRAM WHO ARE COMPLETING THEIR HIGH SCHOOL DIPLOMA OR GED WITH EMPLOYMENT FOR 20 HOURS/WEEK. CURRENT ELIGIBILITY CRITERIA FOR NON-CASH ASSISTANCE PARENTS WHO MEET THE INCOME CRITERIA ARE OUTLINED IN RHODE ISLAND'S CHILD CARE AND DEVELOPMENT FUND (CCDF) STATE PLAN.

Child Care Assistance ends dependence of needy families on government benefits by promoting job preparation and supporting working families. Consistent withTANF Purpose 2

- **State funded Head Start Services for low-income children** who are not able to be served through federally funded Head Start Programs - State-funded head start is a means tested program and accepts only those families who are determined low income needy as defined above. Children between 3 and 4 years of age benefit by school readiness programs and parent involvement which is required by all families and these parents gain information about adult education, job skills training and work opportunities, thus improving their ability to become economically independent. Consistent with TANF Purposes 1, 2, 3, 4
- **Emergency Assistance and residential services for vulnerable youth, through the R.I. Department of Children, Youth and Families -** Emergency Assistance as allowed under prior law supports the maintenance of services for those families who would have qualified for EA under the prior program as described in Rhode Island's State Plan in 1995. Services are provided to children who are victims of abuse and/or neglect, or at risk of abuse and neglect. EA is used for TANF MOE only to the extent that State-only dollars are expended to support the range of family intervention, counseling and case management services provided. State-funded residential services through DCYF, for those with active reunification plans, also provide a safe temporary environment for children as families seek stability. In such circumstances, children may be absent from the home for more than 180 days so long as reunification plans are maintained. These expenditures are not matched with any other federal or non-federal funding source.Consistent with TANF Purposes 1 and 3
- **Child Support Pass-through payments to children -** The state pass-through of eligible payments to children of non-custodial parents increases the family's income, and supports the likelihood that the custodial parent's household income will increase, by both regular child support payments and with the TANF work program, their ability to prepare for and enter the job market. Consistent with TANF Purpose 2
- **Rental Assistance Payments through the State Community Action Fund -** Rental assistance may be provided through CAP agencies using state-only dollars. Low income families qualify if they can demonstrate an ability to maintain themselves in the home or apartment and have a short term need for special assistance. The rental assistance payment may not exceed the State's maximum payment which cannot

exceed $600 per month for a maximum of 2 months. - Consistent with TANF Purposes 1 and 4

- **State funded low income heating assistance -** Low income families may receive state funded heating assistance during the year. This is administered by the R.I. Community Action Programs. - Consistent with TANF Purposes 1 and 4
- **State funded Supportive Housing and Development Services for low income families administered through Office of Housing and Community Development and Rhode Island Housing -** The State of Rhode Island supports housing for low income families who need help in transitioning to permanent housing, who may be working toward qualifying for the purchase of affordable housing, or who need emergency intervention to prevent the loss of otherwise stable housing. Stable housing is a core need of families who are trying to prepare for or maintain themselves in a job.- Consistent with TANF Purposes 1, 2, and 4
- **Governor's Workforce Board job training and education for disadvantaged youth and adults -** The R.I. GWB has funded a significant number of programs throughout Rhode Island which are designed to provide low income youth and adults with job training and access to employment resources. Services include job finding skills and for many in Rhode Island, skill upgrading programs. Both youth and adults are either unemployed or underemployed and are held to a means tested application process. Some programs are geared to meet the special needs of young parents, both custodial and non-custodial parents. - Consistent with TANF Purposes 1, 2, 3, and 4
- **State funded Adult Literacy Services -** Rhode Island has in effect adult education programs through Rhode Island Department of Education (RIDE). Additionally, RIDE has worked very closely with the TANF Program to create contextualized learning opportunities for low income parents who are not academically eligible for much post-secondary programming.. - Consistent with TANF Purposes 1, 2, 3 and 4
- Under the category known as short-term, non-recurrent benefit programs, funds may emanate from state general revenue, charitable organizations, non-profit, or local government resources. Programs may include a benefit to a custodial parent in lieu of child support, a one-time benefit to those who qualify for Rhode Island's Earned Income Tax Credit or to any low-income family, including those receiving some form of public support, and one-time benefits may take any form, including but not limited to, food, restoration of utilities or avoidance of utility shut-offs, appliance replacement to enable food storage or meal preparation, auto repairs, or other basic necessities - Consistent with TANF Purposes 1 and 2
- State-funded higher education grants to low-income youth helps families prepare older youth for careers - Consistent with TANF Purposes 2 and 3

Systems for tracking and managing funding streams, beneficiary education, training, work activities, and other child and families support programs are in place as well as data reporting to meet requirements outlined in Final TANF Regulations. Administrative costs for technology would also be claimable as MOE under the State's TANF Program.

Non-Assistance

The state supports several other MOE-funded services for low-income needy families including, but not limited to, recurring short-term benefits, as noted below.

1) Short-term Cash Assistance or Benefit Programs

Under R.I. Works Program, the state may implement a short term (not more than 4 consecutive months) cash payment or benefit program for qualifying applicants for cash assistance and low income families. The state may also provide non-recurrent, short-term benefits to low income families while TANF Emergency Contingency Funds, or its successor legislation, is available to these families.

2) State Earned Income Tax Credit

The Rhode Island State Earned Income Tax Credit (SEITC) has both a non-refundable as well as a refundable tax credit which is based upon twenty-five (25%) percent of the federal Earned Income Tax Credit. Consistent with R.I.G.L. 44-20-2.6 (d) and 44-30-98, Article 30, Rhode Island taxpayers filing for State EITC who meet both financial eligibility criteria as defined by federal tax law to claim EITC, and who have at least one (1) dependent child in their family, will receive a refundable amount equal to up to twenty-five (25%) percent of the federal EITC. The Rhode Island General Assembly may legislatively adjust, from time to time, the percentage of the federal rate used by this state, to determine the State EITC amount refunded to low income working families.

3) Disaster Relief

The State of Rhode Island provides short-term non-recurring benefits to victims who have been affected by Hurricane Katrina and/or Hurricane Rita and other officially declared disasters from time to time.

4) Property Tax Relief for Income Eligible Home Owners and Renters

The State of Rhode Island provides property tax relief in the form of tax refunds to individuals 65 and older, disabled individuals as well as non-disabled/non-elderly individuals and families who meet income eligibility requirements and who file for such tax refunds. Consistent with R.I.G.L. 44-33, the refundable tax credit is based upon the amount that property taxes or rent constituting property taxes exceeds the amount of the low income thresholds established in law and for purposes of TANF MOE, the State would only claim expenditures paid to low income families.

4) Community-based Work, Training, Housing, Food Assistance, Emergency Needs, and Family Support and Development Programs for low income parents and children funded through state and local non-profit funding streams such as

The Annie E. Casey Foundation, the Rhode Island Foundation, the United Way of Rhode Island, which collectively support a wide range of employment and training, shelter, food assistance, emergency needs and community development initiatives targeted to improve outcomes for youth and families in the areas of economic self-sufficiency. Only non-matched qualifying funds and services may be claimed toward Rhode Island's TANF MOE, including third-party and charitable contributions supporting the RI Community Food Bank's distribution of food to low income Rhode Island families.

5) State-funded Programs for Youth and Families administered through the Community Action Network.

Programs and services funded through the R.I. Community Action Network assist children and families throughout the state. These state funded programs and services meet at least one or more of the four purposes of TANF and include but are not limited to youth development, state funded nutrition programs, energy, early childhood programs, housing services programs**.** Additionally, the Rhode Island Alliance of Boys and Girls Clubs provides pregnancy prevention and services to RI teens who are high risk of having a teen pregnancy or second teen pregnancy

6) State funded legislative grants to community based special programs and services.

The State legislature funds a wide range of programs and services which benefit the needs of families, children and the community. Family intervention services, truancy intervention, substance abuse counseling, transportation, youth mentoring, parenting, and other types of special programs are delivered to at-risk youth, children, and/or parents. These services meet at least one of the four purposes of TANF.

7) Adult Literacy and Job Training Development funded by the Governor's Workforce Board

State funded programs which target youth as well as custodial parents and non-custodial parents are provided throughout the state for those who need basic education, GED, and job skills in order to compete in the Rhode Island job market. Such programs improve the economic well-being of youth and families by assisting both unemployed, under-employed individuals, some of whom may be transitioning from youth training school or adult correctional institution and need re-entry services. These programs are administered through the R.I. Department of Labor and Training, Department of Corrections, as well as the R.I. Department of Education. These goals are consistent with all four purposes of TANF and thus meet the requirements for TANF-MOE.

8) State funded Supplemental Security Income (SSI)

In accord with DHS Policy Section 0402.10, Standards of Assistance, SSI State Supplements paid to children and parents receiving Supplemental Security Income. These payments augment the federally funded SSI payments and assist families who are typically unable to improve their household resources because they are either unable to work themselves or must remain in the home to care for a disabled child(ren).

C. ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT)

All parents and caretaker relatives not specifically exempted are required to participate in appropriate work activities. Failure to do so may result in a penalty if good cause is not provided for the non-participation. Current policy states: During the first three (3) months of noncompliance with work requirements, the amount of cash assistance to which an otherwise eligible family is entitled shall be reduced by the portion of the family's benefit attributable to any parent who, without good cause, has failed to enter into an individual employment plan or has failed to comply with his or her individual employment plan; provided that the reduction shall be applied during the first three (3) months, whether or not consecutive, of such failure or non-compliance by the parent.

For a family size of two (2), the benefit reduction due to noncompliance with the employment plan shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred five dollars ($105).

After three (3) months of noncompliance, the Department shall terminate cash assistance to a family if any parent in the family has failed, without good cause, to enter into an individual employment plan, or to comply with his or her individual employment plan and has been penalized for three (3) months, whether or not consecutive.

The penalty becomes effective on the next payroll date after the adverse action period. The participant is notified of the penalty by a system-generated notice.

If the family's benefit has been reduced for less than three (3) months, whether or not consecutive, due to the parent's failure to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan, benefits shall be restored to the full amount beginning with the initial payment made on the first of the month following the month in which the parent (1) enters into an individual employment plan and demonstrates compliance with the terms thereof, or (2) demonstrates compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department.

If the family's benefit has been terminated due to the failure by one or more parents to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan and has been penalized for three (3) months, the family may re-apply for benefits and benefits shall be restored to the family in the full amount the family is otherwise entitled to under this chapter beginning on the first of the month following the month in which all parents in the family who are subject to the employment plan requirements (1) enter into an individual employment plan and demonstrate compliance with the terms thereof, or (2) demonstrate compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department, i.e., the parent must sign a new Employment Plan, demonstrate compliance with the Plan for at least two (2) weeks, and continue to participate, for the penalty to be considered cured and the case accepted beginning with the first of the month following the month that she or he began to comply.

(iv) Take reasonable steps, as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government.

In accordance with the General Laws of Rhode Island 40-6-12 all records pertaining to the administration of public assistance are declared to constitute confidential matter. It is unlawful for any person to make use of, or cause to be used, any information contained in these records for purposes not directly connected with program administration, except with the consent of the individual concerned. Any person violating any provisions of this state law, or the lawful rules and regulations made there under will be deemed guilty of a misdemeanor, and fined not less than two hundred dollars ($200) or will be imprisoned for not more that six (6) months or both.

D. TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND

FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

In accordance with the General Laws of Rhode Island 40-6-12 all records pertaining to the administration of public assistance are declared to constitute confidential matter. It is unlawful for any person to make use of, or cause to be used, any information contained in these records for purposes not directly connected with program administration, except with the consent of the individual concerned. Any person violating any provisions of this state law, or the lawful rules and regulations made there under will be deemed guilty of a misdemeanor, and fined not less than two hundred dollars ($200) or will be imprisoned for not more that six (6) months or both.

E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

YOUTH RESPONSIBILITY AND THE ADOLESCENT SELF-SUFFICIENCY COLLABORATIVE BECAME THE YOUTH SUCCESS PROGRAM

The Department has contracted since April 1, 2009 with an association of six (6) community-based organizations to provide an intervention program for at-risk and pregnant/parenting populations, called the Youth Success (YS) Program. All contracted organizations have either their own educational (GED) program or access to each others' programs, should a teen not remain in high school, which is the primary educational goal. Academic instruction leads to a high school diploma or its equivalent, pregnancy prevention education, skills development, service learning, and career exploration/work experience. The Youth Success program provides case management services, ensures health and dental care needs are met, improves teen character development and increases life skills, especially academic and parenting skills. Substance abuse services, domestic abuse/trauma services, mental health services and coordination with the Office of Child Support Services are all present in-house in these nine member agencies. The Family Needs Assessment used by YS is in compliance with the ACF's Teen Parent Responsibility Plan. As partner agencies may also operate Early Head Start, Head Start and licensed child care centers, participating youth receive priority for Head Start and child care services when appropriate. Further, as three of these agencies are regional leads in the Family Care Community Partnership (FCCP) operated by RI's Department of Children, Youth and Families, outreach is coordinated with the FCCP to reduce instances of teen pregnancy. An example of this Department's partnership with the FCCP and with the Department of Health is the joint effort to add resources to the Nurse-Family Partnership Program. Using strategies scientifically proven effective to reduce initial and repeat pregnancy, the YS works with teens, individually or in groups, in schools, in community sites, and/or in the teens' own homes. The YS also tracks, monitors, and reports to DHS each pregnant and parenting teen's school attendance, and works to resolve issues of non-compliance with DHS requirements, such as attending school. Minor parents are required to live at home with their parents, with a relative, or a legal guardian in order to be eligible for cash assistance through the R.I. Works Program. Unless otherwise authorized, the cash assistance is issued to the parent, relative, or the legal guardian on behalf of the minor parent. When there is good cause for a minor parent to live outside the allowable living arrangements above, and there is no suitable relative or legal

guardian, the minor parent must live in an adult-supervised supportive living arrangement which ensures regular adult supervision and which requires the minor parent to participate in secondary education and the Youth Success program. Youth may be placed at state-developed New Opportunity Homes, as appropriate.

NEW OPPORTUNITY HOMES

New Opportunity Homes (NOH) are a key component of DHS's teen parent programs. The New Opportunity Homes are supervised living arrangements which offer an alternative option for pregnant and parenting minor R.I. Works Program applicants/recipients who are unable to remain at home with their own parents or guardians. The New Opportunity Homes provide minor teens with a positive environment that is safe and nurturing. A multi-disciplinary team reviews prospective residents to determine the appropriateness of a NOH, using screening criteria and assessments to assure that minor teen's needs may be met by a NOH. Moreover, each resident is assigned a case manager. Together, the NOH and the case management agency offer each resident educational supports and opportunities to develop social and life skills, including parenting skills, necessary to become positive parents and self-sufficient, productive adults.

Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan

In accordance with the requirements of State PL 97, Chapter 176, DHS has had an active role in a formal partnership called the Rhode Island Alliance to Prevent Teen Pregnancy (formerly the Rhode Island Teen Pregnancy Prevention Partnership) with the Department of Health, Department of Education, the Department for Children, Youth and Families, and several community-based organizations, which was originally formed to address the complex issues of teenage pregnancy and to develop Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan. The Plan, which was completed in June 1999 and revised in 2004, is based on research findings, results of community forums, and professional expertise in teenage pregnancy prevention. The Plan was distributed to members of the R. I. Teen Pregnancy Prevention Coalition, Governor's Office, and the General Assembly. The Plan contains information on federal and state funding sources, programs that educate at-risk teens, programs that provide pregnancy prevention education, a review of current literature pertaining to this topic, state level initiatives and financial resources for teach training. The Plan is being reviewed by the RI Alliance at this time, for possible further revision and updating.

The Prevention Plan updated in 2004 continued with its original nine (9) recommendations, along with progress achieved to date, and updated strategies to successfully implement the recommendations. Data reflects that the state exceeded its initial numerical goals for calendar years 1999 through 2004, and as a result the TANF State Plan defined new numeric goals for calendar years 2005 through 2008. These goals were well addressed and, as of 2009, Rhode Island's teen birth rate had declined to 26.8 per 1000 girls aged 15-19 years old, as compared with the national teen birth rate of 39.1 per 1000 girls. In 2015, the RI teen birth rate was 14.3%[1] Teen births are concentrated in four of the poorest communities, and efforts and resources are focused on those areas, in an attempt to reduce the rate there, further. Of special concern is the disparity between birth rate for those who are 18-19 years old (42.8%), and the rate for those who are 15-17 years old (18.9%). The RI

Alliance's Strategic Plan for 2012 provides much data and information about the context of this problem.

In both 2016 and 2017 RI contracts with the Rhode Island Alliance of Boys and Girls Clubs to provide teen services across the State. These contracts have a targeted focus of supporting efforts to prevent teen pregnancy and serve pregnant and parenting teens. Provide pregnancy prevention, career development, financial and academic support, and leadership skills programming to RI youth. In FY2018, RI will be procuring new Youth Success and Youth Support vendors, these vendors are required to develop a teen pregnancy prevention work plan.

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[1]*2017 Rhode Island KIDS COUNT Factbook/ Health*.

F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

Statutory Rape

Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan has recommended that "Rhode Island should clarify, communicate, enforce and strengthen existing statutory rape and child molestation laws." A collaborative effort has therefore developed between each ASSC, now Youth Success (YS), and the DHS funded Domestic Violence Prevention program which provides education and training on the problems of statutory rape and child molestation to state and local law enforcement officials, educators, and adolescent counselors, all of whom are required to notify the R.I. Department of Children, Youth and Families when sexual abuse of a child is suspected. Further, the YS Program has been expanded to outreach and enroll 100% pregnant and parenting teens and a minimum of 330 males and 300 females who are considered at-risk youth. The YS Program will outreach to fathers in an effort not only to establish paternity and child support, but to encourage them to maintain an emotional relationship with their child.

G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

1427 ELECTRONIC BENEFIT TRANSFER

1427.05 PAYMENT OF EBT CASH ASSISTANCE

REV:10/2008

Payment of RI Works Program cash benefits through an electronic benefit transfer (EBT) system is authorized by R.I.G.L. 40—5.2—31. Cash benefits are credited to an EBT account in the recipient's name by 5:00 a.m. on the first and sixteenth of the month including weekends and holidays.

Monthly reporting cases are issued benefits once a month within five (5) business days after the Department receives a completed monthly report form. (See Section 1426.20 et seq.)

1427.05.05 Accessing EBT Cash Benefits

REV: 01/2016

Recipients and authorized payees access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs) which display the NYCE logo.

Some retail establishments also provide access to cash accounts at point—of—sale (POS) terminals which display the QUEST logo.

This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store.

1427.05.20 Restrictions on Use of EBT Cash Benefits

REV: 01/2016

Pursuant to Section 4004 of Public Law 112—96, it is prohibited for a TANF recipient to use their TANF cash assistance benefits received under RI Works, Rhode Island General Laws 40—5.2 et seq., in any electronic benefit transfer transaction (EBT) in:

* any liquor store; or

* any casino, gambling casino, or gaming establishment; or

* any retail establishment which provides adult—oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

The Department is working with the EBT contractor to block the use of the EBT card in these restricted establishments.

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

1427.05.05 Accessing EBT Cash Benefits

REV: 01/2016

(continued from above)

. . . Each month, recipients can make a total of two (2) free cash withdrawals from ATMs. For each additional ATM cash withdrawal in the month, a fee of forty-five (45) cents is charged. The fee is automatically deducted from the recipient's cash benefit account.

No fee is charged when cash benefits are accessed at POS terminals.

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

The State of Rhode Island does not intend to treat families moving into the state differently than established residents.

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

The R.I. Works Program has adopted the provisions in section 402 (b) of PRWORA with regard to legal non-citizens. This requirement to comply with PRWORA will remain in effect according to all applicable changes made to the federal law, as that Act may hereafter be amended. Legal non-citizens must meet income and resource criteria including their sponsor's income and resources. Such individuals will be eligible for cash assistance at the same levels and under the same rules as citizens. In order to be eligible, the non-citizen must be:

- A qualified non-citizen who entered the U.S. prior to 8/22/96; or
- A qualified non-citizen who entered the country on or after 8/22/96 and is exempt from the five (5) year ban as defined below; or
- After the five (5) year ban, a qualified non-citizen who entered the U.S. on or after 8/22/96.

Qualified non-citizens who are exempt from the five (5) year ban include:

- Refugees, under section 207 of the Immigration and Nationality Act (INA);
- Asylees, under section 208 of the INA;
- Amerasian entrants as defined under section 584 of the Foreign Operations, Export Financing and Related Programs Appropriations Act of 1988;
- Cuban or Haitian entrants under section 501 (e) of the Refugee Education Assistance Act of 1980;
- Lawfully residing honorably-discharged veterans (except one discharged for reasons of immigration status), and the unremarried widow or widower of the veteran;
- Non-citizens on active duty in the U.S. Armed Forces, their lawfully residing spouses and unmarried dependent children;
- Battered victims with a petition pending under 204 (a) (1) (A) or (B), or 244 (a) (3) of the INA; or

- Victims of human trafficking in accordance with section 107 (b) of the Victims of Trafficking and Violence Protection Act of 2000.

Qualified non-citizens who entered the U.S. on or after 8/22/96, who are subject to the five (5) year ban include:

- Lawful permanent residents (LPR)
- Parolees for at least one (1) year under 212 (d) (5) of the INA
- Conditional entrants under 203 (a) (7) of immigration law in effect before 4/1/80
- Certain American Indians born outside the U.S.

A person who is not a United States citizen and does not meet the alienage requirements established in PRWORA, as amended, is not eligible for cash assistance. Those applicants who are ineligible include undocumented and/or illegal immigrants and persons documented as temporary visitors.

K. SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Rhode Island provides an objective process for the delivery of benefits and the determination of eligibility, for fair and equitable treatment, and for complaints and an appeals process for those recipients that have been adversely affected. Specific details pertaining to the policy and procedures are contained in Rhode Island DHS Manual Sections Civil Rights Compliance and Complaints and Hearings.

Furthermore, a parent or caretaker who requests assistance for a child shall meet with an agency representative as soon as possible and no later than five (5) days from the date of request for assistance. The application for assistance shall be accepted or denied by the Department no later than thirty (30) days following the date of application.

A family found by the Department to meet the eligibility criteria shall be entitled to receive cash assistance from the date of submitting a signed application. The family members shall be eligible for cash assistance for so long as they continue to meet the eligibility criteria and parents shall be eligible so long as they meet the terms and conditions of the work requirements.

Any applicant or recipient aggrieved because of a decision by the Department, including but not limited to, a decision regarding eligibility for benefits, the amount of benefits, terms of an Employment Plan or a delay in making a decision with respect to an application for assistance shall be entitled to an appeal. The Department shall provide an applicant with written notice of a decision to deny benefits and shall provide recipients written notice at least ten (10) days in advance of a decision to terminate or reduce benefits to the family. Notices shall be in easy to understand language and shall explain the reason for the Department's decision and cite the relevant section of the Department's regulations. The family may appeal the decision by filing a written request with the Department within thirty (30) days of the date the notice was mailed. If the recipient files the request within ten (10)

days of the date the notice was mailed, the recipient may receive benefits without reduction pending the outcome of the appeal. Hearings with respect to public assistance shall be conducted by the Department.

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

The Patient Protection and Affordable Care Act of 2010 added a provision to the Social Security Act requiring each state to indicate its intention to assist individuals in training for, seeking and maintaining employment in the eldercare workforce. Rhode Island notes its status as one of the most elder-populated states (proportionately) in the country, and has been proactive historically in ensuring our TANF recipients are prepared to work effectively in this field which serves 14.4% of the state's population (2010 census). The current national average is that the elderly represent 12.9% of the population, and this proportion will increase both nationally and in Rhode Island, per the Administration on Aging. It is predicted that, in 2030, elderly persons will be 19.7% of the national population, and 21.4% of Rhode Island's population.

Vocational trainings, which the Department supports for TANF recipients who choose them, in the areas of Healthcare Exploration, Homemaker, Certified Nursing Assistant and Medical Assistant are provided by eight separate agencies in Rhode Island. Of those eight agencies, seven already incorporate much material devoted to preparation for work with the elderly, and the eighth will have developed and begun delivering elder-centric training by 7/1/2012.

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICECS ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

Name of Program or Benefit	Financial Eligibility Criteria	Program Benefit to Eligible Families
Child Support Pass-Through	When a non-custodial parent receives a court order to pay child support on behalf of any children receiving cash assistance, the Department is designated to administer child support collections and payments. The Department passes along to the cash assistance family the first $50 of the monthly payment.	Families must be receiving cash assistance and have current child support collected through the Department.
Child Care	Corresponds to ACF 196 items 5b and 5c, column B. Child care services are provided to all cash assistance parents who participate in work activities and to low income working families and teen parents involved in the Youth Success program. Eligibility for these populations are defined in the CCDF and TANF state plans.	Either must be a cash assistance family or below 180% FPL.
Refundable Earned Income Tax Credit	The state provides an earned income tax credit that is refunded to eligible low income working tax payers with one or more dependents.	Eligibility is limited to low income working adults with at least one dependent in the household, who filed for and were eligible to receive Federal EITC, in accordance with state taxation rules. RI's EITC started in 1996.
RI Property Tax Circuit Breaker Refund	RI property tax "Circuit Breaker" refund for low income eligible home owners and renters. The circuit breaker program reduces the property tax liability for individuals whose property tax payments represent a large portion of their family's income.	Families with dependent children with incomes at or below 225% FPL.

Name of Program or Benefit	Financial Eligibility Criteria	Program Benefit to Eligible Families
Program Administration	This category reflects the overall administrative costs for RI Works/TANF program operations, management, direct services and case management staff, as well as systems and financial management.	At or below 225% of FPL
State Funded Head Start	The program provides early education and comprehensive school readiness services to low income 3 and 4 year old children who would otherwise not be able to access such services through the federally funded Head Start programs. This is a means-tested program.	Family income at or below 100% FPL, or categorically eligible for cash assistance or SSI.
Emergency Assistance Through the Department of Children, Youth and Families	Emergency assistance helps children and families in cases of emergency situations such as deprivation of food, housing, or parental support. Expenditures may be related to the temporary absence of the child from the home and family.	Families that are cash assistance eligible.
State Supplement for SSI Recipients	This state program augments the Federal SSI by providing a supplemental cash payment to low income children and/or parents who qualify.	Child and/or parent must meet SSA and TANF state plan low income needy family criteria at or below 225% FPL.
Youth Services	Youth focused career assessment and development, job skills training and mentoring.	Family income at or below 225% FPL.
RI Governor's Workforce Board Adult Literacy Programs	Adult education and literacy programs for low income families.	Family income at or below 225% of the poverty level.
Residential Services	Non-Emergency Assistance youth temporarily out of the home who have a goal of reunification with their families require shelter, clothing and guidance. These expenditures from state general revenue are managed by DCYF. Parents have requirements and children receive services to ensure their continuing education, safety and well-being.	Children must have a goal of reunification and be from families whose incomes were at or below 225% FPL.

Name of Program or Benefit	Financial Eligibility Criteria	Program Benefit to Eligible Families
Community Based Family Support and Development	This program consists of legislative grants that help low income families with state funded rental or shelter assistance, heating and utility expenses, employment preparation of adults and youth, youth responsibility workshops, parenting skills, basic education, pregnancy prevention counseling, anti-violence activities, after school tutoring, and crisis intervention.	Family income at or below 225% FPL
Low Income Energy Assistance	The Henry Shelton Act provides one-time energy assistance to low-income families who qualify for the federal LIHEAP program. Electricity consumers throughout Rhode Island pay a small surcharge on their monthly bill to fund the program. Each household determined eligible for the LIHEAP program by a local Community Action Agencies are eligible to receive a one-time credit of $450 on their utility bill.	Family income at or below 225% FPL
Supplemental food	The RI Community Food Bank distributes non-federally funded food to community based organizations for low income families.	All families would be below 225% FPL.
Roman Catholic Diocese of Providence	The Roman Catholic Diocese of Providence is a non-profit organization that provides several basic assistance programs to low-income individuals and families in Rhode Island, including tax preparation, utility assistance and other one-time basic needs assistance.	Family income at or below 225% FPL

Name of Program or Benefit	Financial Eligibility Criteria	Program Benefit to Eligible Families
The Salvation Army	The Salvation Army runs the Good Neighbor Energy Fund (GNEF), which was created to provide assistance to individuals and families in a financial crisis who are not eligible for the Low Income Home Energy Assistance Program (LIHEAP). Clients are eligible to receive assistance through GNEF once per fiscal year, for a total of two years. Based on what type of assistance (electric, gas, oil) there are monetary limitations on how much GNEF can assist the client.	Family income at or below 225% FPL
United Way of Rhode Island	United Way Rhodes Island provides grants that support basic services, lifelong learning and community engagement. UWRI connects Rhode Islanders to critical services like job skills training, educational opportunities, child care, housing, health and emergency services to change lives.	Family income at or below 225% FPL.
Rhode Island Mentoring Partnership	RI Mentoring Partnerships invests in expanding the community's capacity to mentor youth, both through capacity build efforts, supporting school based mentoring programs and through public service announcements. Mentoring connects a young person to personal growth and development, and social and economic opportunity.	Family income at or below 225% FPL

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act) Yes

Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under The Unified or Combined State Plan under title XIX. (section 402(a)(3) of the Social Security Act) Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have had at least 45 days to submit comments on the plan and the design of such services Yes

Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act) Yes

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act) Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— refer such individuals to counseling and supportive services; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence Yes

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.

For those companies affected by increased imports or shifts to production out of the United States, Rapid Response staff members provide information about the Trade Adjustment Act (TAA), Reemployment Trade Adjustment Assistance RTAA, and Health Coverage Tax Credit

(HCTC) programs. Layoff aversion and business retention strategies are practiced as part of the scope of work for Rapid Response as a function of the Business Service Unit. The Business Service Representatives continually work on relationship building with the employer community to support them throughout all business cycles. Workshare has been a very popular and often used program by businesses experiencing a downturn in business. Joint visits to employers by the RI Department of Labor and Training Business Service Unit and other economic resources entities such as The RI Commerce and Small Business Development Corporations are conducted regularly initiated by outreach as a result of employer requests.

Has the state incorporated TAA into the sections indicated above? No

JOBS FOR VETERANS' STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

A. Veterans and eligible persons will receive employment, training, and job placement services at netWorkri Career Centers same or equal to all other customers. However, veterans and eligible persons will receive priority of service, which means, the veteran or eligible person will receive access to a service earlier in time than a non-covered person, or, if the resource is limited, the veteran or eligible person receives access to the services instead of or before the non-covered person. NetWORKri Career Centers offers a priority of service delivery system to all veterans and covered persons on employment, training and job placement services. In all netWORKri Career Centers at point of entry all customers are screened for veteran status by an American Job Center (AJC) staff person by verbally asking "Are you a Veteran?." Once the veteran or covered status is identified a quick assessment is conducted by the AJC to identify Significant Barriers to Employment. At point of contact, if one or more Significant Barriers to Employment (SBE) is indicated as outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14, a referral or "Warm Handoff" is made to a Disabled Veterans' Outreach Program Specialists (DVOP). However, if no SBE's are indicated during the screening/intake process the veteran or covered person will be referred to an AJC staff person to render appropriate employment, training and job placement services. In addition, after a SBE has been

identified by a AJC staff person, a Disabled Veterans' Outreach Program Specialists (DVOP) will render intensive services to eligible veterans or eligible persons with one or more Significant Barriers to Employment (SBE), identified by the Secretary of Labor outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. DVOP Specialists will conduct a comprehensive assessment of education, skills, and abilities of each referred eligible veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veterans to meet their employment goals. If training has been identified in the Individual Employment Plan either by DVOP Specialist or an AJC counselor, they will make an appropriate referral to a suitable training program including but not limited to the following: occupational skills training; on-the-Job training; job readiness training; adult education and employer customized training. When an eligible veteran or eligible person is determined job ready and/or completes training services; DVOP Specialist or AJC staff will collaborate with Local Veterans' Employment Representatives (LVER) and the Business Service Unit (BSU), for information on job orders and job development opportunities for veteran. The LVER's principal duties are to 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 facilitate employment, training, and placement services furnished to veterans in our state's career service delivery systems. LVER staff will conduct follow-up activities with employers to ensure veterans and/or eligible persons are successful throughout the hiring process.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

Disabled Veterans' Outreach Program (DVOP) Specialists as an integral part of the State's Labor Exchange System the Disabled Veterans' Outreach Program (DVOP) Specialists primary duties are to meet the needs of eligible veterans and eligible persons that have one or more (SBE), as per outlined, Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. DVOP Specialist will provide intensive services and facilitate the employment needs of eligible veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor (Secretary). DVOP Specialists will conduct a comprehensive assessment of education, skills, and abilities of each referred eligible veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the eligible veterans to meet their employment goals. In addition, DVOPs will continue to provide intensive service, in combination with follow-up activities. DVOP specialists will continue to monitor veteran's progress throughout training. Eligible Veterans or eligible persons in need of intensive services will be assigned to a DVOP Specialist after receiving an initial intake assessment conducted by the identified AJC staff member. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veteran to meet his or her employment goals. All activities, services and case notes and appropriate data are entered by the DVOP Specialist into the state's case management information system and virtual

one-stop for monitoring and reporting purposes. In order to maximize services to those eligible veterans and eligible persons, DVOP staff conducts outreach activities at a variety of sites including, but not limited to:

• Vocational rehabilitation and employment programs;

• Homeless veterans retention project grantees;

• Department of Veterans Affairs Medical Center and Vets Center;

• Homeless shelters;

• Community Stand Down Events; and

• State vocational rehabilitation agencies.

Local Veterans' Employment Representatives (LVER) As an integral part of the state labor exchange system the Local Veterans' Employment Representatives (LVER) staff will focus on their primary role, which is employer outreach on behalf of all Veterans and eligible persons at netWORKri. Furthermore, netWorkri is able to develop a veteran marketing strategy and individualized employer outreach program that promote the hiring of Veterans. Furthermore, LVER Staff only perform the duties outlined in 38 U.S.C. 4104(5), which are related to outreach to the employer community and facilitation within our state's employment service delivery system. Therefore, LVER Staff assigned to netWorkri offices are only assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. Additionally, employer outreach is primarily accomplished by a LVER or BSU representative, LVERs should advocate for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities such as: Planning and participating in job and career fairs; Conducting employer outreach; In conjunction with employers, conducting job searches and workshops, and establishing job search groups; Coordinating with unions, apprenticeship programs and businesses or business organizations to promote and secure employment and training programs for veterans; Informing Federal contractors of the process to recruit qualified veterans; Promoting credentialing and licensing opportunities for veterans; and Coordinating and participating with other business outreach efforts.. Employer outreach is primarily accomplished by a "business services team" or like entity, and the LVER is an active member of that team. Additionally, the LVER serves an integrated member within netWORKri by providing principal duties of a LVER including:

• 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

• Facilitate employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems.

In the effort to promote the hiring and retention of eligible veterans and eligible persons the LVER staff will establish a rapport and follow-up with each employer by making weekly employer site visits with Business Service Representatives. This rapport and follow-up will allow the LVER to remind the employers of the benefit of hiring veterans. LVER staff will continue with the relationship building to act in response to the employer's needs in response to any objectives to retain better employees. LVER staff coordinates with the

Business Service Representatives, as a part of the AJC system, on all the job fair and recruitment events. LVER staff will promote job development and provide information on the access to federal tax credit opportunities for employers that hire qualified veterans.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR ONE-STOP DELIVERY SYSTEM PARTNER NETWORK;

DVOP specialist and LVER staff are fully integrated within the career center network to ensure eligible veterans receive a streamline access to all eligible services and veteran employment opportunities. This may include partner programs such as Workforce Innovation and Opportunity Act (WIOA) or the State Office of Rehabilitation Services (ORS) and/or ongoing activities including job recruitments, workshops, computer classes and job fairs. DVOP specialist and LVER staff are fully embedded into the AJC system, and are required to actively participate in all AJC activities so their customers can take full advantage of all available employment and training services. Staff meetings and training sessions amongst AJC partner programs and agencies such as WIOA, Trade Adjustment Assistance Program (TAA), Rapid Response, Reemployment Services and Eligibility Assessment (RESEA), and Employment services to partner programs including ORS, and RI Department of Elderly Affairs (DEA), Department of Human Services (DHS), is critical to the professional development of DVOP and LVER staff. DVOP Specialist and LVER staff participation in these partner staff meetings broaden their knowledge of programs and resources, thus improving their capacity to effectively serve their customer base. Veteran customers benefit from the team approach to service delivery and internal networking among staff. LVER staff communicates veteran employment opportunities to AJC counselors and partner agencies including ORS, DEA, and DHS to ensure veterans are afforded opportunities to employment. Furthermore, LVER staff conducts regular site visits to employers as part of the business service model to ensure a full integration into the business services unit. DVOP Specialist conduct outreach activities to ensure that the veterans' community is aware of the services provided by the DVOP staff as well as the AJC. To help veterans access and connect to AJC partner programs, resources and service outreach activities are conducted at the following locations:

- Veteran community care center at the VA Regional Hospital;
- Homeless veterans projects at the Rhode Island Veterans Home;
- Vocation Rehabilitation and Education (VR&E) unit at the VA Regional Office;
- TAP seminars and follow-up activities at the Newport Naval Base;
- National Guard demobilization events; and
- Yellow Ribbon Events.

Rhode Island employs a Coordinator of Employment & Training Programs to oversee the implementation and delivery of veteran services in the state. This individual will be responsible for the assessment and monitoring of all services provided to veteran customers ensuring compliance with federal Veterans Priority of Service requirements, coordination of services among partners, and the effective utilization of employment and training services. The success of this plan will be monitored and assessed by the review of

case notes, system weekly reports, and quarterly reports made available via the State's EmployRI database

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

The Rhode Island Department of Labor & Training is not approved for Incentive Award Plans, per the states collective-bargaining union contract cash awards for nonfinancial incentives are not currently permitted to give to state employees.

E. THE POPULATIONS OF VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

The eligible veteran and eligible person population to be serviced under the JVSG program have been outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. DVOP Specialist will provide intensive services and facilitate the employment needs of eligible veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor (Secretary). The targeted veteran population is as follows:

1. A special disabled or disable veteran, as those terms are defined in 38 U.S.C 4211(1) and (3); Special disabled and disabled veteran are those:

a. Who are entitled to compensation (or who but for the receipt of military retired pay would be entitle to compensation) under laws administered by the Secretary of Veteran Affairs; or,

b. Were discharged or released from active duty because of a service connected disability;

2. A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento

Homeless Assistance Act (42 U.S.C. I 1302(a) and (b), as amended;

3. 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;

4. An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;

5. A veteran lacking a high school diploma or equivalent certificate; or

6. A low-income individual (as defined by WIOA Section 3 (36))

7. Transitioning members of the Armed Forces who have been identified as in need of intensive services;

8. Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and

9. The spouses or other family caregivers of such wounded, ill, or injured members

DVOP specialist are able to outreach veterans with one or more Significant Barriers to Employment (SBE). Rhode Island Department of Labor and Training strategies have also been developed to address veterans that do not qualify for federal homeless programs and/or Vocational Rehabilitation and Employment (VR&E) services. DVOP Specialist will continue to conduct outreach to Veterans' Service Organizations (VSOs), homeless shelters, U.S. Department of Veterans Affairs (VA) Medical Centers and Vet Centers, food pantries, correctional institutions and residential treatment houses throughout the state as part of community networking strategy to locate veterans with SBEs. A DVOP specialist will provide assistance once a week at the Providence VA Vocational Rehabilitation and Employment (VAVR&E) office to provide and coordinate services to Disabled veterans look to use Chapter 31 benefits.

The State has two HVRP Grantee, Operation Stand Down and Veterans Inc. which DVOP Specialist provide regular site visits to provide intensive services to homeless veterans and provide an opportunity for meaningful employment. The state will target non-qualifying veterans and refer them to the local NetworkRI Career Centers for reemployment and training services offered by Wagner-Peyser and WIOA. Rhode Island's veterans' population includes; incarcerated veterans who are served by the Department of Corrections along with the AJC and DVOP staff after the veteran is released from the Adult Correctional Institution (ACI), and Native American veterans who receive services in collaboration with AJC staff and the RI Indian Council in Providence. Through the collaboration with the RI Indian Council Native American veterans with SBEs will be identified and outreached in an attempt to provide services by DVOP staff.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

As required by 38 U.S.C 4215 (b) and 20 CFR part 1001 and 1010, priority of service is provided to ensure that all veterans and eligible persons receive consideration for all opportunities for which they qualify within the employment service delivery system and any sub-grantee funded in whole or in part by the US Department of Labor. Rhode Island's two local Workforce Development Boards, the Workforce Partnership of Greater Rhode Island and the Workforce Solutions of Providence/Cranston, include the priority of service requirements in their local plans. In addition, display signs are posted at the AJC point of entry that clearly describes priority of service in an effort to encourage individuals to self-identify their veteran status. Furthermore, every AJC staff member is required to verbally ask every customer which enters the center "Are you a Veteran?" If the customer identifies as a veteran or an eligible person, the individual is provided immediate priority. Our AJC centers have intake forms/sign in sheets to screen veterans and eligible persons for one or more Significant Barriers to Employment (SBE) is indicated outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14, when they visit our service delivery points in person. AJC managers are responsible for ensuring that every veteran and/or eligible person is immediately notified by Career Center staff of their potential eligibility and rights through Priority of Service. This information is also conveyed when veterans and eligible persons access service electronically. Our web-based EmployRI system includes content that explains priority of service, as well as provides veterans and covered persons the opportunity to self-identify veteran status through virtual self-service registration. If a veteran or an eligible persons, at a point of service does not have the documentation verifying his or her eligibility for priority of service, he or she is

afforded access on a priority basis to all services provided by program staff (including an intensive service) while awaiting verification.

For USDOL funded training within the local AJCs, priority of service is given to veterans and eligible person over non-covered person. AJC managers review all applicant files before approving an applicant's training request. When reviewing training request the AJC manager implements the priority of service procedure, as follows: First, if there is a waiting list for the training, priority of service is awarded by requiring the veteran or eligible person go to the top of that list. Second, the AJC manager applies priority of service up to the point at which an individual is both: a) approved for funding; and, b) accepted or enrolled in a training class. Therefore, once a non-covered person has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible person to "bump" the non-covered person from that training class.

The Vets Coordinator will assist AJC manager in the verification process of veterans and/or eligible persons by providing expertise in veteran documents and priority of service. In such cases where a veterans or eligible persons is unable to produce supporting documents at point of enrollment they will be able to gain access to training funds as a non-covered person until supportive documentation are verified. During this time, DVOP specialist and/or AJC staff will continue to render career services to the veteran or eligible person per self-attestation as first indicated at point of entry. In addition, DVOP Specialist and AJC staff will provide assistance and provide these veterans or eligible persons with resources to recover these documents, while continuing to provide services. Furthermore, oversight and monitoring on the priority of service delivery system on WIOA training files will be conducted on a monthly basis by AJC managers to ensure first inline access is being provided to all veteran and eligible persons.

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND ONE-STOP DELIVERY SYSTEM PARTNER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

All eligible veterans and eligible persons who have one or more SBE's referred to DVOP specialist will receive the following intensive services:

- Comprehensive and Specialized Assessment
- Individual Employment Plan
- Group Career Counseling
- Individual Career Counseling/Planning
- Follow-up Activities

DVOP Specialist activities may include referrals to other agencies, supportive services, and/or career workshops to overcome employment barriers identified in the comprehensive assessment. Additional DVOP specialist and AJC staff activities include individual Job Search Planning, Résumé Preparation Assistance, and Labor Market Information for veterans and/or eligible persons. Job development services will be facilitated by LVER staff and the Business Services Unit to coordinate veteran referrals to employers. All job postings within EmployRI will provide veterans and eligible persons a

priority of service. JVSG and AJC performance goals will be measured through, ETA 9002 and Vets 200 reports to track the following categories:

• Intensive Service Rate

• Enter Employment Rate (EER)

• Employment Retention Rate (ERR)

• Six Month Average Earnings (AE)

All reports are produced on a quarterly basis and are submitted to the State Directors of Veterans' Employment and Training (DVET) 45 days after close of quarter as outlined in VPL 01-15

2. EMPLOYMENT PLACEMENT SERVICES, AND

All eligible veterans and eligible persons referred to DVOP specialist will receive the following intensive services:

1. Comprehensive and Specialized AssessmentDVOP Specialist activities may include referrals to other agencies, supportive services, and/or career workshops to overcome employment barriers identified in the comprehensive assessment. Additional DVOP specialist and AJC staff activities include individual Job Search Planning, Résumé Preparation Assistance, and Labor Market Information for veterans and/or eligible persons.

Job development services will be facilitated by LVER staff and the Business Services Unit to coordinate veteran referrals to employers. All job postings within EmployRI will provide veterans and eligible persons a priority of service.

DVOP Specialist and AJC staff will refer veterans and eligible persons to applicable training programs based on training needs identified in the Individual Employment Plan (IEP). Veterans and eligible persons will be provided a priority of service on all considerate training program funded in whole or in part by U.S Department of Labor. JVSG and AJC performance goals will be measured through, ETA 9002 and Vets 200 reports to track the following categories:

1. Intensive Service Rate.

2. Enter Employment Rate (EER).

3. Employment Retention Rate (ERR).

4. Six Month Average Earnings (AE)

All reports are produced on a quarterly basis and are submitted to the State Directors of Veterans' Employment and Training (DVET) 45 days after close of quarter as outlined in VPL 01—15

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

To promote the development of job driven employment and training opportunities for veterans and eligible persons within the employer and education community the Veterans

Coordinator will continue to serve on the Workforce Partnership of Greater Rhode Island Board of Directors. This allows the employer to communicate what skills are needed for veteran to obtain employment within particular organizations and or industries. Also, this creates a training opportunity for training institutions to ensure that programs offered to veterans are aligned with the employer's current and future needs. The process creates robust information of opportunities to be conveyed to veterans. With this information veteran can make the best decision considering their employment needs and the projected labor market.

DVOP Specialist and AJC staff will refer veterans and eligible persons to applicable training programs based on training needs identified in the Individual Employment Plan (IEP). Veterans and eligible persons will be provided a priority of service on all considerate training program funded in whole or in part by U.S Department of Labor.

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

All newly hired JVSG staff must complete required training within 18 months of hire date per VPL 07-10. All specialized training will provided by National Veterans' Training Institute (NVTI). DVOP staff must complete the following required courses; Facilitating Veteran Employment (FVE) and Intensive services (IS). LVER must complete the following required courses; Employer Outreach (EO) and Facilitating Veteran Employment (FVE). DVOP and LVER staff will receive additional training from NVTI upon; manager/staff request, availability of training openings and changes in JVSG program training requirements. Rhode Island Department of Labor and Training is approved under 2014-2019 approved JVSG State Plan for 6.5 FTE positions which includes; 4 DVOP Specialist and 2.5 LVER Staff. For current staffing guide and NVTI completion dates:

Jason T. Fafard, DVOP

Date of Hire: 09/08/2014

Facilitating Veteran Employment: (12/05/2014); Intensive Services: (12/12/2014).

Roger P. Richards, DVOP

Date of Hire: 12/26/2012

Labor & Employment Specialist: (05/11/2012); Basic Veteran Benefits On-line: (01/07/2013); Case Management: (02/01/2013); Promoting Partnerships for Employment: (06/07/2013); Intensive Services: (07/18/2014)

Brenda P Tetreault, DVOP

Date of Hire: 07/10/2005

Transition Assistance Program: (03/03/2006); Case Management: (06/23/2006); Basic Veteran Benefits On-line: (02/26/2007); Labor & Employment Specialist: (12/17/2010); Promoting Partnerships for Employment: (03/18/2011); Intensive Services: (04/03/2015).

Jeremy B Tolleson, DVOP

Date of Hire: 01/26/2014

Labor & Employment Specialist: (04/11/2014); Intensive Services: (06/13/2014); Facilitating Veteran Employment: (08/01/2014);

Joaquin J. Andrade, LVER

Date of Hire: 11/20/2010

Labor & Employment Specialist: (03/11/2011); Case Management: (06/21/2011); Basic Veteran Benefits On-line: (03/16/2012); Promoting Partnerships for Employment: (05/04/2012); Employer Outreach: (06/13/2014); Facilitating Veteran Employment: (7/25/2014).

Timothy McGorty, JVSG Coordinator

Date of Hire: 12/27/2015

Intensive Services: (04/03/2015);Facilitating Veteran Employment: (10/23/2015); Leadership for the Integration of Veterans: (05/12/2016).

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

UNEMPLOYMENT INSURANCE (UI)

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 21-14 for the FY 2015 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

A. CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. TRANSMITTAL LETTER

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

August 24, 2018

Mr. Timothy Martin

Regional Administrator

Employment and Training Administration

U.S. Department of Labor

John F. Kennedy Federal Building

Boston, MA 02203

Dear Mr. Martin:

The Rhode Island Department of Labor and Training is pleased to submit the Fiscal Year 2019 State Quality Service Plan (SQSP) on behalf of the State of Rhode Island.

If you have any questions or concerns regarding the State's SQSP materials, please contact Assistant Director Fernanda Casimiro at (401) 462-8543 or fernanda.casimiro@dlt.ri.gov.

Sincerely,

Scott R. Jensen

Director

cc: Lisa D'Agostino, Deputy Director

*Please note that a signed copy of the transmittal letter is maintained with the State Agency and the Regional Office.

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.

Regarding SF-424 to be indicated at end of applicable section -

"Descriptive Title of Applicant's Project: Unemployment Insurance Administration

Funding Total: $12,132,031.00

Project Start: 10/01/2018

Project End: 09/30/2019

Authorizing Representative: Mr. Scott R. Jensen, Director

A signed copy of the SF-424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office."

3. THE STATE PLAN NARRATIVE

The 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).

RHODE ISLAND DEPARTMENT OF LABOR AND TRAINING STATE QUALITY SERVICE PLAN

STATE PLAN NARRATIVE

(Rhode Island - Fiscal Years 2019 and 2020)

Section A: Overview

1. State priorities and the strategic direction the state has adopted to ensure continuous improvement.

For Fiscal Years 2019 and 2020, the Department has identified the following strategic plan to improve the UI program's service quality to the citizens of Rhode Island:

303. ***Preserve*** the outstanding performance levels the Unemployment office has achieved in the area of first payment and nonmonetary timeliness;
304. ***Improve*** non-monetary quality;
305. ***Focus*** sufficient resources on customer service by ensuring call wait times for customers who contact the UI call center by telephone at an acceptable level;
306. ***Embrace*** the Peak ensuring that busy seasons do not impact performance goals;
307. ***Continue*** to coordinate efforts to ensure maintained focus on national priorities.

2. Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.

Rhode Island's Performance in the area of First Payment Timeliness

Rhode Island has been exceeding performance goals in first payment timeliness since April 2016. To meet the standard, the Call Center analyzed the issues contributing to late payments and took action for long term improvements. Issuing timely first payments to eligible individuals continues to be one of the Department's highest priorities and a performance measure we pride ourselves in.

The State's overall performance in the area of first payment timeliness for the 12-month period from April 2017 thru March 2018 was 92.8%. RI had tied for the eighth highest score nationally in this area over that same time period. Rhode Island has remained off the "at risk" designation status assigned by USDOL since 2016.

Rhode Island's Performance in the area of Nonmonetary Timeliness

For many years, Rhode Island had a history of struggling to meet nonmonetary determination timeliness. In 2009 our scores in this area dipped as low as 16%. Management and staff spent many years trying to identify strategies which would result in

meeting the standard. Through hard work and dedication, dramatic improvements were made, and Rhode Island met the standard in June 2016. Improvements continue to be seen and the State achieved a score of 92.0% for the 12 months ending March 31, 2018. This is the highest performance level Rhode Island has achieved in reporting history. RI had the ninth highest score nationally in this area over that time period and remains well above the US average of 74%.

RHODE ISLAND'S PERFORMANCE IN THE AREA OF NONMONETARY QUALITY

The performance in the area of nonmonetary quality was not at the acceptable level for the 12 months ending March 31, 2018. It is important to note that staffing levels in this unit have fluctuated during the reporting period and continue to be impacted today. With the current budget restrictions, we are unable to backfill as individuals retire or resign to accept other positions within the state. We are committed to taking the necessary steps toward improvement in this area. Information on the Department's plan can be found in the workbook CAPs.

CALL WAIT TIMES AND CUSTOMER SERVICE

The Department continues to include Call Center wait times in its top priority at a state level. It is important to note that our goal is to maintain an average weekly wait time of no more than 15 minutes. This could have the potential to impact other performance measures but to date it has had no negative impact on first payment timeliness.

For the 2017 calendar year, Rhode Island's call center maintained an average wait time of 10.5 minutes. Current year to date average wait time for 2018 has increased slightly to 13.7 minutes. A reduction in overall staffing levels in the Call Center and the inability to post vacant positions due to budgetary restrictions has contributed to this increase.

3. Coordination with other plans and commitment to national priorities.

Rhode Island works to reach state goals and priorities along with national priorities. Rhode Island's Department of Labor and Training is working diligently to operate the Unemployment Program effectively.

Workforce Innovation and Opportunities Act

The Department has always considered the reemployment of UI claimants a number one priority in the delivery of services. Largely because of the size of the State but also because of the structure of the divisions in the agency, it is common for UI program staff to be promoted to the outlying netWORKri offices, which provides advantage for direct UI assistance as necessary to UI claimants in the local offices. In addition, UI is working closely and developing effective strategies with both Workforce Development and the AJC operators to provide the best possible UI assistance to affected customers.

The Department's Unemployment Insurance Service Center (UISC) hires and employs individuals in entry-level positions. These individuals learn the Unemployment Insurance program, its laws, processes and procedures, before moving on to other positions within the agency. Staff in these positions are often promoted to Principal Employment and Training Interviewer positions in our America's Job Centers (AJC) under Wagner-Peyser, Trade, and WIOA.

Each office is staffed with a number of former UI staff members who are able to provide meaningful guidance to individuals seeking assistance with unemployment insurance benefits. The on-site staff is trained in UI Programs and assist claimants in filing claims on the web using the netWORKri resource room.

There are also procedures in place for individuals seeking information concerning their UI claims. Each netWORKri is equipped with kiosks that customers can use to electronically send emails to the UISC for information or assistance. The UI Help email process has been very successful allowing claimants to receive a phone call at home or on a cell phone. This quick access to the UI program reduces the number of calls coming into the UISC and allows individuals who need help to receive it in a timely manner.

For those individuals who require immediate assistance with either filing their claims via telephone or determining the status of their claim, staff in the AJC will direct the individual to a designated telephone area so that UISC staff can contact them directly. AJC staff contact a designated manager in the UISC, provide the name, last four of the Social Security number and direct line at which to call the customer back. If that manager is not available, they have backup managers and administrators they may contact as well.

Finally, the close working relationships established over the past several years between the netWORKri management and the UI program team allows immediate action to be taken on behalf of individuals who are in need of comprehensive assistance. The open lines of communication between both of these units and the partnership that has been fostered continues to be a priority with this administration and has proven to allow for higher quality service to those most in need.

Improving, Prevention, Detection, and Recovery of UI Overpayments

The Overpayment Unit of the Unemployment Insurance Service Center continues to place emphasis on the recovery of overpayments of benefits through benefit payment offsets, state income tax returns, Federal Treasury Offset Recovery, IRORA, lottery winnings, and prosecutions. When individuals are prosecuted at Superior Court, collections are processed directly through the court as part of sentencing, and all recoveries are paid by the courts to our department on a monthly basis.

The Overpayment Unit continues to facilitate the detection of overpayments through the Crossmatch Program, National and State Notices of Hire, claims interviewing, employer protests of charges, anonymous tips, and investigations referred from the Fraud Unit.

Rhode Island is continually exploring ways to automate our systems for detection and recovery of overpayments. Our consortium team has spent countless hours working on requirements for our Benefit Payment Control processes and crossmatches and has collaborated with Maine and Mississippi to develop new strategies and implement existing strategies that have proven productive in individual states.

The Crossmatch Unit continues to review both the National and State Directories of New Hires, as well as the quarterly Wage Crossmatch report to determine any potential overpayments due to claimants continuing to receive Unemployment Insurance benefits after they have returned to work.

Two modifications have been implemented in our Crossmatch process and were implemented in 2017. These changes will reduce total dollar amounts of benefit year earnings overpayments significantly. Preliminary metrix related to the Wage Record Crossmatch modifications indicate a full-week's decrease in the average number of weeks per overpayment.

- Wage Record Crossmatch: Quarterly crossmatch reach-back to second quarter back will now reaches back to the most recent completed quarter and is run on a monthly rather than quarterly schedule.
- NDNH Crossmatch: Reach-back was modified from five (5) weeks to seven (7) weeks.

The Department also receives a crossmatch report from the Department of Corrections to establish if claimants may have collected while incarcerated. Staff receives continued training in the detection of potential overpayments in the course of interviewing claimants. Rhode Island is currently investigating the possibility of a crossmatch of State employees against the claim file to detect any internal fraud and is further working to upgrade computer systems to identify fraud schemes.

Based on hits received from the National Directory of New Hires, reported return-to-work dates are auto-posted to the UI claim. At the same time a letter is auto-generated to affected claimants instructing them to contact the department if the information received is not accurate. Claimants are provided the email address and phone number to contact the department in the event that a staff member is not successful in reaching them by phone.

In addition, staff review the NDNH list, contact the claimants by phone and question as to the accuracy of the employer information on the NDNH. If the claimant disputes the issue or never responds to the phone call or letter, staff remove the return to work date from the system. The claimant will be scheduled for an adjudication appointment where the employer and the claimant will have an opportunity to give a statement. The claimant will be allowed to receive weekly benefits until the week of the adjudication appointment. A determination will be made within seven to fourteen days.

Rhode Island has recently begun to capture the IP address for each weekly certification that is processed online. This tool is used to help the Department detect fraud and to investigate instances of questionable certifications. We have developed inquiry reports that are produced on-demand from the internet claims system to help identify identity theft claims. We can identify suspicious address changes, blank drivers' license fields, etc. These reports, as well as others we've developed, have been instrumental in helping us to identify these fraudulent claims before ever being paid in most cases.

In addition, we have developed several new automated reports designed to detect instances of internal fraud at their earliest stages.

The Fraud Unit continues to investigate potential fraud cases from a number of sources when individuals are working and receiving Unemployment Insurance benefits. The unit currently consists of five Fraud Investigators and one unit manager.

In an effort to avoid prosecution, a claimant is notified by mail to contact the Fraud Unit within 15 days of the mailing date of the letter to arrange restitution. If the claimant fails to contact the Fraud Unit, the case is referred to the State Police for further investigation.

The Office of the Attorney General maintains a prosecutor on staff to solely work on the cases referred by the Fraud Unit. These individuals are generally charged with obtaining money under false pretenses in a sum over $1,500, which is a felony offense. The relationship has been productive and will continue into the future. As of mid-August 2017, individuals committing UI fraud have been prosecuted and order to repay a total of over $557,000.

In addition, Rhode Island has built a strong working relationship with both the RI State Police and the US Department of Labor - Office of Inspector General. These relationships have allowed UI to further investigations and publication of many of our highest dollar amount and federal program cases. In addition, incidents of employer fraud are now in the first stages of being investigated by our teams.

Finally, the Department conducted a L.E.A.N. review of the Benefit Payment Control Unit. An area of concern was detected in the Wage Verification form. Many participants felt the form was too difficult to read and understand. Therefore, the form was revised to be less cluttered and easier to read. At the current time, a test is being conducted to determine whether the improved form is resulting in more employers responding to wage verification requests.

Misclassification Enforcement in Rhode Island

The State of Rhode Island utilizes a task force approach in investigating employee misclassification. The task force is comprised of investigators and enforcement agents from the Department of Revenue and the Department of Labor and Training Workforce Fraud Unit and Workers' Compensation Division.

The investigators and agents gather relevant evidence of employee misclassification which results in the disposition of cases through Settlement Agreements and Administrative Hearings. Penalties are enforced in accordance with state law and tax audits are conducted on all employers where a determination has been made that they misclassified workers.

Section B: Federal Emphasis (GPRA Goals)

1. State performance compared to the GPRA goals

Percent of Intrastate Payments Made Timely

Target: 87.0 percent of intrastate first payments for full weeks of unemployment compensation will be made within 14/21 days from the week ending date of the first compensable week.

Rhode Island has met the recommended 87.0% since 2016. For the 12 months ending March 31, 2018, Rhode Island's first payment timeliness rate is 92.8%. Continuing to achieve high levels of first payment timeliness remains one of the Department's highest priorities.

Calendar 2012 through 2017 and Prior 12 Months

% of First Payments Made Within 14 days	2013	2014	2015	2016	2017
	76.1%	77.3%	86.0%	88.8%	93.4%

	April 2016 - March 2017	April 2017 - March 2018
First Pay Workload	29,319	27,662
First Payments Made Within 14 Days	27,130	25,676
% of First Payments Made Within 14 Days	92.5%	92.8%

Detection of Recoverable Overpayments (Detect Benefit Overpayments)

Target: Overpayments established will be at least 54.5 percent of the estimated detectable, recoverable overpayments.

For the period April 1, 2017 through March 31, 2018 Rhode Island's Overpayment Detection Core Measure was 65.22%, well-above the required 54.5% performance measure.

Percent of Employer Tax Liability Determinations Made Timely (Establish Tax Accounts Promptly)

Target: 89.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Rhode Island has consistently exceeded this performance measure as evidenced by the data presented in the table below. We are at 96.3% year-to-date in 2018.

Calendar 2014 through 2017 and 2018 to Date

% of New Status Determinations Made Within 90 Days	2014	2015	2016	2017	2018
	95.7%	96.0%	96.1%	97.4%	96.3%

UI Reemployment Rate

Rhode Island has failed to meet the acceptable level of performance (ALP) for UI claimants to be reemployed by the end of the first quarter in which they received their first payment. This has resulted in a new CAP requirement.

2. Actions planned to achieve GRPA goals and targets.

State Self-Assessment: Utilize Findings

The state self-assessment is underway and has already resulted in internal findings. Administration and management are teaming up to identify and prioritize needed

procedural guidance and trainings. This will be a big task that will require an abundance of time and resources. We are committed to ensuring our policies and procedures are updated and practiced but realise these changes will be ongoing.

We are hopeful that addressing the items identified will assist our staff in continuing to process timely claims and issuing timely payments and non-monetary determinations. We are hopeful that the information identified in the state self-assessment will also provide some additional ideas to help nonmonetary quality scores.

Embrace the Peak: Maintain Quality Service During Busy Seasons

Since April 2016, the Department has coined the phrase "*Embrace the Peak*", which was designed to improve service quality to the citizens of Rhode Island - particularly during the Department's busiest or "peak" periods. In doing so, the Assistant Director holds full staff meetings in advance of peak periods to "boost" staff morale and cheer on staff for the anticipation of increased workloads. These meetings have been well received and our internal performance goals have been met.

Rhode Island strives to keep wait times below 20 minutes during these periods and pending claim backlogs below 400 claims at any given time. While it has been challenging to maintain first payment timeliness, claims filing, and call wait times when our workloads are at their highest it has been accomplished each winter and summer peak since inception. We will continue to keep the "Embrace the Peak" mindset strong as we prepare for the upcoming increase in workloads and the reality of staffing level decreases.

Performance Management

Since the most recent recession, Rhode Island has been tracking and reporting internal performance measures through a Daily Workload Report. These measures include pending claims, email responses, and call wait times. This has proven to be helpful in workload forecasts and productivity evaluations.

As we prepare for potential staffing level reductions, it is crucial to dig deeper and report on other miscellaneous workload counts. The Call Center's Principal Manager is spearheading a new reporting requirement for front line management. The goal is to have a daily back office workload tracking system. This tool will be used to monitor productivity and assist in identifying potential increases in miscellaneous workloads which could have a negative impact on wait times and/or payment timeliness. By addressing these workload increases daily, management will be able to take immediate action to prevent harmful impacts to other critical areas.

TAX PERFORMANCE SYSTEM: ESTABLISHING TAX ACCOUNTS PROMPTLY

The Tax Performance System (TPS) Report submitted during FY 2018, which examined twelve (12) functions in the Employer Tax Section, concluded that all operational levels of performance were either met or exceeded results.

One of the most important TPS measurements is the prompt establishment of tax accounts, and Rhode Island will continue to make that critical tax function a top priority. The most recent TPS review determined that Rhode Island had established 96.3% of new accounts within 90 days of the liability date, and 98.2% within 180 days. We will continue to take all

reasonable actions to ensure that every new Rhode Island employer is assigned a UI account number as soon as possible

The Employer Tax Section website, used by employers to obtain information about Rhode Island UI, TDI, and JDF taxes, to register as an employer and obtain an employer registration number, and to file their UI Tax and Wage Reports via the Internet, continued to operate successfully. Employers are encouraged to file online. Continued modifications were made to the filing options which allowed the operation to become more user- friendly.

Rhode Island's work with Maine and Mississippi as a consortium (MRM) has temporarily been put on hold due to funding issues.

Facilitating the Reemployment of UI Claimants

Rhode Island failed to meet the acceptable level of performance (ALP) for UI claimants to be reemployed by the end of the first quarter in which they received their first payment. The ALP for the period was 61%. Our fourth quarter 2017 through first quarter 2018 rate was 60.7%, which represents a .3% deficiency below the ALP.

UI has made modifications to our programming to ensure registration for all non-exempt UI claimants in EmployRI. We continue to work closely with Workforce Development to ensure that UI claimants are registered in EmployRI. As always, the goal is to connect UI customers with any appropriate reemployment services and training resources.

UI includes instructions on completing reemployment registration in EmployRI with all UI initial claim mailings. Customers have the ability to self-register to receive emails informing them of activities in the Reemployment Career Centers and "Hot Jobs" of the week. The "Hot Jobs" is a successful tool we are using by advertising jobs through a local television station, publishing on our website, and sharing with customer service staff in the UISC. Through EmployRI, customers can also track their work search activities, and have access to information on job fairs, current Labor Market data and resume-writing tools.

The Reemployment Services and Eligibility Assessment (RESEA) program in Rhode Island has also been a valuable resource for connecting UI claimants with reemployment services and training and increases the likelihood of reemployment during the benefit year. Our data shows that individuals participating in REA had a higher likelihood of returning to work than those who do not receive the same services. Rhode Island was awarded RESEA funding to now provide appropriate reemployment services to participants. We are grateful for the new requirements of the program, which allow us to serve a new population of participants who are most likely to exhaust UI benefits, and who are most in need of the services the RESEA program offers. We've modified the delivery of service under RESEA. This year, we're taking a much more one-on-one approach at both orientation and 30-day follow-up. We also provide training to our counselors several times throughout the year to ensure uniformity in delivery of service and accurate case management in EmployRI.

In researching the sources from which we derive our reemployment data, it was discovered that no out-of-state wage data is included in our reemployment reporting for UI claimants. This project is now included in a list of IT priorities to complete, and we've requested this corrective programming be escalated for completion by December 2018.

We will continue to monitor our reporting outcomes and identify better ways to accurately report our reemployment rates for UI claimants.

Section C: Program Review Deficiencies

Rhode Island has conducted all required reviews.

Section D: Program Deficiencies

Rhode Island's program reviews have not identified any deficiencies at this time.

Section E. Reporting Requirements

Rhode Island has been late submitting the ARUI3 and ATUI3. This was due to an issue with timelines reminders. To correct this, a calendar reminder has been added to the responsible party 15 days prior to the due date of these reports. In addition, another person will be identified and trained to submit these reports so there will be another responsible party in the event that there are conflicting priorities for the current preparer.

Rhode Island did not submit the AR9048 because we stopped providing Worker Profiling Reemployment Services when RESEA became available in every AJC. We have followed up with the regional office to identify how they would like us to address this issue and will take appropriate action when we receive a response.

F. Customer Service Surveys

Surveys are not included in this narrative.

Section G: Other - UI Trust Fund Solvency

The balance in the Rhode Island Employment Security Fund was $407,100,408 as of June 30, 2018. This was an increase of $91 million from June 30, 2017. The Rhode Island Department of Labor and Training completely repaid its federal UI loans on May 5, 2015 and has been rapidly rebuilding fund reserves since that time. The State's outstanding loan balance peaked at $291.8 million during April 2012.

Rhode Island's ability to reduce its outstanding federal balance and rebuild trust fund reserves was greatly enhanced by the passage of Article 4 of the FY 2012 Appropriations Act. Article 4 implemented adjustments to the Unemployment Insurance taxable wage base provisions beginning on January 1, 2012 and adjustments to Unemployment Insurance benefit provisions beginning on July 1, 2012. On the employer tax side, the taxable wage base went from a fixed amount based on the Employment Security Fund reserve to a variable amount equal to 46.5 percent of Rhode Island's average annual wage in January 2012. For CY 2012, the taxable wage base for most employers was $19,600. The taxable wage base for employers with the highest negative reserve account percentages was $21,100, which is $1,500 above the level set for all other employers. In CY 2013, the taxable wage base rose by $600 to $20,200 for most employers and $21,700 for employers with the highest negative reserve account percentages. In CY 2014 the taxable wage base rose by $400 to $20,600 for most employers and $22,100 for employers with the highest negative reserve account percentages. In CY 2015, the taxable wage base rose by $600 to $21,200 for most employers and $22,700 for employers with the highest negative reserve account percentages. In CY 2016, the taxable wage base rose by $800 to $22,000 for most employers and $23,500 for employers with the highest negative reserve account percentages. For CY

2017, the taxable wage base rose by $400 to $22,400 for most employers and $23,900 for employers with the highest negative reserve account percentages. Currently, in CY 2018, the taxable wage base rose by $600 to $23,000 for most employers and $24,500 for employers with the highest negative reserve account percentages.

On the benefits side, the maximum weekly benefit amount formula percentage was adjusted effective July 1, 2012. It was previously set at 67 percent of the statewide average weekly wage. This article reduced the percentage to 57.5 percent of the statewide average weekly wage. As of July 1, 2018, the maximum weekly benefit amount rose from $566 to $576. Had the legislation not been passed, today's maximum weekly benefit amount would have been $671.

For individual workers, the total amount of benefits payable during a benefit year was reduced from a maximum of 36 percent of total wages during his or her base period, to 33 percent effective July 1, 2012. In addition, the percentage of an individual's earnings replaced by Unemployment Insurance benefits was reduced from 60 percent to 57 percent on July 1, 2012, to 54 percent on July 7, 2013 and was further reduced to 50 percent on July 6, 2014.

These changes and an improved economy enabled the Employment Security Fund to quickly rebuild its reserves. Based on our improved trust fund reserves, Article 3 of the FY 2016 Appropriations Act was enacted which made several changes to our UI tax structure. The range of tax rates was expanded by adding three new categories at the lower end of the tables. This change reduced the minimum UI tax on employers from 1.69% to 0.99% for CY 2017. Article 3 also lowered the reserve percentages for each of our nine tax schedules to make it easier to move to a lower tax schedule as reserves built up. As a result, we moved off our highest tax schedule, Schedule I, for the first time in 25 years to the next lowest tax schedule, Tax Schedule H, for CY 2017. This will reduce RI employer UI taxes by approximately $30 million. As projected, our reserves increased which directly resulted in a trigger to the next lower tax schedule. Rhode Island is currently on tax schedule G which has provided the employer community with an estimated $10 million in savings for this calendar year.

Section H: Assurances

Assurance: Equal Employment Opportunity/Affirmative Action

In accordance with RIGL § 28-5.1, equal opportunity and affirmative action toward its achievement is the policy of all units of Rhode Island state government, including all public and quasi-public agencies, commissions, boards and authorities, and in the classified, unclassified, and non-classified services of State employment. All policies, programs, and activities of state government shall be periodically reviewed and revised to assure their fidelity to this policy.

Each State agency has an Affirmative Action Plan publication that outlines numerous policies and practices instituted to ensure an equal opportunity/affirmative action environment. This Plan is available for review at the respective human resources office.

Assurance: Administrative Requirements and Allowable Cost Standards

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all applicable federal and State statutes, regulations, formal polices, and/or established practices expressly complies with appropriate administrative requirements and allowable cost standards.

Assurance: Management Systems, Reporting, and Recordkeeping

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper management system, reporting, and recordkeeping procedures.

Assurance: Program Quality

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper program quality practices and procedures.

Assurance: Use of Unobligated Funds

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to use of unobligated funds.

Assurance: Prohibition of Lobbying Costs

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to prohibition of lobbying costs.

Furthermore, the Hatch Act restricts Executive Branch employees in any agency of State government whose principal employment is in connection with an activity financed, in whole or in part by federal loans or grants from being a candidate in any partisan contested election.

Employees who are concerned that their political activities may be subject to the Hatch Act may obtain an advisory opinion from the United States Office of Special Counsel.

In addition, Rhode Island General Laws contain prohibitions on classified employees from seeking the nomination of or being a candidate for any elective State Office and also contain prohibitions on classified employees regarding running for partisan political office, campaigning for public officials during working hours and soliciting political contributions for or being solicited for political campaigns. Violations of these statutes can result in demotion or dismissal.

Assurance: Drug-Free Workplace

The State of Rhode Island, in accordance with Executive Order 89-14 and the State's Drug Free Workplace Policy, prohibits possession, use and distribution of illegal drugs in the

workplace. The only exceptions to this policy are those specified by RIGL § 21-28.6, known and cited as The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act.

In addition, each employee is required by law to inform the agency within five days after (s)he is convicted for violation of any federal or state criminal drug statute. A conviction means a finding of guilt, a plea of guilty, regardless of the imposition of any sentence. Employees who violate this Drug Free Workplace Policy will be subject to disciplinary action.

The State encourages any employee with a drug abuse problem to seek assistance from the Care24 Employee Assistance Program. For further information and details, see the State's Drug Free Workplace Policy available at http://www.hr.ri.gov.

Assurance: Contingency Planning

The Rhode Island Department of Labor and Training, participates in the State of Rhode Island disaster recovery plan. This is a comprehensive set of procedures whose goal is recovery from an event that disables the existing information technology infrastructure with minimal disruption to critical business functions. The data recovery process is still intact. The Department participates in the Enterprise disaster recovery plan and test. The IT Contingency Plan was implemented in January 2010, was last tested in March 2018, and last reviewed in March 2018. The next test was scheduled for November 2016 but had to be delayed due to problems with the State's Enterprise Recovery Plan. Our State IT Department is working to resolve those problems and will schedule the next test once those issues have been resolved.

The Department's Continuity of Operations Plan (COOP) outlines the procedures that are in place in the event of a natural disaster, pandemic or other emergency in order to continue to provide essential income support services to RI workers and to operate its Income Support Division which includes Unemployment Insurance. The plan provides an emergency organization structure and communications network. While this plan provides a blueprint for actions that will allow the Department to maintain its essential services during an emergency situation, it is to be considered a work in progress that will be updated and amended as situations arise and dictate.

Critical to the Enterprise Disaster Recovery Plan and the Department's COOP are the prioritization of functions for the Income Support Division, namely, Unemployment Insurance. Our main priority is to provide on-going customer service and to respond to customers' requests and inquiries. The second priority is to process UI payments in a timely manner and the third is to process the claims timely to ensure they are completed and ready when payment is due.

Assurance: Conformity and Compliance

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to conformity and compliance.

Assurance: Automated Information Security System

The UI program has prepared an SSR for the IRS as required for participation in the Treasury Offset Program. This document was submitted and accepted by the IRS on October 30, 2018. As specified in IRS Publication 1075, an accurate and approved SSR is accepted by the IRS as a System Security Plan. The SSR is consistent with the security plan guidelines provided by NIST in SP800-16 which provides a baseline SSP for the UI program. The System Security Plan was last reviewed in March of 2017 when the IRS conducted and onsite Safeguards Security Review.

The Department of Information Technology (DoIT) is in the process of revising Security Planning Policy and the planning policy document is currently undergoing final review. The draft calls for each state business unit to develop a System Security Plan that documents security controls in place for that unit, following NIST guidelines. The SSR addresses most of the elements called by the (draft) policy and will provide a basis satisfying DoIT policy. A POA&M is currently in place to develop a security plan for the Department. A copy of the POA&M is provided with the current DOL submission

Rhode Island is within the three year cycle for conducting Risk Assessment as the latest one was signed on April 2018. The next scheduled Risk Assessment will occur in the Spring of 2021.

Assurance: Confidentiality

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to confidentiality.

4. CORRECTIVE ACTION PLANS (CAPS)

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.

Nonmonetary Determination Quality:

A. The Reason for the deficiency.
After reviewing our BTQ cases that failed the review, the majority of cases failed due to the adjudicator not having enough information in the claimant or employer statements as well as not asking the right questions to render a proper decision. The information obtained was just not sufficient to come to a supportable conclusion at the end of the investigation.
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.

A. The Reason for the deficiency.

Our plan to improve our BTQ scores will begin with the BAM Unit reviewing 5 additional cases each week and scoring them using the BTQ criteria. The BAM Manager and CAU Managers will then meet with the adjudication staff as a group on a monthly basis to discuss the quality of the extra cases being evaluated. This will help us be pro-active with our evaluation of our current case load. The CAU managers will review 3 cases (1 termination issue, 1 quit issue and 1 non-sep issue) for 2 adjudicators, each week. Each case will be evaluated by the CAU Management team based on the information obtained (using our CAU guide questions as the standard), the written determination based on the facts of the case along with the supporting documentation and the overall effectiveness of the interview. The managers will listen to each of the actual phone calls to determine the quality of the interview and evaluate the written statement relating to each call. Each case will then be evaluated and scored by the managers. Each selected adjudicator will meet individually with the managers to listen to the calls and evaluate the cases. We believe this part of our plan will be effective in holding the adjudicators accountable for their work and elevate their decision making process. All of our additional case evaluations will be discussed with the individual adjudicators and each evaluation will be tracked on a spreadsheet, showing the progress that is being made by each adjudicator. Following each BTQ quarterly review, the CAU managers in conjunction with the BAM manager will identify: 1) if the BTQ failures were limited to a small of number of adjudicators making the same mistakes. This will result in a one on one meeting with the adjudicator(s) to discuss policy. 2) If the BTQ failures involved multiple adjudicators making the same mistakes. This will result in a training session for the entire adjudication staff. 3) If the BTQ failures are widespread among the adjudication staff regarding a similar issue, this will result in management confirming, in writing, the policy that is confusing the staff. The policy will then be clearly communicated to the staff.

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.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Continued meetings with BAM management and review of cases that pass or fail.

Improper Payments Measures: **A. The Reason for the deficiency.**

Rhode Island has experienced incremental increases in Improper Payments due to work search requirements. Based on cause analysis, work search continues to negatively impact our improper payment rate because of restrictive language in our Rules and Regulations. The previous language required work search contacts to be verifiable. In many cases, a work search contact cannot be verified due an employer's applicant purge practices, or small business' lack of ability to store applications, etc. Also, some employers cannot be reached for verification after exhaustive attempts. In cases where the contact cannot be absolutely verified due to the aforementioned reasons, investigators will now have the latitude to determine based on the available information whether it can be reasonably assumed the claimant did make work search contact.

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.

A. The Reason for the deficiency.

Plan: UI submitted changes to the UI/TDI Rules and Regulations in 2016 which would no longer require work search contacts to be verifiable. Those updates to the Rules and Regulations became effective as of August 7, 2018. This will afford staff some latitude in determining whether or not a contact for employment meets Rhode Island's standard for qualifying for a payment. Training has been provided to BAM investigators on the proper and consistent application of the work search requirements within the BAM process. The Administrative Office is confident staff are now applying the rule consistently and properly in all cases. Continued review and training will be provided based on monitoring and data analysis. Finally, Rhode Island will request Technical Assistance from the Regional Office of US DOL if no improvement is shown following the third quarter 2018. Do: In interviewing the employer and the claimant, BAM investigators will determine the validity of the contacts, and will investigate all three submitted for the key week, etc. We have strengthened our messaging to customers on the work search requirements by requiring staff to advise every caller of UI's work search policy. Check: Each case submitted is reviewed by the BAM supervisor. Every work search determination will be reviewed and verified as having met or not met the work search policy and rule. We will regularly monitor our Improper Payment rates to assess the need to implement further changes. Act: The impact of claimant messaging around the work search requirements will be discussed in weekly meetings with the Administrator overseeing BAM. If adjustments are required to any of these processes, those will be developed on an as-needed basis.

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.

Due to delays in approval of our rule changes regarding work search requirements, Rhode Island was unable to improve work search improper payments. UI Administration is confident that the approval of our more realistic rule and continued monitoring and training will prove to significantly improve our improper payment rate in a short period of time.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

The impact of claimant messaging and application of rule changes around the work search requirements will be discussed in weekly meetings with the Administrator overseeing BAM. In addition, staff training will be provided on an as-needed basis based on review of BAM cases to ensure accurate and consistent coding. If adjustments are required to any of these processes, those will be developed on an as-needed basis. We will regularly monitor our Improper Payment rates to assess the need to implement further changes.

Benefits Data Validtion: A. The Reason for the deficiency.

RI was required to validate populations 3, 3a, 4, 5, 12, 13, and 14 in FY 2018. Initially there were problems running the extracts. We requested that the extract files for the seven populations be run at the end of March for the fourth quarter 2017. The programmer did not have permission to access the Sun Server and on two occasions created the extracts for incorrect quarters. In addition, the lead validator had a family emergency resulting in several days of loss work. These issues delayed the start of the validation until the mid of May leaving just four weeks to validate all seven populations. Since population 12 was the only population to pass the report element portion of the validation, the decision was made to validate just populations 4 and 12 since the remaining populations would need to be validated in the next fiscal year.

Benefits Data Validtion: A. The Reason for the deficiency.
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.
Our corrective action plan is to begin the validation process earlier.
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.
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
Populations 3, 3a and 4 will be validated during the quarter ending 12/31/18 Populations 12, 13 and 14 will be validated during the quarter ending 3/31/19 Population 5 along with Mods 3 and 4 will be validated during quarter ending 6/30/19
Tax Data Validation: **A. The Reason for the deficiency.**
RI has been working on the consortium project and as a result was unable to run data validation extracts as much as it would have liked due to limited resources. RI has since trained the TPS supervisor in the data validation process so that next year RI will be able to run these extracts on a more frequent basis as a result RI should have less failure and be able to submit passing populations. RI Failed population 1 because RI had reimbursable accounts that were active that had more than 8 quarters of zero. RI failed tax population 3 because the file extract was pulling in the wrong dates for successor accounts that had a change in liability date after the fact. Population 4 for RI is still a work in progress. RI has yet to create an extract file for this population that is working correctly. This population extract is very complicated. RI while working on the consortium project had stopped working on updating the program for population 4 as RI was designing a new program for the consortium. Population 5 failed because one audit was coded as a change audit in our system in error and when the data validation software ran is was picked up as a no change audit. Do to this one error it caused us to fail population 5. Module 3 was not submitted and validated in time for the deadline but has been since been submitted and finalized. Module 4 failed because in 2017 RI had a changeover in staff in the audit entry process. The new staff member was entering the completion date as the date the auditor finalized the audit but did not account for the time it took the supervisor to review and process the audit. When the completion date and process dates overlapped quarters, the audit was never reported on the 581 as the 581 had previously ran. This was corrected on 7/28/17 and going forward it should not be an issue. As a result, the numbers on the 581 were understated for the 4th QTR 2016 through the 3rd QTR of 2017.
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.

Benefits Data Validtion: A. The Reason for the deficiency.
RI has been working on the consortium project and as a result was unable to run data validation extracts as much as it would have liked due to limited resources. RI has since trained the TPS supervisor in the data validation process so that next year RI will be able to run these extracts on a more frequent basis as a result RI should have less failure and be able to submit passing populations. RI failed population 1 because RI had reimbursable accounts that were active that had more than 8 quarters of zero. Reimbursable accounts will be reviewed quarterly to determine if they have more than 8 quarters of zero's and will be terminated if necessary. As a result, RI will pass population 1 the next time the extract file is run through the sun system. RI failed tax population 3 because the file extract was pulling in the wrong dates for successor accounts that had a change in liability date after the fact. RI will review the extract file and errors that were created as a result of Data Validation to determine what adjustment need to be made to the extract file. Once the adjustments are made RI will rerun the DV extract file through the sun system to verify that the changes made have addressed the issue that caused RI to fail Population 3 Population 4 for RI is still a work in progress. RI has yet to create an extract file for this population that is working correctly. This population extract is very complicated. RI while working on the consortium project had stopped working on updating the program for population 4 as RI was designing a new program for the consortium. Now that new staff has been trained RI will review the Data Validation(DV) requirements and continue to make modifications to the extract file as required per DV requirements for the current RI tax system. RI will also review the current 581 programming for accounts receivable to verify that it to is programmed correctly per 581 requirements. Once both files have been reviewed and changes are addressed if needed RI will rerun the extract file through the sun system. If there are any errors RI will continue to address them until Population 4 passes the 2% Data Validation requirements and sample. Population 5 failed because one audit was coded as a change audit in our system in error and when the data validation software ran is was picked up as a no change audit. Do to this one error it caused us to fail population 5. A clerical error created population to fail as a result staff will be retrained on entering audits into the RI tax system Module 3 was not submitted and validated in time for the deadline but has been since been submitted and finalized. Module 4 failed because in 2017 RI had a changeover in staff in the audit entry process. The new staff member was entering the completion date as the date the auditor finalized the audit but did not account for the time it took the supervisor to review and process the audit. When the completion date and process dates overlapped quarters, the audit was never reported on the 581 as the 581 had previously ran. This was corrected on 7/28/17 and going forward it should not be an issue. As a result, the numbers on the 581 were understated for the 4th QTR 2016 through the 3rd QTR of 2017.
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.
Last year RI had a plan in place for population 4 and was unsuccessful accomplishing this plan. This was directly related to the fact that the RI resources allocated to the Consortium project are the same resources needed for Data Validation from both the business and IT departments. Additional business resources have been trained for Data Validation that are not fully allocated to the consortium project. As a result, RI is more confident that they will have the time to address Population 4.
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
RI will once a quarter allocate time for data validation to make sure that the milestones below will be met or adjusted if needed on a regular basis.

Benefit Accuracy Measurement (BAM): A. The Reason for the deficiency.
Until May 7, 2018, BAM NDNH crossmatch hits were deleted from the program if they had a previous Benefit Payment Control (BPC) hit. This issue was corrected as of May 7, 2018. We have been assured by IT that duplicate hits are not longer being excluded.
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.
BAM detected an issue in 2017 regarding programming which excluded BAM NDNH "hits" already identified in the PBPC crossmatch. IT was informed of the requirement that BAM receive NDNH hits separately from the BPC process. In May, 2018, IT corrected the program to allow BAM to receive NDNH hits separately, although BPC may have received one previously.
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.
BAM had requested an update to NDNH programming to no longer exclude duplicate hits from the BAM NDNH process in early 2017. Due to IT involvement in consortium, many UI IT requests were pending for significant periods of time. When consortium was placed on hiatus, IT began working on those UI projects that had been pending. BAM requested the NDNH issue be resolved with priority. As such, the work for this project was completed in May, 2018.
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
Administrative Benefits is monitoring the programming to ensure it is working properly. Although we have not yet seen a BAM NDNH hit, we have informed the BAM unit to advise as soon as the first hit is identified. A follow up request to IT to verify proper programming resulted in a reiteration that the program is operating correctly , and duplicates are no longer excuded from the BAM NDNH program.
Facilitate Reemployment: A. The Reason for the deficiency.
Rhode Island failed the Acceptable Level of Performance in the Facilitation of Reemployment measure by .3% for first payments during the period October 1, 2016 through September 30, 2017. In researching the sources from which we derive our reemployment data, it was discovered that no out-of-state wage data is included in our reemployment reporting for UI claimants. We have requested corrective programming to include WRIS data to identify individuals who return to work in another state. This project is included in a list of IT priorities to complete. We have requested this correction be completed prior to year-end 2018.
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.

Facilitate Reemployment: A. The Reason for the deficiency.
Plan: Rhode Island has requested corrective programming to include Interstate reemployment in reporting. We will continue to work closely with our partners in Workforce Development to develop strategies to assist UI customers in becoming reemployed as soon as possible. Do: UI Administration will work with IT to ensure completion of corrective programming prior to 12/31/2018. Check: Facilitation of Reemployment measures will be monitored and assessed on a quarterly basis to ensure Rhode is meeting and exceeding acceptable levels of performance. Act: All issues detected during the monitoring and analysis phase will be addressed with IT and/or WD. In addition, technical assistance will be requested if necessary.
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.
Rhode Island has met or exceeded the acceptable level of performance (ALP) in Facilitation of Reemployment of UI Claimants since the last biennial State Quality Service period. We are confident corrective programming to include Interstate reemployment will allow for improvement to exceed future ALP's.
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
Facilitation of Reemployment measures will be monitored and assessed on a quarterly basis to ensure Rhode is meeting and exceeding acceptable levels of performance.

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.

Improve Prevention, Detection , and Recovery of UI Improper Payments

Rhode Island continues to operate an extensive integrity plan and will continue to improve our efforts. Director Jenson strongly feels that integrity is a critical part of the Departments mission and seeks to continue the effective operation of all prevention, detection and recovery tools. Accountable Agency Official: Fernanda Casimiro, Assistant Director

During FFY 2017, Rhode Island was successful in the efforts outlined in the Program Integrity Action Plan. Currently, Rhode Island maintains four Fraud Investigators and a Coordinator who manages the unit. During 2017 the Fraud Unit investigated 419 cases of potential fraud and identified $803,109 in fraudulent improper payments. One senior investigator left state service during the prior year, however, the Department has been unable to fill the position due to budget constraints. Rhode Island has also implemented tools which are intended to identify improper payments faster thus limiting the dollars paid out and reducing improper payments.

Rhode Island has been successful in changing the look back period for the NDNH cross match to a 7 week reach back period. Also, adjustments were made to the quarterly wage record cross match to review the most recent completed quarter rather than looking two quarter back. In addition to changing the quarter reviewed, Rhode Island has begun to run the cross match during each month of the quarter rather than once. This change ensures

that the cross match will pick up wages reported from employers that a late filing quarterly wage reports.

The rule change relating to the work search requirement that was originally submitted in July 2016 and became effective August 7, 2017 of 2018. The change to our work search rule should greatly reduce the number of improper payments that are the result of work search. Unfortunately, because of the very recent approval of the work search rule change, the impact of this milestone is not yet visible. However, it is anticipated that in the coming quarters, the improper payments attributable to work search issues will be greatly reduced. Further, the planned meetings between BAM and call center management have continued and resulted in improved communication, training and the quality of work. Given the continued use of all the previously mentioned practices, Rhode Island has met all the milestones laid out in the FFY 2018 Integrity Action Plan. Finally, the Department conducted a L.E.A.N. review of the Benefit Payment Control Unit. An area of concern was detected in the Wage Verification form. Many participants felt the form was too difficult to read and understand. Therefore, the form was revised to be less cluttered and easier to read. At the current time, a test is being conducted to determine whether the improved form is resulting in more employers responding to wage verification requests.

Moving forward into FFY 2019, Rhode Island will be taking additional steps to improve the processes which are used to prevent, detect, investigate and recover improper payments. Rhode Island has begun the process to participate in the Suspicious Actor Repository that was developed by the Integrity Center. Rhode Island is currently reviewing the participation agreement with approval expected very soon. Once approval is granted, a plan to develop an exchange with the SAR will be developed. In addition, during the first week of October 2018, Rhode Island is scheduled to have a state services visit with the subject matter experts at the Integrity Center. Rhode Island has engaged the Integrity Center to have a review of Benefit Payment Control processes to determine where improvements can be made. It is anticipated that Rhode Island will have a report from the Integrity Center on operations in early November. Once the report is received by the Department, it will be evaluated to determine which recommendations are able to be implemented based on cost and perceived effectiveness. Rhode Island will focus its efforts on implementing changes that can result in the greatest reduction in improper payment for the most reasonable cost.

The Department will continue to make additional efforts to reduce the number and amount of improper payments throughout the year. We anticipate that the changes made during the prior year, as well as, the new tools and analysis that will be conducted during the current year will result in a measurable impact in the form of reduced improper payments.

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.

Rhode Island has been unable to produce a copy of our organization chart in MS Word format for submission via the portal. A copy of the chart is maintained by the State Agency and the Regional Office.

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.

Please note: a signed copy of the SQSP Signature page is on file with the State Agency and the Regional Office

U.S. Department of Labor

SQSP SIGNATURE PAGE

OMB Control No. 1205-0132 Expires 2/28/2021

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEARFY 2019	STATERI
UNEMPLOYMENT INSURANCESTATE QUALITY SERVICE PLANSIGNATURE PAGE		
This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and _____RHODE ISLAND_____ The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds. All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.		
TYPED NAME AND TITLE	**SIGNATURE**	**DATE**
STATE ADMINISTRATOR	Scott R. Jensen	8/24/2018
DOL APPROVING OFFICIAL		
DOL APPROVING OFFICIAL **(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, A COMPLETE SQSP PACKAGE MUST BE SUBMITTED. 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.

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.

See Appendix

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.

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

A. ECONOMIC PROJECTIONS AND IMPACT

States must:

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.)

I. ECONOMIC PROJECTIONS AND IMPACT:

- 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).)

Rhode Island employment is expected to increase by more than 51,000 jobs during the 2012- 2022 projection period as the state's economy continues to recover from recessionary losses. Employment in 2022 is projected to reach 545,550 an increase of 51,420 (10.4%) job from the 2012 employment level. Much of this growth is attributed to the increased demand for the products and services provided by the Health Care & Social Assistance; Accommodation & Food Services; Professional, Scientific& Technical Services; Administrative & Waste Services; Construction and Manufacturing sectors. Nationally employment is projected to increase by 10.8 percent.

Rhode Island Industry Projections by Economic Sector				
2012 - 2022				
	2012	2022		
	Projected	Projected	Numeric	Percent
	Employment	Employment	Change	Change
Statewide	494,130	545,550	51,420	10.4
Agriculture, Forestry, Fishing and Hunting	716	779	63	8.8
Mining	188	226	38	20.2
Utilities	1,055	1,000	-55	-5.2
Construction	16,002	20,250	4,248	26.6
Manufacturing	39,623	43,685	4,062	10.3
Wholesale Trade	16,843	17,100	257	1.5
Retail Trade	46,905	50,585	3,680	7.9
Transportation and Warehousing	9,780	11,015	1,235	12.6
Information	9,566	9,365	-201	-2.1
Finance and Insurance	23,310	24,950	1,640	7
Real Estate and Rental and Leasing	5,782	6,420	638	11
Professional, Scientific, and Technical Services	21,472	26,000	4,528	21.1
Management of Companies and Enterprises	10,513	13,200	2,687	25.6
Administrative & Waste Services	24,102	28,600	4,498	18.7
Educational Services	44,178	45,600	1,422	3.2
Health Care and Social Assistance	80,648	94,500	13,852	17.2
Arts, Entertainment, and Recreation	7,618	9,130	1,512	19.9
Accommodation and Food Services	44,131	49,550	5,419	12.3
Other Services (except Government)	17,370	18,200	830	4.8
Government	31,989	31,030	-959	-3
Self Employed & Unpaid Family Workers	42,300	44,325	2,025	4.8

OCCUPATIONAL OUTLOOK

Rhode Island employment in 2022 is projected to reach 545,550 an increase of 51,420 (10.4%) from our 2012 employment. Much of this growth is attributed to the increased demand for the products and services provided by the Health Care & Social Assistance; Accommodation & Food Services; Professional, Scientific & Technical Services; Administrative & Waste Services; Construction and Manufacturing sectors. Job openings result from the need to replace workers who leave an occupation and the need to fill vacancies created by business expansion. During the 2012-2022 projection period, it is estimated that employers will need to find workers to fill nearly 170,000 job openings. Nearly one-third of the job openings are attributed to the economic growth expected to occur during the projection period while over two-thirds of the jobs openings are due to replacement needs resulting from employee turnover. Several occupational groups are expected to grow at above average (10.4%) rates. Among the fastest growing occupational groups are Construction & Extraction (20.9%), Healthcare Support (20.4%), Personal Care & Service (18.2%), Computer & Mathematical (16.7%), and Business & Financial Operations (14.5%). These occupational groups are expected to generate over 17,000 new jobs during the projection period.

Occupational declines result from decreasing industry employment and from technological modifications. While all occupational groups are projected to have job gains: Protective Service (2.1%); Farming, Fishing, & Forestry (2.5%); Education, Training, & Library (4.5%); and Office & Administrative Support (5.8%) occupations are projected to grow at much slower rates. It is important to note that while job gains are below average, there will still be a demand for over 33,000 workers in these occupational groups resulting from new jobs and the need to replace workers who leave their jobs.

	Employment		Net Change	Percent Change	Openings Due To	
	2012	2022			Replacement	Growth
Total Occupations	494,130	545,550	51,420	10.41	115,950	53,798
Management Occupations	24,287	26,930	2,643	10.88	4,958	2,685
Business and Financial Operations Occupations	23,640	27,075	3,435	14.53	4,817	3,505
Computer and Mathematical Occupations	12,754	14,888	2,134	16.73	2,114	2,140
Architecture and Engineering Occupations	7,560	8,326	766	10.13	1,767	801
Life, Physical, and Social Science Occupations	3,645	4,019	374	10.26	999	380

	Employment		Net Change	Percent Change	Openings Due To	
Community and Social Service Occupations	9,942	11,247	1,305	13.13	2,308	1,314
Legal Occupations	3,965	4,382	417	10.52	639	417
Education, Training, and Library Occupations	31,806	33,234	1,428	4.49	6,550	1,455
Arts, Design, Entertainment, Sports, and Media Occupations	8,466	9,022	556	6.57	1,964	614
Healthcare Practitioners and Technical Occupations	36,275	40,886	4,611	12.71	7,456	4,662
Healthcare Support Occupations	19,971	24,044	4,073	20.39	3,793	4,087
Protective Service Occupations	10,788	11,014	226	2.09	3,081	439
Food Preparation and Serving Related Occupations	46,098	51,928	5,830	12.65	18,120	5,830
Building and Grounds Cleaning and Maintenance Occupations	18,212	20,245	2,033	11.16	3,796	2,036
Personal Care and Service Occupations	18,846	22,271	3,425	18.17	3,850	3,436
Sales and Related Occupations	50,222	53,319	3,097	6.17	15,040	3,271
Office and Administrative Support Occupations	76,016	80,393	4,377	5.76	16,125	5,338
Farming, Fishing, and Forestry Occupations	590	605	15	2.54	163	29
Construction and Extraction Occupations	19,420	23,488	4,068	20.95	3,047	4,082
Installation, Maintenance, and Repair Occupations	16,943	18,413	1,470	8.68	3,918	1,521
Production Occupations	30,927	33,576	2,649	8.57	5,986	3,239
Transportation and Material Moving	23,757	26,245	2,488	10.47	5,459	2,517

HIGH DEMAND OCCUPATIONS

The top fifty occupations with the greatest number of total openings represent numerous opportunities for finding employment in the years ahead. It is projected that during the 2012- 2022 projection period, employers will need to fill nearly 170,000 jobs resulting from employee turnover and economic growth. These occupations will account for more than half of all job openings projected for Rhode Island.

2012-2022

Retail Salespersons	683	First-Line Supervisors: Retail Sales Workers	144
Waiters & Waitresses	535	Bartenders	133
Combined Food Prep & Serving Workers	527	Maintenance & Repair Workers, General	129
Cashiers	519	Dining Room & Bartender Helpers	128
Registered Nurses	413	Hosts & Hostesses	125
Nursing Assistants	388	Maids & Housekeeping Cleaners	125
Customer Service Representatives	327	Secondary School Teachers	123
Counter Attendants: Cafeteria & Coff ee Shop	231	Receptionists & Information Clerks	118
Offi ce Clerks, General	223	Management Analysts	117
Janitors & Cleaners	216	Teacher Assistants	117
Laborers:Freight, Stock, & Movers (Hand)	208	Team Assemblers	115
First-Line Supervisors: Office & Administrative Support Workers	197	Social & Human Service Assistants	110
Home Health Aides	196	Sales Representatives: (Wholesale & Manufacturing)	110
Personal Care Aides	194	Medical Secretaries	105
Landscaping & Grounds keeping Workers	188	Construction Laborers	101
General & Operations Managers	176	Elementary School Teachers	98
Childcare Workers	171	Automotive Service Technicians & Mechanics	93
Dishwashers	168	Packers & Packagers, Hand	91
Accountants & Auditors	166	Tellers	91
Stock Clerks & Order Fillers	164	Financial Managers	88

Retail Salespersons	683	First-Line Supervisors: Retail Sales Workers	144
Bookkeeping, Accounting, & Auditing Clerks	160	Food Preparation Workers	86
First-Line Supervisors: Food Preparation & Serving Workers	152	Hairdressers, Hairstylists, & Cosmetologists	86
Secretaries & Administrative Assistants	151	Electricians	80
Cooks, Restaurant	149	Soft ware Developers, Systems Software	79
Carpenters	147	Heavy & Tractor-Trailer Truck Drivers	78

- Provide a discussion of 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).)

The Rhode Island SCSEP program is concerned for the participants in the SCSEP program. According to the Rhode Island DLT's Labor Market Information (LMI) Unit, the following industries are projected to rank among the fastest growing from 2012 to 2022: Construction & Extraction (20.9%), Healthcare Support (20.4%), Personal Care & Service (18.2%), Computer & Mathematical (16.7%), and Business & Financial Operations (14.5%). These industries are not the common job skill training for SCSEP participants. The RI SCSEP participants lack the education and experience to apply for these positions. However, the SCSEP participants can be trained for the "supportive services" to these industries. Past trainings and Job placements have included positions such as Food Preparation and Service; Education, Training, and Library Services; Office and Administrative Support; Retail, Sales, and Related Services; Maintenance and Custodial Services; Personal Care and Service; Production, Assembly, Light Industrial; Protective Service; Transportation and Material Moving; Community and Social Services; Management; Healthcare; and Legal Services. This strategy has proven successful and will continue to be followed.

- Discuss current and projected employment opportunities in the state (such as by providing information available under W-P Section 15 (29 USC 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

Employment in Rhode Island is projected to grow at all education and skill levels, from jobs requiring less than a high school diploma to those requiring advanced degrees. During the 2012- 2022 projection period, it is estimated that employers will need to find workers to fill over 170,000 new jobs and to replace more than 115,000 workers who will leave their jobs for various reasons. Parallel to the national distribution, jobs requiring a high school diploma for entry into an occupation represent the largest portion of the Rhode Island labor market. Thirty four percent (34%) of Rhode Island jobs require the minimum of a high school education; slightly below the nation percent (43.4%) in this category. More than

57,000 openings are projected for occupations at this educational level. Thirty two percent are jobs due to growth in the economy with sixty eight percent due to replacement needs.

Jobs requiring college degrees (Associate, Bachelor's, Master's or Doctoral) represent slightly less than a quarter of the current occupational distribution in Rhode Island.

Education Level			Annual Openings		
	2012	2022	Growth	Replacements	Total
Doctoral or professional degree	18,723	20,379	1,687	3,925	5,612
Master's degree	9,629	10,586	976	1,953	2,929
Bachelor's degree	87,835	97,587	9,913	18,328	28,241
Associate's degree	24,293	27,493	3,244	4,770	8,014
Postsecondary non-degree award	29,839	33,704	4,022	5,981	10,003
Some college, no degree	6,230	6,619	389	1,322	1,711
High school diploma or equivalent	190,318	206,604	18,180	39,470	57,650
Less than high school	127,263	142,578	15,387	40,201	55,588
Grand Total	494,130	545,550	53,798	115,950	169,748

Prior work experience in a previous occupation is required for fifteen percent of the occupations in our workforce. Ten percent of all occupations require from 1 to 5 years of work experience.

Work Experience			Annual Openings		
	2012	2022	Growth	Replacements	Total
5 years or more	13, 893	15,457	1,584	2,594	4,178
Less than 5 years	50,969	56,176	5,375	10,638	16,013

Work Experience			Annual Openings		
None	429,268	473,917	46,839	102,718	149,557

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

Training Requirements			Annual Openings		
	2012	**2022**	**Growth**	**Replacements**	**Total**
Grand Total	494,130	545,550	53,798	115,950	169,748
Internship/residency	24,284	25,369	1,116	5,504	6,620
Apprenticeship	9,399	11,706	2,308	1,369	3,677
Long-term on-the-job training	23,120	24,736	1,914	5,201	7,115
Moderate-term on-the-job training	75,924	82,581	7,562	14,724	22,286
Short-term on-the-job training	192,352	211,559	20,051	54,102	74,153
None	169,051	189,599	20,847	35,050	55,897

National employer surveys also indicate the need for workers to have basic and "soft" skills now and in the future. For almost a decade, the National Association of Colleges and Employers has surveyed employers about their "most-wanted" skills. Transferable "soft skills" are those that are important to employers—regardless of the jobs pay or rank. The types of skills possessed by individuals eligible for and/or participating in the RI SCSEP are in line with the projected growth in employment opportunities in Rhode Island as well as the education and skill levels needed to fill those opportunities.

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))

The Rhode Island SCSEP program is concerned for the participants in the SCSEP program. According to the Rhode Island DLT's Labor Market Information (LMI) Unit, the following industries are projected to rank among the fastest growing from 2012 to 2022: Construction & Extraction (20.9%), Healthcare Support (20.4%), Personal Care & Service

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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))

Employment in Rhode Island is projected to grow at all education and skill levels, from jobs requiring less than a high school diploma to those requiring advanced degrees. During the 2012- 2022 projection period, it is estimated that employers will need to find workers to fill over 170,000 new jobs and to replace more than 115,000 workers who will leave their jobs for various reasons. Parallel to the national distribution, jobs requiring a high school diploma for entry into an occupation represent the largest portion of the Rhode Island labor market. Thirty four percent (34%) of Rhode Island jobs require the minimum of a high school education; slightly below the nation percent (43.4%) in this category. More than 57,000 openings are projected for occupations at this educational level. Thirty two percent are jobs due to growth in the economy with sixty eight percent due to replacement needs.

Jobs requiring college degrees (Associate, Bachelor's, Master's or Doctoral) represent slightly less than a quarter of the current occupational distribution in Rhode Island.

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Less than 5 years	50,969	56,176	5,375	10,638	16,013
None	429,268	473,917	46,839	102,718	149,557

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

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Training Requirements			Annual Openings		
Moderate-term on-the-job training	75,924	82,581	7,562	14,724	22,286
Short-term on-the-job training	192,35 2	211,55 9	20,051	54,102	74,153
None	169,05 1	189,59 9	20,847	35,050	55,897

National employer surveys also indicate the need for workers to have basic and "soft" skills now and in the future. For almost a decade, the National Association of Colleges and Employers has surveyed employers about their "most-wanted" skills. Transferable "soft skills" are those that are important to employers—regardless of the jobs pay or rank. The types of skills possessed by individuals eligible for and/or participating in the RI SCSEP are in line with the projected growth in employment opportunities in Rhode Island as well as the education and skill levels needed to fill those opportunities.

B. SERVICE DELIVERY AND COORDINATION

States must:

1. PROVIDE 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. ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

The RI DLT is a partner in the One-Stop Delivery System, including the American Job Centers (AJC's). The RI DLT has a Memorandum of Understanding (MOU) with the Greater Rhode Island Workforce Development Board and the Providence/Cranston Workforce Development Board. SCSEP information is shared with the AJC's, such as program eligibility requirements and priorities, open training slots, and workshop information. In addition, information is shared regarding the fastest growing industries, occupations and businesses that offer appropriate job opportunities for SCSEP participants. Also, SCSEP marketing materials, such as brochures and posters (including bilingual materials) are placed at the AJC's and updated and replenished during frequent visits. SCSEP staff and participants will continue to participate in Job Recruitments at the AJC's. SCSEP participants assigned to the One-Stops as Older Worker Specialists will help older Rhode Islanders access job information and obtain other One-Stop services that may be available to enhance employability. In addition, they will cross flow job market and training information between the AJC's and the SCSEP program staff. And, the RI DLT staff will disseminate information regarding training vacancies and refer potential applicants to the SCSEP program. Exiting participants will be encouraged to continue their association with the AJC's. In particular,

participants who have reached their individual durational limit for SCSEP services - but who have not yet obtained unsubsidized employment - will be referred to the AJC's for further job search and training support.

B. ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))

Rhode Island SCSEP collaborates with other Older Americans Act programs, such as the nutrition and adult day programs. These partnerships have led to the establishment of effective training assignments that provide much needed services to older Rhode Islanders. And, SCSEP participants have been hired by host training sites that provide OAA program services.

C. 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))

The SCSEP program collaborates and leverages resources with many organizations to provide training and supportive services for the participants. Some of these entities include host training sites, educational organizations, veteran representatives, vocational rehabilitation activities, and social service agencies. In addition, RI SCSEP coordinates with many agencies to help participants in need of services such as subsidized housing or temporary shelters; no-cost medical and prescription programs; Catholic Charities; energy assistance; utility discounts; food stamps; Supplemental Security Income; reduced fares on transportation; the RI Food Bank; church-provided food and clothing; and, nutrition programs provided through the Older Americans Act. For participants who will exit SCSEP without a job, referrals will be made to programs such as Foster Grandparents. Those exiting participants who wish to volunteer will be referred to opportunities such as through the American Red Cross, Salvation Army, United Way, Big Brothers Big Sisters and other organizations who seek people to contribute on a voluntary basis.

D. ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

DLT's SCSEP staff in conjunction with DLT's Labor Market Division continually monitors labor market trends and opportunities. Working relationships will be maintained with the One-Stops, including Disability Specialists from the Office of Rehabilitative Services (ORS) and Veteran Representatives. Also, SCSEP participants are continually in contact with their case workers to modify and update their employment plan.

Also, job market information such as the Occupation and Industry Projections information will be considered when making training decisions.

E. ACTIONS THE STATE WILL TAKE 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)

RI SCSEP will continue its collaboration with the One-Stop system, including the AJC's and the Greater Rhode Island Workforce Development Board and Providence/Cranston Workforce Development Board. SCSEP program managers and staff visit the AJC's on a frequent basis to discuss and review the progress of the partnership and to learn about any new programs, workshops or training that may be available to Participants. SCSEP marketing materials, such as brochures and posters (including bilingual materials) are placed at the Centers and updated and replenished during visits. SCSEP participants who are training as Older Worker Specialists at the AJC's will continue to provide guidance on how to access job information, write resumes, and access other services that may be available to help secure employment. Also, valuable information is shared with the AJC's, such as eligibility requirements and priorities; available jobs and open training assignments; and, workshop information. Access to intensive and training services will continue to be considered with the above collaborative actions. However, One-Stop Center training funds are used primarily for Rhode Islanders seeking full time work; and, most SCSEP participants are interested in part-time employment.

F. EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Rhode Island does not have a strategy to work with local economic development offices in rural location. According to the SCSEP final rule where rural is defined as "areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile", there do not exist any communities that are considered rural communities.

2. DESCRIBE THE 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)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)

RI SCSEP will continue to emphasize actions that transition participants to successful unsubsidized employment. A significant portion of that effort goes towards strengthening working relationships with the organizations that hire SCSEP participants and in establishing new relationships with potential employers. The Program develops job leads and identifies potential employers in the public and private sectors by advertising, attending job fairs, responding to ads in local newspapers, and contacting employers (in person, by telephone, and by letter). The Program will continue to use the Internet to access various job search sites in an effort to identify job opportunities for SCSEP participants.

The SCSEP partnership with the AJC's will continue to be maintained and improved. For example, program participants are assigned to the One—Stops as Older Worker Specialists and facilitate a cross flow of information, such as job market trends and job openings. Also, the program managers and staff will routinely consult with the One—Stops. After each SCSEP participant has been transitioned to his or her unsubsidized job, follow ups will be accomplished with the successful person and his or her new workplace to facilitate long term employment.

The Program will maintain contact with the employers who have hired participants in the past to promote goodwill and future job prospects. Follow—up activities that are required by Program regulations, as well as more informal contacts, increase the probability of retention and of employers being receptive to SCSEP when additional jobs become available. Also, to foster good job retention and employer relations, emphasis will continue to be placed on sending qualified and suitable participants to each particular job interview. The typical SCSEP participant usually accepts only part—time employment with day time hours during the normal work week. Therefore, the program mostly targets community service organizations and small businesses, since these employers have more of the types of jobs that SCSEP participants are seeking. Also, because SCSEP participants do not normally accept relocations or extended commutes, the Program has primarily focused on the local, community job markets. A significant portion of the Program's unsubsidized placements occur when the host training sites hire the SCSEP participants that are assigned to them. Program managers and staff will continue to routinely visit host training sites to encourage them to hire their assigned SCSEP participants when there are job openings and available funds. The value and benefits of hiring their SCSEP—trained participants will continue to be emphasized.

3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))

Historically, the majority of participants in RI SCSEP have been minority individuals. For example, the most recent U.S. DOL SCSEP minority report indicates that the state's overall incidence of all minorities in the population was 24.4% while the SCSEP enrollment percentage is 49.2%. However, while the SCSEP enrollment of blacks was significantly higher than this minority's incidence in the State (14.8% versus 6.6%), SCSEP's enrollment of Hispanics was about 203.3% of the incidence of this minority (e.g. 31.1% enrolled in SCSEP versus 15.3% residing statewide)[1]. RI SCSEP has emphasized and will continue to focus on minority enrollments. Specifically, organizations that are frequented by Hispanics are visited to provide outreach and recruit candidates for the program. Also, the program engages in job fairs and other events that are designed to make the Hispanic group inclusive. In addition, high quality flyers and literature in Spanish have been developed and distributed to reach this group. And, the RI SCSEP enrollment levels for minorities in PY 2011 have been positive. For example, the percentage of minority enrollees through the second quarter of Program Year 2015 totaled 47%; and, the Hispanic enrollment level was 19%. RI SCSEP will continue to recruit the minority population in many ways, such as: (1) contacting community agencies, minority churches and organizations that serve multi—cultural populations; (2) assigning participants to host training sites which serve and communicate with the minority population; (3) inviting guest speakers from the minority community to participate in SCSEP workshops; (4) asking all participants, including minority individuals, to make program referrals for family, friends, and other contacts.

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[1] U.S. DOL Report on Senior Community Service Employment Program — Analysis of Service to Minority Individuals, Program Year 2013, Volume 11: Appendices, revised April 6, 2015.

4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

The Program views the distribution of community service needs across the State as being in-line with the equitable distribution of program-eligible individuals.

1) Needs of Individuals:

Many SCSEP participants are in need of various supportive services. The needs of individuals will be met so they can fully benefit from SCSEP services and be in the best position to obtain and retain unsubsidized jobs. RI SCSEP staff will provide job-related or personal counseling directly; or, by referral to community resources that are better qualified to deal with particular problems. When the need is job-related, the counseling may also include the Participant's training site supervisor. If a participant's personal or social need can not be satisfied, there will be access to a full array of services through information and referral networks and procedures. Services include legal assistance, health care agencies, educational opportunities, Social Security benefits; and, clothing, housing, home heating fuel and transportation assistance. In addition, incidentals necessary for training site assignments (e.g. safety glasses, work shoes, etc.) will be obtained by referral to social agencies that may provide them without charge. If unavailable at no cost through local resources, RI SCSEP may procure the needed items.

2) Community Services and Supportive Services:

The work of collecting, monitoring, and analyzing community service needs is an ongoing process. SCSEP's service to a community is based primarily on the social and economic needs of the participants entering the program; and, on the demand for services within local communities. The identification of potential training sites is accomplished through community outreach efforts, such as through meetings with current and potential host training sites, to determine where the greatest needs for SCSEP assignments exist. Efforts also include frequent coordination with the One-Stop Career Centers and Rhode Island's Division of Elderly Affairs to monitor community needs. RI SCSEP initiates and maintains partnerships with area non-profit agencies that provide a wide range of services, including: adult day programs, child day care, food services, recreational facilities, health care, and social services. The current focus is on community service needs being supported through the state's network of senior centers, state service centers, housing agencies, shelters, and child care facilities.

Efforts are ongoing to expand the reach of SCSEP throughout the State. For example, there is an ongoing effort to recruit additional community service training sites in RI to complement the existing sites. Existing sites include AccessPoint RI, Blackstone Valley Tourism Council, Capital City Community Center, Community Care Alliance, East Providence Senior Center, Farm Fresh RI, The Fogarty Center, George Wiley Center, Good Neighbors, The Governor's Commission on Disabilities, Progreso Latino, Providence Housing, and the RI Office of Veteran Affairs.

5. DESCRIBE THE 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))

RI SCSEP has been successful for many years in providing work experience, supportive services and job search assistance to Older Workers and, in assigning productive trainees to community service agencies. The Program has helped Older Rhode Islanders become job-ready and to re-enter the workforce - while providing employers with trained individuals. The RI SCSEP operates in three countis. The distribution of authorizations is based on the Equitable Distribution as provided by U.S. DOL, which identifies each County's percentage of the state's program-eligible population. The Program Year 2017 grant funds 44 authorizations across the state, according to the following allocations: Bristol County - 6 slots; Kent County -7 slots; Providence County - 31 slots.

RI SCSEP previously administed the program through a sub-grantee. Beginning with Program Year 2017, the program will no longer be operated by a sub-grantee, but rather by the grantee (RIDLT). The SCSEP will be administered by RIDLT through the Chief of Labor and Training Operations overseeing the program in its entirety with a Coordinator of Employment and Training Programs overseein the day to day operations. In addition, RIDLT has an Assistant Coordinator assigned to SCSEP to assist the Coordinator in overseeing the SCSEP Counselors assigned to work with participants. This change in program operator allows RI SCSEP to focus on building stronger partnerships with AJC partners as SCSEP staff are co-located in the AJC. Participants will be able to access AJC partner programs like Wagner-Peyser and WIOA through their SCSEP counselor. Due to this change in program operator, the RI SCSEP program was redesigned to operate more efficiently to achieve higher performance measures than previous years with a goal of participants obtaining unsubsidized employment in a shorter time than previous program years. RI SCSEP would recommend that U.S. DOL continue to increase nationwide outreach so that employers become more aware of SCSEP and its job-ready participants.

6. DESCRIBE A 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))

1) Targeting Jobs Effectively:

RI SCSEP has been most successful in placing its participants in unsubsidized employment with community service agencies -- especially with host training sites -- and in other service-oriented industries. The most prevalent occupations for SCSEP participants include jobs in maintenance and custodial work; as office clerks and receptionists; van drivers; child care workers; senior center program assistants; retail sales associates; housekeeping; food service; and, in customer service. The Program focuses on all areas of the state. However, many participants cannot - or prefer not to - have long commutes to and from work; so, all attempts will be made to identify and develop local job opportunities. Again, a significant portion of the Program's unsubsidized placements occur when community service training sites hire SCSEP participants that have been training at the sites. Therefore, program managers and staff will routinely visit host training sites and encourage them to hire their

assigned SCSEP participants as funds becomes available. The value and benefits of hiring their trained participants will be emphasized. Also, the Program will require training sites to sign a Letter of Agreement that clearly describes the temporary nature of training assignments; and, which emphasizes the site's responsibility for considering qualified participants for jobs.

2) Working with the AJC's Effectively:

The Program will continue to partner with the AJC's to monitor information on job openings and trends that will help identify current and future regional job opportunities. Information will be tracked regarding the fastest growing industries and the occupations and businesses that offer appropriate job opportunities for SCSEP participants. Also, future coordination will increasingly emphasize workforce development in view of demographic, economic and job market changes. In addition, SCSEP participants training as Older Worker Specialists will continue to be assigned at the AJC's to assist older job seekers; and, to cross flow job market and training information with One-Stop Center personnel and SCSEP program managers and staff.

3) Managing Durational Limits Effectively:

The Program will continue to provide quality support to each participant who is approaching his or her SCSEP durational limit (e.g. not employed after 48 months in the program). The grantee will continue to train on individual durational limit requirements; transitional planning and scheduling; conducting assessments; preparing and implementing transitional Individual Employment Plans; researching the local job market; and, on accessing all supportive services available to assist the SCSEP participants. When a participant receives an assessment 12 months before his or her durational limit date, a transitional IEP is developed and initiated. Also, a reassessment will be accomplished six months before the individual's durational limit date (or sooner, if needed); and, his or her transitional IEP will be updated during the reassessment. For individuals with good or reasonable job potential, transitional IEP actions may include polishing resumes and interviewing skills; enhancing job development and training efforts; and/or making rotations. In addition, to foster good employer relations during the transition process, emphasis will be placed on sending qualified and suitable participants to each job interview.

4) Training Participants Effectively: Participant training is a key ingredient for successful program performance. The following training activities are ongoing and will continue to be emphasized:

A). In addition to providing quality work experience, the host training sites will be encouraged to make formal in-service and on-the-job training available for their assigned SCSEP participants. The intent is not only to increase effectiveness in the current assignment, but also to further prepare participants for unsubsidized employment. Training will be consistent with each participant's assessment and Individual Employment Plan. Also, computer training and experience will continue to be emphasized and provided by the grantee; host training sites; and, by training sources under agreement with the grantee. In addition, SCSEP will continue to collaborate with the local libraries and non-provide agencies that offer free training.

B) Participants will be referred to workshops at the AJC or partner agencies, covering different aspects of the job-seeking process and topics relating to health, consumer

information, transportation, social security and retirement security. Workshops include speakers from community service organizations, government agencies, and the local business community. In addition, workshops will continue to be arranged for specific skills -- such as customer service.

C) Participants seeking full time employment - who would improve their potential for transition into unsubsidized employment with skills training - will be encouraged to attend programs offered through WIOA American Job Centers.

C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

States must:

1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

Rhode Island residents 55 and older (older residents) account for 28.1 percent of the state's population. Of the state's population for whom poverty status is determined, 14.2 percent are living in poverty (100% or below poverty level) and 18.5 percent are living in or near poverty levels (125% or below poverty level). Older residents are less likely to be living at or near poverty levels than the population as a whole as 9.6 percent of those aged 55+ for whom poverty status is determined are living in poverty and 13.6 percent are living in or near poverty levels. Providence County has the greatest number of older residents living in or near poverty levels on both a numeric and percentage basis. A total of 19,263 Providence County residents 55 or older are living in poverty accounting for 12.3 percent of the county's older population and 27,056 are living in or near poverty levels accounting for 17.3 percent of the county's older population. In Kent County a total of 3,556 older residents are living in poverty accounting for 7.1% of the county's older population and 5,191 older residents are living in or near poverty levels accounting for 10.4% percent of the county's older population.

In Bristol County a total of 879 older residents are living in poverty accounting for 5.8% percent of the county's older population and 1,382 are living in or near poverty levels accounting for 9.1% percent of the county's older population. Within Providence County seven cities and towns have more than 1,000 older residents living in or near poverty levels, including Providence (8,435), Pawtucket (4,291), Cranston (2,922), East Providence (1,814), Woonsocket (2,415), North Providence (1,542) and Johnston (1,237). Warwick (2,675), Coventry (1,094) and West Warwick (1,092), located in Kent County, are the only other Rhode Island cities or towns with more than 1,000 older residents living in or near poverty levels. On a percentage basis, the cities of Central Falls (32.9%), Providence (27.7%), Pawtucket (24.9%) and Woonsocket (24.0%), all located in Providence County, have the greatest share of older residents living in or near poverty levels. Demographic data for all individuals living at the poverty level, which accounts for over three-quarters of all those living in or near poverty levels, shows that women, both older and total population, are more likely to be living in poverty than men of the same age group. Older women account for 63.9 percent of the older residents living at the poverty level, with older men accounting for 36.1 percent. Likewise, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55 and older, defined as a person whom is both white and non-Hispanic. There are 8,148 minority residents 55 and older living in poverty. They account for 24.4 percent of Rhode Island's older minority population

(33,330). There are 21,611 non-minority residents 55 and older living in poverty. They account for 8.2 percent of Rhode Island's older non-minority population (262,029). However, older minority residents living in poverty numbering 8,148 account for 31.3 percent of the 26,043 older RI residents living in poverty and older non-minority residents numbering 21,611 account for 83 percent of the older RI residents living in poverty.

2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

In Rhode Island the SCSEP equitable distribution consists of six slots in Bristol County; seven slots in Kent County; and thirty-one (31) slots in Providence County. Cities located in Bristol County include Barrington, Bristol, and Warren. Cities located in Kent County include Coventry, East Greenwich, Warwick, West Greenwich, and West Warwick. Cities located in Providence County include Burrillville, Central Falls, Cranston, Cumberland, East Providence, Foster, Glocester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Providence, Scituate, Smithfield, and Woonsocket. The SCSEP project will take place in each of these three counties and the cities or towns that comprise those counties.

3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

As of Program Year 2017 Quarter 3, RI SCSEP equitable distribution data indicates that of the 44 authorized slots (unmodified) Kent County is under-enrolled by 6 slots; Bristol County is under-enrolled by 2 slots; and Providence County is under-enrolled by 25 slots. Program Year 2017 began with zero enrollees from the previous Program Year due to the change in operator of the grant and RI SCSEP has been working diligently to modify the previous program structure and recruitment strategies to ensure an increase of enrollment across all counties. RI SCSEP is aware of the slot imbalances and is actively pursuing new enrollees throughout all Counties using a multipronged approach. RI SCSEP strategy will include continued efforts to engage local businesses, churches, and agencies/centers that seniors may visit. We recognize the importance of maintaining equitable distribution among the counties we serve and will remain diligent and aggressive to more specifically target our recruitment efforts with this in mind. Modified slots for RI SCSEP are 32 in number, based on Rhode Island's minimum wage.

4. EXPLAIN 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.

RI SCSEP strives to provide equitable access to the program in accordance with the percentages of program-eligible residents' three counties. When there are changes to the ratios, authorizations will be redistributed among the three counties based on the new equitable distribution -- increasing positions where needed and decreasing training slots in over-served counties. However, current participants will not be impacted by any reallocations.

RI SCSEP will work wtih the RI National Grantee to esnure equitable distribution of slots in all counties of Rhode Island to minimize over-serving or underserving locations. If the scenario arises that positions must be transferred to address over-serving or underserving locations, RI SCSEP will ensure to adhere to CFR 641.365 by communicating wtih the National Grantee, USDOL, and the Federal Project Officer. RI SCSEP will ensure all participants and host agencies are kept informed of the changes.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

Bristol County, Kent County and Providence County are considered urban areas. Within those counties, and according to the SCSEP final rule where rural is defined as "areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile", there do not exist any communities that are considered rural communities. Again, training authorizations will follow the equitable distribution percentage for each County.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

In selecting eligible individuals for participantion in the SCSEP, priority is given to individuals who have one or more of the following characterists as defined in the Older Americans Act section 518(b) (1)-(2) and by the Jobs for Veterans Act: covered persons in accordance with the Jobs for Veterans Act; 65 years of age or older; have a disability; have limited English proficiency or low literacy skills; reside in a rural area; have low employment prospects; have failed to find employment after using services provided through the One-Stop delivery system; or are homeless or are at risk of homelessness.

To assist employment counselors in prioritizing participants with significant barriers to employment, DLT utilizes a multifaceted approach to reach the hardest to serve. DLT assesses and reassesses participants via a face to face interview, facilitated by the case manager. The assessment covers previous employment history and transferable skills; strengths and barriers; interests and hobbies; educational level; and previous training. DLT also utilizes a variety of contacts to recruit those individuals and these contacts include Senior Centers; Churches and Faith Based Organizations; Homeless Shelters; Veteran's Organizations; Community Food Banks. Within all enrollment priorities those with poor employment prospects are given preference. These are individuals who are unable to obtain employment without the assistance of SCSEP or other employment and training programs. Those included in this category are individuals who have limited or no work histories; are basic skills deficient; have limited English language proficiency; are displaced homemakers; are disabled; are homeless. The Program views the distribution of priority individuals across the State as being in line with the equitable distribution of program-eligible individuals across the three counties.

5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

RI has one SCSEP Grantee who serves three Counties per the SCSEP equitable distribution as provided by the U.S. Department of Labor, which identifies each county's percentage of

the state's program-eligible population. In 2014, out of a Rhode Island civilian labor force of 565,123 (those aged 16 and older) who were either working or actively seeking employment, 21.7%, or 122,783, were aged 55 and older. 97.2% of Rhode Islanders aged 55 and older have had their poverty levels determined. Of those individuals, 9.6% are below the poverty level.

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

Provide the relative distribution of eligible individuals who:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

US Census Bureau estimates a 2014 total population for the State of RI at 1,053,252. Of Rhode Island's 862,851 working age (16+) residents, approximately 296,115 (34.3%) were aged 55 and older in 2014. Broken down by county, the 16+ populations (and corresponding distributions) of those over age 55 are as follows: Bristol County 40,776 (38.8%); Kent County 136,492 (37.5%); and, Providence County 510,822 (31.7%). This population distribution generally corresponds to the percentage of program-eligible Rhode Islanders in each county. Specifically, the three counties are allocated positions and funding based on the Equitable Distribution ratios that are in effect for each grant year *(as identified by the U.S. Department of Labor).* The ratios for the PY 2015 grant year are Bristol County 10%, Kent County 21%, and Providence County 69%.

B. HAVE THE GREATEST ECONOMIC NEED

For those participants facing the greatest economic need RI SCSEP's partnership with local homeless shelters, food banks and other community agencies serving economically depressed mature individuals has led to the SCSEP program being able to serve the majority of participants who are at or below 100 percent of the Federal Poverty Level at the time of enrollment. Greatest social need and individuals described in "priority of service". The RI SCSEP reaches out to local minority communities through churches, schools and community networking to provide services to and engagement of disparate groups in all local service areas resulting in a consistently "meets or exceeds the performance" on the most-in-need measure.

C. ARE MINORITIES

In RI, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55 or older, minority being defined as not white non-Hispanic. There are 8,148 minority residents 55 and older living in poverty. They account for 24.4 percent of Rhode Island's older minority population (33,330) for whom poverty status has been determined.

There are 21,611 non-minority residents 55 and older living in poverty. They account for 8.2 percent of Rhode Island's older non-minority population (262,029) for whom poverty status has been determined. However, older minority residents numbering 8,148 account for 24.4 percent of the 33,330 older RI residents living in poverty and older non-minority residents numbering 19,419 account for 75.6 percent of the older RI residents living in poverty.

D. ARE LIMITED ENGLISH PROFICIENT.

The 2013 Community Service Survey reported that 28.6% of the foreign born population aged 5+ in RI spoke English "not well" or "not at all" in the home. RI SCSEP currently serves 17% limited English proficient participants and has consistently met that need for eligible SCSEP participants in RI.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Greatest social need means the need caused by non-economic factors, which include: Physical and mental disabilities; language barriers; and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently. (42 U.S.C. 3002(24)). According to the U.S. Census Bureau, of the 88,385 individuals aged 18-64 living below poverty, 25.8% have disabilities, while 74.2% do not. However, of the 77,086 individuals aged 18-64 with disabilities, 29.6% live below poverty, while 11.6% of the 566,336 18-64 years olds without disabilities live below poverty. Additionally individuals with disabilities aged 18-64 have an unemployment rate 13.6 percentage points higher than those without disabilities. As mentioned above, English proficiency is also a barrier to employment, however with the small geographic area involved with the state of RI, geographic isolation is not a major barrier. 11.8% of all Rhode Islander's aged 18-64 have a disability and RI SCSEP participants are comprised of 23% disabled enrollees.

7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR PARTICIPANTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

If positions are required to be redistributed, RIDLT will ensure clear communication and coordination wtih Host Agencies, participants, the Federal Project Officer, and USDOL. Any positions that require movement will be coordinated with and approved by the Federal Project Officer. RIDLT will work with participants and host agencies to ensure a seamless transition as to not disrupt participant wages or interfere with the participants individual employment plan.

SCSEP ASSURANCES

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

STATE COMMENTS ON SCSEP ASSURANCES

REINTEGRATION OF EX-OFFENDERS PROGRAM (REXO)

NOTE: PLEASE NOTE THAT THE DEPARTMENT OF LABOR HAS UPDATED THE NAME OF THE REXO PROGRAM. THIS PROGRAM IS NOW THE REENTRY EMPLOYMENT OPPORTUNITIES PROGRAM (REO).

There are no program-specific state planning requirements for RExO. If the state includes RExO in a Combined State Plan, the state must incorporate RExO in its responses to the common planning elements in sections II, III, IV, and V WIOA State Plan requirements instrument.

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the 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 adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as "baseline" indicators in the first plan submission. A "baseline" indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. "Baseline" indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that that have been designated as "baseline". The actual performance data reported by States for indicators designated as "baseline" in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as "baseline" indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):

- Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State 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.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	73.30	77.00	73.60	78.00
Dislocated Workers	78.00	79.00	79.00	80.00
Youth	55.80	61.00	56.60	62.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	65.00	72.00	67.00	73.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	72.80	72.80	73.60	73.60
Dislocated Workers	80.00	80.00	81.00	81.00
Youth	59.20	59.20	59.40	59.40
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	62.00	63.00	63.00	64.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	5,800.00	5,800.00	6,000.00	6,000.00
Dislocated Workers	7,000.00	7,000.00	7,100.00	7,100.00

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,122.00	5,800.00	5,144.00	5,900.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	68.00	68.00	69.00	69.00
Dislocated Workers	77.40	77.40	77.80	77.80
Youth	53.70	53.70	60.60	60.60
Adult Education	Baseline	Baseline	Baseline	Baseline

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	52.00	52.00	53.00	53.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 1 (enter the measure information in the comments below)	Baseline	Baseline	Baseline	Baseline
Line 2	Baseline	Baseline	Baseline	Baseline
Line 3	Baseline	Baseline	Baseline	Baseline
Line 4	Baseline	Baseline	Baseline	Baseline
Line 5	Baseline	Baseline	Baseline	Baseline
Line 6	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

Rhode Island has selected "Retention with the same employer" and "Employer Penetration Rate" as our measures of Employer Effectiveness.

TABLE 7. ADDITIONAL INDICATORS OF PERFORMANCE

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

STATE WIOA Policies and Planning: https://gwb.ri.gov/policy-and-planning1501261899350-2ec86dd0-d758

http://www.gwb.ri.gov/pdfs/CSIPJan16.pdf - Rhode Island Continuous Improvement Plan-Governors Workforce Board Strategic Planning

http://www.dlt.ri.gov/wio/WINotices/PY15/15-01DWAllocation.pdf- Rhode ISland State WIN Notice 15-01

http://www.dlt.ri.gov/wio/WINotices/PY15/15-02AdultYouthAllocations.pdf - Rhode Island State WIN 15-02

http://www.dlt.ri.gov/wio/WINotices/PY15/15-03DWAllocations.pdf - Rhode Island State WIN 15-03

http://www.dlt.ri.gov/wio/WINotices/PY15/15-04AllocationsAdultYouth.pdf - Rhode Island State WIN 15-04

http://www.dlt.ri.gov/wio/WINotices/PY15/15-05WIOALocalAreaDesignationPolicy.pdf-rhode Island state WIN 15-05

http://www.dlt.ri.gov/wio/WINotices/PY15/15-06WIOALocalBoardCriteria.pdf- Rhode Island State WIN 15-06

http://www.dlt.ri.gov/wio/WINotices/PY15/15-07PY14DataElementValidation.pdf- Rhode Island State WIN 15-07

http://www.dlt.ri.gov/wio/WINotices/PY15/15-08TrackingYouth.pdf- Rhode Island state WIN 15-08

http://www.dlt.ri.gov/wio/WINotices/PY15/15-09CertProcess4ETPLs.pdf- Rhode Island WIN 15-09

Unemployment Insurance Organizational Chart - http://www.dlt.ri.gov/wio/pdfs/OrgChart.docx

Unemployment Insurance SQSP Workbooks - http://www.dlt.ri.gov/wio/pdfs/RISQSPWorkbook4Qfinal112117.xls

Jobs for Veterans Grant Tables- http://www.dlt.ri.gov/WIO/pdfs/JVSGTablesWIOAAppendixXX.pdf

Employment Breakdown Tables - http://www.dlt.ri.gov/wio/pdfs/EmploymentTablesWIOAAppXX.pdf