

**WIOA State Plan for the Territory of Virgin Islands 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.

#### Overview

On September 6, 2017, Hurricane Irma, the fifth most powerful storm recorded in the Atlantic basin hit the US Virgin Islands as a Category 5 hurricane with winds exceeding 185 miles per hour. The storm caused catastrophic destruction on the islands of St. Thomas and St. John and significant damage on the island of St. Croix. The infrastructure of the islands to include the electrical grid, air and port transportation facilities, roadways and mass communication facilities was severely damaged or destroyed. Businesses and government agencies were rendered useless in the wake of the storm displacing thousands from their worksites and ultimately halting the economic viability of the Territory. Private residential and public housing communities were damaged or destroyed causing widespread displacement of individuals and families.

Thirteen days later, on September 19, 2017 Hurricane Maria, another Category 5 hurricane with winds of 175 miles per hour followed almost the same trajectory as did Hurricane Irma, veering more southward yet still hitting the already ravaged Territory again; this time the island of St. Croix experienced the brunt of the storm with the same devastating effects as seen by its sister islands during Hurricane Irma. The brief recovery experienced by St. Croix in the wake of Hurricane Irma was wiped clean by Hurricane Maria rendering the Territory an area of total destruction.

The effects of the hurricanes of September 2017 are long lasting and far reaching; however, with the destruction has come unprecedented opportunities for change, especially in the workforce system. Many jobs were lost due to storm related displacements and though many individuals have reentered the workforce it is either temporary employment or a job that requires a different skill set from the one previously held. The workforce gaps exposed in the wake of the storms allude to a broken pipeline:

- The continuum from academic preparation to workforce training/development is weak;
- The continuum between post-secondary preparation and the workplace functionality is disconnected;
- and • The relationship between workforce development activities and the employer community remains unclear.

In the upcoming years, the Workforce Development System will be redefined to address not only the immediate needs of the Islands' recovery, but more importantly to implement a more robust and sustainable system. The strong collaboration of education, workforce development, economic development and the employer community will be integral in achieving this vision which occurs in three phases:

- Short-term immediate rebuilding phase, with basic training and quick employment;
- Mid-term larger scaled recovery, with advanced training and higher-level credentials on the career ladder;
- Long-term build out of a new diversified sustainable economy, with a skilled and nationally competitive workforce

The goal is not simply to place large numbers of job seekers in unsubsidized employment, but rather to create a dynamic system of continuous education and skills training that ignites new job creation, creates growth opportunities within existing businesses that promote upward mobility and encourages small business growth through entrepreneurial activities.

## 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. Yes

**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. No

### 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.) No

Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))) No

Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)) No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.) No

Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law) No

Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)) No

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)) No

## **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.

Economic and Workforce Analysis (A) Economic Analysis The U.S. Virgin Islands continues to recover from the widespread devastation brought about by two back to back category 5 hurricanes that severely impacted the Territory in September 2017. Prior to the storms, the local economy had been making gradual strides towards stability, with small businesses beginning to expand their product and their workforce; with infrastructure projects on roadways and harbors projected to start within a few months; and with anticipation of the oil refinery, once the top private employer in the Virgin Islands and now an oil storage facility, about to announce its reopening.

Over the past 12 months our labor market has experienced contraction related to the impact of the storms. The retail and hospitality sectors which are our core economic drivers have been impacted and continue to offset the growth we are experiencing in 2018. Year to date both

sectors combined are down by -26.7%. However, with the recovery efforts in both the private and public sector, the labor market is anticipated to see growth in the coming quarters of 2019 and 2020. More specifically in the construction sector and by the 4th quarter of 2019 the manufacturing sector should see employment gains related to refining operations. • There have already been gains in workforce activity as construction openings have come on line since November of 2017 and continue to rise with a 40.4% increase from Aug 2017 to August 2018. • In the manufacturing sector occupations that were no longer in demand will return to the labor market such as welders, pipefitters, erectors, and millwrights — all associated with refining operations. • The return of the tourist market is assured but will be slower to come back to the market; however it is anticipated that the retail and hotel inventory will move up compared to the 2018 season. • Other signs of positive labor economic activity are apparent with the decline in the amount of initial filings for unemployment insurance which averaged 130 year to date, compared with 495 in 2017, with the peak occurring in October 2017 immediately after the Hurricanes. • In addition, based on federal awards, upwards of five million dollars will be made available from other sources to assist in worker training and job activity for Virgin Islanders. As we move forward into the last quarter of 2018 and based on the activity occurring in the economy, our employment is anticipated to reach levels prior to the storm and rise higher as the refining projects and other private sector projects impact the labor market. Current Employment in the Virgin Islands during the 2017 and first half of 2018 continued to see the impact of the hurricanes on the current employment data (measure of persons on payrolls). In 2017 employment averaged 37,553 and dropped to an average of 35,844 at the third quarter of 2018 (see table 1). Construction was the major growth sector in the latter part of 2017 and continued to climb in 2018 as result of the recovery efforts from the storms. This increase occurred in Oct 2017 at 1,863 and has continued. From October 2017 through July 2018 the sector has increased by 25% (see table 3). The hardest hit sectors on an over the year basis were in the retail and leisure sectors wherein many establishments and 60% of the major accommodation business were closed or at minimal operating capacity. Although the construction sector resulted in increases during the period the offsets in the downturn in other sectors still kept employment count low. As of July 2018 the retail, and leisure, still reflect the offline factors in addition to the cyclical slowdown that occurred during this slower than normal tourism season (see Table 2). • On the total employment year over July 2017-2018 employment estimates were -2,089. • Construction employment was up by 627 or roughly 25% higher than 2017 estimates. • Total private sector employment also continued to be impacted as a result of the overall economic slowdown in all sectors of the Territory. • Looking at the sectors that establish our core tourism related employment, roughly 2,083 have exited the economy compared to the 2017 data. Industry Employment Industry employment in the 1st quarter of 2018 aligns with the employment situation and reflects increases in the construction sector. This sector is expected to be sustained at this level throughout the year and into the 2nd quarter of 2019. The continued recovery and the reestablishment of refining petroleum products are the main drivers in this sector. The weak sectors continues to be the leisure and hospitality, and retail which have been down from the 4th quarter of 2017 into 3rd quarter of 2018 as a direct result of tourism related establishments offline due to the impact of the storms. This sector is expected to remain weak straight through 2018 — 2019. Establishments in the Virgin Islands paid out \$1,513,847,665 in total wages in 2017 (see table 4). • The private sector paid \$935,553,040 or 61.80% o The leisure and hospitality total wages were at 18.85% representing the highest sector in private sector (\$176,394,171) although impacted by storms. o The retail sector total wages

were \$135,000,426 or 14.43% of private sector wages. • The public sector total wages were \$578,294,625 at 38.20%. o The Federal government at \$71,098,323. o The Local government at \$507,196,302. The firm size (count of employee within an establishment) reflects that the Virgin Islands economy is primarily based on small to medium size businesses. Approximately 1,252 of 3,121 firms at the end of 2017 employed 1-9 employees (see table 5). In 2017, a -13% decrease in the number of firms were apparent as a result of the storms, limited energy, communication, and impacted infrastructure, and weak economic activity occurring at year end. The 1-4 employee firms ended -103 less in 4th quarter compared to 1st quarter of 2017. In addition all other size firms sustained losses as entities remained offline or simply dissolved (see table 6).

## **B. Workforce Analysis**

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.\* 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'.

## **(B) Workforce Analysis**

**Employment and Unemployment Data** The unemployment rate averaged 10.66% during the 2017 cycle with the first part of the year at a lower mark compared to the last quarter of 2017 when rates peaked as high as 18.59% in October (see table 7), and remained elevated for the rest of the year as a direct result of interruption in all sectors of the Virgin Islands economy. Over 97% of establishments remained close or at bare minimum in staffing and employment in the

first month immediately after the storms. The initial filing of unemployment claims raised as high 5k during the period as employees, and self-employed filed for unemployment insurance assistance. Although all island areas were heavily impacted by the storms, the St. Thomas/St. John area experienced a higher rate due to the entire retail and accommodations industry getting knocked offline. In addition, the labor force size as a result of the contraction that occurred in the St. Croix labor markets in previous cycles also impacted the lower rates for the district; however, the area saw an uptick in persons filing for initial unemployment claims immediately after the hurricanes. On St. Croix the labor force averaged 20,288, and the unemployed counts were around 2,400 with rates at 11.86% for the year. However rates did climb as high as 14.91% in October 2017. In the St. Thomas/St. John district the rates dropped as low as 9.06% as result of lower claims and a good tourist season prior to the impact of Irma, but climbed as high as 18.59% in the month of October based on a combination of storm impact and seasonality factors that normally drive up claims at the end of tourism season. Occupational Data

The mean hourly wage in the Virgin Islands during 2017 was \$19.12, and average annual salary was \$39,770 per annum. The median (middle value of salaries in survey) in 2017 was \$30,760. The average annual salary for occupations can be seen in table 8. The median (midpoint of salaries for the given occupation) salary for all occupations was \$30,670.

Table 9 provides the median salaries for occupations within the Virgin Islands during the 2017 survey. The legal, healthcare, and management occupations rank the highest. At the lower and entry level, the support and sales related occupations average \$21k.

When comparing the average wage in the Virgin Islands with other State areas, the Territory ranks 50th at \$19.12 just above Mississippi, Guam and Puerto Rico. Table 10 provide tree mapping of all States and Territories average wages. The US Virgin Islands Department of Labor estimates that the mean annual wage for Total All in Virgin Islands in 2017 was \$39,770. The estimated entry level annual wage was \$21,280 and the experienced annual wage was \$47,530. Average employment in 2017 was 37,490. Occupational Projections Occupational projections from a base year 2017 to the 1st quarter of 2019 estimate that the job openings (announcement of job vacancy) will continue to be in the service related occupations. The top are retail sales persons, food workers, cooks, and information record clerks. In the mid-tier but at lower demand are financial specialist, law enforcement, and supervisory positions. At the lower end of the job demand computer, transportation workers, and health aides are some of the occupations wherein employers will announce openings.

The required job training for the anticipated openings are short-term with a minimum requirement and just entry level skill sets. The occupations on this level are as follows: In comparison, the job openings that require a longer term for training are much smaller for the projected period which can be observed below: The educational criteria for many of the openings are at the high school diploma or equivalent, and are occupations mainly within the service industry such as cashiers, office clerks, and customer service representatives. Advance degree occupations (see table 12) with the highest demand are operations managers, accountants, registered nurses, and financial occupations. Subsequent to the 2019 projection round, the VI Government entered into a contractual agreement with operators of the Oil storage terminal to resume the oil refining process by late 2019 into 2020. It is anticipated that construction and maintenance related jobs will be coming on line in late 2018 and the first quarter of 2019 as the project moves forward. Over the period of the upstart it is anticipated that approximately 1,500

jobs will be created. Once the refining process has begun, the occupations that were once in demand during its earlier operations will come back to the labor force, such as erectors, pipe fitters, millwrights, and other related petroleum operating jobs.

At the end of May 2019 employment in the maintenance industry is anticipated to be at roughly 1,300 see table 13 as the contractors that will performing the various projects at the plant increase employment. Education and Skills Levels of the Workforce

Education and skills levels are critical factors in workforce development continuity and expansion. The Virgin Islands workforce education levels at the end of 2014 reflect the majority of educational skill level at the high school diploma level. The educational attainment level of customers during the PY14/ FY 15 fiscal year can be seen in table 14. Roughly 300 had less than high school completed, and 328 with a Bachelors or higher degrees. Looking at the short term and potentially further out to ten years, and the assumption that there will be no significant economic event or major emerging sector requiring upwards of 2,000 employees, the educational and training needs in the short term 3rd quarter of 2016 require high school diploma and less, representing 80% of the projected openings. The replacement and growth component of projected potential jobs and the required educational attainment level remains proportionally the same, with 1,378 of the replacements requiring high school diploma or less. 94 required associates and 173 at the bachelor's level. 128 of the 209 growth occupations require a high school diploma or less, with 35 for bachelors, 12 for associates, and the residual spread among post-secondary or professional post-secondary certificates or licenses.

**Skill Gaps** The 2015 US Virgin Islands Business and Employer Survey conducted by the VI Bureau of Economic Research states that “essential hard skills deficits in reading, writing and verbal skills (40%); computer technical skills (27%) and math logical reasoning (22%) are most cited as lacking in candidates”. The often stated lack of soft skills is primarily related to customer service (59%), punctuality and reliability (52%), and time management (42%).

Half of businesses (53%) have expressed that the main cause contributing to hiring difficulties in jobseekers is lack of relevant work experience; or lack of technical or occupational skills (49%). Forty percent (40%) have cited that there are not enough qualified applicants to choose from.

In summary, employers in the Territory have identified skill gaps in the workforce in three specific categories: ? Soft Skills — to include customer service, punctuality and time management ? Basic Academic Foundational Skills — specifically math, writing and verbal language efficiency ? Low Technological Skills — limited basic fluidity, limited knowledge of applications and web based navigation

**Workforce Skills Assessment** As stated earlier and based on the shift in the economy, the Virgin Islands is at a cross road with a misaligned workforce population. This asymmetry is not entirely based on educational deficiency, but partially endemic to island economy, and many years of declining output capacity (depletion of the goods producing sector, and moving toward a single source sector economy (tourism)), which when present spurs entry level employment and results in an areas' labor force gaining work experience and building upon skill sets necessary to meet employers job demand. An independent survey conducted by the Virgin Islands Bureau of Economic Research, on employment skills gap, in 2015 supports the analysis of the skewed infrastructure. Of the establishments that were respondents in the survey, 38% indicated having difficulties filling positions. Sectors that experienced difficulty were retail, scientific,

professional, and accommodation services. Some of the difficulty is attributable to the seasonality component prevalent in the aforementioned areas, wherein the business cycles window of ramping up personnel for quarterly employment, or short term projects at times places pressure on the labor supply pool for a given period. However, although the churn factor within a twelve month cycle is persistent, the required occupational and requisite skill sets deviation is negligible.

The survey revealed technical management, sales, administrative, and skilled trades are most difficult to fill. Short falls in the number of candidates with relevant work experience was a primary reason reported by 53% of the respondents. Forty-nine percent (49%) stated candidates lacked technical or occupational skills. Sixteen percent (16%) cited candidate's unwillingness to accept offered wages. Other minute reasons were lack of soft skills, behavioral, and work ethics.

There is unanimous consensus on the impact of the workforce's skills gap on the surveyed establishments. Overall it touches each entities bottom line, workload, and competitiveness abroad and in the local market. Some of the factors which are ranked in the chart by responses are delay in product development, loss of revenue, market share and/or niche, operating cost and loss of customers.

Area Rank Increased workload on other staff 64% Increased operating cost 26% Revenue Loss 26% Eroded Customer Satisfaction 19% Loss of Market Share 19% Set back in product development 14% Hindrance in meeting quality objectives 34% Based on the information collected and looking at other external data from education test scores and candidate's resumes, the Virgin Islands Workforce System has to focus its talent development in the short term around workforce preparedness and work-based training activities, on the job training and apprenticeship opportunities to meet the work experience deficit and be able to source the labor market with dynamic candidates.

## **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, Education and Training Activities Analysis (A) The State's Workforce Development Activities** The Virgin Islands Workforce System is comprised of workforce and related programs from both WIOA core program partners and required one-stop delivery system partners. The agencies that make up the core program partners include: the VI Department of Labor, which administers the Youth, Adult, Dislocated Worker and Wagner-Peyser programs; the VI Department of Education, which administers Adult Education and Family Literacy programs and the VI Department of Human Services which administers the Vocational Rehabilitation program.

The Virgin Islands Workforce Board serves as the link between all interagency and partner organizations as well as employer-generated activities and programs. The Board is charged with system coordination, integrity and compliance, and continuous improvement. Each of the four core agencies is represented on and is a voting member of the Virgin Islands Workforce Board.

**One-Stop Job Centers** The Virgin Islands One-Stop Job Centers, housed in each island district at the VI Department of Labor's offices serves as the hub of all employment and training activity. It is a job-driven system designed to simplify access to education, training and support services needed to attain employment. It is specifically designed to assist those with multiple barriers to attaining and maintaining employment by streamlining administrative functions and focusing on individual goal attainment. An expansive offering of career readiness and training services are available and may be accessed either virtually through the Virgin Islands Electronic Workforce System (VIEWS) at [www.vidolviews.org](http://www.vidolviews.org) or in person at one of the two Job Center branches. Services are available to both job seeker customers and employer customers.

The Virgin Islands Workforce System operates on the premise that everyone who accesses the system is seeking employment — either a first time job or an advanced work opportunity. To achieve these goals individuals must be equipped with knowledge of their career interest area, the skill levels to perform at their desired point of entry, an understanding of the local work environment and the discipline to be effective and productive on the job. The Workforce Innovation and Opportunity Act (WIOA) provide the framework through which these services are delivered. Job seekers have access to career services (that prepares them for the workforce); training services (that helps them attain the credentials in varying skill areas) and follow up services (to ensure that career goals are met).

The Virgin Islands Job Centers also serve as a portal to the business community. The Employer Engagement Team assists business, small to large with solutions to their workforce needs. Employers can schedule access to the Job Centers facilities for screening, interviewing or providing workshops for their current or potential employees; they may request assistance with the administration of testing or career assessments; work with business service representatives to develop job fairs or information dissemination; post their job vacancies; or schedule hiring events. Employers can also take advantage of a range of business training solutions that help their employees ascend the career ladder within their organization. Those solutions include incumbent worker training that allow current employees to upgrade their skills or customized training for new and current employees who need to master a specific skill set.

The Virgin Islands Workforce System is made up of multiple programs offered by WIOA core and non-core partners who coordinate services to reduce duplication and ensure that all potential barriers are addressed. The core partners include Title I (Adult, Dislocated Worker, Youth programs); Title II (Adult Education programs); Title III (Wagner-Peyser programs) and Title IV (Vocational Rehabilitation programs).

Title I Job seeker customers have access to services to include job readiness workshops and seminars, individualized career counseling, and job search, matching and referrals. Those customers requiring additional assistance in securing employment work with case managers to develop an individual service strategy (ISS) which identifies their employment goals and sets a path through educational services, work experiences, occupational skills training and support services to help each individual achieve that goal. Job seekers who are new to the world of work can test their newly developed skill through short term work experience or on-the-job training. Current labor market information can be accessed through the virtual system [www.vidolviews.org](http://www.vidolviews.org) and is used to ensure that training is aligned with locally in demand occupations.

Additionally, job seekers who have been or are about to be laid off from their current employment have access to all workforce preparedness and training services. Through the reemployment program they can rework their resume, hone their interviewing techniques and job search skills. If retraining is necessary they are referred for occupational skills training in local demand occupation areas.

Youth customers have access to fourteen (14) program elements designed to develop the whole person with wrap around services that are connected to career development goals.

Title II Customers who seek to obtain their high school diploma or equivalent are referred to Adult Education services offered by the VI Department of Education. Students can achieve their secondary level credentials through the traditional route — attending subject specific classes to earn credits (20 required); or by taking preparatory courses for the General Educational Development (GED) diploma which consists of a set of five tests: Math, Reading, Writing, Social Studies and Science.

All Adult Education students are assessed with the Test of Adult Basic Education (TABE). Students who score 6.9 or below on the TABE are enrolled in skills classes. Basic Skills Enhancement courses are available for students who need goal-specific elementary or secondary level basic skills such as work related math, functional literacy and reading or writing assistance. For English language learners, English as a Second Language (ESL) classes from the pre-literacy to the advanced level are available to help the adult learner develop speaking, listening, reading writing and grammar skills to communicate effectively and function successfully with their workplaces and community.

Title III Wagner-Peyser programs are also administered by the VI Department of Labor. The primary customers are job seekers who are skilled and ready for work or who have been in the workforce and are seeking employment change or advancement. These customers can either virtually or in person use the resources of the Job Centers to prepare/update their resumes; attend virtual or in-house workshops and seminars designed to enhance workplace etiquette; attend short-term pre-vocational activities to enhance specific skill sets such as computer literacy,

communication skills and interviewing techniques. Job search activities generated through live labor market data and demand sector information.

Labor market information to include an analysis of workforce trends, economic indicators, labor market supply, income and wage data and occupation and industry profiles are a few of services available to employers using the Workforce System. Information is available either virtually through the Virgin Islands Electronic Workforce System [www.vidolviews.org](http://www.vidolviews.org) or through the Job Center.

Title IV Job seeker customers who because of a disability may need additional assistance attaining employment may be referred to Vocational Rehabilitation services administered by the VI Department of Human Services. Once eligibility is determined through a comprehensive assessment, customers work with a VR counselor to develop an Individualized Plan for Employment (IEP). The services available include: vocational counseling, guidance and referral; vocational training; transition services from school to work; rehabilitation technology services; supported employment; and job search and placement.

The Vocational Rehabilitation Program serves persons with various types of disabilities. Financial eligibility may be required to receive some purchased services.

Required Partners Programs offered by the required partners of the One-Stop delivery system include: the VI Department of Labor — Unemployment Insurance program; the VI Department of Education — Career and Technical Education programs; the VI Department of Human Services — Temporary Assistance for Needy Families program, Supplemental Nutrition Assistance Program and the Senior Community Service Employment program; and the VI Housing Authority — Youthbuild, and Family Self Sufficiency (FSS) programs.

## **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.

(B) The Strengths and Weaknesses of Workforce Development Activities Strengths Single point of Operations — The base of operations for the Virgin Islands Workforce System has always been managed by a single entity — The Virgin Islands Department of Labor. It houses the Adult, Dislocated Worker, Youth, Wagner-Peyser and Unemployment Insurance programs. Program and fiscal staff interact consistently to align activities and services for both job seeker and employer customers. The LMI unit is also in-house which facilitates the access to real time data and analyses that drives decision making by the Board as well as Workforce Staff. The Department of Labor serves as the clearinghouse for all employment activities. By VI law (Act 5174) all employers must register their job vacancies with the Virgin Islands Department of Labor. Small Community — The Virgin Islands is a small community therefore workforce agencies and programs share the same customer base thus providing additional opportunities for alignment of activities and services. Partnerships and interagency activities are more fluid and translated through living Memoranda of Understanding — ensuring that the customer receives holistic support services while they progress along their chosen career paths.

Weaknesses Island economy — The Virgin Islands is a single local delivery area; however, there are two districts in the Virgin Islands which are separated by forty miles of ocean. All services must be made available in each district in order for customers to have access to the full range of

workforce services. This is true for the partner agencies and community organizations as well. This separation creates an inherent duplication in all services and activities proffered. Employment base is limited — While job seeker customers may have career goals that are in keeping with the fast moving global economy, those occupations are not often present or practical within an island economy where demand occupations are relatively static. Inconsistency of service delivery between island districts — The flow of services and products offered between island districts, although expected to have some unique distinctions, are not consistent enough to create the image of a unified system. Customers are challenged to see the Workforce System as a single unit of operation. Limited data sharing — The partnerships formed with both internal and external partners of the Workforce System have not yet reached the point where technology bridges the gap. Program Silos — The Workforce System has made great strides in collaborating with programs and partners to streamline access to services; however, many programs still operate in a vacuum once the common intake process is completed. Undue demand on Employers — The employer base in the Territory is comprised largely of small to medium sized business. Businesses in the VI have traditionally been good corporate partners; however, with multiple demands by multiple agencies and organizations on the same entities the element of fatigue takes its toll on even the most willing employer.

### **C. State Workforce Development Capacity**

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

(C) State Workforce Development Capacity The Workforce Innovation and Opportunity Act present a new vantage point for serving all customers of the workforce system. Previously focused on talent development, the new system is job driven and focuses on developing talent with specific employment outcomes in local demand sectors as the goal.

Currently, the US Virgin Islands has two main One-Stop or American Job Centers — located in each of the island districts. The AJC's are housed within the Virgin Islands Department of Labor offices with the core partner Vocational Rehabilitation and non-core partners SNAP and TANF maintaining a physical presence on a scheduled basis each week. Adult Education maintains a presence at the Job Centers two days a week on each island; information is presented and referrals are done for literacy and GED training and testing. There are two Access Points, one in each island district, housed by the University of the Virgin Islands Community Engagement and Lifelong Services (UVI-CELL) which are located in close proximity to public housing communities. The Access Points serve as a point of registration into the Workforce System, point of access to information on career readiness, job opportunities and available training and a learning site for selected training.

By forging stronger partnerships with both core and non-core partners, the Workforce System has increased its capacity to reach more customers and provide them access to universal career readiness services at any location they first enter. System partners have created an orientation presentation that provides information on workforce preparedness in general and further broken down into each partner's role in the process. An accompanying handout with location and contact information for specific services will be available.

The Virgin Islands Electronic Workforce System (VIEWS) also helps to increase the reach to customers who prefer a self directed style of navigating the system. In addition to job search,

customers can also post their resume, take advantage of numerous work preparedness online courses and research the local area trends with real time labor market information.

As with the job-seeking workforce, the current agency workforce staff in each of the core as well as the non-core partner programs has seen the aging and ongoing departure of its experienced staff. While new staff is being recruited, the capacity to address the needs of both job seeker and employer customer remains challenging. The Workforce System seeks to address this by utilizing joint agency teams for customer service and employer engagement. In order to attend to the training needs of the customers, local service providers who are fewer than in previous years are adjusting their training methods to include technology, distance learning options and partnerships with employers to target specific occupational skill needs. The Virgin Islands Workforce System also looks to qualified off-island providers to offer training services in local demand areas where credentialed training opportunities in the Territory are scarce.

## **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.

The U.S. Virgin Islands’ recovery is tied to a strong economy and a flexible workforce that supports its continued growth. Employment opportunities must be accessible for all job seekers, and available in industry sectors that promise a rewarding return for both the job seeker and the employer.

(1) Vision The vision seeks to create a Workforce Delivery System that promotes a dynamic collaborative between workforce agencies and business that is responsive to the growth and stability of the local economy. The System will connect to businesses by providing a full range of career development services that begins with building foundational and personal development goals, enhancing basic academic skills, and occupational skill proficiency that leads to the attainment of a post-secondary certificate or degree in order to find meaningful and progressive employment.

### **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.

## (2) Goals

To achieve this vision, the Virgin Islands Workforce Board has developed the following goals: Goal 1 — Enhance Business Engagement through a Sector-based approach to Workforce Training • Develop program design in conjunction with the business sector needs • Establish on-going work based learning opportunities based on real time skills gaps expressed by employers

Goal 2 — Align Work-Readiness and Workforce Training Programs with Economic Development Strategies • Proactively prepare for new employers and emerging occupational opportunities • Develop a signature work readiness product that stamps customer as “ready to work” through the workforce system

Goal 3 — Promote Diversification of Post-Secondary Education and Training Opportunities • Explore alternative and innovative methods of attaining credentials • Foster new opportunities for online and blended learning options

Goal 4 — Develop Focus Driven Sector Strategies • Reengineer the workforce system from the “street level” • Engage with hiring agents who assess job applicants for competency • Encourage sector expose where employers present their business process and core occupations

Goal 5 — Develop network for temp or “gig” economy workers • Append current system and use AJC as central repository for bridging employer seeking day labor, short term projects, or intermediary jobs that will sunset in less than one year; • Encourage jobseekers to unify as talent groups in related occupations

Goal 6 - Develop an Integrated Data System • Integrate agency operations through technology • Design electronic common intake tools • Manage customers through shared profiles • Partner with private sector entities • Promote employer services and consultations

## **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.)

### (3) Performance Goals

Performance goals were determined for Title I the Adult, Dislocated Worker, Youth and Title III Wagner-Peyser measures. Goals were set using data from the workforce and economic analysis previously described in this document as well as past performance for the previous two program years. Performance goals for the next two years will be negotiated with the US Department of Labor and are reflected in Appendix 1.

Goals for Title II — Adult Education and Literacy - According to the Adult Education National Reporting System (NRS), the current baseline level for the VI Measureable Skill Gains of Title II AEFLA programs are 7% and 11% respectively.

The negotiated adjusted levels for the following categories: 2018-2019 Proposed Individual Targets 2019-2020 Proposed Individual Targets ABE Beginning Literacy 37% 38% ABE Beginning Basic Education 37% 38% ABE Intermediate Low 37% 38% ABE Intermediate High 37% 38% ASE Low 37% 38% ESL Beginning Literacy 37% 38% ESL Beginning Low 37% 38% ESL Beginning High 37% 38% ESL Intermediate Low 37% 38% ESL Intermediate High 37% 38% ESL Advanced 37% 38%

Adult Education Family Literacy Act funded programs and participant activities will be recorded using a WIOA approved MIS System to capture Territorial Adult Education data. According the VI State Assessment Policy for Measuring Educational Gains, evaluations will be based on level completions on standardized pre and post test results with evidence of literacy gains resulting from hours of instruction. Educational Functioning levels have been adopted from the NRS and outcome measurements have identified and defined in the State Assessment Policy for each level. [Measuring Educational Gains in the National Reporting System for Adult Education (34 CFR Part 462). Baseline data is being collected to determine goals for Vocational Rehabilitation services.

## **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.

(4) Assessment The Virgin Islands Workforce Board has developed a comprehensive tool to evaluate all components of the new workforce system, inclusive of all the core programs. This tool will be a formative evaluation tool that tracks activity throughout the program year and reports at quarterly intervals. The tool will be used to gauge:

- Overall functionality of the System
- Integration between core programs
- Interaction with non-core programs
- Use of Technology
- Customer satisfaction with workforce services
- Employer satisfaction with workforce services

The evaluative process has been set back due to the untimely arrival of the 2017 hurricanes. The ability to gather and collect information was severely impacted due to months of little to no communications as well as emergency functions overtaking normal operations. This tool will not be implemented until the next program year.

### **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).**

The analysis of the components of the Virgin Islands Workforce System, to include the Economic and Workforce Analysis; and the Territory's Strategic Vision and Goals led to the development of the following strategies.

(1) 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)

Workforce development activities revolve around the build out of Industry sectors. The Territory's current demand sectors based on current hiring trends are:

Industry Occupation Administrative and Support Services • Administrative Staff • Program Managers/Administrators • Security Guards Allied Health • Nursing • Home Health Care Attendants • Healthcare Technicians • Child/Senior Care Attendants • Dental Assistants/Hygienists • Behavior/Mental Health Professionals Construction Trades • Electricians • Carpenters • Masons • Welders • Plumbers • Alternative Energy Installers/Maintenance Workers

Information Technology (across industries) • Program Analysts • Information Systems Operators • Fiber Optic Installers/Technicians • Network/Computer System Administrators

Leisure and Hospitality • Office Managers • Front Desk Clerks • Food & Beverage Service • Marine Service Workers Retail • Retail Clerks & Managers Transportation and Logistics • Heavy Equipment Operators • Warehouse Clerks & Logisticians

The sectors with the greatest local employment opportunities prior to the storms have not changed; rather, the shift occurred in the priority of demand. Whereas, the last few years offered more employment in leisure and hospitality sector and related areas, now the immediate needs of the construction industry in all trade areas has notably surged.

An immediately available and skilled workforce is needed for the rebuilding of homes and businesses, roads and ports, schools and hospitals. A working partnership has been established with the Virgin Islands Housing Finance Authority (CDBG-DR grant recipient), to provide training for job seekers, including section 3 residents on rebuilding residential and business establishments. The Workforce System will address this need with a two prong strategy:

1. An employment triage that gives the least skilled workers short-term introduction to construction training that allows them sufficient knowledge and skills for entry-level positions;

Approximately, seven hundred individuals will be trained within the year. They will be equipped with general soft skills and safety training, basic knowledge of the construction industry and Level 1 training in a trade of choice — carpentry, masonry, electrical or plumbing. Prior to entering the workforce, training participants will spend at least two-weeks either job shadowing or engaged in a work experience that gives them a practical foundation to work from. 2. Longer termed work-based training opportunities that allow for higher level training while employed

Participants who have had prior exposure to the construction trades or who have completed entry level training and are interested in continuing on this pathway will be able to do so while working. Through employer based partnerships, job seekers can engage in on-the-job training or customized training where employers can use their preferred curriculum to train for the specific skills needed for their area of service. Pre-apprenticeship training will be available for those participants not aligned with a specific employer during the training but, which is acceptable throughout the industry; and then segue into industry based apprenticeships that strengthen the employers' team. This type of training will last from six months to a year or more depending on the trade. Approximately three hundred and fifty participants are scheduled to be trained within the first year with additional training becoming available as the demand rises.

Benefitting from widespread training in the construction trades is the Territory's oil refinery which closed in 2012 but is scheduled to come back on line within the next two years. The basic skill set remains the same but is buoyed by skills in welding, pipefitting and scaffolding. This level of training requires significant classroom training prior to OJT's and/or apprenticeships.

Also, in preparation for the return of oil refining, advanced level training in information technology and process technology will be required. Training will be long-term and on-going. The workforce system continues to work with refinery employers and sub-contractors to ensure that training that is industry appropriate, locally relevant and timely.

The hospitality and retail sectors were hard hit by the 2017 hurricanes with 80% of the Territory's hotels seriously damaged or destroyed. Most are scheduled to remain off-line until late 2019 and into 2020. Typically, training in the hospitality area can be

accomplished with a quick turnaround period. A short term career pathway plan that spans 4-6 months enable customers seeking employment in these sectors to engage in workforce activities that develop basic foundational competencies — personal, academic and workplace — while simultaneously receiving occupational skills training to acquire industry-recognized credentials in their desired field. A short term work experience becomes an intrinsic part of this strategy as does on-the-job training to assist participants in relearning their skills and to support employers with soft openings as they strive to bring their establishments fully back on line.

After the passage of the storms the majority of hotel and restaurant workers were displaced. Many sought employment in “non-traditional” occupations, with line cooks becoming brick layers and front desk clerks becoming traffic controllers. The interval between losing employment and regaining employment in the hospitality area will span more than eighteen months for most. The loss of time plus the need for alternate employment prevents individuals from honing their preferred skill; therefore, the Workforce System seeks to address this sector’s development not simply through basic courses for skills upgrading but for skills refining — providing the opportunity to train for advanced skills and new certifications that will be needed in tomorrow’s workplace, thus giving job seekers a competitive advantage to recapture their place in the hospitality industry. Further, the University of the Virgin Islands offers a BA in Hospitality and Tourism Management for those job seekers who seek credentials in management and administration. Eligible participants can access this degreed program through the workforce system. The career pathway to attaining industry recognized credentials in the administrative and support services and careers in the transportation and logistics sector requires a 6-12 month training period that allows for more intensive training coupled with on-the-job learning. Allied health and information technology sectors will see a training path that spans 9-18 months. All training offered start with the basic foundational competencies to ensure a job seeker is equipped with life skills needed to perform on any worksite. On-the-job training, pre-apprenticeships and Registered Apprenticeship options factor into the training offerings. Customers who embark on long-term strategies will have several off-ramps to seek full time employment at varying levels of competency — specifically, entry-level, intermediate or advanced.

The training strategies for each career path will be developed jointly by workforce professionals, educator/trainers and industry-specific experts to ensure that the training is timely, relevant and leads to portable industry recognized credentials.

The rise of the gig economy is never more evident than after an economic altering event such as a natural disaster. From individuals who have lost steady employment to those who see gaps in the “normal” functioning of daily activities; those with employable skills/talents can and do create new work opportunities for themselves. However, to be successful and turn their talents into lucrative ventures, additional training and sometimes certification is needed. The workforce system is enhancing its entrepreneurial training options to support this growing avenue of work.

The gig economy coupled with the advances in technology has changed the way we work. It also changes the way we prepare for the workforce. The brick and mortar establishments are institutionalized and will always have a role in workforce preparation;

however, as the millennial generation followed closely by i-gen or generation z become more prolific in the workforce the tools needed to help them chart their path to success must include modern technology, as displayed through robotics and artificial intelligence as well as flexibility in the learning. Recognizing that the new workplace may exist in an environment previously unknown; it becomes apparent that training providers can no longer survive as stand-alone entities with a rigid curriculum. It is further recognized that it may take a network of providers to equip the new workforce with all the tools needed to be successful within an industry.

As the Virgin Islands Workforce System redefines and establishes itself as a contender in workforce preparation, evaluating the way training providers prepare the workforce will be revisited. A team approach consisting of industry experts, employers, trainers and workforce specialists will be tested in the development of new program designs with the intent of ensuring industry appropriate and relevant training for all.

**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).**

The Workforce Innovation and Opportunity Act focuses on providing opportunities for those individuals with multiple challenges that prevent them from entering the workforce. This includes out-of-school youth, dropouts, individuals with basic skill deficiencies and individuals with disabilities, English language learners and the long-term unemployed. The service strategies are broken into three tracks of development: Ready for Work; Job Assist; and Intensive Career Preparation.

Ready for Work — This group of individuals are ready for work. They may have already chosen their career path and are equipped with skills, credentials and some work experience, but are still having challenges connecting or reconnecting to employment. Through the Job Center customers have access to a variety of workshops that include, resume preparation, interviewing techniques and workplace etiquette. Self directed programs that boost confidence and helps an individual learn to “sell their skills” are also available. Current job listings are always available which facilitates the search process. Customers can participate in these activities either on their own or with the assistance of a career counselor. If support services are needed both workforce and partner agency representatives are available to provide assistance. These customers are ready for work and with a little guidance can land their dream job.

Job Assist — These customers may have work experience but no specific job interest or skill level. Career counselors begin by developing an individual career plan that includes career assessments, academic competency level testing and career exploration and matching. Referrals to core and non-core partner programs are made and noted on the

career plan to coordinate activity intervals. Some customers on this track may be seeking retraining to advance their skills and/or credential level. Local LMI information is provided so that customers can make informed decisions about their career areas of interest and determine the time and effort needed to achieve their goal. Education and training opportunities are made available and customers choose the intensity of their path. Customers requiring this level of assistance may take 6-12 months to complete the foundational competencies and academic/training required to accomplish their goals. They will have access to job shadowing, on-the-job training, paid or unpaid work experience and transitional employment before they complete their regimen. Career counselors are available throughout their journey to assist and encourage. Once career credentials are earned, customers are assisted with finding unsubsidized employment.

**Intensive Career Preparation** — This track is taken by individuals who face significant or multiple barriers to employment. They may need preparation for a high school diploma or GED. Some may be English language learners who have a skill but have challenges functioning in a new environment. Others may have visible or hidden disabilities that can be successfully managed with a longer development plan. Still other customers may experience difficulty maintaining employment due to poor social skills or work habits. Customers who are served in this track will work with career counselors to map out and follow the same foundational to training path as other customers and have access to the same tools and activities; however, in addition to that they will have mentors that work with them throughout their time in the workforce system to give them the added encouragement they need to complete their goals.

**Integration with Partner Programs** — All tracks are available to core and non-core partner participants either through referral to the Job Center for services or through development of shared Individual Employment Plans.

Partners share in the provision of workshops in the Ready for Work track. Subject matter experts from both core and non-core partners to include TANF and SNAP offer workshops at the Job Centers that are available to all customers and may be scheduled through their IEP. Further, several workshops are developed with the “hardest to serve” customer in mind. TANF, SNAP, Vocational Rehabilitation and Reemployment customers are all required to participate in a “Getting Ready for Work” workshop series. Local Certificates of Completion are given to those who complete the series. The Business Services Unit which includes representatives from all program agencies advise employers to be on the lookout for these certificates to show which potential employees have benefitted from these workshops.

By offering a general orientation at which all partners provide information about the services available at both the Job Centers and at various entry points customers are able to work with their case managers to develop a schedule that fits their individual needs. A common intake form that is shared among referred partners documents Basic Career Services to include eligibility determination, registration and initial assessments. This may be done by any partner program where contact is first made. Individual Career Services and Training services currently includes referral between partner programs; however, the System is working towards having all training opportunities listed in one service menu and available to all customers eligible to access training.

While some services are program specific such as GED testing which may only be provided by Adult Education staff, GED preparation programs are available at the Job Centers and through other eligible providers. Successful completers of the preparation programs may now sign up for testing through the Job Centers.

Addressing Weaknesses — Workforce partnerships among core and non-core partners were formed early in the planning phase of WIOA and relies on periodic meetings to continually improve the programs offered and methodology used. Discussions center on the practical experience gained through the day to day interactions in the Job Centers as well as at the host agency locations. Joint discussions also cover electronic access and system compatibility alignment between AJC partners to ensure consistency of services. For example, VIEWS capability allows case managers to indicate, at any time during participation, which partner program job seekers are currently enrolled in; this enables case managers to make informed decisions on each customer's development path. Also, through an improved referral process pertinent customer data is shared between partners to reduce duplication of intake information. A more streamlined approach to blending these activities into a seamless system is one of several topics currently being explored to upgrade the efficiency of the workforce system. It is anticipated that by the start of PY 2019 a working solution will be identified and implemented.

### **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).

(1) State Board Functions The U.S. Virgin Islands is a single State local area and has one Workforce Board who performs the duties of the State and Local boards. The Virgin Islands Workforce Development Board (WDB) is comprised of twenty-three members to include the Governor, Commissioners of the three workforce agencies — Labor, Education and Human Services, the State Administrator for Adult Education and Family Literacy, the Administrator of the Vocational Rehabilitation program, representatives from the University of the Virgin Islands, Economic Development Authority and Workforce Development; representatives of local labor unions and majority representation from local businesses. A complete roster of VIWDB members can be found at the Workforce Board’s website - [www.viwib.org/board/members.htm](http://www.viwib.org/board/members.htm). The Board has three standing committees — Executive, Strategic Planning and Operations. There is a Youth committee that operates as a sub-group of the Operations committee. During the planning stages of this document an ad-hoc working group was formed to gather more intelligence on the economic and workforce outlook for the Territory. This information formed the basis of the State Planning section. In addition to WDB Strategic Planning members the committee also included representatives from the Office of the Governor, Bureau of Economic Research and the University of the Virgin Islands.

Private sector board members were selected based on their affiliation with local in-demand occupations. As sector strategies are built out, these board members will take the lead to ensure the accuracy and integrity of workforce product delivered. Career pathways will be developed in a similar manner. The State Administrator of Adult Education and Literacy also oversees the State Career and Technical Education programs in the Territory and in conjunction with the Career and Technical Education Board and local businesses has begun to align career pathway development with the local demand occupations to ensure a smooth transition from secondary school to post secondary education or training.

The Virgin Islands Workforce Area consists of one region. Programs and activities developed for the delivery area are the same as that of the region. Tourism and hospitality

is the overarching resource of the area and many businesses support it or feed into it thus creating one solid product. Through academic advancement, occupational skills training and workforce preparedness efforts, the Board seeks to align the Territory's workforce system with multifaceted requirements of meeting the regions workforce demand.

The members of the business or employer community are also customers of the Workforce System. Board members provide first hand advice on the types of products, activities and offerings that might benefit a business. Resources are made available through the One-Stop delivery system to help them develop their talent pool and expand their workforce. The business engagement unit within the Job Centers conducts outreach to businesses to advise them of various workforce strategies that might be beneficial to them. Real time labor market information is also available to businesses to help their decision making processes when considering expanding or withdrawing from the local labor market.

The major workforce agencies are represented on the Workforce Board and strategies to assist those individuals with barriers including those with disabilities are brought to the forefront and included in any plan proffered to increase access to the workforce.

## **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.

(2) Implementation of State Strategy In order to realize the Territory's vision and goals the partners of the Workforce System have formed a "partner's workgroup" led by the SWDB director and made up of core agency program directors, non-core program directors, administrators and front line managers. During the planning phase, the group met weekly to discuss areas of possible collaboration and streamlining of services. A splinter group comprised of program directors and front line managers also met once a week to discuss each programs current operations and features of their individual system in order for each group to gain a better understanding of what each agency duties entailed.

(A) Core Program Activities to Implement the State's Strategy The partner's workgroup will continue to meet on a semi-monthly basis to ensure the implementation of WIOA progresses smoothly. Representatives from each of the core partners - Adult, Dislocated Workers, Youth, Adult Education and Family Literacy, Wagner-Peyser and Vocational Rehabilitation have agreed on a universal intake strategy. A common intake form and process is being designed to simplify the customer's initial entry into the workforce

system and promote the “one system” message across agencies. Customers will be made welcome “at any door” and will have access to basic information on obtaining services from each of the core partners.

The Job Center will operate as the hub of workforce services and in addition to providing information, all core partners will be able to deliver at least their initial assessment services at these centers. An inter-agency video is also being created to provide a system-wide orientation to the activities of the workforce system promoting “employment” as the joint goal. The orientation is the key to tying the agencies message together. The videos will run on a loop at each Job Center site as well as in the lobbies of each core and some One-Stop partner agency locations.

## **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.

(B) Alignment with Activities outside the Plan The required One-Stop partners who are not core partners include the Temporary Assistance for Needy Families (TANF) program; Supplemental Nutrition Assistance Program (SNAP); Unemployment Insurance (UI); Career and Technical Education programs (CTE); Senior Community Service Employment program (SCSEP) and Housing and Urban Development (HUD) programs. These programs have also participated in the planning process for WIOA and some maintain a presence in the Job Centers. They will also be included in the orientation video to ensure the consistency of the service flow. The VI Workforce System has upgraded its referral process so that all agencies are represented in its service delivery plan and customers with barriers - limited access to housing, food and support services - are provided with options for addressing their most basic needs as well as supplementing the needs that enable them to prepare for attaining unsubsidized employment. A universal referral form with links to all core and One-Stop partner programs has been developed to facilitate the referral process as well as to reduce the duplication of services.

## **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.

(C) Coordination, Alignment and Provision of Services to Individuals An individual service strategy will be developed for all customers seeking more than basic career services that include referrals to core and one-stop partners for additional services. The

referral connections are currently documented in the service strategy and followed up via points of contact in each agency and through email and telephone contact. In addition to the core partners, One-Stop partners TANF and SNAP also maintain a presence at the Job Centers facilitating the referral process to occur in real time. Appointments can be set up on the spot and customers benefit from making all their connections at one location. For those customers accessing the System from a non Job Center location, the universal referral form is used to ensure consistency and reduce duplication. Each core and partner program retains the integrity of their program requirements by having their staff perform the more involved services of their respective programs. Coordinated activity occurs at the onset and in the referral process. The Virgin Islands is working on an electronic solution to this connectivity to ensure a faster more accurate response to customer needs. This solution is slated to be rolled out during the first program year of Plan implementation.

#### **D. Coordination, Alignment and Provision of Services to Employers**

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

(D) Coordination, Alignment and Provision of Services to Employers The Business Engagement team now consists of representatives from the core programs and some of the One-Stop partner programs. The joint agency team will conduct outreach to employers to provide information on the services and programs available to them through the Workforce System. This information will be disseminated through quarterly Employer Educational Forums/Seminars; Workforce newsletters and on-site visits that will occur on a rotating basis to ensure coverage to all employers during a set timeframe. The Employer Newsletter will cover topics such as: Developing Sector Strategies; Acquiring a Skilled Workforce; Hiring Workers with Disabilities; Recruiting through Job Fairs and Workforce Expansion Strategies to name a few. A calendar of Employer Workforce events will be developed and posted at the Virgin Islands Department of Labor website [www.vidol.gov](http://www.vidol.gov) with a link established at each core and partner agencies websites for easy access. Additionally, an interactive feature will be added to the website so that employers can voice their suggestions and concerns.

#### **E. Partner Engagement with Educational Institutions**

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

(E) Partner Engagement with Educational Institutions The U.S. Virgin Islands does not have a community college; however, the University of the Virgin Islands with campuses in both island districts has been and continues to be an integral partner to workforce development; both through its assistance with program and curricula development and through the University's Community Engagement and Lifelong Learning or (UVI-

CELL), its community college unit that offers online and face to face courses developed specifically to fill the Territory's post-secondary skill gaps.

UVI-CELL also maintains a physical location in each island district that border public housing communities; this has enabled them to act as access points for workforce delivery services outside of the Job Centers. Information dissemination and skill training occur at these sites when necessary to facilitate attendance by those for whom access to transportation is a hardship. Several career pathways to include the construction trades, business administration and nursing begin with career exposure and coursework in secondary school that contain foundational and early occupational skills training and ultimately result in entry-level certification at high school graduation. The training continues on through post-secondary at UVI-CELL with higher level industry-recognized certifications and at the University of the Virgin Islands with associate and bachelor degrees.

## **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.

(F) Partner Engagement with Other Education and Training Providers The Workforce Board has also partnered with numerous training providers who have expertise in training and development activities in demand sectors. These providers work primarily with the adult learner, including those with barriers to employment. All training providers are required to make available reasonable accommodations for individuals with disabilities. Career and Technical Education programs of study to include allied health, the construction trades, information technology and administrative and support services highlight the local offerings and work in concert with the business community to ensure the integrity of the programs. The providers are an important part of the career pathway for local demand occupations; specifically for the adult learner who is attempting to advance their education and skill levels while holding down a job. The providers offer flexible schedules and relevant training developed in concert with employer partners to ensure training is up-to-date and can result in industry-recognized credentials.

All providers listed on the Territory's Eligible Training Provider List are available to customers from all partner eligible funding streams. The University of the Virgin Islands community arm UVI-CELL offers program certificate courses and related program certification for many of the demand occupations listed. Participants from all partner agencies take advantage of these opportunities as they are available Territory-wide. The services from private or community based providers are available to partner agencies district wide since many providers offer programming specific to the island where they are located.

## **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).

(G) Leveraging Resources to Increase Educational Access The Workforce Innovation and Opportunity Act calls for increased access to educational and training services. The Workforce Board as well as the interagency partners' workgroup is discussing reasonable options for leveraging existing resources. In the Territory, workforce development activity across the agencies is funded primarily through federal sources. The replication of services to accommodate separate island districts presents a challenge to leveraging limited resources while still maintaining the integrity of each individual program. This is an issue that will continue to be addressed at the Board and agency levels.

Currently, all core partners utilize the services of the University of the Virgin Islands and UVI-CELL by funding eligible customers in programs of study (either degree or certificate) that meet their Individual Employment Plan. In order to maximize the number of customers that may benefit from this resource the agency partners' workgroup continue to work on developing joint service strategy form that includes shared costs for funding customer services, at both local and off island training institutions. See Action Plan for timeline on completing this item.

## **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.

(H) Improving Access to Postsecondary Credentials The newly re-energized partnerships formed by the WIOA core and One-Stop partner programs have committed to "employment as the outcome" as the basis for all education and training programs offered and delivered. In order to deliver well educated and highly skilled workers it is imperative that all training offerings result in post-secondary credentials that are industry recognized. The Workforce Board, charged with reviewing and approving training providers and their course offerings, requires that all training has an approved industry curriculum and delivers content sufficient for a student to take and pass a national credentialing exam.

The Department of Education through their Adult based Career and Technical Education program offers a wide variety of post-secondary occupational skills training programs - many of which are on the Demand Occupation List and are available in both island districts to the general public. The Department of Education is an Eligible Training Provider in the Territory.

Some employers offer training in-house (incumbent and customized) to prospective as well as current employees thus expanding customer access to those already in the workforce. Although not required to be on the Eligible Provider List these employers often collaborate with the workforce system to expand their customer pool and gain access to federal funds. The review and approval of their training offerings are subject to the same scrutiny by the Workforce Board as any other provider. At the completion of any occupational skills training provided by an employer and funded through the federal workforce system customers must be ready to take national credentialing exams.

Customers whose first point of entry to the Workforce System is through TANF, SNAP, VR, SCSEP or HUD are all provided information on training services at the orientation given at any door. Case managers or career counselors advise them on the steps needed through development of their service strategies and referrals are made accordingly ensuring that all barriers are addressed before embarking on a training regimen. Having access to different avenues of training increases the opportunities for more customers to find training in their area of interest at different locations throughout the Islands.

## **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.

(I) Coordinating with Economic Development Strategies The Workforce Board has engaged with Economic Development representatives throughout the Territory's planning stages to align the workforce vision with the economic goals. The Chief Executive Officer of the Economic Development Authority who is also a member of the Virgin Islands Workforce Board and the Executive Director of the Bureau of Economic Research, have both been strong participants in the development of the State's strategy. These entities are developing a long term economic/workforce development strategy that encompass the overarching goals and direction for rebuilding the Territory's infrastructure through strengthening its workforce and ability of the Territory to compete in the global economy.

This planning group advocates a twenty-year strategy that allows for continuous learning, advanced training in each of the current and emerging sectors. The workforce system is constantly seeking new tools and products to help bolster the viability of existing businesses and new businesses are being recruited to the Territory that fall into the emerging occupations listing. The Board will continue to work with economic development and all other workforce development agencies and organizations to create varied and flexible opportunities in the local workforce area.

## **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.).**

(1) The State operating systems that will support the implementation of the State's strategies

The Virgin Islands Workforce System uses the Virgin Islands Electronic Workforce System (VIEWS) as the overall tool for disseminating labor market information, driving data systems, case management for Adult, Youth, Dislocated Workers and Wagner-Peyser programs and job search and listings. The Adult Education and Family Literacy program uses LACES as their data management tool and to collect information needed for federal reporting. The Vocational Rehabilitation program is currently acquiring a VR portal powered by the company that hosts the Virgin Islands Electronic Workforce System (VIEWS). This transition will offer optimum integration capabilities between Titles I, III and IV, and allow for the facilitation of integrated case management.

All WIOA core and One-Stop required partners will have “view-only” access of common (non-confidential) data to the VIEWS operating system to align service strategies for customers. Partners will be trained to help customers with their initial registration on VIEWS from any location; and all have access to labor market information and job listings. Policies for the joint use of the operating system are being crafted.

### **B. Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers\*.**

The Virgin Islands Electronic Workforce System (VIEWS) is the tool used for data collection to produce quarterly and annual reports for Titles I and III. With the addition of Vocational Rehabilitation three of the four core programs will be able to generate joint and agency specific reports through this system.

The VI Department of Education AEFLA program purchased an MIS System that is WIOA compliant called LACES. The company, Literacy Pro, uses LACES for Agency data and the much larger Community Pro for interfacing with various departments that have existing MIS Systems. Community Pro is able to accept information from several commonly used MIS Systems and convert it to where it is compatible and WIOA compliant. Conversely, the information may interface with VI Department of Labor’s VIEWS MIS software. Additional time will be required to finalize MIS System coordination plans and efforts between Adult Education and other Partner agencies.

\* 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.**

(2) State policies that will support the implementation of the State’s strategies

The Virgin Islands Workforce Board has developed policies that support the foundational elements of the Territory’s strategy. Policies are disseminated as Workforce System Guidance (WSG) or Workforce Program Guidance (WPG). Policies include WIOA Title I Eligibility Requirements, Delivery of Services and Activities under WIOA, WIOA Training Provider Eligibility Process, Removal from the Eligible Provider List and

Grievance to name a few. The development of policies and procedures that include the joint operation of core partners is still in progress. A listing of WIOA policies can be found on the WIB website at [www.viwib.org](http://www.viwib.org).

An additional list of joint system policies being developed may be found in the Action Plan. The format for Joint Policies to be developed is as follows: - Interagency program directors and managers determine that a joint process needs to be in place for a given service or function; - An interagency workgroup is formed to secure data and best practices; - The group develops recommendations to be considered by the Board; - The Operations committee of the SWDB meet to consider recommendations and finalize policy; - The SWDB issues joint policy. Note\* The completion of the joint policies was delayed due to the interruption of the 2017 storms and ensuing challenges. However, the Action Plan is back on track and policy discussions will continue through the calendar year.

Since the Virgin Islands is a single state local area, the SWDB issues policy directly to the One-Stop delivery system.

All partner programs participate in the joint policy development process to ensure the integrity of the system. Core programs in Titles I - IV take the lead in these discussions to ensure accurate representation of agency/program specific requirements.

The Adult Education programs are supported in part by the local Government of the Virgin Islands which allows the Division to conduct a number of higher level activities to help bridge the divide and allow learners within reach of their goals to achieve completion. An annual amount determined by the Legislature of the Virgin Islands is allotted to assist this effort.

### **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.

(A) State Agency Organization The Governor of the U.S. Virgin Islands is the chief executive officer in the Territory. There are no local layers to the government structure such as mayors, councilmen, district representatives or the like. The Commissioners of Agencies comprise the Governor's cabinet. The Virgin Islands is a Single Local Workforce Area and has one State Workforce Development Board that also assumes the duties of the Local Board. The Virgin Islands Department of Labor is the designated State Workforce Agency. There are two workforce centers in the Virgin Islands — one in the St. Thomas/St. John district and one in the district of St. Croix.

The agencies that comprise the public workforce investment system include the Departments of Labor, Education and Human Services. The Virgin Islands Housing Authority, the University of the Virgin Islands (UVI) and its community development arm UVI Community Engagement and Lifelong Learning (UVI-CELL) are semi-autonomous, but are integral partners of the public workforce system. The Virgin Islands

Workforce Board and the Economic Development Authority comprise the advisory and policy development segment of the Workforce system. The Governor of the Virgin Islands provides the vision and the mission that the agencies and advisory boards must then translate into viable activities that become the product to which the business community and the jobseeker public avails itself.

The Workforce Development System in the US Virgin Islands comes together through the efforts of various government agencies. The VI Department of Labor administers the WIOA Adult, Dislocated Worker and Youth programs. It also houses the Wagner-Peyser, Veterans and Unemployment Insurance programs. The VI Department of Education administers the Adult Education and Literacy program as well as the Career and Technical Education program. The VI Department of Human Services administers the Vocational Rehabilitation program. It also provides non-core programs such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) and the Senior Community Service Employment Program (SCSEP). Additional non-core programs that fall under the Workforce Development banner include the Family Self Sufficiency (FSS) program under the VI Housing Authority and the Community Development Block Grant — Disaster Recovery (CDBG-DR) program administered by the VI Housing Finance Authority. The Virgin Islands Division of Adult Education has established an agreement with the Virgin Islands Department of Human Services to deliver instruction and services to the clients of the Department of Human Services to facilitate Adult Basic Education instruction. ABE instruction with HHS is provided to eligible HHS recipients by Adult Education providers. These services are delivered by providers; however, HHS fund their eligible HHS recipient cohorts. Each of these programs is staffed by agency personnel and adheres to agency specific funding requirements, but converge at the Job Centers for joint pre-employment workshops and career development activities. Training services are offered by shared Eligible Training Providers and may be funded in whole or in part by partner agencies through a coordinated service strategy. The chart below is reflective of the VI Workforce Development System.

Chart A

## VI PUBLIC WORKFORCE SYSTEM ORGANIZATIONAL CHART

### **B. State Board**

Provide a description of the State Board, including—

(B) State Board The State Workforce Development Board (VI Workforce Board) is charged with coordination, development and maintenance of the overall integrity of the Workforce System. In this multi—faceted system, the diversity of the Board will provide continuity by aligning goals among agencies and organizations. Board members bring to the table expertise not only in their area of operation but also from their alliances with other organizations — for example, members of the State Workforce Board are active members of the Career and Technical Education Board, the Vocational Rehabilitation advisory group, Rotary organizations, Chambers of Commerce and other community—based groups.

The Commissioners of the three lead agencies with workforce programs sit on the Board. The Commissioner of Labor and the Assistant Commissioner of Employment and Training represent the Virgin Islands Department of Labor whose oversight authority extends to programs authorized under WIOA Title I including Adult, Dislocated Worker and Youth programs, and Title III the Wagner—Peysner program, and also the Unemployment Insurance and Veterans employment programs.

The Administrator of Vocational Rehabilitation represents WIOA Title IV programs under title I of the Rehabilitation Act of 1973 — Vocational Rehabilitation. The Commissioner of Human Services represents Temporary Assistant for Needy Families (TANF), employment and training programs under Supplemental Nutrition Assistance Program (SNAP), and the Senior Community Service Employment program (SCSEP) title V of the Older Americans Act of 1965.

The Commissioner of Education and the State Director of Adult Education and Career and Technical Education represent adult education and literacy activities authorized under Title II of WIOA; they also represent career and technical programs and literacy services for youth and programs authorized under the Carl D. Perkins Career and Technical Education Act in the Territory. All entities described have and will continue to be involved in the Workforce Development System.

As of January 2019, the US Virgin Islands is under a new administration and it is expected that a new WDB will be named within the next few months. The new Governor of the Virgin Islands or his named representative will appear on the Board's roster.

#### **i. Membership roster**

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

BUSINESS — In—Demand Sectors and Industries

1. Richard Difede Marine 2. Dan McIntosh Construction Trades 3. Sam Rey Hospitality 4. Athniel Ottley Communications 5. Scot McChain Law 6. Mark Eckard Law 7. Peter Schultz Information Technology 8. Brendan Anzalone Allied Health 9. Gillian Marcelle Information Technology 10. Julien Henley Retail Management 11. Neil Ruan Electrical Trade 12. Reginald Perry Hospitality

Workforce — (labor, apprenticeship, youth organization)

13. Jerry Jackson Organized Labor 14. Sheryl Parris Organized Labor 15. Averil George Commissioner of Labor

Education and Training Representatives (ABE, Higher Education, Local Education)

16. Shirley Lake—King UVI Representative 17. Sharon McCollum Commissioner of Education 18. Nancy Callwood Director of Adult Ed. & Career/Technical Education

Government and Economic Development (economic development, Wagner—Peysner, Veterans and Vocational Rehabilitation)

19. Wean Williams-Farrell Workforce Development 20. Sharia Green Vocational Rehabilitation 21. Wayne Biggs Economic Development

Other Members (One—Stop Partner, Legislature, Governor Representative)

22. Felecia Blyden Commissioner of Human Services 23. Senator Jean Forde Legislative

\*Note - This roster is subject to change within the next few months due to a change in administration.

## **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 VI Workforce Board in consultation with the Governor develops the State Plan. The Board is comprised of two major committees: the Strategic Planning Committee and the Operations Committee. All activities relating to the operation of the One—Stop service delivery system, information management systems, performance reporting and general oversight of the statewide employment statistics system is managed through the Operations Committee. All activities related to Youth services are also performed by the Operations committee. Strategic planning, policy development and direction, community linkages and cross program alignment are under the purview of the Strategic Planning Committee.

## **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.

(A) Assessment of Core Programs The four WIOA core programs will adhere to the Performance Measures described in Section 116(b) of WIOA for Adults, Dislocated Workers, Adult Education and Literacy, Wagner—Peysner and Vocational Rehabilitation, as applicable by program requirements. Specifically, —The percentage of participants who are in unsubsidized employment during the second quarter after exit from program; —The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from program; —The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from program; —The percentage of participants who obtain a recognized post—secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within (1) year after exit from program; —The percentage of program participants who during a program year are in an education or training program that leads to a recognized postsecondary credential or employment and who are receiving measurable skill gains

toward such a credential or employment; and —The indicators of effectiveness in serving employers.

Similarly, the primary indicators of performance for Youth, also in accordance with Section 116(b) of WIOA shall be adhered to. Specifically, —The percentage of program participants who are in education or training activities or in unsubsidized employment, during the second quarter after exit from program; —The percentage of program participants who are in education or training activities or in unsubsidized employment during the fourth quarter after exit from program; —The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from program; —The percentage of participants who obtain a recognized post—secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within (1) year after exit from program; —The percentage of program participants who during a program year are in an education or training program that leads to a recognized postsecondary credential or employment and who are receiving measurable skill gains toward such a credential or employment; and —The indicators of effectiveness in serving employers.

The Virgin Islands is a single state local area and has no local jurisdictions. There are no additional measures that have been assigned to these programs.

## **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.

The One—Stop program partners will continue to evaluate and assess their programs in keeping with their individual program and agency requirements. In the first year of WIOA implementation the partners' workgroup will research best practices for methods of One—Stop evaluation. The assessment will be put into effect immediately upon determination of the process.

## **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.

(C) Previous Assessment Results Due to the twin hurricanes of September 2017, which halted the flow of “normal” services and activities the Virgin Islands Workforce System has not been able to gather data to be used as a benchmark of the newly enacted system. A reevaluation of the resources, services and capacity of individual agencies as well as of the system as a whole will be conducted prior to the development of an evaluation and assessment roll out plan.

## **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.

(D) Evaluation The Virgin Islands Workforce Board in conjunction with the WIOA core agencies will revisit the process for evaluating the effectiveness of core programs. It will take into consideration the overall activity of the Workforce System; the integration of core agency programs, on-site One-Stop partner programs, the referral process for partner programs that are not on-site, the effectiveness of service delivery to the job seeker customer, the effectiveness of service to employers and the overall return on investment to the System.

## **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),**

(A) For Title I — Employment and Training Programs Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas — The Virgin Islands is a single state local area. There are no local areas as described in WIOA section 128 (b) or section 133 (b). Funding is not distributed beyond the State Agency — Virgin Islands Department of Labor.

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

The Virgin Islands is a single state local area. There are no local areas as described in WIOA section 128 (b) or section 133 (b). Funding is not distributed beyond the State Agency — Virgin Islands Department of Labor.

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

The Virgin Islands is a single state local area. There are no local areas as described in WIOA section 128 (b) or section 133 (b). Funding is not distributed beyond the State Agency - Virgin Islands Department of Labor.

### **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.

Eligible providers awarded federal funds through this application process will be required to use the funds for the establishment or operation of one or more programs in the St. Thomas/St. John district, the St. Croix district or both that provide services or instruction in one or more of the following categories: Adult Education and Literacy services; and English literacy programs.

**General Procedure for Funding Eligible Providers** The Virgin Islands will provide successful agencies with a 25% starting of their respective funding awards during the initial quarter of service and continue with quarterly draws in increments of 25% upon receipts of expenditures and verifications of services rendered.

**Applications** The VI Department of Education will run an open and competitive grant process for funding with the adult education services. Eighty two point five percent (82.5%) of the federal allocation for grants will go to local entities providing adult education services.

**Eligible Applicants** Eligible applicants for these funds include: (1) local educational agencies; (2) community based organizations of demonstrated effectiveness; (3) volunteer literacy organizations of demonstrated effectiveness; (4) institutions of higher education; (5) public or private nonprofit agencies; (6) libraries; (7) public housing authorities; (8) nonprofit institutions that are not described in any of these descriptions and have the ability to provide literacy services to adults and families; and a consortium of agencies, organizations, institutions, libraries, or authorities described in items (1) through (8). Community based organizations and nonprofit institutions include nonprofit faith based organizations. Public Notice of Availability and A Public Notice of Process will be distributed and advertised in the local media and related agencies. Eligible providers will also be verified against SAM.gov listing. Request for Proposal Readers (Grant Reviewers) A Public Notice to solicit the services for Grant Reviewers will be published in local media. Objective and Qualifications, Compensation, Scope of Work will be listed in advertisements. The VI Department of Education, under the Provisions of the Adult Education Family and Literacy Act, will consider eligible providers seeking grant funding the submit an application within the guidelines set forth in the Workforce Investment and Opportunity Act.

Applicants will include a descriptive narrative of use of funds which will be consistent with Title II of AEFLA. Particular attention will be given to details of program and service alignment and how they will be achieve measureable outcomes. Successful Agency provider must agree to attain State set levels for performance of primary core indicators set by Federal and State Plans. Provider activities will be carried out through the One Stop Delivery System with recommendations from the Workforce Investment Board. Eligible providers will be assessed on past demonstrated effectiveness to deliver services and effect significant educational student gains. Applicable local laws governing commerce, licensing of sub grantees and reporting will be in effect throughout the duration of the multiyear grant. A request for Proposal (RFP), including an application packet, will be prepared and a public notice will be given to the general public to further

assure equity among applicants and interested parties. All submitted entries post marked or submitted in person and time stamped within the appointed date, will be reviewed and sent to the Virgin Islands Workforce Board for additional review. The RFP process will be subject to the Procedures outlined for the Virgin Islands Department of Procurement as well as the Virgin Islands Department of Education.

## **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.

All interested responsive parties will receive an application packet with instructions for preparation of the application and procedures for submittal to the designated Division of Purchases. The deadline will be advertised to all as prescribed. All grants are date stamped at the Division of Purchases and logged in by the Purchases Staff. The grants are then picked up by a VIDE designated staff member and teams or readers are assembled to read and rate the proposals based on a common evaluation tool which assigns numerical values to essential elements of the proposal. Grants reading teams are made up of representatives from the Virgin Islands Department of Education, educational consultants, and other stakeholders. Evaluation of Application Teams use an evaluation tool with specific criteria to determine whether the proposed applications will meet Virgin Islands Department of Education with specific criteria to determine whether the proposed application will meet Virgin Islands Department of Education quality program standards as well as the USDOE requirements set forth in Section 231 of Title II of the Workforce Investment Opportunities Act. All proposals must also submit a reasonable budget with at least a 10% local match. Applications will be read and rated a minimum of three times by trained grant readers. No grant will be funded unless it has met a minimum score of 70 points.

The Virgin Islands State Office for Adult Education will ensure direct and equitable access to all eligible providers by reinstating its policy for the selection of prospective applicants as defined in WIOA guidelines. Additional guidance as outlined in (VI.b.) All proposals must be returned to the VI State Office for Adult Education with WIB recommendations for final review and selection of providers. The Eligible providers will be selected through a review process of the State Office for Career, Technical and Adult Education and the Virgin Islands Workforce Board. Assurances must be given by the successful applicant that receives the grant funding that they will conduct classes that provide adult education and literacy activities including programs that provide such activities concurrently. Reference [Section 463.20(b)] Additionally, successful applicants will be apprised of the Target Performance categories and data as well as NRS Tables which outline areas of concentration. Efforts will be made to strengthen information gathering of student goals for education and employment and Exit Data and follow up to facilitate the ultimate goal of client employment. The same announcement, application and process will be used for all applicants for each RFP that is issued.

## **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.

The Virgin Islands has one designated State Agency that is responsible for serving all individuals with disabilities within the state. Funds are not distributed to two different agencies. Many states across the US have separate agencies for persons who are blind and in some instances individuals who are deaf. The Virgin Islands has a “Combined” agency and serve all disability types. Vocational Rehabilitation has sufficient funds to serve all eligible individuals who apply for services at this time.

## **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.**

The VI Department of Labor administers all programs in Titles I and III as well as Unemployment Insurance and Veterans programs. The Virgin Islands Electronic Workforce System (VIEWS) manages the program and performance data for Titles I and III. Title II - Adult Education uses LACES to manage information and reporting. Title IV — Vocational Rehabilitation is acquiring the management information system module within the Virgin Islands Electronic Workforce System (VIEWS).

The VI Workforce System partners continue to collaborate on the most effective methods to share data and coordinate reporting among the core programs. This process is scheduled to reach resolution by the first quarter of Program Year 2019.

#### **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.**

This integrated data system benefits both customers and staff by streamlining redundant operations such as intake and creating more effective customer service strategies. Title II — Adult Education and Family Literacy uses LACES to gather data and customer information. It does not currently align with VIEWS but options to do so are being explored. Until then, Adult Education customers, who are generally also customers of other services offered through Title I, III or IV, will be picked up as customers from these

programs as will customers from the other titles being represented in the Adult Education rosters as applicable.

**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.**

Common intake and basic data collection occurs through an updated referral system. This ensures that staffs of all programs know where a customer's journey begins, why referrals are made, how they are made and what services are expected by means of the referral. The American Job Centers have acquired a universal tracking system through VIEWS that customers access upon entry into the Workforce Centers, which automatically documents the purpose for the particular visit, and outcomes achieved during each visit. Final outcomes can be traced back to the point of entry into the workforce system and all programs that touch an individual will receive the benefit.

**iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).**

VIEWS has the capacity to manage the data needed for reporting under WIOA section 116 (d) (2). The data systems integration of the four titles will maximize the accuracy of data collected and reported on for WIOA. This will be further researched for effectiveness and efficiency as individual agencies continue to normalize operations over the next few months.

*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.

All participants will traverse the Workforce System by means of a wholly developed service strategy that accounts for the linkages needed from all relevant partner agencies and programs prior to successfully exiting the system. Customers who choose to continue on to advanced post-secondary education and/or enter or remain in employment will be assessed using WIOA performance measures as described in section 116. The State lead agencies have not determined a need for or set any additional indicators of performance at this time.

**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.)

The Virgin Islands Unemployment Insurance program is housed at the VI Department of Labor along with WIOA Titles I and III programs. This information has been historically collected quarterly and managed through the MIS unit to determine performance and conduct LMI analyses that are consistent with Federal and State law. The information is used for making assessments of current workforce for planning purposes, structuring programs and analyzing the demographics of UI claimants. It is also used to improved re-employment strategies for claimants - determining how long and/or often they receive benefits and return to seek other employment options. On the LMI side, wage record data is used in analysis of industries and sectors as they expand or contract, used for more in-depth look at occupational staffing patterns and for analysis of workforce development for economic growth and development.

AEFLA and Vocational Rehabilitation programs being new to the collection of wage record data for performance reporting are receiving technical assistance from their respective federal agencies. In the interim, accommodations have been made for both programs to submit wage record inquiries to the VI Department of Labor which houses the UI program. The VI Department of Labor will provide responses to the respective programs within a 7 day period.

#### **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.

The Virgin Islands adheres to privacy issues as described in section 444 of the General Education Provisions Act. There are data sharing agreements in process between the agency partners. Internal policies are in place to safeguard the sharing of personal information among staff and customers.

### **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.

In accordance with the Jobs for Veterans Act of 2002, the VI Workforce System offers covered Veterans and eligible spouses 'Priority of Service'. The designation requires that these individuals are given first consideration for program participation and they receive access to services ahead of "non-covered" persons or, if resources or space is limited. In order to receive Veterans Priority of Service for a specific program, a Veteran or eligible

spouse must meet the statutory definition of a “covered person” as well as any other statutory eligibility requirement applicable to the program. Additionally, ‘Veterans Priority of Service’ designation shall take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals and those who are basic skills deficient.

Each Workforce Center or other points of entry will inform covered persons that by identifying as a Veteran or covered spouse, they are entitled to Priority of Service. Signage to this effect will also be visibly displayed at the site. System staff and affiliate program partners will also be required to enable and facilitate the identification so that ‘covered persons’ may take full advantage of the Priority of Service. Further, it is also required that staff and partners inform Veterans and eligible spouses of the full array of employment training and placement services available; and, applicable eligibility requirements for other programs and services. Informational pamphlets and other methods of promoting the Priority of Service provision will also be utilized to ensure that this mandate is executed.

DVOP Program Veterans who meet the eligibility criteria as defined in 38U.S.C. Sub Section 4211(1) and (3) are identified and referred to Disabled Veterans Outreach Program (DVOP) Specialists for intensive services. These specialists provide case management services to veterans and eligible spouses of Veterans with ‘significant barriers to employment’. Veterans’ eligibility for these services includes:

- Veterans between the ages 18 to 24.
- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211 (1) and (3); Special disabled and disabled veterans are those:
  - o Who are entitled to compensation (or who but for receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
  - o Were discharged or released from active duty because of a service-connected disability;
- Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));
- A recently-separated service member, as defined in 38 U.S.C. SS 4211(6), who has been unemployed for 27 weeks or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or have been released from incarceration,
- Lacking a high school diploma or equivalent certificate; or
- Low-income individual (as defined by WIOA Section 3 (36)).

Eligible spouses’ eligibility includes:

- The spouse of a veteran who has a total service connected disability,
- Is Missing In Action,
- Captured in the line of duty by a hostile force,
- Is a Prisoner of War or
- Who died from a service connected disability.

In accordance with the authorization provided in the Consolidated Appropriations Act of 2014, the following populations are eligible to receive DVOP services:

- Transitioning members of the Armed Forces who have been identified as in need of intensive services;
- Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and
- The spouse or other family caregivers of such wounded, ill, or injured members.

Partnerships In an effort to assist veterans to overcome their Significant Barriers to Employment, the Disabled Veterans Outreach Specialist will collaborate with Veterans Organizations and community-based organizations such as:

- The Methodist Training &

Outreach Center • Catholic Charities • Bethlehem Shelter • Eagle's Nest Shelter • My Brother's Table Soup Kitchen • Veterans Affairs Clinic • Salvation Army • Veterans Affairs Vocational Rehabilitation • Local Office of Veterans Affairs • Employer Support of the Guard and Reserve (ESGR) • Virgin Island National Guard State Family Program Office • Women/Men's Coalition

One Stop Career Center staff and partners are aware of the policy and procedures addressing priority of service for veterans. This notification is also posted in our Center lobbies and the process is monitored by the Program Administrators through periodic on site reviews and evaluation of our quarterly ETA 9002 reports. Under the Wagner Peyser program veterans receive preference for all new job postings received within the System and are afforded preferred access to a range of other services. Application of this designation and requirement is monitored through the ViEWS database and is evidenced by the established 72 hour "vet hold" on each job order. All staff are provided with a range of comprehensive information on the services available through the WIOA program and are prepared to disperse to the veterans they serve. Additionally, the DVOP specialists are fully integrated into the American Job Center and all staff are aware that veterans identified or self-attesting to meeting one or more of the criteria defined to signify a Significant Barrier to Employment (SBE), are eligible to receive individualized services from the DVOP. Once eligibility is established, the veteran is referred to the DVOP and this activity is also recorded in the database. Veteran's Referral Protocol The Military Veterans' Customer Flow chart provides a visual representation to JVSG and non-JVSG staff about the veterans' referral process. Veterans who walk-in and require staff assistance are registered and provided with an orientation on the Workforce System. The veterans are also provided with an intake form which indicates the various Significant Barriers to Employment. According to the responses on the intake form, veterans are either served by the AJC staff or referred to the Disabled Veterans Outreach Program Specialist for service. Only veterans with SBE are referred to and are served by the DVOP. DVOP also receive referrals from other community partners who are serving veterans with SBE. Eligibility is determined through assessments. Veterans who apply for Unemployment Insurance have to register with the Workforce System. If the veteran self-registers, he or she will be asked a series of questions through the online registration that will determine if he or she possesses a Significant Barrier to Employment (SBE). If the veteran does possess an SBE, the DVOP Specialists will receive an email alert indicating that a qualifying veteran registered on Virgin Islands Electronic Workforce System. Follow-up action will then be initiated by the DVOP.

## **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.

The Department will provide whatever reasonable accommodations as may be deemed necessary to assure programmatic and architectural accessibility including, but not limited to ensuring that: -Customers and staff with disabilities will be provided access to assistance deemed necessary to accommodate their needs, including assistive technology and alternate barrier-free work locations. -Assistance to disabled customers to include testing (if applicable) and placement support is reasonably accessible. Such services and support may include providing interpreters, readers and other accommodations deemed necessary.

### **9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners.**

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The Virgin Islands has a diverse population with a high concentration of individuals whose first language is Spanish or French Creole. The Adult Education program has program locations in both districts that address language learning. Through an agreement with Vocational Rehabilitation many of these programs are made accessible for individuals with learning and other disabilities. As core partners, these programs will be included in the menu of services when preparing individual career plans for each customer.

## **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.

The Strategic Planning Committee of the Virgin Islands Workforce Board in conjunction with representatives from the Office of the Governor held a series of planning sessions to develop the State Strategic Vision and Goals. The Virgin Islands Planning Workgroup comprised of directors and managers of the Adult, Dislocated Workers, Youth, Wagner-Peyser, Adult Education and Family Literacy, Vocational Rehabilitation, SNAP, TANF and Paternity and Child Support programs met weekly from March 2015 to present day to operationalize the vision and goals described by the State Board. The partners planned activities that led to the co-location of Vocational Rehabilitation, SNAP and Child Support programs in the One-Stop to the development of common intake processes and data integration. Programs from Titles I and III have always been co-located at the One-Stop centers. The group will continue to meet until all details on joint implementation have been resolved and then will continue to meet thereafter on a monthly basis to ensure continuous improvement.

## **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 administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide 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.**

The US Virgin Islands is a single state local workforce development area. Its population is approximately 104,000. There are two major Island districts that house two physical One—Stop Centers in order to accommodate access for all individuals. Services in each district including with all core and non—core partners mirror each other. The Virgin Islands operates as a single Region.

**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.**

As a single state local workforce development area there are no local areas or separate regions designated.

###### **C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.**

There is no process required.

###### **D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.**

The Virgin Islands has not yet developed an appeals process relating to determinations for infrastructure funding.

##### **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 policies and guidance for the workforce development system can be found on the Virgin Islands Workforce Board website at [www.viwib.org](http://www.viwib.org) .

## VI WORKFORCE DEVELOPMENT BOARD POLICY DOCUMENT

### Workforce Program Guidance WIOA 303-15

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TO: Virgin Islands Single State Workforce Development Area

SUBJECT: Delivery of Services and Activities under the Workforce Innovation and Opportunity Act of 2014 (WIOA) — Adults and Dislocated Workers

DATE: July 2015

Purpose: To provide guidance to all staff and administrators of the One-Stop Career Centers providing WIOA services to customers of the Workforce Development System.

References: Workforce Innovation and Opportunity Act of 2014 (P.L. 113-128) Title I; TEGL 3-15

Background: The Workforce Innovation and Opportunity Act (WIOA) is designed to help job seekers access employment, education, training and support services to succeed as a valuable member of the workforce. The workforce system provides universal access to career services and training that is job-driven and specific to local demand occupations.

Policy: Services provided to Adults and Dislocated Workers through the One-Stop Centers will consist of Career Services and Training Services. There are three types of “career services”: basic career services, individualized career services and follow-up services. Training services may be made available if One-Stop Center staff determine, after an interview, evaluation or assessment and career planning that the individual is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency. There is no sequence of service requirement for career services and training.

#### Adult Priority

Priority of services shall be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient for receipt of career services and training services.

#### Career Services

Career Services for Adults and Dislocated Workers replaces “core” and “intensive” services practiced under WIA. There are three categories of career services — basic, individualized and follow-up — which can be provided in any order, but specific to the needs of each individual customer.

Basic Career Services must be made available to all individual job seekers through the One-Stop Centers. The services include:

- Determinations of whether the individual is eligible to receive assistance from the adult, dislocated or youth programs;
- Outreach, intake (including identification through the Worker Profiling and Reemployment Services system of Unemployment Insurance claimants likely to exhaust benefits) and orientation to information and other services available through the one-stop delivery system;
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps) and supportive services;
- Labor exchange services, including —
  - o Job search and placement assistance and when needed by an individual, career counseling, including —
  - ? Provision of information on in-demand industry sectors and occupations; and
  - ? Provision of information on nontraditional employment
- Provision of referrals to and coordination of activities with other programs and services, including those within the one-stop delivery system and when appropriate other workforce development programs;
- Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional and national labor market areas, including
  - o Job vacancy listings in labor market areas;
  - o Information on job skills necessary to obtain the vacant jobs listed; and
  - o Information relating to local occupations in demand and the earnings, skill requirements and opportunities for advancement for those jobs;
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers;
- Provision of information about how the local area is performing on local performance accountability measures;
- Provision of information relating to the availability of supportive services or assistance and appropriate referrals to those services and assistance including: child care, child support, medical or child health assistance available through the Territory’s Medicaid program and Children’s Health Insurance Program, benefits under Supplemental Nutrition Assistance Program (SNAP), assistance through the earned income tax credit, housing counseling and assistance services sponsored through the US Department of Housing and Urban Development (HUD), and assistance under the Temporary Assistance for Needy Families (TANF) program and other supportive services and transportation provided through that program;
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and

- Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals seeking assistance in filing a claim —

- o Meaningful assistance means providing assistance:

- ? On-site using staff who are properly trained in UI claims, filing and/or the acceptance of information necessary to file a claim or

- ? By phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time;

- o The costs associated in providing meaningful assistance may be paid for by the UI program, the WIOA Adult or Dislocated Worker programs, the Wagner-Peyser Employment Service, or some combination of these funding sources.

\*Labor Exchange/Job Services, the primary services provided by Wagner-Peyser staff fall under Basic Career Services. All basic career services must be made available by Wagner-Peyser staff in coordination with other one-stop partners. They may also make available Individualized Career Services for those individuals with barriers to employment.

Individualized Career Services — If One-Stop Center staff determines that individualized career services are appropriate for an individual to obtain or retain employment, these services must be made available to the individual. These services must be available in all one-stop centers.

One Stop Center staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate. These services include:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include —

- o Diagnostic testing and use of other assessment tools; and

- o In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;

- Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the customer to achieve his or her employment goals, including the list of and information about eligible training providers;

- Group and/or individual counseling and mentoring;

- Career planning;

- Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills and professional conduct to prepare individuals for unsubsidized employment or training in some instances pre-apprenticeship programs may be considered as short-term pre-vocational services;

- Internships and work experiences that are linked to careers;

- Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems and obtaining skills necessary for successful transition into and completion of postsecondary education or training or employment;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and
- English language acquisition and integrated education and training programs.

Follow-Up Services must be provided as appropriate for customers who are placed in unsubsidized employment for up to (12) months after the first day of employment. Counseling about the work place is an appropriate type of follow-up service. Follow up services do not extend the date of exit in performance reporting.

Delivery of Career Services — Career Services shall be provided through the One-Stop Delivery System —

- (i) Directly through one-stop operators; or
- (ii) Through contracts with service providers, which may include contracts with public, private for profit, and private nonprofit service providers approved by the local Board

#### Training Services

Training services may be made available to Adults and Dislocated Workers who are eligible to receive services from the One-Stop Center —

- (I) Who after an interview, evaluation or assessment and career planning have been determined by a One-Stop Operator or One-Stop Partner as appropriate to —
  - (a) Be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services;
  - (b) Be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
  - (c) Have the skills and qualifications to successfully participate in the selected program of training services;
- (II) Who select programs of training services that are directly linked to the employment opportunities in the local area or the planning region or in another area to which the adults or dislocated workers are willing to commute or relocate;
- (III) Who meet the requirements of Adult and Dislocated Worker funding eligibility; and
- (IV) Who are determined to be eligible in accordance with the Adult Priority requirements

Training services may include —

- Occupational skills training, including training for non-traditional employment;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs offered by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training;
- Job readiness training provided in combination with services described above;
- Adult education and literacy training provided concurrently or in combination with services described in above;
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of training.

Work-based Training — There are additional work-based training options and flexibilities for adults and dislocated workers under WIOA. They include —

- Registered Apprenticeship
- On-the-Job Training
- Incumbent Worker Training
- Transitional Jobs

#### Delivery of Training Services

##### Consumer Choice

Training services provided shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such service.

##### Linkage to Occupations in Demand

Training services shall be directly linked to an in-demand industry sector or occupation in the local area or in another area to which an adult or dislocated worker receiving such services is willing to relocate. The Board may authorize a program of training services for occupations not currently in demand but that have a high potential for sustained demand or growth in the local area.

##### Individual Training Accounts

An individual who seeks training services and who is eligible may in consultation with a career counselor select an eligible provider of training services from the list of approved providers. Upon such selection, the one-stop operator involved shall, to the extent practicable, refer such individual to the eligible provider of training services and arrange for payment for such services through an individual training account.

##### Training Contracts

In accordance with WIOA Section 134 (c) (3) (G) (ii) contracts may be procured for training services for the following reasons —

- On-the-job training, which may include placing customers in a Registered Apprenticeship program, customized training, incumbent worker training or transitional jobs;
- If the Board determines that there are insufficient number of eligible providers of training services to use ITA's;
- If there is a training services program of demonstrated effectiveness offered in a local area by a community-based organization or other private organization;
- If the Board determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for jobs in demand sectors or occupations; and
- If the Board determines a pay-for-performance contract strategy.

Additionally, the Board may determine that providing training through a combination of ITA's and contracts is the most effective approach.

#### One-Stop Center Permissible Activities

WIOA provides additional flexibility to Adults and Dislocated Workers by allowing more than the standard work readiness activities and services. Other activities that are permissible and should be employed as needed in the One-Stop Centers include:

##### Job Seeker Services

- Customer support to enable individuals with barriers to employment (including individuals with disabilities and veterans) to navigate among multiple services and activities;
- Training programs for displaced homemakers and for individuals training for nontraditional occupations in conjunction with programs operated in the local area; and
- Work support activities for low-wage workers, in coordination with one-stop center partners, which will provide opportunities for these workers to retain or enhance employment. This may include any activities available under the WIOA adult and dislocated worker programs in coordination with activities and resources available through partner programs.

##### Employer Services

- Customized screening and referral of qualified participants in career and training services to employers;
- Customized employment-related services to employers, employer associations or other such organizations on a fee-for-service basis that are in addition to labor exchange services available to employers under Wagner-Peyser; and
- Activities to provide business services and strategies that meet the workforce investment needs of area employers.

## Coordination Activities

- Employment and training activities in coordination with child support enforcement activities, as well as child support services and assistance activities;
- Employment and training activities in coordination with activities to facilitate remote access to services provided through the one-stop delivery system, including facilitating access through the use of technology;
- Improving coordination between workforce investment activities and economic development activities carried out within the local area involved and to promote entrepreneurial skills training and microenterprise services;
- Improving services and linkages between the local workforce investment system and employers, including small employers;
- Strengthening linkages between the one-stop system delivery system and the unemployment insurance programs; and
- Improving coordination between employment and training activities and programs carried out in the local area for individuals with disabilities, including programs carried out by Statewide Independent Living Councils, and activities carried out by Centers for Independent Living;
- Other Federal agency supported workforce development initiatives, under the Departments of Transportation, Energy, Veterans Affairs, Housing and Urban Development, Interior, Health and Human Services and Defense programs, as applicable.

VIWIB JULY 2015

VI WORKFORCE DEVELOPMENT BOARD POLICY DOCUMENT

Workforce System Guidance WIOA 203-15

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TO: Virgin Islands Single State Workforce Development Area

SUBJECT: UNIVERSAL ACCESS AND CONSISTENCY OF SERVICES —

One-Stop Service Delivery

DATE: July 2015

Purpose: To provide guidance to all staff and administrators of the One-Stop Career Centers providing WIOA services to customers of the Workforce Development System.

References: Workforce Innovation and Opportunity Act of 2014 Title I Section 121

Background: The One-Stop Service Delivery system shall provide services to job seekers and employers that are unified in its approach and serve to produce quality outcomes to both groups in the workforce development experience. Each Job Center shall have for public use a fully functional resource room; provide all customers access to basic career services as defined in the Act; provide access to current workforce and labor market

information in order to make informed decisions; utilize self-help and customer assisted services; and provide access to partner services and resources.

One Stop Partners: The entities involved in the One-Stop System include WIOA core partners and One-Stop required partners. The programs represented involve:

- VI Department of Labor — Adult, Dislocated Worker, Youth, Wagner-Peyser, Unemployment Insurance, Veterans
- VI Department of Education — Adult Education and Literacy, Career and Technical Education
- VI Department of Human Services — Vocational Rehabilitation, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program, Senior Community Service Employment program (SCSEP)

Services to Customers

Services to job seekers shall:

- Be unified throughout all One-Stop locations;
- Expedite customer flow;
- Be tailored to the needs of each individual customer;
- Be presented in a manner that allows for maximum customer choice; and
- Facilitate academic and workforce advancement in local demand sectors.

Services to employers shall:

- Offer unified workforce development services throughout all One-Stop locations;
- Be developed through an “action plan” created to meet the individual employer customer’s need;
- Be provided by a trained team of employer representatives knowledgeable about the local economic and workforce trends;
- Include relevant and “real time” labor market information;
- Be maintained in a database that tracks employer preferences and growth needs to facilitate employer’s interaction with the Center.

Universal access to basic career and program information is available to all persons in the community. Basic information and literature from each partner program will be available at each Job Center location and at each partner agency. Information pamphlets will detail contact information to each program and service referenced in the literature.

VIWIB July 2015

**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 set—aside funding will be broken into two categories — system evaluation and innovative programming. The system evaluation piece will assess the entire system for effectiveness and be used to gauge continuous improvement. The evaluation is still being developed but will be available for use by the end of the first year of implementation. Several options for innovative activity are being explored by the Workforce Board at this time to include alternative methods of providing foundational workplace skills with credentials.

Rapid Response funds will be used to supplement employer engagement efforts in response to lay—off aversion strategies. Employers will be made aware of this option through public service campaigns by literature or media or in general orientation to workforce services either by visiting the VIDOL website or through informal interaction with a business service representative. A business service representative may contact an employer known to be going through a hardship to initiate this discussion or such employer may make contact through the One—Stop Centers.

An employer or group of employers may request funds for Incumbent Worker Training as part of a layoff aversion strategy caused by undue economic hardships within a given sector or because of significant changes in the nature of an industry. Incumbent worker funds are solely for the purposes of providing training that upgrades employee skills levels or introduces new occupational skills required for an employee to remain effective in his/her position. The training involved may include a mix of classroom training, technology—based learning and on—site training. Since the audience is already employed training will be industry specific and may occur wholly at the workplace. Training should be on an advanced level and result in either employer and /or industry recognized credentials. Professional level certification (where applicable) resulting in degree attainment is sought for professional services. Incumbent workers may be eligible to receive additional One—Stop services consistent with possible job disconnection. Since training will take place as a layoff aversion strategy, it is possible that a lay—off or partial lay—off may still occur. To ensure that workers are prepared for any type of transition, they may have access to workshops on Resume Enhancement, Budgeting, and Time Management. Incumbent worker customers may also have access to career counseling to help them identify ‘next steps’ in building careers. This will allow them to define skill sets, especially those that may be transferable to other occupations, and restructure their career goals to include additional/advanced academic or occupational skills training. Additionally, incumbent workers have access to general One—Stop services to include information on Unemployment Insurance, Job Search and Training activities.

**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.**

The VI Department of Labor and other agencies in the Virgin Islands central government partner with the local Virgin Islands Territorial Emergency Management Agency (VITEMA) to coordinate responses to natural disasters. The VI Department of Labor is

currently updating its policies for addressing natural disasters and will include the role of Rapid Response in its development.

**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.**

The Virgin Islands does not have a Trade Adjustment Assistance program.

## **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.

The use of work—based training is integral to the Virgin Islands’ workforce development strategy. As the local workforce system continues to determine sector strategies and build career pathways a work based learning experience will be required for most participants specifically those who have had little to no previous experience in the workforce — out—of—school youth and adults with barriers. These customers can expect to have a six to twelve week work experience built into their career plan that allows them to put into practice the foundational workplace skills and/or occupational training that they have just acquired. Customers who have had some exposure to the workplace already such as older youth and dislocated workers are prime candidates for on—the—job training. These strategies allow both job seeker and employer customer the opportunity to provide hands on training in specific occupational areas which facilitates the long term commitment of both to advance on the job. It is expected that those who participate in on—the—job training will remain in that sector, possibly with the same employer for a time.

### **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).

The Virgin Islands Department of Labor has applied for and is awaiting recognition on its status as an Apprenticeship Agency.

### **3. Training Provider Eligibility Procedure**

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

The policy and procedures for Training Provider Eligibility (Initial and Continued) can be found at the Workforce Board's website [www.viwib.org](http://www.viwib.org) under the tab — Plans, Performance and Reports.

## VI WORKFORCE DEVELOPMENT BOARD POLICY DOCUMENT

Workforce Program Guidance WIOA 307-15

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TO: Virgin Islands Single State Workforce Development Area

SUBJECT: WIOA TRAINING PROVIDER ELIGIBILITY PROCESS —

Initial and Continued

DATE: July 2015

Purpose: To establish the procedures that determine eligibility of training providers as defined under Title I of the Workforce Innovation and Opportunity Act of 2014

References: Workforce Innovation and Opportunity Act of 2014 - Title I Section 122;  
TEGL 41-14

Background: To be identified as a provider of service, eligible to receive funds for the provision of training services to the Virgin Islands Workforce Development Area, such individual or entity shall be:

- a) An institution of higher education that provides a program that leads to a recognized postsecondary credential;
- b) An entity that carries out programs registered under the National Apprenticeship Act;  
or
- c) Another public or private provider 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.

A program of training services is defined as one or more courses or classes or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent, employment or measureable skill gains toward such a credential or employment. These training services may be delivered in person, on-line or in a blended approach.

Policy: An institution of higher education or a public or private provider of a program of training services that wish to provide training services to the Virgin Islands Workforce Development Area shall first submit an application to the Virgin Islands Workforce

Board. The Workforce Board shall review the application based on the submission of requested criteria.

The application at the least shall contain elements that describe:

1. A description of the program of training services;
2. The performance of training providers with respect to performance accountability measures and other appropriate measures of performance outcomes;
3. The ability of the provider to collect and submit program and performance information based on the criteria established;
4. The ability to ensure access to training services throughout the Territory through the use of technology, if deemed necessary;
5. The degree to which the training programs relate to in-demand industry sectors and occupations;
6. State licensure requirements of training providers and licensing status, if applicable;
7. The ability of the provider to provide industry recognized certificates or certifications — or offer programs that lead to recognized postsecondary credentials;
8. The quality of the program of training services; and
9. The ability of the providers to provide training services that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities; and
10. Program specific cost information, program duration and requirements of participants to successfully complete the program.

A provider that is an entity that carries out programs registered under the National Apprenticeship Act shall be included and remain on the list of eligible providers of training services for so long as the corresponding program of the provider remains registered.

Exceptions: Providers of On-the-Job training, customized training, incumbent worker training, internships and paid or unpaid work experience opportunities or transitional employment shall not be subject to the requirements of the Eligible Training Provider processes.

#### Agreements with Other States

An individual may choose a training provider located outside the local area. States may enter into agreements, on a reciprocal basis to permit eligible providers of training services to accept individual training accounts provided in another State. Providers of training services that are located outside the local area may not be subject to State eligibility procedures if the provider has been determined eligible by another State with such an agreement.

Note: Recipients of WIOA Title I financial assistance must maintain compliance with WIOA Section 188 — Nondiscrimination of the Workforce Innovation and Opportunity

Act of 2014, which prohibits discrimination on the basis of race, color, religion, sex, genetics, national origin, age, disability, political affiliation or belief, and for beneficiaries only citizenship and participation in WIOA.

Procedures: The procedures for initial and subsequent eligibility may be found in Attachment A.

Inquiries: Questions should be addressed to the:

Chairman of the Workforce Development Board at VI Workforce Board, Sunny Isle Professional Building, Suite 7, Christiansted, VI 00820; (340) 773-5237.

VIWIB July 2015

## ATTACHMENT A

### Initial and Continued Eligibility for Providers of Training Services

#### Under the Workforce Innovation and Opportunity Act

##### Initial Eligibility

Providers may seek initial eligibility as a new provider under WIOA as a provider of training services and may receive that initial eligibility for only one (1) year for a particular program.

The provider shall provide verifiable program-specific performance information based on criteria established by the Workforce Board.

The criteria shall include at least:

- (a) A description of each program of training services to be offered;
- (b) Information addressing factors related to indicators of performance;
- (c) Information concerning whether the provider is in a partnership with business;
- (d) Other factors that indicate high-quality training services, such as resulting with a recognized postsecondary credential;
- (e) Information concerning alignment of the training services with in-demand industry sectors and occupations, to the extent practicable; and
- (f) Program cost information, including tuition and fees for WIOA participants in the program.

This information, in an application along with verifiable organizational documents shall be submitted to the Workforce Board for review.

After the Workforce Board has reviewed the application and eligibility has been determined, a list of eligible applicants will be created and submitted to the designated State Agency — VI Department of Labor (VIDOL). The list will include performance and program costs information for each eligible applicant.

? All information will be verified by the State Agency for accuracy.

? The State Agency shall compile a single list of eligible providers and disseminate such list with performance and program cost information to the one-stop delivery system.

? The State Agency will maintain the provider list.

? The list and the accompanying information shall be made available to participants and members of the public through the One-Stop delivery system in a manner that does not reveal personally identifiable information about an individual participant;

? The list may be made available electronically through a searchable database and/or through print media.

#### Continued Eligibility

In order for a provider of training services to maintain their eligibility and the eligibility of their programs, such provider shall submit an Application for Continued Eligibility. Continued Eligibility requirements apply to training providers transitioning to WIOA title I-B who were previously eligible under WIA title I and newly eligible providers that were determined to be initially eligible under WIOA.

Each provider seeking continued eligibility shall submit an application to the Workforce Board with the following criteria:

(a) Program description;

(b) Performance outcome information for the indicators described in accompanying criteria;

(c) Information identifying the recognized post-secondary credentials received by WIOA participants;

(d) Program cost information, including tuition and fees for WIOA participants in the program; and

(e) Information on the program completion rate for WIOA participants.

After the Workforce Board has reviewed the application and eligibility has been determined, a list of eligible applicants will be submitted to the designated State Agency — the Virgin Islands Department of Labor (VIDOL). The list will include all verifiable performance and program costs information for each eligible applicant.

? All information will be verified by the VIDOL for accuracy.

? The State agency shall maintain the list of the providers identified and disseminate such list with performance and program cost information to the one-stop delivery system.

? The list and the accompanying information shall be made available to participants and members of the public through the One-Stop delivery system in a manner that does not reveal personally identifiable information about an individual participant;

? The list may be made available electronically through a searchable database and/or through print media.

Providers of Continued Eligibility must renew their application every two (2) years. Applications for Continued Eligibility shall be submitted at least thirty (30) days before the end of the eligibility period for review by the Board.

In addition, the Workforce Board will annually review the status of the Eligible Training Providers to ensure up-to-date information on the training provided, performance outcomes and placement rates of the provider.

### Registered Apprenticeships

Under the Workforce Innovation and Opportunity Act title I-B, Registered Apprenticeship program sponsors that request to be ETP's are automatically included on the list and will remain as long as the program is registered or until the program sponsor notifies the State that it no longer wants to be included on the list.

Registered Apprenticeship programs are not subject to the same application and performance information requirements or to a period of initial eligibility or initial eligibility procedures as other providers because they go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with the US Department of Labor or the State Apprenticeship Agency (SAA).

Registered Apprenticeship can take many forms and the sponsors are diverse, including:

1. Employers who provide related instruction
2. Employers who use an outside educational provider
3. Joint Apprenticeship Training programs
4. Intermediaries

Registered Apprenticeship program sponsors must indicate their interest in being placed on the Eligible Training Provider list to the Workforce Board in writing. Additionally, the following information should be included on the request:

- o Occupations included within the Registered Apprenticeship program;
- o The name and address of the Registered Apprenticeship program sponsor;
- o The name and address of the Related Technical Instruction provider, and the location of instruction if different from the program sponsor's address;
- o The method and length of instruction; and
- o The number of active apprentices.

The State Board will review the list Registered Apprenticeship programs as part of the review of the list of eligible training providers at least every two years. The Board will coordinate with the federal OA or the local SAA to obtain a list of all Registered Apprenticeship programs that are either voluntarily or involuntarily deregistered.

The list of Registered Apprenticeship program sponsors must also be maintained by the State Agency. This includes updating new Registered Apprenticeship Program ETP's,

removing programs that no longer want to remain on the list and eliminating deregistered programs.

**4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.**

WIOA Section 134(c)(3)(E) establishes priority to recipients of public assistance, other low income individuals and individuals who are basic skills deficient for receipt of career services and training services. The policy and procedures for the delivery of services and activities can also be found at the Workforce Board's website.

The section relating to the policy for Priority of Service can be found in WIB Policy Number 303-15 which states:

**Adult Priority**

Priority of services shall be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient for receipt of career services and training services.

The Virgin Islands has always given priority to individuals who fit this definition. The electronic case management system defaults to this target group for determining eligibility. In addition, the VIDOL's monitoring team reviews all contracts, ITA's and agreements to ensure priority is given to this target group.

**5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.**

The Territory will continue to utilize the transfer of funds between Adult and Dislocated Programs as it has in the past. Historically, the VI Workforce System has served more adult funded individuals than dislocated individuals and funds have been transferred as needed. The Territory has not yet established a policy on the transfer of funds between adult and dislocated worker programs.

**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)

Providers of youth activities are not subject to the Individual Training Accounts policy or the Eligible Providers Certification system. Eligible providers of youth activities will be determined by contracts awarded through a competitive process, based on the recommendation of the Youth Committee of the Workforce Board and on the criteria as described in the Youth Transition Plan. An eligible provider list for youth activities will be developed and disseminated throughout the One—Stop system for providers of youth services approved through the competitive bidding process. Proposals will be required to make assurances that the following are in place: — Adequate technical and financial resources; — A well defined program design that relates to the needs of the local economy; — The ability to meet program design specifications at a reasonable cost; — A satisfactory record of past performance; and — A satisfactory record of fiscal accountability, organization and operational controls. The disqualifying factors for bidders under the competitive process include: — Providers with a history of poor past performance; — Providers that fail to establish linkages to local market demands; — Providers that fail to demonstrate adequate goals and structure in youth program design.

Evaluation factors are based on a hundred point scale and include: Labor Market Status — The strength of the occupational area in terms of employment opportunities available, entry—level wages, upward mobility and stability of the industry — is occupational area demand driven? (15 points) Program Design — The relevancy of the program design to the promised outcomes; type and mix of services as compared with the population to be served (30 points) Reasonableness of cost — Reasonableness of the single unit charge in relation to the program goals and outcomes. (25 points) Organization Capability — The organization’s overall capability including experience with serving at—risk youth; administrative capacity, available resources, and demonstrated effectiveness in past training (10 points) Facilities, staffing, equipment — Accessibility of the training site to participants, the availability of appropriate equipment and the adequacy of the facility and the experience of staff. (10 points) Youth Services — Ability of program to provide services to youth. Does provider regularly work with youth or is program a subset of Adult training? (10 points)

**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.**

The Youth team at the Job Center has developed an interactive program that is being rolled out throughout the Territory directed at addressing the needs of out—of—school youth. The Work, Learn and Earn program is a twelve (12) week paid work experience for out—of—school youth aged 18—24 in which youth customers work for twenty (20) hours a week. During this time they will engage in work ready foundational skills development and career planning related workshops offered by the WIOA Youth team. At the program’s outcome each youth customer will: — Learn the soft skills needed for Job Success; — Be able to and complete at least one networking experience with local employers in the community; — Complete a resume and cover letter; — Be able to perform a self service search through the Virgin Islands Electronic Workforce System

(VIEWS) to access current job openings; — Participate in a work experience in a career sector of interest; — Know how to use labor market information to determine career interest

**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 system will utilize a multi—dimensional strategic approach to provide youth with workforce investment activities and services which align with the fourteen (14) program elements. Youth programs and activity will focus on ensuring that the WIOA provisions focusing 75 percent of program funds on out—of—school youth is met and achieved. Similarly, paid work experiences, pre—apprenticeships and on—the job training programs will highlight the approach taken by the system to achieve this desired outcome. Specific emphasis will be placed on services to the following out—of—school targeted population: high school drop—out; high school completers who are low— income, basic skills deficient or an English language learner; homeless; connections with the juvenile system or adult justice system; pregnant or parenting, person with a disability; low income in need of assistance to enter or complete an educational program or to secure or hold employment.

The Youth team provides in-house academic and career assessments for WIOA Youth to determine the services and activities needed for each young person. Individual Employment Plans or Service Strategies are developed and referrals made to the service providers linked to the program elements. The Youth team maintains a listing of Youth providers that specialize in the provision of one or more Youth element. An RFP is released each year requesting proposals from providers in the areas most in need. Due to the size of the Territory, many providers have been with the Workforce System for many years and have adapted programming to accommodate and/or expand the offerings based on the changes in WIOA.

**4. Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.**

The Territory has not yet established this policy.

**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.**

In accordance with the Virgin Islands Code the Territory’s policy for attending and not attending school is: 17 V.I.C. § 82. Compulsory school attendance; age of pupils; exceptions (a) All children shall commence their school education by attending an approved kindergarten from the beginning of the school year in the calendar year in which they reach their fifth birthday, and they shall continue to attend school regularly until the expiration of the school year nearest their eighteenth birthday, except as provided in section 287 of this title; provided, however, those who graduate from high school before the age of 18 are excepted and students attending the National Guard Youth Challenge Program or any other program approved by the Virgin Islands Board of Education which has the equivalency of a high school diploma are also excepted. (b) The Commissioner of Education, in conjunction with the Virgin Islands Board of Education shall promulgate rules and regulations to carry out this section no later than 12 months after the enactment of this section

**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.**

The Virgin Islands recognizes the definition as described in WIOA section 3 (5) (B) and adopts as follows: The term “basic skills deficient” means, with respect to an individual— (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the 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.

#### **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 disbursement 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).)**

(3) Youth activity is available for both in-school and out-of-school youth who are eligible as per the requirements of WIOA 129 (a) (1) (B) and 129 (a) (1) (C) (iv). A priority of the VI Workforce System is older and out-of-school youth. These youth face multiple barriers to employment, which must be addressed in their individualized service plan. The service strategies created for them include as many of the fourteen program elements as may be necessary; however, the need for wrap-around services has proven to be the greatest factor in overall success. A career path is planned for each individual that takes into account their goals, aptitude and environment. Goals — What occupational areas are they interested in? Are they available in the local area? Are they sustainable jobs that allow for growth and career development? Are the occupations trending upwards, declining, stagnant or emerging? Are goals realistic? Aptitude — What is the student's academic profile? Has the student received training in the occupational area? Does the student have additional barriers that would deter completion of an academic or training regimen? Are the goals realistic for the preferred occupation? Environment — Is the industry or occupation viable in the local area? Are there available education and/or training resources available to allow for progression? What does the academic or training regiment entail? Are time limits set sufficient to allow for comprehension or mastery of competencies and skills? Are supports in place to allow for overall development?

The US Virgin Islands is a small community with no community college system and no standalone trade schools. Service providers are recruited through the solicitation process but many have worked with youth and with the workforce system for many years. Some providers work in tangent with each other to ensure students receive a continuous flow of services to achieve the benchmarks set through their service plan. The benefit of operating in a small community allows for flexibility in the delivery of services, whether that entails creating programming that is culturally relevant, adjusting for language barriers or infusing unique factors that enhance the learning experience. WIOA Youth providers offer services for all eligible customers and accommodations are made for those with disabilities as needed.

The models that have been most successful have been those that occur in a blended learning format. Today's student relies on technology in most aspects of their lives. By infusing technology into the learning experience through online classes; or by using webinars to supplement lectures; or through the use of technological instruments, the subject matter becomes more applicable and relatable to the occupational training area. However, the use of technology coupled with interaction in a training cohort, which offers support, competition and inclusion has yielded by far the best results.

### **4. A description of the roles and resource contributions of the one-stop partners.**

(4) The roles and resources contributed by One-Stop partners are outlined in the AJC Memorandum of Understanding, which at a minimum includes the basic services of each program. American Job Centers (AJC) are designed to provide a wide array of workforce

development services to all customers of the system to include job seekers, career workers, employers, and businesses. The Virgin Islands Department of Labor is the One Stop Operator in the Territory of the US Virgin Islands. They are responsible for the management and operations of the One Stop Centers in both districts. In accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA) One-Stop Centers and their partners are tasked with:

- o Providing job seekers with the skills and credentials necessary to secure and advance in employment with family-sustaining wages;
- o Providing access and opportunity to all job seekers, including individuals with barriers to employment, such as individuals with disabilities, to prepare for, obtain, retain and advance in high-quality jobs and high-demand careers;
- o Enabling business and employers to easily identify and hire skilled workers and access other supports, including education and training for their current workforce;
- o Participating in rigorous evaluations that support continuous improvement of one-stop centers by identifying which strategies work better for different populations;
- o Ensuring that high-quality integrated data inform decisions made by policy makers, employers and job seekers.

## **5. The competitive process used to award the subgrants and contracts for title I activities.**

(5) WIOA Title I services are administered through the VI Department of Labor (VIDOL). VIDOL also serves as the One-Stop Operator and manages the programs and services offered through the AJC. As a government entity, VIDOL follows the requirements as outlined in 2 CFR 200.317 “When procuring property and service under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non-Federal funds.” All procurement, which includes the competitive process to award sub-grants and contracts for the Virgin Islands government is administered by the VI Department of Property and Procurement. Their processes may be accessed from their website at: <https://dpp.vi.gov/forms-documents> in documents entitled: Procurement Process Overview & Guide and Procurement Rules & Regulations.

## **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.**

(6) The One-Stop system is the basic delivery system for adult and dislocated worker services. Through the One-Stop system adults and dislocated workers in need of training will be provided an Individual Training Account and access to lists of eligible providers of training. Participants may purchase training services from eligible service providers they select in consultation with their case managers.

Customer Choice: Individual Training Accounts allow customers to choose the provider of training service based on the specific information (prerequisites, costs, location, duration, certification received) listed by the provider.

- The amount of the Individual Training voucher shall not exceed \$3,800.00, except in the instance of an approved specialized or technical program.
- The duration of an

Individual Training voucher shall not exceed twelve (12) months, except in the instance of an approved specialized or technical program.

Linkage to occupations in demand: Training services shall be directly linked to an in-demand sector or occupation in the local area or the planning region, or in another area to which an adult or dislocated worker receiving such services is willing to relocate, except that a local board may approve training services for occupations determined by the local board to be in sectors of the economy that have a high potential for sustained demand or growth in the local area.

All providers are given a copy of “Eligible Training Providers Background Information” document, accessible through [www.viwib.org](http://www.viwib.org) under the Providers tab, which details the types of training available and the requirements of participating in each one.

**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.**

(7) The Operations Committee, out of the State Board is designated to fulfill the roles of the local board. As part of the submission process Title II applicants will describe the alignment between their proposed services and the local WDB plan by demonstrating the extent to which the eligible provider aligns the proposed activities and services; strategy; and goals of the local plan to the activities and services of the one-stop partners. As required under WIOA (34 C.F.R. 463.21), VIDE will submit all applications to State Board for review by the Operations Committee. The Board will make recommendations to the VI Department of Education about the application’s alignment with the local plan. The Workforce Board provides recommendations on the applications, but they are not responsible for approving or denying AEFLA grant applications.

**8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.**

(8) The VI Workforce System does not have any cooperative agreements in place at this time.

**e. Waiver Requests (optional)**

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

**1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;**

**2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;**

**3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;**

**4. Describes how the waiver will align with the Department's policy priorities, such as:**

- A. supporting employer engagement;**
- B. connecting education and training strategies;**
- C. supporting work-based learning;**
- D. improving job and career results, and**
- E. other guidance issued by the Department.**

**5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and**

**6. Describes the processes used to:**

- F. Monitor the progress in implementing the waiver;**
- G. Provide notice to any local board affected by the waiver;**
- H. Provide any local board affected by the waiver an opportunity to comment on the request;**
- I. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.**
- J. 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 US Virgin Islands is requesting five (5) waivers; three are hurricane disaster-related and two stem from the functionality of normal operations. They include: Waiver to permit the Territory to exclude individuals affected by the disaster from the calculation of State and local performance measures identified in WIOA sections 116 (b) and (c). ? Waiver of section 129 (c)(2) requiring that local programs provide each of the fourteen youth program elements in order to prioritize the services needed by youth in the hurricane affected area. ? Waiver of the requirement to conduct evaluations of workforce activities for adults, dislocated workers and youth at WIOA section 134 (a)(2)(B)(vi) and 129 (b)(1)(A). ? Waiver of sections 116 (d)(4)(A) and 122 to waive the requirement that eligible training providers collect performance data for all students in a training program. ? Waiver of section 134 (c)(3)(H)(i) to allow the wage reimbursement to employers

participating in on-the-job training to up to 90% for businesses with 50 or fewer employees

#### WAIVER OF THE REQUIREMENT THAT ELIGIBLE TRAINING PROVIDERS COLLECT PERFORMANCE DATA FOR ALL STUDENTS IN A TRAINING PROGRAM

Statutory and/or Regulatory Requirement to be Waived WIOA Section 116 (d)(4)(A) and 122; 20 CFR 677.230 (a)(4) and (5) and 20 CFR 680.400 — 680.530

Actions taken to Remove State of Local Barriers There is no State or local statutory barrier for the implementation of the proposed waiver.

State Strategic Goal(s) and Department of Labor priorities supported by the waiver The Virgin Islands seeks to align workforce development with economic development in order to rebuild the capacity of sectors debilitated by the storm. The Territory has no trade schools or community college therefore most of the training that occurs are provided by targeted provider training or by the local University. In order to maximize the resources of the University the reporting burden needs to be eliminated. Additionally, eligible training providers are more likely to partner with the workforce system if the reporting burden is alleviated.

USDOL priorities include sector-based training and consumer choice fueled by the availability of multiple providers. The workforce system's ability to attract high functioning training providers with reduced paperwork requirements is dependent on this waiver.

Projected programmatic outcomes resulting from implementation of the waiver This waiver will ensure that the pool of eligible training providers remain steady and increase the number of customers able to access training through ITA's.

Individuals, groups or populations benefitting from the waiver This waiver will benefit all WIOA populations including Youth, Adults, Dislocated Workers, Individuals with Disabilities and Returning Citizens by increasing their choices of training offerings and training providers who offer different types and methods of training.

How the State plans to monitor waiver implementation, including collection of waiver outcome information The Planning, Research and Monitoring Unit at the VI Department of Labor will conduct regularly scheduled reviews of the effectiveness of this waiver. Also, performance data collected through the State's MIS system will be analyzed to determine any patterns that result from usage.

Assurance of State posting of the request for public comment and notification to affected local workforce development boards The waivers will be posted for review and comment on the VI Workforce Development Board and VI Department of Labor's websites.

#### WAIVER TO ALLOW THE US VIRGIN ISLANDS TO EXCLUDE INDIVIDUALS AFFECTED BY THE DISASTER FROM THE CALCULATION OF STATE AND LOCAL PERFORMANCE MEASURES

Statutory and/or Regulatory Requirement to be Waived WIOA Section 116 (b) and (c)

Actions taken to Remove State of Local Barriers There is no State or local statutory barrier for the implementation of the proposed waiver.

State Strategic Goal(s) and Department of Labor priorities supported by the waiver The US Virgin Islands Strategic Goals enhance the opportunities for workforce advancement through partnerships with occupational sectors, targeted employers and agencies, and through the self-reliance built by entrepreneurs. Temporary and immediate employment was sought by the individuals in the wake of the 2017 hurricanes. These individuals are not working on a career path; simply recovering from long term job loss therefore including them in the performance measures would not garner accurate results on employment.

USDOL's priority of improving job and career results would not be adequately reflected from an abundance of temporary employment in a few quarters only to fall off in subsequent quarters. Once the economic situation of the US Virgin Islands has been stabilized, and employment is based on permanent situations where employees return to either jobs previously held or advanced employment, collection and inclusion of this data will reflect a more accurate overall employment narrative.

Projected programmatic outcomes resulting from implementation of the waiver This waiver will result in accountability for those jobs that are permanent and reflective of the economic environment in the Territory. It will also show the targeted activities of the workforce system at this point of recovery.

Individuals, groups or populations benefitting from the waiver All WIOA populations will benefit from this waiver, particularly Dislocated Workers.

How the State plans to monitor waiver implementation, including collection of waiver outcome information The MIS Unit can assign special project ID's to identify individuals affected by the storm and record it in the PIRL. Additionally, the Planning, Research and Monitoring Unit at the VI Department of Labor will conduct regularly scheduled reviews of the effectiveness of this waiver.

Assurance of State posting of the request for public comment and notification to affected local workforce development boards The waivers will be posted for review and comment on the VI Workforce Development Board and VI Department of Labor's websites.

#### WAIVER OF THE REQUIREMENT THAT LOCAL PROGRAMS PROVIDE EACH OF THE FOURTEEN (14) YOUTH PROGRAM ELEMENTS IN ORDER TO PRIORITIZE NEEDED SERVICES TO YOUTH PARTICIPANTS IN HURRICANE AFFECTED LOCAL AREAS

Statutory and/or Regulatory Requirement to be Waived WIOA Section 129 (c)(2)

Actions taken to Remove State of Local Barriers There is no State or local statutory barrier for the implementation of the proposed waiver.

State Strategic Goal(s) and Department of Labor priorities supported by the waiver The ultimate goal of the Virgin Islands Workforce System is to prepare individuals for work; for them to be properly prepared to enter to the workforce; engaged in learning while working; and to develop career goals based on actual experience. This waiver allows

young adults to immediately focus on attaining the outcome through relevant experience. It also opens doors for them to subsequently access advanced education and training needed to master the preliminary skills learned.

USDOL supports work-based learning in many variations. This waiver allows for the focus to be on work-based learning in several high-demand sectors. The remaining youth program elements will be infused as much as possible into the learning experiences. Employers will be encouraged to work with case managers on other needs that may arise for specific customers. Projected programmatic outcomes resulting from implementation of the waiver There are many work opportunities available for older and out of school youth in light of the reconstruction efforts taking place in the Territory. Young adults will enter employment, retain employment over several quarters and develop a work and wage history as a result of focusing on targeted program elements.

Individuals, groups or populations benefitting from the waiver The WIOA Youth customer based will be the primary beneficiary of this waiver. The workforce system staff will also benefit due to emphasis placed on acquiring targeted program elements that most serve the youth population at this time rather than all fourteen.

How the State plans to monitor waiver implementation, including collection of waiver outcome information The Planning, Research and Monitoring Unit at the VI Department of Labor will conduct regularly scheduled reviews of the effectiveness of this waiver. Also, performance data collected through the State's MIS system will be analyzed to determine any patterns that result from usage.

Assurance of State posting of the request for public comment and notification to affected local workforce development boards The waivers will be posted for review and comment on the VI Workforce Development Board and VI Department of Labor's websites.

#### WAIVER OF STATEWIDE REQUIRED ACTIVITIES TO CONDUCT EVALUATIONS

Statutory and/or Regulatory Requirement to be Waived WIOA Section 129 (b)(1)(A) and 134 (a)(2)(vi); Section 116 (e) and Section 169 (a)

Actions taken to Remove State of Local Barriers There is no State or local statutory barrier for the implementation of the proposed waiver.

State Strategic Goal(s) and Department of Labor priorities supported by the waiver The Virgin Islands' Workforce System is built upon a network of providers, employers and partners. In order for the system to perform, all need to work in tandem with each other to offer a seamless experience for the customer. The Workforce Board encourages continuous improvement within the Workforce System and thus conducts annual evaluations of different components of the system. Partners, providers and employers have yet to fully recover from the severe damage of system infrastructure caused by the 2017 hurricanes therefore systems, programs and outcomes cannot be fully measured.

USDOL priorities also speak to continuous improvement of the workforce system based on data gathered from partners, providers and employers. This waiver is necessary to allow for the strengthening of education and training strategies and improving job and career results.

Projected programmatic outcomes resulting from implementation of the waiver By waiving the requirement to conduct evaluations at this time, all entities of the system will be able to concentrate on restructuring their processes, both individually and collectively while keeping the functions of the overall system in mind.

Individuals, groups or populations benefitting from the waiver The Virgin Islands Workforce System benefits from this waiver as evaluations will be conducted with the proper tools at a time when employers, partners and providers are in a more permanent environment and have access to the resources needed to collect and assess data.

How the State plans to monitor waiver implementation, including collection of waiver outcome information The Planning, Research and Monitoring Unit at the VI Department of Labor will conduct regularly scheduled reviews of the effectiveness of this waiver. Also, performance data collected through the State's MIS system will be analyzed to determine any patterns that result from usage.

Assurance of State posting of the request for public comment and notification to affected local workforce development boards The waivers will be posted for review and comment on the VI Workforce Development Board and VI Department of Labor's websites.

#### WAIVER OF THE FIFTY PERCENT (50%) WAGE REIMBURSEMENT OJT CAP TO UP TO NINETY PERCENT (90%) FOR BUSINESSES WITH FIFTY (50) OR FEWER EMPLOYEES

Statutory and/or Regulatory Requirement to be Waived WIOA Section 134 (c)(3)(H)(i) and 20 CFR 680.720 (b)

Actions taken to Remove State or Local Barriers There is no State or local statutory barrier for the implementation of the proposed waiver.

State Strategic Goal(s) and Department of Labor priorities supported by the waiver The Virgin Islands Workforce System seeks to enhance business engagement through a sector-based approach to workforce training. On-the-job training is a tried and true method of work-based training especially in times of recovery from natural or other disasters. Employers need a strong workforce but when one is not readily available, quick but effective turn around training is needed. The VI has seen a need for such activity especially in the construction industry. While general theoretical knowledge is necessary, learning through performance allows for a quick ramp up of the local workforce. Employers are able to meet their objectives and job seekers are introduced to and learn to perform (by doing) in an actual work environment. For smaller companies who do not regularly have a large workforce on standby, this waiver allows them the opportunity to employ individuals who may still be dislocated from other employment, while still being able to use their limited resources for other critical aspects of job performance.

USDOL also prioritizes the need for work-based learning situations. It connects education and training strategies and fulfills the gaps in sector-driven demand areas.

Projected programmatic outcomes resulting from implementation of the waiver This waiver allows for smaller businesses to be more flexible with the use of their resources and increase their labor force thus making them more competitive for jobs often afforded to larger companies who are able to absorb the cost of a larger work force. It also builds

capacity for smaller companies by allowing for the use of local talent rather than having to undergo costly recruitment from off-island.

Individuals, groups or populations benefitting from the waiver This waiver benefits both employers and job seekers.

How the State plans to monitor waiver implementation, including collection of waiver outcome information The Planning, Research and Monitoring Unit at the VI Department of Labor will conduct regularly scheduled reviews of the effectiveness of this waiver. Also, performance data collected through the State's MIS system will be analyzed to determine any patterns that result from usage.

Assurance of State posting of the request for public comment and notification to affected local workforce development boards The waivers will be posted for review and comment on the VI Workforce Development Board and VI Department of Labor's websites.

## **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. No
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). No
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. No
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.**

(a) Employment Service Professional Staff Development 1) Professional development activities for Employment Service staff are an on—going process. New staff undergoes orientation that describes the workforce system and employment services role in it. They learn how to use job search and matching techniques based upon demand occupation and local labor market information. Work readiness products and resources used to conduct workshops and seminars is shared with staff so that they can better assist their customers with choosing services and strategies that benefit them in a job search. Additionally, online training, webinars and direct training from industry experts is utilized to enforce trends, products or tools with demonstrated performance or new to the workforce system. New for the Territory’s implementation of WIOA is the goal to have at least one third of the staff acquire industry credentials in workforce development during each program year until all staff are credentialed. This plan will be launched during program year 2016. All core program staff will be invited to participate in this professional training endeavor.

#### **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.**

2) Program leads periodically conduct an assessment of staff’s knowledge and skill levels of UI and W—P programs. Quarterly sessions that update the respective staff of the others product, including any changes or upgrades are conducted. Both Unemployment

Insurance and Wagner Peyser staff are co—located at the Workforce Center thus facilitating the interactivity between them. Front line staffs are trained to know eligibility requirements and basic information of both programs.

All UI claimants register for services with Wagner-Peyser at the time of entry to the Workforce System. Since UI staff is housed at the Job Center in both island districts, all customer eligibility determination is done by UI staff therefore any need for adjudication is done either at the time of application or by appointment at a later date.

**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.**

All UI customers are required to view an orientation video informing customers of their benefits and rights and procedures for filing a claim. They are then given the opportunity to ask questions of both the UI and W—P staffs on next steps, timelines or to clarify any information that was given.

**c. Describe the state’s strategy for providing reemployment assistance to Unemployment Insurance claimants and other unemployed individuals.**

Reemployment assistance is provided to UI claimants who have been profiled by UI staff. Claimants are referred to W—P staff for services which begin with an orientation to workforce services. Additional services include access to labor market information, career assessments and structured workshops such as job search techniques and resume building. Other unemployed individuals also have access to these and other services available at the Workforce Centers to include basic career services.

**d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate, including the following:**

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

1. Wagner—Peyser funds are used to support UI claimants and the communication process between UI and W—P through the provision of access to labor market information on Virgin Islands Electronic Workforce System (VIEWS).

UI claimants attend an orientation session that provides an overview of Wagner-Peyser, WIOA and other services available at the Job Center. Claimants are encouraged to begin the job search process right away and utilize the resources funded through W-P (job club, short-term prevocational training, career exploration tools, etc.) to enhance their job preparation and search.

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

2. The flow of services at the Territory's Workforce Centers have all customers registering with W—P to search for jobs prior to filing a UI claim; therefore all customers have knowledge of and access to jobs available in local demand occupations as well as other jobs that are listed with the Virgin Islands Department of Labor that they may have interest in pursuing.

## **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**

3. Customers are determined "able and available" to work as established by the requirement to register with W—P before they file a UI claim. W—P staff initiates the UI claim process and claimants are later called back by a UI staff person for further processing of their claim.

An initial assessment which is comprised of a review of job skills and qualifications, work experience and employment availability in requested occupational field is conducted to determine job readiness and availability.

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

4. The Eligible Training Provider list is available at all Workforce Center locations and on the VI Department of Labor's website. Customers who are interested in attending training either as a refresher or to acquire new skills work with workforce career counselors to develop a training plan and schedule training and other services that may be needed to attain employment.

Customers seeking UI benefits register under Wagner-Peyser at the time of entry into the Workforce System. Job search activities begin immediately and are done concurrently with application for UI benefits. Wagner-Peyser staff tries to match customers with available jobs based on their work history and qualifications. If it is determined that additional training will be required for employment sought, customers are referred to a Workforce career representative who works with the individual on developing an Individual Employment Plan or Service Strategy. Training may be selected by the customer and referrals are made by the career representative once prerequisites are met.

## **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 Virgin Islands does not participate in the AOP program.

**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.**

**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.**

## **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:

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

**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.**

**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.**

**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.**

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

**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:**

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

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

**C. Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.**

**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).

**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.

### **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.

### **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.

### **E. State Monitor Advocate**

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

## **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; No
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)).

The Virgin Islands Department of Education Division of Adult Education will align adult education content standards with the territory adopted Common Core state Standards (CCSS), through the adoption and implementation of the College and Career Ready (CCR) Standards for Adult Education that were dispersed through USDOE. The CCR standards are the result of a practice that examined the CCSS from the viewpoint of adult education. The CCR standards reflect a broad agreement among subject matter experts in adult education about what is required for adult students to know to be prepared for the rigors of post—secondary education and training. Qualified providers will be required to include these standards to maximize the effectiveness of curricula and instruction, and to prepare students for transition to post—secondary education and/or the workforce. In order to ensure that all instructors are knowledgeable of CCR Standards, and that they understand how to use them effectively to guide classroom instruction, the State Office of Career, Technical, and Adult Education will provide professional development to all instructional staff in presently funded programs, and to any prospect adult education grantees. At the adult secondary level, adult high school credit programs implement the same course descriptions and standards as those used in the K—12 educational system. GED® preparation courses are also a component of the Virgin Islands adult secondary level programming and are also aligned to the Common Core Standards. A high school equivalency diploma is issued in the Virgin Islands to candidates who successfully demonstrate competency in language arts (reading and writing), mathematics, science, and social studies. The assessment used for the diploma program is the 2014 GED® Test.

## **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.

The State Office of Career, Technical and Adult Education is responsible for administering funds to suitable providers, and providing program performance oversight to sub-grantees. Funds will be provided to eligible local entities for the provision of adult education services which include: Adult Education; Literacy; Workplace adult education and literacy activities; English language acquisition activities; Integrated English literacy and civics education; Workforce preparation activities; or Integrated education and training

#### ADULT GENERAL EDUCATION PROGRAMS AND COURSES

**Adult Basic Education (language arts, mathematics, and reading) Program** - The courses included in this program are designed for the student to obtain a level of educational instruction intended to improve the employ-ability of the state's workforce through instruction in mathematics, reading, language, and workforce preparation skills at grade level equivalency of 0-8.9. These courses are based on the College and Career Readiness Standards for Adult Education. **Adult High School Program** - This program is designed for students to receive high school credit in one or more courses leading to a standard high school diploma. Students obtain credits upon completion of courses and passing state mandated assessments necessary to qualify for a high school diploma.

**GED® Preparation Program** - This program prepares adults to successfully complete the four subject area tests leading to qualification for a United States Virgin Islands High School Diploma. There are four courses Reasoning through Language Arts, Mathematical Reasoning, Science and Social Studies. These courses have been aligned with the College and Career Readiness Standards. The U.S. Virgin Islands has approved the GED® as the only high school equivalency test. **Adult ESL Course**- The adult ESL course is designed to improve skills of adults who desire to enter the state's workforce through acquisition of communication skills and cultural competencies which enhance the ability to read, write, speak, and listen in English.

Citizenship studies will be integrated into the Social Studies curriculum. General topics will include elements of U.S. History, Government, culture and symbols, with specific emphasis on rights and responsibilities under the Constitution of the United States of America.

#### Funding Opportunities

The Virgin Islands Department of Education will accept applications for all eligible applicants to fund Adult Education and Family Literacy services in the St. Thomas/St. John and St. Croix Districts in accordance with applicable Public Law Title II, Adult Education and Family Literacy Act (AEFLA) for an established period designated by the VIDE State Office of Career, Technical and Adult Education. Non-profit entities will be required to have proof of tax exempt organization status under 501 (c) (3) of the Internal Revenue Code.

## **Purpose**

The purpose of the sub grant award is to provide Adult Education and Literacy programs in the US Virgin Islands that will assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency; assist adults who are parents to obtain the skills necessary to be partners in the education of their children; assist adults in the completion of a secondary school education. Title II, Adult Education and Family Literacy Act provides funding for Adult Basic Education and Literacy services programs that will help break the cycle of poverty and illiteracy by improving educational opportunities of low income families.

Each eligible provider receiving a sub grant from the Virgin Islands Department of Education shall use the funding to operate one or more programs in the St. Thomas/St. John District, St. Croix District or both that provide services or instruction in one or more of the following categories; Adult Education and Literacy services including workplace literacy services; family literacy services; and or English Literacy programs; for individuals interested in improving their education and employment skills. AEFLA, Section 231 (b). Awards will be subject to availability of funding from the US Department of Education. Time Period The period will be assigned for the period of (2) two years.

## **Eligible Participants**

An organization of demonstrated effectiveness that may include local educational agencies; community based organizations; volunteer literacy organization of demonstrated effectiveness; institutions of higher education; public or private non-profit agencies; libraries; public housing authorities; non-profit institutions that are not described in any of these descriptions and have the ability to provide literacy services to adults and families; and a consortium of the agencies; organizations and non-profit institutions to include non-profit faith based organizations as well as profit entities will be eligible. Successful provider receiving sub grants under AEFLA are required to obtain the corresponding MIS System being used by the VIDE State Office for Career, Technical and Adult Education. Annual MIS System professional development will be provided to eligible providers.

The Management Information System must comply with State and Federal National Reporting Systems (NRS) enrollment information will be provided at orientation. The Virgin Islands Department of Education maintains a record of eligible past providers in the state who might offer Adult Education and Literacy Services. A Request for Proposal (RFP) including and application packet, will be prepared and public notice will be given to the general public and interested parties. The request for proposal were collected initially on November 15, 2018, due to late submissions and/or providers not meeting demonstrated effectiveness, RFP submission has been extended until December 14, 2018. VIDE anticipates awarding new sub-reipients by January 15, 2019. Newspapers, websites and commonly used medium will be used to advertise. Selection and Training of readers. Reminders of deadlines for Applications will be posted with the final month of RFP acceptance. The process of reading and rating the proposal will be followed by the notification and successful selection process. Evaluation of Applications Teams use an evaluation tool with specific criteria to determine whether the proposed applications will

meet the specific requirements set by US Department of Education as set in Section 231 of Title II of the Workforce Investment Act and the VI Department of Education. All proposals must also submit a reasonable budget with at least a 15% local match. Applications will be read and rated a minimum of three times by trained grant readers. No grant will be funded unless it has met a minimum score of 70 points.

**Number of Sub Grants** - The number of sub grants funded will depend on the number applicants, number of centers and funds available. Statutory Considerations Literacy Act, AEFLA Section 231 (e) In awarding sub grants under this section, the Virgin Islands Department of Education shall consider the following factors: 1. Based on recent previous, reliable evidence of past performance, eligible provider shall demonstrate the ability to align with negotiated and established measurable performance goals for participant outcomes. 2. The past effectiveness of an eligible provider in assisting adults, especially those with the lowest levels of competencies, to meet and or exceed in learning commonly established level literacy skills for within a 1 year period beginning with the adoption of an eligible agency's performance measures 3. The commitment of the eligible provider to serve individuals in the community who are most in need of literacy services, including individuals who are low income or have minimal literacy skills; Literacy Act, AEFLA Section 231 (e) Adult Education - State Administration Purpose- To implement all facets of the Virgin Islands Adult Education State Plan based on the extension of the Adult Education and Family Literacy Act. Inclusive of the State responsibilities of the State Office is to ensure that performance levels of adult education programs are competitive grants for community agencies, monitoring and providing of technical assistance to designated personnel. The State Office responsibilities encompass overseeing all aspects of Adult Education programs such as workplace literacy, family literacy, and English literacy programs, one stop delivery systems performance reporting for eligible providers. Additionally, the State would be responsible for the evaluation and review of outcomes achieved by each local program based on the prescribed Adult Education Monitoring tool for evaluation and WIOA Performance measurements. Assessments of progress made in achieving State goals for Adult Education will be handled by reporting of findings at the National level. Special Rule The Virgin Islands State Office of Career, Technical, and Adult Education will 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 the agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities.

If family literacy activities are provided, the eligible provider shall attempt to coordinate with other agencies that provide program and services that are not included in Title II funds. This should occur prior to using funds for adult education and literacy activities other than activities for eligible individuals.

Workforce preparation activities means activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining

skills necessary for successful transition into and completion of post-secondary education or training, or employment.

Each eligible provider desiring a grant or contract from VIDE shall submit an application to VIDE containing such information and assurances as VIDE may require, including: A. A description of how funds awarded under Title II will be spent consistent with the requirements of the 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 State Plan, including how such provider will promote concurrent enrollment in programs and activities under Title II, as appropriate; D. A description of how the eligible provider will meet the State adjusted levels of performance described in 116(b)(3), including how such provider will collect data 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. Additional notes on allowable activities include but are not limited to: 1. Advertising/ Public Relations are allowable with restrictions 2. Communications 3. Depreciation and Use is allowable with restrictions 4. Employee/Employer Relations - Allowable (refer to Edgar for detailed explanation) 5. Maintenance/Repair of existing structures- allowable with major restrictions 6. Student recruitment- Allowable 7. Allowable with restrictions Please see 2 CFR 200 (Unified Guidance) for additional details of allowable and unallowable expenses.

### **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.

Eligible providers awarded federal funds through this application process will be required to use the funds for the establishment or operation of one or more programs in the St. Thomas/St. John District, St. Croix District or both that provide services or instruction in one or more of the following categories: Adult Education and Literacy services; and English literacy programs and to negotiate awards with potential recipients.

The funds will be competed and awarded in accordance with the common elements and distribution of funds section.

Using funds made available under Section 222(a)(1), priorities will be focused on increasing the number of incarcerated adults completing a secondary school credential, entering post-secondary education and training. Adult Basic Skills programs will be offered through the Virgin Islands Bureau of Corrections and include classes in Adult Basic Education (ABE), High School Equivalency preparation, and English as a Second Language. 1. Adult Basic Education courses will be provided to students who score below the 9th grade level on a standardized assessment. Reading comprehension, writing, and math skills are emphasized in these classes. 2. High School Equivalency preparation courses will be provided to students who have not attained a high school diploma or the equivalent and score at least at the 9th grade level, but less than the 12th grade level on a standardized assessment. 3. English as a Second Language courses will provide instruction in speaking, listening comprehension, reading and writing skills for offenders whose primary language is a language other than English. 4. Vocational Skills Training will be offered as a series of courses or classes necessary to achieve a proficiency standard and obtain certification for employment. The goal of this collaborative effort is to develop and implement curriculum that will enhance offenders' success upon release. 5. Participating offenders will be assessed through pre- and post testing assessments placed according to scoring level and general ability. Core competencies in a format deemed appropriate by the Bureau of Corrections and Adult Education which will take into account the program design with emphasis on attainment of a high school equivalency. 6. Adult Education State Staff will continue to engage with Adult Education Administration Staff of the Bureau of Corrections with the goal of continuous improvement of the Adult Education program and improve how elimination of obstacles to successful re-entry. Funding allocations will be determined as part of the planning process for implementation of WIOA. Adult education programs offered in correctional

institutions include ABE, GED® Preparation, and ESL. Individuals also participate in career exploration and planning activities to develop a career and education plan based on career goals.

A correctional institution includes any prison; jail; reformatory; detention center; or halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders. A criminal offender is any individual who is charged with or convicted of any criminal offense.

## **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.**

(Does not apply to the Virgin Islands)

**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.**

(Does not apply to the Virgin Islands)

## **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.**

SOCTAE will use funds made available under section 222(a)(2) for the following adult education and literacy activities to develop or enhance the adult education system of the State. 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 mandatory leadership activities are:

1. Alignment of adult education and literacy activities with core programs and one-stop partners, including eligible providers, including the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.

SOCTAE will work collaboratively with other core programs and partner agencies to provide comprehensive and wraparound services to program participants. State-level policy and planning bodies provide an opportunity for Adult Education to work with Virgin Islands Department of Labor (VIDOL) and other key agencies defined in the law. Adult Education will provide resources and services through One-Stop Centers (including intake/orientation for Adult Education services, and transition resources), referral processes, and other joint mechanisms developed through agency partnerships. 2. The establishment or operation of high quality professional development programs (section 223(a)(1)(B) of WIOA)

SOCTAE will provide targeted professional development based upon a statewide needs assessment, research regarding best practices, and federal recommendations. SOCTAE will survey local providers to ascertain areas in which there may be a gap in knowledge or a need for improvement. From these results, SOCTAE will coordinate and execute broad-based training through a variety of modalities to assist program leaders and teachers in areas such as program improvement, instructional techniques, integrated education and training, CCR standards, transition to post-secondary education and employment, and the infusion of technology into instruction. Professional Development may include: • An annual operations meeting, wherein local program administrators are given an overview of changes in policy and related practices, budget management, and reporting requirements; • An annual statewide professional development conference for a variety of adult education personnel; • Webinars/Teleconferences.

### 3. Technical Assistance

SOCTAE will deliver technical assistance to eligible providers to enhance program effectiveness, increase the ability of providers to meet established performance standards, and fulfill obligations associated with being a one-stop partner. SOCTAE will provide professional development/technical assistance via phone, webinar, teleconference, on-site training, and seminars. Targeted technical assistance will focus on areas of national interest such as recruitment and intake, student engagement, data management and reporting, testing procedures, and transition to post-secondary education and employment. To ensure that local providers are adequately equipped to foster continuous improvement and maintain an ability to meet the needs of the Virgin Islands workforce, SOCTAE will: • Deliver technical assistance to increase the ability of instructors to provide impactful instruction and obtain desired results in key areas. • Provide State and local level information regarding the role of adult education as a key component in the delivery of one-stop center services. • Provide training related to the use of technology to improve classroom effectiveness and program outcomes. 4. The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State.

SOCTAE will engage in islandwide program monitoring procedures to maintain sufficient knowledge and oversight of local adult education providers. Oversight will include continuous data monitoring, in addition to site visits and on-site reviews. Specific attention will be given to programs with low performance. OAE will develop targeted technical assistance to meet the specific needs of the program in need of improvement.

## **2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.**

The State Office for Adult Education will continue to assist with the development of curricula in order to incorporate the essential components of reading that relate to adult activities such as family literacy and civic education. In conjunction with Partners programs and recommendations from the Workforce Development Board, we will continue to develop a more complete model of careers pathways programs for each level. Memorandums of Agreements will continue to be implemented under existing and new

Partnership agreements to continue the facilitation of the completion of Adult Basic and Adult Secondary level courses to Post Secondary programs.

## **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.

SOCTAE uses various means of assessment in its annual and ongoing evaluation process, including site monitoring visits, desk monitoring, program improvement processes, and performance and financial audits. Quarterly monitoring will be performed and additional random verification audits will be performed for verification purposes. Instructional Observations are performed twice per year. Additional observations may be performed for verification purposes. The results of these processes determine program improvement actions.

Monitoring SOCTAE will implement a Quality Assurance System that will assure student performance improvement, financial accountability, program quality, and regulatory compliance of local providers in accordance with federal laws and regulations, state statutes and rules, and the provisions of an approved grant award. The monitoring component of the Quality Assurance System is risk-based. Risk assessment is a process used to evaluate variables associated with workforce education grants and assign a rating for the level of risk to the Virgin Islands Department of Education (VIDE) and SOCTAE associated with each provider. In order to complete a risk assessment, certain risk factors have been identified which may affect the level of risk for each agency. A risk matrix is completed for each provider. The annual risk assessment is conducted by the quality assurance team to determine the monitoring strategy appropriate for each provider. A range of monitoring strategies includes conference calls, improvement plans; grant reviews, etc., with the more comprehensive strategy such as an onsite visit, designated for providers deemed to be at higher risk.

Actions taken to improve quality If non-compliance finding(s) are identified, a corrective action plan will be implemented. The corrective action plan must identify the findings and specific strategies the provider will implement to ensure finding(s) have been resolved.

In addition to program improvement plans and other actions taken to improve quality, the following activities are available: New Director Training Provides new directors with information such as federal and state guidelines, data collection and NRS reporting, and resources needed to administer their programs. MIS System training will be afforded to providers on an annual basis and technical support will be available through both the MIS provider and the VIDE State Office for Adult Education.

TABE and Training/Trainers Through ongoing training, a network of trained professionals ensures the uniform administration and reporting of assessments used for determining federal level gains.

Data Reporting and Program Improvement Training Provides training on the fundamentals of the NRS. Topics include monitoring, data analysis and collection, types of data and measures, assessments, data quality, and related information.

Technical Assistance Adult education calls to inform adult educators of program changes, reporting announcements, and opportunities to ask questions of the SOCTAE staff.

Teacher Training Provides information and resources to support instruction in the areas of GED preparation, college and career readiness, career awareness and planning, career pathways, reading and math instructional strategies.

The State Office for Adult Education has in place a monitoring tool that assess each component of the Adult Education program. Curriculum, Program performance, Enrollment, expected Outcomes, and reporting are all assessed through the Monitoring tool. Professional Development services have been identified both locally and nationally to enhance performance levels in each area. (1) Instruction in the essential components of reading instruction will be guided by National Common Core Standards for Adult Education as well as traditional Common Core Standards. (2) Instruction related to the specific needs of adult learners will be guided by Placement Tests results and Common Core State Standards for Adult Education. Partner Agencies will be consulted especially when Memorandum of Agreements are in place to serve a particular population. (3) Instruction provided by volunteers or paid personnel will be guided by designated Principals, Administrators or Directors of the noted Local Educational Agency and will be part of monitoring and performance assessments. (4) The dissemination of information about models and promising practices will continue through recommended Partnerships and available services both locally and nationally to enhance teaching techniques and quality of instructional material. All persons associated with the program will be included in mass emails with information on promising practices and links for educational improvements.

Program Evaluation (2 pages max) 1. The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the project and will produce quantitative and qualitative data to the extent possible.

Guidance for applicants: Submit a strong evaluation plan that will shape the development of the project from the beginning of the grant period. The plan should include the program objectives and performance indicators, clear benchmarks to monitor progress toward specific objectives and outcome measures to assess impact on adult student learning. The plan should identify the individual(s) and or organization(s) that have agreed to serve as the evaluator for the project and describe his/her/its qualifications. The plan should describe the evaluation design, indicating : (1) types of data that will be collected; (2) when various types of data will be collected; (3) what designs and methods will be used; (4) what instruments will be developed and when; (5) how the data will be analyzed; (6) when reports of results and outcomes will become available; and (7) how information will be used by the project to monitor progress and to provide accountability information to stakeholders about success at the project site(s).

## **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    **Virgin Islands Department of Education - State Office of Career, Technical and Adult Education**

Full Name of Authorized Representative:    **Dr. Sharon Ann McCollum**

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>.

The State Office of Career, Technical & Adult Education includes GEPA language in the Application of the RFP. A GEPA Attestation Statement Form is included in the RFP package for eligible providers to describe in detail how they will comply with the GEPA requirements.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision? The following examples may help illustrate how an applicant may comply with Section 427. (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language. (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in Braille for participants who are blind. (3) An applicant that proposes to carry out a model science program for secondary participants and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment. The State Office recognizes that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

## **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:

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\* 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 Virgin Islands State Rehabilitation Council (VISRC) continues to work cohesively with the Vocational Rehabilitation Program to ensure that all persons with disabilities are provided equal rights, services and access to opportunities that lead to gainful employment. Over the years, VISRC has developed an excellent rapport with the VR program in hopes of achieving the goals and performance measures set forth by the federal government. The council and its members had an extremely challenging year and basically are still in recovery mode following the twin hurricanes in 2017. VIDDRS priority is to ensure that the SRC is fully constituted in federal fiscal year 2019. VIDDRS plans to hold public meetings for input from the SRC and public on PY 2018 state plan in spring of 2019. Majority of the members have relocated and some are at the end of the terms. Therefore, we are currently in the process of recruiting interested persons in membership.

The storms paralyzed some of our efforts as the Vocational Rehabilitation Program in both districts were severely damaged thus forcing the council to become more creative in its approach. Through our collaboration with other local agencies and programs we were able to facilitate some successful events throughout the year. Several forums were held on all three islands to assist the disabled community with preparedness in the case of another natural disaster and addressed issues that confronts this population with political incumbents and aspirants to see how they can assist in removing barriers. Under Workforce Innovation Opportunity Act, the One Stop continues to train and hire persons with a disability. The VR Counselors remain actively engaged in the daily operations of the One Stop Center. We also sponsor a White Cane Walk to allow the community to understand the needs of the disabled and visually impaired population. VR facilitated a six week summer internship for transitioning youths and both employers, parents and youths were recognized for successfully completing the program. Most recently, an Employment Fair was held in recognition of NDEAM in hopes of filling the gaps in the changing workforce in the U.S. Virgin Islands.

The VISRC is committed to working with VR on the development of its goals and objectives for the upcoming years in hopes of improving the services to the consumers and ensuring customer satisfaction. The storms provided a unique opportunity for the VISRC to ascertain whether consumers were pleased with VR's response and support in the aftermath. It is clear that the VR Team was visible and connecting with consumers, however, there is some room for improvement in terms of communication and accessibility. VISRC will provide the program with some recommendations of how to adequately address the needs of the consumers as we forge ahead. It is also the intent of

the VISRC to continue surveying the community as well as the disabled population regarding their interactions with VR.

VISRC recognizes that the VR Program has undergone significant transition as it relates to staff and infrastructure. However, the council is fully supportive of the strides the program has made despite the challenges. The VISRC will continue to advocate for the VR program while it strives to change the landscape for disability hiring in the U.S Virgin Islands. It is our continued mission to highlight the program's achievements while providing candid feedback and recommendations as necessary to ultimately improve the services for all persons.

## **2. the Designated State unit's response to the Council's input and recommendations; and**

The Designated State Agency recognizes the need for more collaboration especially since being affected by two Category 5 storms and agrees that collectively we can achieve more goals. VIDDRS accepts the input and recommendations of the VISRC and plans to continue partnering with the council to improve service delivery and aid in the development of an updated procedural policy manual.

## **3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.**

The Designated State Agency does not object to the input, feedback or recommendations of the State Rehabilitation Council.

## **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;**

The Virgin Islands Vocational Rehabilitation Program is not requesting a waiver of statewideness.

### **2. the designated State unit will approve each proposed service before it is put into effect; and**

This requirement does not apply to VIDDRS.

### **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.

This requirement does not apply to VIDDRS.

### **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 Virgin Islands Vocational Rehabilitation program continues to cooperate with entities not in the State Workforce System. The Designated State Agency recently engaged in 5-year agreement with Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD) to increase college readiness for person with disabilities residing in the U. S. Virgin Islands. The program will provide 24 transitioning students (12 in St. Thomas/St. John District and 12 in St. Croix District) with access to on-campus resources, disability related services and degree program advisement. The program will take place on the university's campus throughout the summer for a period of one week. College placement assessments, orientation, training and counseling will introduce the academic expectations of post-secondary education to interested consumers. One of the main objectives of the program is sensitize the faculty and staff of the University to the needs of persons with disabilities in and out of the classroom. This program will serve as a catalyst for students with disabilities to improve student success rates and facilitate an opportunity to foster relationships with peers with similar backgrounds and career goals. The Virgin Islands Disabilities and Vocational Rehabilitation collaborates with the Statewide Independent Living Council and the Association for Independent Living Center on initiatives and activities focused on the client population. The VIDDR staff participated in the White Cane Walk held in both districts to bring awareness to the challenges faced by the visually impaired population.

The Virgin Islands University Center for Excellence on Developmental Disabilities (VIUCEDD), in conjunction with Banco Popular continues to provide low interest loans to purchase assistive technology devices for individuals with disabilities. They also present mini-workshops on disability related issues. Periodically, they offer sign language training to companies in the community. Self-advocacy training for persons with disabilities is also provided. The St. Croix Career & Technical Educational and the Wheatley Skills Centers are operated by the Department of Education. They provide vocational and technical training in areas such as welding, millwright, computer repair, auto and diesel mechanic, cosmetology, food and beverage management, upholstery, carpentry, and many other vocational courses. Vocational Rehabilitation clients who demonstrate interest and potential are referred to both facilities for training. The Child Care Block Grant Program is a division within the Department of Human Services through which eligible mothers receive assistance with child care while actively seeking employment. This service extends after they have been placed in employment. Small Business Development Center (SBDC), is an entity with whom we have developed a working relationship. As part of our Entrepreneurship Services to qualified VR Clients, it is required that a business proposal be developed with the assistance of the SBDC. Clients who are interested in the Business Enterprise Program are required to attend seminars sponsored by SBDC. The Vocational Rehabilitation Program in collaboration

with its partners, (Department of Labor, and the Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD) and the UVI Cooperative Extension Service (UVI-CES). The designated State Unit strives to maintain a professional relationship with the Client Assistance Program locally known as the Disability Rights Center of the Virgin Islands. They are invited to participate in workshops and VR sponsored events, VR is also invited to participate in parent forums and other activities as appropriate.

VR will provide supported employment services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. This will be achieved through the expansion of our supported employment initiative to include the University Center for Excellence in Developmental Disabilities (VIUCEDD). Additionally, Independent job coaches will provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances for up to four years post placement. VIDDRS will continue to partner with the VI Department of Labor to ensure that a sound business engagement strategy is implemented to maximize opportunity for sustainable relationships and employment opportunities with businesses in the the community. VIDDRS will utilize existing partnerships and establish new partnerships in the private sector to facilitate these extended services.

## **2. State programs carried out under section 4 of the Assistive Technology Act of 1998;**

At this time, VIDDRS is not engaged in any agreement with programs under the Assistive Technology Act.

## **3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;**

Presently, there are no programs carried out by the Secretary for Rural Development under the Department of Agriculture.

## **4. Noneducational agencies serving out-of-school youth; and**

Yes, there are non-educational agencies that serve out-of-school youths. The Virgin Islands Housing Authority sponsors the Youth Build program that caters to students that drop out of school and are beyond the age requirement. The program provides students with an opportunity to learn a trade while working to complete their GED or High School Equivalency. For program year 2018, the Youth Build Program did not receive funding and therefore services will be discontinued. The Virgin Islands Department of Labor offers services to a large percent of out of school youths under the Workforce Innovation and Opportunity Act.

## **5. State use contracting programs.**

At this time, the VIDDRS is not involved in state use contracting program.

## **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.

The Designated State has coordinated with education officials and individuals from private sector to provide Pre-Employment Transition Services to students. Education officials were oriented to the Pre-ETS services and they are intricately involved in referring students for said services. VIDDRS will continue to provide presentations to students and school officials about the pre-employment transition services.

VIDDRS has partnered with Virgin Islands University Center of Excellence in Developmental Disabilities, VIUCEDD will be providing Orientation on Post Secondary Education to transitioning students during summer 2019. The participants will be selected by the Vocational Rehabilitation Counselors to attend a one week sessions at the University campus inclusive of placement test preparation, workshops on campus life and faculty expectations aimed at increasing student success.

In addition, the Virgin Islands Developmental Disability Council, VIDDC is slated to provide Job Exploration and Independent Living Services to the student population. The year long program will provide Parent/Caregiver's Training, Leadership and Self Advocacy Instruction as well as wrap around services that includes individual and group counseling, home and school visits as well as Post secondary education preparation.

Throughout the summer and afterschool, the participants will receive work experience through internships. Placements are determined based on participants interests and are provided by private and public sector employers. The participants are paid in accordance with the Virgin Islands minimum wage and all employers are informed of the pay rate prior to placement.

Employers in the Territory have identified skill gaps in the workforce in three specific categories: Soft Skills - to include customer service, punctuality and time management Basic Academic foundational Skills - specifically math, writing and verbal language efficiency Low Technological Skills - limited basic fluidity, limited knowledge of applications and web based navigation. VIDDRS continues to maintain rapport with stakeholders of the local education agency to ensure a seamless Transition Services Procedure.

- VIDDRS continues to provide technical assistance to counselors on strategies for timely determination of eligibility and development of IPEs for youth with disabilities to ensure that the IPE is developed before the student leaves high school.
- VIDDRS conducts regular case reviews to provide a forum for counselors to discuss and share strategies that have been successful in addressing challenges.

- VIDDRS implemented a plan for identifying cases at day 45 for which eligibility has not been determined as follows: Transitioning applicants will be identified and flagged upon receipt of referral; cases that have been in applicant status for over 30 days will be reviewed and appropriate action taken Once eligibility has been determined;
- DRS monitors IPE development based on 90 days as stated in our policy manual Quarterly case reviews will be conducted within the last two weeks of December, March, June, September to determine compliance with requirements for timely determination of eligibility and development of IPE. The goal is for 100% of IPEs be developed within 90 days of eligibility determination.
- VIDDRS is committed to building its capacity to provide extended services services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. VIDDRS is working in partnership with the University of the Virgin Islands to develop innovative pathways that will allow individuals to access support services in "non-traditional" ways, while helping to build the foundation for achievement of sustainable accomplishments. Independent job coaches may provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances.
- VIDDRS is in the process of updating it's policy and procedure manual to reflect the processes and coordination with other agencies for the delivery of transition services.

## **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;**

1. The Designated State provides training to Special Education officials and counselors so that students can be identified and referred for transition services.
2. VR Counselors are invited to attend IEP meetings for eligible students with disabilities as appropriate and anticipate service needs;
3. VIDDRS work with local workforce development boards, One-Stop centers, and employers to develop work opportunities for students with disabilities;
4. VIDDRS develop guidelines and provide technical assistance on the implementation of this Agreement to LEA personnel, parents and students;
5. Counselors notify relevant transition team participants to include education officials of student eligibility determination and appeal process;
6. VIDDRS assist in the development of an Individual Plan of Employment (IPE) with eligible students, before the student leaves the school setting;
7. At this time, there are no students working below the minimum wage in the Virgin Islands.

**B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

VI DOE and VIDDRS Transition Unit work collaboratively to to facilitate interagency planning as well as collaboration with other agencies to assist in referring students to appropriate pre-employment transition services and develop strategies that support the career development pathways of students with disabilities leading to career and college readiness.

Students are referred to VIDDRS at age 14 for said services. A Memorandum of Understanding, MOU was developed between the State Agency and the Virgin Islands Department of Education, VIDE to facilitate said services. The agencies meet on a regular basis to discuss and coordinate services as needed. The Vocational Rehabilitation Counselors are invited to attend IEP meetings on a regular basis. The students are referred to VIDDRS from age 14 by the LEA for transitioning services. All referred students, their parents and education officials receive written information regarding how to access the services. The counselors are directly involved in securing employment sites for the students to complete their internship. There is ongoing communication between VR and the SEA to address any concerns or the need for changes in services. The plan is to update the agreement with Department of Education prior to the start of school year 2019-2020.

**C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;**

The Interagency Agreement outlines roles and responsibilities for both VIDE staff and VR staff. VIDDRS staff is actively engaged in the implementation of the student's IEP, collaborating in the planning, referral and identification of students with disabilities who may benefit from VR services as early as possible in the transition process. This ensures that transition services and pre-employment services goals on a student's IPE are aligned. VR services should compliment services provided by schools but not replace those services. Once student is accepted for placement, the designated state agency assumes the financial responsibility and compensates students in accordance with the VI minimum wage. Both agencies are required to maintain an open line of communication in regards to the student's success and/or lack thereof. VIDE will be responsible for Special Education services under FAPE; VIDDRS is responsible for providing VR Services under the Rehabilitation Act.

**D. procedures for outreach to and identification of students with disabilities who need transition services.**

VIDDRS is engaged with the LEA to participate in IEP meetings. VIDDRS is also a member of the SEA/LEA Capacity Building team and we have developed a territorial plan for transitioning students that will be inclusive of Pre Employment Transitioning requirements. The plan includes action steps that each agency's responsibility to promote the core principles for transition. Outreach to and identification of students with disabilities who require transition services begin at age 14. VIDE is responsible for

sending referrals and supporting documentation to VIDDRS. VIDDRS counselors describes the purpose of the VR Program, eligibility requirements, application procedures and scope of services.

Transition planning for students requires an ongoing multi agency collaboration with early dialog between the student with their families and other stakeholders (VR, DOE and DOL). This coordination will ensure consistent information and guidance about VR program and the availability of services between partner agencies. VR will continue to educate the general public through regular presentations, social media and public service announcements.

### **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.

Currently, VIDDRS have three agreements with private non-profit organizations. In accordance with the Workforce Innovation and Opportunity Act, the designated state unit continues to strengthen agreements with Private Non-Profit Rehabilitation Agencies. This will allow individuals with significant disabilities to develop skills which result in an employment outcome. The designated state agency continues to collaborate with other agencies and organizations that focus on persons with disabilities such as the Virgin Islands Developmental Disabilities Council, Inc. (VIDDC). VIDDC is slated to conduct a youth transitional program for 30 students (15 in the St. Thomas/St. John District and 15 in the St. Croix District). The program promises to provide students with disabilities with services that aligns with core requirements to include job exploration, self-advocacy, independent living skills training, and opportunities to explore postsecondary education and work-based learning. The program will run for one year and the components of the program are as follows:

- A. Parent /Caregivers Orientation
- B. Leadership and Advocacy Training
- C. Independent Living Skills Training
- D. Pre-Employment Training
- E. Post-Secondary Education Preparation
- F. Wrap Around Services

Each heading has the corresponding lesson and or activity that will aid in understanding the transition from school to work. Professionals in various fields of work will be included in the various presentations. The operating cost associated with this initiative is \$50,000 which will be paid in quarterly allotments.

The Virgin Islands Association for Independent Living plays a vital role in teaching independent Living skills to Vocational Rehabilitation Clients who are interested in the coordination of attendant care services, mobility training and integration in community affairs.

The Disability Rights Center/CAP of the Virgin Islands provides advocacy and referral services. This ensures accessibility to services and community resources. They also conduct workshops for parents of students with disabilities and education officials. They facilitate presentations on various disabling conditions; and information relation to transitioning. The VR staff has been invited to make presentations at these workshops and also on radio talk shows that focus on needs of persons living with a disability.

## **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.

As it pertains to Supported Employment Services, the Designate State Agency is engaged in an agreement with Virgin Islands University Center of Excellence in Developmental Disabilities, VIUCEDD to provide employment readiness training to 8 consumers within the territory, 4 from each district. The services will focus on youths under the age of twenty-five (25). Assessments will be completed to determine competency and skill level. Supported Employment trainees will be given the opportunity to learn about work place etiquette and the expectations to secure gainful employment while fostering relationships. Job Coaches will provide counseling and support to the trainees to ensure their successful integration into the work environment. Sensitivity training sessions will also be conducted to confirm that employers understand the needs of persons with disabilities in the workplace as well as address any concerns. Supported Employment does not begin until after job placement.

In an effort to recruit, certify and maintain job coaches, the State Agency in collaboration with VIUCEDD is in contact with a provider to facilitate ongoing training for interested persons with transferrable skill set. In addition, assistance with the required tools, resources and devices will be provided to trainees as needed. Which will improve the trainee's functionality in the workplace and overall way of life. The supported employment training program will run for approximately one year with the option of subsequent renewals. Once both parties agree, the program will refer a new group of trainees and the term remains the same. In the past, the Virgin Islands has been faced with challenges in the provision of supported employment services for its VR clients. In 2010, the VI lost its two CRPs. Due to the uniqueness of the population, and the geographical isolation of the territory, traditional CRP models have not been most beneficial therefore VIDDRS is implementing a unique model that it believes will be successful. VIDDRS has seen a steady decline in job coaches and the program is actively recruiting.

As mandated by WIOA, VIDDRS is engaging in an initiative with the Virgin Islands Department of Labor (VIDOL) and Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD), to facilitate employment for individuals with

significant disabilities. The intervention will serve as a pilot led by VIUCEDD and the results will be documented and used to improve employer engagement, outreach efforts and employment outcomes for the most significantly disabled individuals.

VIDDRS continues to collaborate with private non-profit service providers who are able to provide supported employment in limited fields. VIDDRS continues to work with clients to develop natural supports to include employers, family members and other local programs that serve our target population. The agency will continue to explore available options for funding the provision of extended supports. In accordance with WIOA, the VR Program continues to partner with the VI Department of Labor (VIDOL) to facilitate employment services for VR clients. VIDDRS is currently present in the job center weekly working with the client population. Through this partnership, VIDDRS to serve VR eligible individuals who are attempting to navigate the Virgin Islands Department of Labor. VIDDRS collaborates with DOL to access on the job training and other job services available to support our clients. VIDDRS continues to concentrate its efforts on educating interested parties regarding the process of becoming a non-traditional provider source for supported employment services. A variety of supported employment provider choices are needed, particularly due to the lack of “factory-type” businesses in the territory. VIDDRS continues to focus on providing technical assistance and coordinating training for vendors of supported employment services to VIDDRS staff members, and staff members of other public and private agencies such as DOL and DOE. VIDDRS has developed a relationship with VIUCEDD and we will continue to pursue evidence based practices to favorably impact supported employment outcomes. VR will provide supported employment services for individuals with the most significant disabilities, including youth, to achieve the employment outcome of supported employment in competitive integrated employment. This will be achieved through the expansion of our supported employment initiative to include the University Center for Excellence in Developmental Disabilities (VIUCEDD). Additionally, Independent job coaches will provide supported employment services for up to 24 months, with the option to increase as needed in special circumstances. VIDDRS will continue to partner with the VI Department of Labor to ensure that a sound business engagement strategy is implemented to maximize opportunity for sustainable relationships and employment opportunities with businesses in the the community. VIDDRS will utilize existing partnerships and establish new partnerships in the private sector to facilitate these extended services. The fee for this service will be covered by the Supported Employment and Title I funds to ensure the required support services are available to persons with significant disabilities.

The Virgin Islands Association for Independent Living is a partner that continues to provide independent living skills and mobility training to individuals with the most significant disabilities. In addition, the Designated State Unit and the Virgin Islands Association for Independent Living are developing projects and extending services to individuals who are older with visual impairments to improve their independence at home and in the community.

Funding for supported employment services is available for youths with the most significant disabilities. Extended support services are available through VIDDRS only to youth with the most significant disabilities for a period of up to 4 years, or until the youth

reaches the age of 25 and no longer meets the definition of a youth, whichever occurs first.(34 CFR 361.5(c)(19). VIDDRS cannot fund extended services for all individuals with the most significant disabilities, only youth with the most significant disabilities.

VIDDRS and its WIOA core partners are in the process of developing a service delivery system that will enable state agencies to cost share the appropriate services needed for consumers to choose, find and maintain meaningful competitive supported employment. We believe that the implementation of this initiative will increase in the availability of resources for extended services.

## **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**

Yes, VIDDRS is working in collaboration with the Department of Labor Employment and Training Division to implement a seamless system for employer engagement to facilitate career opportunities in the demand occupations in the territory which include Administrative and support services, Allied health, construction trades, information technology, leisure and hospitality, retail and transportation and logistics. The Designated State Agency maintains healthy relationships with employers to ensure seamless job placements and transfer current information about available tax credits and benefits. The program continues to recognize employers that have made significant contributions to the program through the presentations of awards and/ or media. This will encourage employers to continue working with the program and it's consumers. VIDDRS will engage in several initiatives to engage employers in this and upcoming fiscal years. In PY 2018, the State Agency will honor and recognize employers with certificates and plaques acknowledging their contributions to be displayed in their businesses year round. This is an initiative that will be continued annually.

The Virgin Islands Vocational Rehabilitation program held a recognition ceremony for employers and participants that successfully completed the 2018 Annual Summer Youth Employment Training Program. Employers received awards for their willingness to participate in the program and carry out the requirements. The annual program is paid 6-week apprenticeship program. Students were placed in various job opportunities based on their career interests and skills. The program proved to be extremely successful as some participants were offered full time employment based on their performances.

During National Disability Employment Awareness Month (NDEAM), an employment fair was held in both districts where employers were able to meet with prospective candidates. Attendees were provided with an opportunity to learn about the job market, current vacancies and possibilities for training. The job fair catered to persons with disabilities and the Vocational Rehabilitation Counselors were on hand to assist individuals with completing applications and working through the pre-screening process. VIDDRS works closely with American Job Center to enhance our approach to business engagement. The agency meets with potential employers to secure and place participants

in employment opportunities. Continued collaboration with local employers will be a priority for VR in the Fiscal year 2018 and 2019. VR officials plan to host town meetings with interested employers that would like to become community partners.

## **2. transition services, including pre-employment transition services, for students and youth with disabilities.**

VIDDRS is currently engaged in planning with employers to develop transition and pre-employment transition services for the next two years. Development and Approval Process for IPE prior to students exiting school VIDDRS will provide technical assistance to counselors on strategies for timely determination of eligibility and development of IPEs for youth with disabilities to ensure that the IPE is developed before the student leaves high school. VIDDRS will hold regular (bi-weekly) case reviews to provide a forum for counselors to discuss and share strategies that have been successful in addressing challenges. VIDDRS has implemented a plan for identifying cases at day 45 for which eligibility has not been determined as follows: Transitioning applicants will be identified and flagged upon receipt of referral; cases that have been in applicant status for over 30 days will be reviewed and appropriate action taken once eligibility has been determined; VIDDRS will monitor IPE development based on 90 days as stated in our policy manual. Quarterly case reviews have been conducted and will continue to occur on a quarterly basis (ie. December, March, June, September) to determine compliance with requirements for timely determination of eligibility and development of IPE. The goal remains that 100% of IPEs will be developed within 90 days of eligibility determination. Coordinating with Education Officials with the Virgin Islands Department of Education as the State Educational Agency (“SEA”), and through its State Office of Special Education (“SOSE”) and through its Local Educational Agencies (“LEAs”), is charged with the responsibility of ensuring that each eligible student with a disability is provided with a free appropriate public education in accordance with the Individuals with Disabilities Education Act (“IDEA”), 20 USC § 1400(d); and The purpose of this agreement is to support the transition of eligible students with disabilities from secondary schools to integrated employment and adult roles, continuing and post-secondary education, adult services, independent living and community participation through improved cooperative and collaborative efforts among relevant service providers; and The Virgin Islands Department of Education shall; Ensure that an interagency agreement or other mechanism for interagency coordination is in effect between each non-educational public agency and the DOE, as required by the IDEA, and its implementing regulation at 34 CFR § 300.2(a) and (b) [20 USC § 1412(a)(12)], in the provision of a free appropriate public education to eligible students with disabilities; and Coordinate with the Department of Human Services - VIDDRS for dissemination of information to local education agencies regarding effective, results-based practices for students with disabilities to be prepared for postsecondary education, vocational training, integrated employment including supported employment, continuing and adult education, adult services, independent living or community participation; Ensure that the collaborating parties to this Agreement meet quarterly or as needed to evaluate the transition process and recommend system changes; Coordinate with DHS to provide professional development and technical assistance activities for DOE staff, the LEAs, other public and private agencies, and parents/guardians/students/ surrogates on topics related to transition

planning and adult service activities; Provide training in conjunction with DHS regarding transition services and interagency service linkages; and Coordinate with DHS to distribute the “DHS Information Packet” for LEAs to provide to students referred to DHS by age 14. The Information Packet will include DHS program and contact information and DHS brochures. DEPARTMENT OF HUMAN SERVICES (DHS) The Department of Human Services, as a State Agency federally mandated to collaborate with the Special Education Division of the Department agrees to Designate at least one member from its respective divisions that may provide services to the eligible client as an IEP team participant for the purpose of attending conference meetings pertaining to the implementation of this Interagency Agreement, and for planning for transition planning and implementing the services required by the student’s IEP. The DHS’s Division of Disabilities and Rehabilitation Services agrees to: Develop guidelines on the implementation of this agreement and train state and local-level staff regarding those guidelines; Provide vocational rehabilitation services to students who meet the eligibility criteria of DHS; Attend IEP meetings for eligible students beginning at age 14 and at a minimum by age 16, to identify and anticipate service needs; Provide consultation and technical assistance to aid LEAs in planning for the transition of eligible students as needed; Conduct educational/informational workshops to interested students, parents/advocates on the Vocational Rehabilitation Process and where referrals may be accepted; Develop an Individual Plan of Employment (IPE) with eligible clients, before the student leaves the school setting. Notify relevant transition team participants of student eligibility determination and appeal process; Provide exploratory opportunities in community-based businesses for students identified by Vocational Rehabilitation and DOE throughout the school year; This agreement recognizes that each agency has its own administrative mechanisms for the timely resolution of internal disputes. All signatory parties and their respective agencies are responsible for resolving their own internal disputes, so long as each agency acts in a timely manner and consistent with provisions set forth in that program’s regulations. Financial responsibility rests with VIDDRS for vocational rehabilitation services needed by transitioning youth with disabilities, ages 16 to 21, who have left school by way of graduation or who have otherwise exited the school system. VIDDRS will provide services that are legally their responsibility for those transitioning youth who are approaching or are of working age and who are determined to be eligible for services by VIDDRS.

VIDDRS provides transitioning students with the opportunity to engage in authentic work experience. Transitioning students are placed in various job placements in both districts based on their career interest and skills.

## **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;**

Both VIDDRS and the Medicaid program are under the same DSA, and a collaborative relationship exists as it relates to shared clients and referral of clients. Existing

information ie medical reports and other financial data is shared as necessary. Staff is permitted and continues to freely interact to collaborate services and ensure that consumers are following through with the appropriate requirements.

During program year 2018-2020, the VIDDRS will continue to refer participants who are unable to obtain health insurance through employment to the Medicaid program for coverage. More individuals in the Virgin Islands are qualified to receive those services. This includes participants who are receiving Supported Employment Services. The Virgin Islands Developmental Disabilities Council will play a vital role in providing Pre-Employment Transition Services to students. The services they provide are outlined in the aforementioned section. VIDDRS will continue to refer consumers to the Department of Health for Mental Health services. Those services are offered on an outpatient basis.

## **2. the State agency responsible for providing services for individuals with developmental disabilities; and**

VIDDRS works collaboratively with this entity to promote advocacy for VR consumers through partnering on various initiatives to identify and address barriers to employment for people with developmental disabilities.

## **3. the State agency responsible for providing mental health services.**

The State Agency responsible for providing mental health services is the Virgin Islands Department of Health, Division of Mental Health. The territory continues to experience significant challenges with the availability of services to persons who are mentally ill. Due to a short fall in professional staff, mental health services are extremely limited to non-existent. Currently, VR is utilizing private vendors both locally and on the mainland to ensure that diagnostic services and treatment are provided for VR eligible individuals.

## **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;

The Designated State Unit staff is currently comprised of fifteen (15) full time employees, (11) Classified, (2) Unclassified and (2) Exempt positions. Within the last

two years, VIDDRS lost a number of personnel and the program experienced significant transition. There are several vacancies within the unit to include two (2) full time Vocational Counselor positions, one in each district. There is a great deficiency in the personnel which places extreme burden on the current staff members. The Designated State continues to actively recruit staff members as there seems to be a steady increase in the number of the program's consumers. It is projected by the start of 2019, the interviewing and selection process to fill the existing vacancies will begin. The current combined caseload from both the St. Thomas/St. John District and St. Croix District is approximately 433 active cases. Immediately following the twin hurricanes in 2017, some consumers relocated to the mainland and caused an initial decline but more recently the cases have increased. Considering that the population faced significant challenges during the hurricanes and in the aftermath, it is projected that the number of individuals served will continue to increase by at least 50 to 75 within the next two years. With adequate staff the program will be able to accommodate the raising number of consumers.

The number of personnel currently needed by State agency to provide VR Services are as follows: Assistant Administrator (1 vacancy), Vocational Rehabilitation Counselor (2 vacancies), Administrative Assistant (1 vacancy), Federal Grant Monitor (1 vacancy) Rehab Specialist Supervisor (1 vacancy) and Project Director (1 vacancy). Through our affiliation with the University of the Virgin Islands, VIDDR have been able to recruit personnel. Currently, one staff is pursuing a Master's Degree in Psychology and is expected to graduate in 2020.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The current number of personnel needed by the DSA is approximately seven (7) employees; Vocational Rehabilitation Counselor (2), Assistant Administrator (1), Administrative Assistant (1), Federal Grant Monitor/Accountant (1), Rehab Specialist (1), Project Director (1). Within the last year, the program was appointed an Administrator and an Executive Assistant also joined the team several months back.

Within the past several years, two VR staff members graduated with their Masters of Arts degree from the University of the Virgin Islands.

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.

It is expected that the current VIDDRS staff (with existing vacancies filled) will be able to serve projected individuals that are eligible for VR services. Currently there are two district managers who are less than 5 years away from retirement. The Program Assistant Administrator and Federal Grant Monitor retired in 2017. One of the VR Counselors relocated after the storms. VIDDRS will continue to work with our Human Resources office to ensure that succession planning is implemented as this extremely crucial to the survival of the program.

## **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;

There is currently one institution of higher education within the territory, University of the Virgin Islands that offers certified undergraduate and graduate degree programs. These programs are in Psychology, Education, Nursing and Business Administration. Unfortunately, the university does not provide a degree program or courses in Vocational Rehabilitation Counseling. The are options available online. Staff interested in a graduate program must enroll in an institution on the U.S. mainland or online. Currently, two VR staff/ counselors have acquired their master degrees at the University and one staff is enrolled in the Masters Psychology Program. The counselors are encouraged to secure their CRC and information and resources have been shared pertaining to acquiring the required certification.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

The University of the Virgin Islands has limited disciplines and programs. In the Virgin Islands, Vocational Rehabilitation Counseling is not offered at the local university and interested persons would have to enroll in an online degree program. At this time, there are no staff persons enrolled in an online rehabilitation counseling program.

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.

At this time, there are no staff members that recently received said certification and or licensure.

## **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.

Staff interested in entering the Council on Rehabilitation Education (CORE) approved Vocational Rehabilitation Counseling Programs must enroll in universities on the United States mainland or study via distance learning. The Designated State Unit (DSU) strongly encourages staff entering the unit to meet the CSPD standards, however this is not required. VIDDRS supports individualized educational pursuit with an expectation that the standards will be met within 3 to 4 years. Staff who are not certified are encouraged to meet the standards. In addition, the DSU is discussing incentives to encourage staff to meet this standard. The proposed incentive is to provide a \$2,000 increase for counselors that obtain their masters degree and an additional \$2,000 increase upon achievement of

CRC certification. Recruitment of staff is conducted through the government personnel system; persons trained in the field of Vocational Rehabilitation counseling or persons with similar backgrounds in social work, education or psychology are qualified to be hired as VR counselors.

### **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**

Traditionally, the Designated State Unit has adhered to standards set by the State Civil Service System which are consistent with the highest entry-level academic degree of a B.A. in Vocational Rehabilitation Counseling or a related field, needed for professions in this category. As there are no State approved or recognized certification, licensing or registration requirements for rehabilitation counselors; the Designated State Unit has based its personnel standards for counselors on those needed to meet the national Certified Rehabilitation Counselor (CRC) requirement which is a master's degree in rehabilitation counseling or a related field or other master's degree that meets the CRC specifications. Deadlines and a written plan for personnel to meet the CRC requirements have been established. The Designated State Unit is communicating with the Office of Personnel and Labor Relations to approve a plan that will address this issue, however, the plan has to be negotiated and agreed with the counselors' collective bargaining unit. The Head of the designated State Agency is very supportive of the State Unit's recruitment efforts. Job specifications for Rehabilitation Counselors were revised to reflect a graduate degree as the minimum entry-level requirement. This revision has increased the entry-level salary and hopefully increases the pool of interested candidates. The State Agency posts its vacancies online with the Human Relations Division and throughout various government offices, The agency often attends college fairs at the local high schools and college campuses to recruit and promote services.

#### **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.**

VIDDRS is working collaboratively with VIUCEDD, LEA, and other training providers to ensure that VR personnel is equipped with the tools required to address the complex challenges that confront VR consumers utilizing evidence based research and other available data.

### **4. Staff Development.**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

#### **A. 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

The Designated State Unit annually identifies personnel need for educational advancement. This year, the agency has been unable to provide additional training as a result of the storms. However, the staff continues to receive monthly training and technical assistance from WINTAC to ensure compliance. Trainings from WINTAC are held monthly and via webinars. The District Managers are responsible for providing training and guidance to the VR Counselors on a daily basis.

The Designated State Unit continues to work with the Office of Personnel and Labor Relations to implement an approved individualized training plan for the counselors' professional development which has the support/approval of the counselor's collective bargaining unit. The fundamental guidelines for this plan include individualized educational pursuit with anticipation that they will meet the CSPD standard for a qualified VR counselor in 3 to 4 years. Progress of these individuals with respect to meeting the applicable standard will be reviewed annually. Therefore, the Designated State Unit is committed in assisting present counseling staff with bachelor degrees to meet the new entry—level requirement of a graduate degree in Rehabilitation Counseling. Those interested persons can enroll in the local university with the understanding that they will also have to complete their studies at a CORE approved Rehabilitation Counseling program at a mainland university or via distance learning.

Continued training is needed in areas such as Assistive Technology, the Rehabilitation Act Amendments, Computer Literacy, Workforce Development, Individual Disabilities, Method of Supervision, Supported Employment or Ticket—To—Work. Through this mode; staff will be able to keep abreast of all emerging trends and changes in the program, as well as, the development of self—growth. All staff is given an annual evaluation of their job performance in accordance with the territory's personnel policies and procedures. Training needs assessments are conducted among the staff, which assists VIDDRS in planning for training based on needs.

#### **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.

VIDDRS will provide access to VR personnel and stakeholders to facilitate a more trained team with enhanced 21st century knowledge on the issues confronting persons with disabilities and strategies that have been effective in other jurisdictions.

VIDDRS holds monthly staff meetings where specific information and research materials is shared and staff is allowed to ask questions and share concerns. As resources become available, they are usually forwarded via email and written correspondence is forwarded to the entire team and discussed if further clarity is needed.

## **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.

In addressing issues associated with diversity and cultural needs, the Designated State Unit lacks the appropriate staff to assist with bilingual consumers. The territory has a large Hispanic and French speaking population mainly due to its close proximity to Puerto Rico and the surrounding Carribean islands. Furthermore, the Designated State Unit is committed to securing the cost for interpreter services for all languages. The DSU also makes available, devices to help improve communication for visually impaired consumers. Lastly, the Designated State Agency has a list of interpreters for the deaf available on an as needed basis.

## **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.

Attempting to maximize available resources and to increase networking opportunities, the Designated State Unit plans to continue cross-training activities that would benefit all professionals involved. The Designated State Unit is actively collaborating with the State Office of Special Education in its capacity building initiatives. Counselors are involved in enhancing transitioning activities within the schools and attend training events sponsored by the schools. Counselors and support staff participate in students IEP development and provide services for students to enhance transitioning from school to work. Staff from related programs is encouraged to enroll in our training programs. Training efforts are geared to ensure the development of qualified staff for succession planning and leadership skills. The Designated State Unit utilizes all opportunities to involve all managers in the Unit's overall functions. They are encouraged to attend management training programs offered by the Department, as well as, those offered in the territory and off island specifically for the Vocational Rehabilitation program. In the event of the resignation or retirement of any staff member, remaining on-board staff will be knowledgeable enough to keep the program running until replacements are hired in accordance with the Designated State Agency's policies. The Designated State Unit continues to search for new and effective practices to attract qualified personnel to work in the territory. Recruitment and retention of qualified vocational rehabilitation counselors continues to be the biggest challenge and liability.

## **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;**

The Combined Statewide Needs Assessment was completed in 2016; the next assessment will be completed in 2019 and results reported in program year 2020 state plan. As a result of the twin hurricanes in September of 2017, both councils have been displaced and not been operating fully due to the loss and relocation of members. The findings and recommendations from the needs assessment remain the same at this juncture. The Assessment was jointly developed under the direction of the Department of Human Services, Division of Disabilities & Rehabilitation Services, the Virgin Islands State Rehabilitation Council, and the Virgin Islands State Independent Living Council. The first two entities are recognized by Rehabilitation Services Administration (RSA), United States Department of Education, as the territory's vocational rehabilitation agency and council under the federal Rehabilitation Act of 1973, as amended. The Rehabilitation Act requires each state's vocational rehabilitation agency and state rehabilitation council to periodically develop a comprehensive statewide needs assessment. The purpose of the needs assessment is to inform the agency and the council as they develop a new three-year strategic state plan. The assessment is designed to answer important questions about the population of eligible for VR services that live in the Virgin Islands and their vocational rehabilitation needs. It serves to inform DVR's strategic plan and goal development for the next three fiscal years, 2016 - 2020.

In its compilation, we rely on a variety of publicly available sources, including survey information from the United States Census Bureau and data from the Rehabilitation Services Administration. We gathered information from the Virgin Islands Departments of Labor, Education, and Health and Human Services, as well as numerous stakeholder groups, including people with disabilities, employers, and Vocational Rehabilitation Counselors.

The VIDDRS's needs assessment was designed to respond to federal regulatory requirement and to provide information for the development of the territory's plan for vocational rehabilitation around three broad areas of investigation:

1. Assess the impact and the nature and scope of services currently provided by VIDDRS;
2. Identify rehabilitation needs of persons with disabilities in the Virgin Islands and specifically the rehabilitation needs of the unserved and underserved Virgin Islanders; and
3. Identify areas for expansion or improvement of services. To address these issues the Agency reviewed data from a variety of sources including information available from the United States Census Bureau, the Rehabilitation Services Administration, Virgin Islands Department of Education and the Virgin Islands Workforce Investment Board.

Updated information was collected through a customer survey, and forums held throughout the territory. Within this report the reader will find:

- Review of population statistics
- Review of VIDDRS service data
- Review of survey data to assess customer satisfaction
- Review of performance data to assess the provision of transition services and the needs of transition aged customers
- Review of the information received at forums held at strategic locations throughout the Territory

Methodology In accordance with federal regulations 34 CFR § 361.29, the focus of the data collection for the CSNA was on:

1. What are the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of individuals with most significant disabilities, including their need for supported employment services?
2. What are the vocational rehabilitation services needs of individuals with disabilities who are minorities or in unserved or underserved populations?
3. What are the vocational rehabilitation service needs of individuals with disabilities who are served through other components of the statewide workforce investment system?
4. What is the need to establish, develop, or improve Community Rehabilitation Programs (CRPs) within the territory?

Multiple data sources were used to inform the CSNA

- Consumer Satisfaction Survey
- Community Survey of the General Population
- VIDDRS VR Counselors Focus Group
- Stakeholders Focus Groups
- US Census Data
- USVI DOE Annual Performance Report FFY 2011
- RSA Statistical Data - Fiscal Years 2007 -2012
- USVI State Integrated Five Year Workforce Plan 2012-2017

A public forum survey was conducted among 2984 persons. Instruments were circulated to all government employees via their pay stubs, to the private sector via outreach activities coordinated by the SRC. Collection boxes were placed strategically in the community as well as telephone contact was made to coordinate pick-up from the more rural areas. VIDDRS was pleased with the enthusiasm and support from staff, stakeholders and the general public. Data contained herein will be utilized as baseline data for future CSNAs

Secondary Research Census Data Statistics

The US Virgin Islands has a population of 105,433 people; 78% black, 10% white and 12% other. While 81% of the population is of West Indian background only 49% were born in the Virgin Islands. The remaining 32% were born elsewhere in the Caribbean. Residents originally from the US Mainland make up 13% of the population and Puerto Ricans make up 4%. The remaining 2% is a mixture of immigrants from across the world including the middle-east, India and Asia (Source: US Census Bureau - 2000). Data from the 2010 USVI Census indicates that there are 615 individuals a disability below the age of 18. The Virgin Islands Department of Education Annual Performance Report for FY 2011 indicated that in FY' 2011, 46 of 152 (30.26%) students in the 4 year cohort group earned a regular diploma; which allowed the Virgin Islands Department of Education, State Office of Special Education (VIDE/SOSE) to meet their targeted goal of 24%. The four-year adjusted cohort graduation rate is required by the Elementary and Secondary Education Act, is used to determine the graduation rate for students with disabilities. The percentage is identified by the number of students with disabilities in the cohort who earned a regular high school diploma through the summer of 2011 and divided by the number of first time 9th graders with disabilities who enter at the beginning of the first marking period each semester plus students who transfer in, minus students who transfer out during four prior school years. The requirements for all students, including students with disabilities, to graduate with a high school diploma are as follows: students must earn a minimum of 26 Carnegie units from grades 9-12. Twenty-one of these Carnegie

units must be in specific required courses and the other five in electives. According to VIDE/SOSE FY' 2011 data, 61 of 1139 (5.35%) students with IEPs did not complete high school. "Dropout" is defined, in the Virgin Islands, as a student with a disability who is enrolled at the beginning of the school year and not enrolled at the conclusion of the school year. This definition applies to all students; however, the data that is presented is from grades 7 through 12. The VIDDRS Vocational Rehabilitation Counselors participated in 2012 Summer Institute. Their participation was a result of an active effort by both VIDDRS and DOE to engage in collaborative activities for the benefit of students with disabilities. This activity enhanced the relation with the staff of both program and it facilitated the development of more effective transition plans for students and ultimately, to positively influence student success in achievement of post-secondary outcomes. VIDE/SOSE maintain data on Special Education students one year beyond secondary education to track students' career paths. The VIDE/SOSE had 6 out of 91 respondents (6.59%) report that they were "enrolled in higher education" within one year of leaving high school; 40 out of 91 respondents (43.96%) reported that they were "engaged in competitive employment"; and 19 out of 91 respondents (20.88%) reported that they were in "some other postsecondary education or training". 26 out of 91 respondents (28.57) report that they were "not engaged". The response rate for this survey was 73.39%. Workforce Investment Board (WIB) The Virgin Islands is a Single Local Workforce Area and has one State Workforce Investment Board that also assumes the duties of the Local Board. The Virgin Islands Department of Labor is the designated State Workforce Agency. There are two workforce centers in the Virgin Islands - one in the St. Thomas/St. John district and one in the district of St. Croix. The agencies that comprise the public workforce investment system include the Departments of Labor, Education, Human Services and Justice. The Workforce Investment Board and the Economic Development Authority comprise the advisory and policy development segment of the Workforce system. The VIWIB is currently coordinating a partnership effort that places additional focus on three vulnerable priority groups who though served can be served more effectively to maximize employment potential. Those groups are the disabled population, veterans and out of school youth. As employment opportunities shrink and become more competitive, disabled workers are forced to acquire even more skills and competencies to become employable. Support services become essential and finding the best fit for their skills often provides a challenge for workforce staff as well as employers. The same is true for those youth who are out of school and displaced. Many find themselves unable to articulate the support they may need to achieve their goals. Watching friends and peers succeed while they do not, only adds to the stress of completing education and training goals. By developing the Careers Pathway model, specific to each group, the VIWIB hopes to help each attain the skills needed to enter and advance in the workforce. Instead of waiting for qualified workers, they can assist in creating qualified workers through on-the-job training and registered apprenticeships for new or unskilled workers and by refreshing their existing workforce through incumbent and customized training. Employers now have the option to choose the most qualified individuals from a large pool of unemployed workers. Unskilled and/or inexperienced Adults and Youth are now in direct competition with skilled and qualified dislocated workers for the same jobs; and many of the existing jobs may not be compatible with the skill set of the dislocated workers. The success of any workforce investment initiative is

contingent on the active participation of employers. This was the sentiment expressed by stakeholders and partners of the WIB. Mental Health Services The Department of Health is the legal authority set forth in Virgin Islands Code; it functions as both the state regulatory agency and the territorial public health agency for the U.S. Virgin Islands. The Department of Health is responsible for the regulation of health care providers and facilities, policy development and planning, as well as vital, conducting programs of health promotion, protection and preventive medicine. The Division of Mental Health, Alcoholism and Drug Dependency Services (DMHADDs) is an entity within the Department of Health charged with establishing and administering programs designed to offer prevention and treatment intervention in the areas of substance abuse prevention, substance abuse treatment, mental health and residential services. Issues and Challenges Impacting the Mental Health and Substance Abuse System of Care in the USVI are: • No reliable data on the incidence of mental illness in the community; • Major problems in delivery, coordination and integration of services; • Lack of services for children with mental disorders; • Increase in demand for counseling and case management services, especially among women and children DMHADDs is encouraging residents to do their part to help de-stigmatize the issue of mental health illness and to help raise the awareness of mental health wellness. Source: 3rd Annual Health Disparities Institute; St. Thomas, USVI October 21-22, 2010 Primary Research Program Staff Focus Group The VI SRC conducted focus groups with VIDDRS staff in an effort to obtain their opinion on the following: • What are the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of individuals with most significant disabilities, including their need for supported employment services? • What are the vocational rehabilitation services needs of individuals with disabilities who are minorities or in unserved or underserved populations? • What are the vocational rehabilitation services needs of individuals with disabilities who are served through other components of the statewide workforce investment system? • What is the need to establish, develop, or improve community rehabilitation programs (CRPs) within the state? Staff indicated specific disability and demographic groups that are underserved or unserved: transitioning youths, US Virgin Islands minority populations, homeless individuals, individuals with moderate to severe cognitive impairments, physical disabilities and mental illness, and migrants with language barriers. Overwhelmingly, respondents indicated that they felt that the disability group that are most underserved are persons with mental illness. They felt that appropriate service infrastructures are not in place; therefore they are unable to manage or cope with their disabilities. In most cases, the consumers are not job ready and unable maintain employment for a significant time period. This may be due to the lack of psychiatric treatment to facilitate mental stability. Persons with challenges which often lead to homelessness was another group that staff felt that was underserved; this group is largely comprised of individuals who are mentally ill. Responders indicated that these individuals had no contact information and were mostly unreachable. This prohibited or caused a significant delay in services. Most times, these consumers were unstable and have mental illnesses. Many are closed before employment outcome; or, they fluctuate between jobs. The Virgin Islands minority population was also indicated as a population that is underserved and unserved. Minorities in the Virgin Islands mainly consist of Asians, Caucasians, and Hispanics. Staff felt that the reason why minorities are underserved is due to attitudinal barriers

within the community that deter the interest in seeking services. Due to the close proximity of the surrounding Hispanic islands, the territory has a large Hispanic population. Spanish is their primary language and many have difficulty accessing resources in the territory. These individuals have a difficult time finding written information in Spanish, and they often experience challenges in verbal communication; especially during job a search. Transitioning youths were considered underserved or unserved due to several concerns. The lack of community rehabilitation programs (CRPs) continues to be a significant concern in providing supported employment services to transitioning youths. VIDDRS has implemented a transition unit that provides some assistance to youths, however, there remains a significant gap in services when these individuals require the services of a job coach. These transitioning youth are mostly individuals with moderate to severe cognitive disabilities and mental illnesses. Some counselors also expressed that transitioning youths are unfamiliar with VR services; therefore does not follow through with services. It was discussed that more outreach should be considered on different platforms to ensure that transitioning youths and their families have frequent opportunities to be fully aware of services; this may favorably influence the amount of closures before employment outcomes. 504 youths were another population that was considered underserved due the amount of referrals. Counselors stated that referrals are only received when teachers or guidance counselors attempt to find resources for particular students. VR Counselors are not regularly invited to 504 meetings and VIDDRS does not provide outreach specifically to this population. Due to the size and geographical uniqueness's to the territory, individuals with physical disabilities encounter many challenges which prevent full participation in the community. Many buildings in urban areas are historic buildings and are not accessible and modifications are not always possible. Many are not equipped with regulatory accessible bathrooms. Additionally, in certain areas, even with the appropriate allotted parking spaces, parking is limited and sometimes challenging to access. In all, staff felt that continued collaboration with the program's stakeholders through outreach within the territory will increase services to the unserved and underserved populations, increase minority participation, and identify unmet service needs. They indicated that having an electronic case management system would increase the efficiency of program and services. All agreed that developing new CRPs or a pool of certified job coaches will increase services and employment outcomes. Consumer Satisfaction Survey Vocational Rehabilitation Services identified 133 former consumers whose cases were closed in fiscal year 2011 at various statuses throughout the Vocational Rehabilitation process. During August 2012, the State Rehabilitation Council conducted telephone interviews with 46 former consumers. Assurances were made to consumers that their comments would remain anonymous and be precise to the extent possible. The interview questions can be found in the appendix. Varying reasons were identified for non-participation in the survey. Many consumers' telephones were disconnected during the survey period. Others never responded to multiple requests left on their answering machines. Several relocated to the Continental United States and a few denied receiving Vocational Rehabilitation services. The result of the survey revealed that more than majority of the consumers felt that Vocational Rehabilitation services were satisfactory or better. A small percentage was neutral throughout the survey. However, there were a significant percentage of consumers that felt the VR services need improvement, especially in continuous

communication with consumers. Some of the generalized comments that were expressed during the survey were: • The need for more job search and job placement assistance, • Insufficient communication and follow-up during service delivery, • Insufficient customer service assistance from VR staff, • Need for more collaboration between Special Education and VR services, and • VR needs to help increase consumer self-advocacy. Transition Services RSA's 2012 monitoring of VIDDRS data analysis of the program's performance outcomes indicates, VIDDRS is bringing more youth with disabilities into the VR program, but an increasing number of them are leaving before receiving services, and therefore not achieving their vocational goal. In addition to an analysis of the performance outcomes for youth with disabilities, RSA interviewed field level staff to better understand the challenges that they face. According to the Virgin Islands Division of Special Education Parent Satisfaction survey dated June 2013, parents responded that , the least satisfying item was that the transition outcomes were developed for the child with his/her input. The second least satisfying item was that the parent was satisfied wioth the transition services provided to their child that will help prepare him/her for movement from school life to adult life. In response to these measures, VIDDRS the LEA and SEA have become more engaged to ensure that VIDDRS is involved in IEPs and outreach activities coordinated by the LEA and SEA. Additionally, VIDDRS and the LEA are discussing how as partners we can be more engaged. VIDDRS, and VIDOL are working closely with the LEAS to facilitate job readiness training that will result in competitive employment opportunities in demand fields in the community. A comprehensive plan will be implemented for the 2017-18 school.

**B. who are minorities;**

No specific services other than VR services are provided to minorities.

**C. who have been unserved or underserved by the VR program;**

The Virgin Islands has experienced significant challenges in serving individuals diagnosed with mental illness as well as individuals with significant intellectual disabilities. In an effort to address these challenges, VR is engaged with the Department of Health address the barriers that the mentally ill face in maintaining stability. The Workforce system is job driven and focuses on developing talent with specific employment outcomes in local demand sectors as a goal. VR counselors will provide counseling and guidance to assist clients in identifying career opportunities that matches their skills and abilities.

**D. who have been served through other components of the statewide workforce development system; and**

The VI Workforce System operates on the premise that everyone who accesses the system is seeking employment - either a first time job or an advanced work opportunity. VR counselors have regular presence in the VI Job Centers and as such all workforce services which are beneficial to VR consumers are utilized such job readiness workshops and seminars, individualized career counseling, and job search, matching and referrals.

**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 students with disabilities with the most significant challenges are students with intellectual or cognitive disabilities. There is a need for more coordination with the LEA to coordinate job readiness training and engagement of the workforce system to facilitate on the job training opportunities that have a the potential of career opportunities for this population. Additionally, there needs to be other valid options for students with severe cognitive disabilities to include a day center that can focus on soft skills and independent living. There is a need for transition and pre-transition services for students with disabilities.

## **2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

The need for functional community rehabilitation programs remains critical. VR continues to work with the University of the Virgin Islands Center for Excellence in Developmental Disabilities (VIUCEDD) and other stakeholders and partners, to develop an innovative model for recruitment, and training of job coaches that can meet client's diverse needs. The program will be actively seeking providers that assist in meeting the needs in this area. VIDDRS management provides ongoing evaluation of the proficiencies of the job coaches. Technical assistance and training will be provided as needed.

## **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 .**

There is a need for career transition services and pre-employment transition services. For program year 2018 & 2019, VIDDRS will continue to coordinate these services with VIDE along with local public and private employers. The youths are placed during the summer for internships and after school for work based learning experiences. The Special Education personnel refer the youths to the abovementioned services.

## **k. Annual Estimates**

Describe:

### **1. The number of individuals in the State who are eligible for services;**

Currently, for federal fiscal year 2019 the number of eligible persons is approximate 517. It is projected that the agency will be able to provide VR services to all eligible individuals. In FFY 2020, the number of individuals eligible for services are projected to increase by 5% bringing the total number to 543.

VIDDRS will continue to work closely with our community partners and WINTAC to address areas that require additional technical assistance to ensure sustainability of providers. Based on the current VR caseload, and existing VR counselor vacancy it is estimated that the VIDDRS will be able to serve persons. Within the next twelve months and beyond, once the program is automated and data is integrated in within partners of

the workforce system it is estimated that the VR program will significantly increase the number of clients served.

## **2. The number of eligible individuals who will receive services under:**

### **A. The VR Program;**

For Federal Fiscal Year 2019, the number of eligible persons that will be served under the VR Program is approximately 495; In FFY 2020, the numbers are projected to increase by 5 to 10% considering the rapid changes in the workforce.

### **B. The Supported Employment Program; and**

In FFY 2019, VIDDRS coordinated with the Virgin Islands University Center for Excellence in Developmental Disabilities to provide supported employment services to the most significantly disabled with job readiness training and on the job support from certified job coaches. The job coaches will provide assessments and also assist with adequate job match based on the individual's capabilities. This initiative will also work with employers by providing sensitivity training and aid in the acquisition of assistive devices and resources. Currently, we are serving 22 individuals and it is projected that in Federal Fiscal Year 2020 that the agency will provide supported employment services to 30 individuals.

### **C. each priority category, if under an order of selection;**

There is no order of selection as it pertains to the provision of these services.

## **3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and**

This does not apply to VIDDRS.

## **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.**

In Federal Fiscal Year 2019, the average cost of services for the number of individuals estimated to be eligible under the VR Program is approximately \$3,500.00 per individual. In FFY 2020, the average cost of services for the number of individuals is projected to be 10% higher than 2019 thus causing the cost of services to slightly increase to \$3,850 per person. The Title I estimated funds for fiscal year 2019 is \$1, 784, 055 and the Title IV funds is approximately \$14, 093. In Federal fiscal year 2020 the estimated funds will also show and increase. VIDDRS is not under an order of selection and therefore, the cost of services for each category have not been appropriated.

## **I. 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 following describes the VIDDRS goals and priorities in collaboration with and agreed to by the State Rehabilitation Council for program year 2019.

1. VIDDRS participants would benefit from enhanced supported employment program by providing more opportunities for the significantly disabled to engage in employment at least half time.
2. VIDDRS will continue to educate the community by providing information, sensitivity training and resources regarding disability related issues.
3. VIDDRS will increase the number of qualified job coaches in the territory. This is a part of the initiative undertaken by VIDDRS and VIUCEDD to recruit, train and maintain certified job coaches in both districts.
4. VIDDRS will utilize multiple levels of communication to promote and advertise the VR program through the use of social media, television and public service announcements.
5. VIDDRS main goal is to increase employment outcomes across the programs.
6. VIDDRS will collaborate with the VISRC to recruit and recommend members to the Governor for appointment.
7. Continued collaboration with the community partners, employers and stakeholders to ensure that participants receive best quality of service.
8. VIDDRS will continue pursuing implementation of an electronic case management system to meet requirements set forth by WIOA. This goal is paramount as the case management system will provide access the jobs, capture the real time data and ultimately aid in improving the program's reporting. The system will deliver a better quality of service to participants.

## **2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.**

Some of the main goals and priorities in carrying out the VR and Supported Employment programs are as follows:

1. VIDDRS consumers would benefit significantly from a year round employment training program that focuses on building their skill set and adequately prepares them for gainful employment. The support from this program will boost consumer's confidence and lead to their success on the job. Sensitivity training for employers and the community will also be provided as the lack of information in this area can become a barrier.
2. VIDDRS will increase the number of qualified job coaches in the territory. This is a part of the initiative undertaken by VIDDRS and VIUCEDD to recruit, train and maintain certified job coaches in both districts.

3. Promote and advertise the VR program through the use of social media, television and public service announcements. Printed material can be distributed and placed in various business places to inform the public about VR and SE offerings for persons with disabilities.
4. VIDDRS main goal is to increase employment outcomes across the programs.
5. Continued collaboration with the community partners, employers and stakeholders to ensure that consumers receive best quality of service. Through operation of the One Stop Centers the program is able to meet with prospective consumers and educate the public about the service.
6. VIDDRS plans to update existing Memorandums of Understanding, MOU and develop new agreements with providers as needed.
7. VIDDRS will continue pursuing implementation of an electronic case management system to meet requirements set forth by WIOA.

**3. Ensure that the goals and priorities are based on an analysis of the following areas:**

The goals and priorities were based on the response from the participants and stakeholders about their experience with the state agency along with some input from the State Rehabilitation Council. Providing the best quality of service is top priority for VIDDRS. Therefore, the program will continuously seek feedback from the participants, community partners and the VISRC to ensure the goals are achieved and to make adjustments as necessary.

**A. The most recent comprehensive statewide assessment, including any updates;**

The most recent comprehensive statewide assessment was completed in program year 2016 and scheduled to be updated in 2019. This information was collected from our consumers through a survey conducted by the VISRC. The comprehensive statewide assessment allows us the opportunity to identify service gaps, consumer needs and ensure that performance accountability measures are met. As a result of the storms and the loss of council members, activities have been delayed. However, we are making progress and are scheduled to reconvene for program year 2019. The program was displaced and experienced connectivity issues which further complicated our ability to complete the RSA 911.

**B. the State's performance under the performance accountability measures of section 116 of WIOA; and**

VIDDRS usually captures this information from the quarterly 911 report. However, due to the State Agency inability to develop and execute a contract with the service provider. At this time, the VIDDRS is unable to report on the performance accountability measures of section 116 of WIOA. The program has been collecting the required data and it is anticipated that the RSA 911 for FFY 2019 will be completed during the second quarter. The information will be updated accordingly.

**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.**

VIDDRS continues to address the findings from RSA's Monitoring. The VIDDRS continues to work with our fiscal office and third party fiduciary to update policies and procedures as required to enhance timely service delivery to clients and vendors. Within the last year, VIDDR has experienced significant setback in terms of membership vacancies that we are currently working to correct. The recruitment of new members are ongoing to better support and advocate for the VR program and its clients. VIDDRS is very interactive and transparent as it relates to the sharing information about operation and programmatic challenges with the SRC that affect the effectiveness of the VR Program. With the implementation of WIOA the SRC leadership has been at the table during meetings with core partners and has provided input that it believes will help the VIDDRS with WIOA mandates. Specifically as it relates to: • Outreach and marketing to impact access to VR services for the unserved and underserved. • Improving transition services for students and youth with disabilities • Implementation of an electronic client case management system • Development of the Business Engagement Plan.

**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.**

VIDDRS will not implement an order of selection for VR services.

**B. The justification for the order.**

N/A

**C. The service and outcome goals.**

N/A

**D. The time within which these goals may be achieved for individuals in each priority category within the order.**

N/A

**E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and**

N/A

**2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.**

N/A

**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.**

VIDDRS plans to increase the number of extended services to youths with the most significant disabilities. The agency goal is to use the provision of these funds to provide supported employment services for FY 2019 & FY 2020. VIDDRS has a agreement to provide supported employment services with 2 of 3 CRP's. The VI comprehensive state wide needs assessment, identified significant gaps in services and available resources to facilitate employment outcomes for the most significantly disabled individuals. • The lack of specialized transportation has been addressed through our partnership with VITRAN Plus. • Need of more public awareness about services available for persons with disabilities • Need for more outreach to employers in both the public and private sectors • Development of quality assurance and evaluation system to improve the overall operation of VIDDRS.

**2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:**

**A. the provision of extended services for a period not to exceed 4 years; and**

The purpose of VIDDRS Supported Employment Program is to assist individuals with the most significant disabilities to include youth with the most significant disabilities, to achieve supported employment outcomes in competitive, integrated employment by developing and implementing collaborative programs with entities that can provide some extended supports. The plan is to provide students in special education programs transition to community employment and individuals with severe and persistent mental illness who have traditionally been unsuccessful in obtaining integrated employment. VIDDRS will provide extended services for youths with most significant disabilities for a period of 4 years or up to age 25 whichever comes first.

**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.**

VIDDRS will first seek out services from the Department of Health to fund extended services for youths before VR funds are utilized. The agency will work collaboratively with other community partners within the workforce and in the private sector to increase extended and expanded supported employment services.

**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 twin Hurricanes of 2017 caused widespread devastation throughout the entire US Virgin Islands. This devastation extended to the facilities and infrastructure of the VI Department of Human Services — Division of Disabilities and Vocational Rehabilitation Services which severely crippled day to day functioning and the capability to fully serve the VR population. In accordance with the Rehabilitation Act of 1973 and 34 CFR 361.3, the state agency may utilize a specified percent of grant funds for capital expenditures such as construction, maintenance, repairs, renovations and or alterations to buildings occupied by the VR program. As a result of natural disasters and events beyond the agency's control, such expenditures are considered as an allowable expense and will be used to rehabilitate the facilities and infrastructure of the VR program. Resources in the Virgin Islands are limited in relation to availability in other jurisdictions across the United States; this is due mainly to our geographical location from the continental United States. The current economic crisis has decreased the availability of jobs overall. This has created a challenge for persons with disabilities and the Vocational Rehabilitation Program. Of the territory's caseload of 509 clients, approximately 4% are clients who receive supported employment services.

VIDDRS, in collaboration with the partners of the workforce system, 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) Workforce development activities revolve around the build out of Industry sectors. The Territory's current demand sectors based on current hiring trends are: Administrative and Support Services, Allied Health, Construction Trades and Information Technology. VR counselors will receive training to better assist clients to develop employment plans that will enable them to be employed in areas that provide opportunities to earn a living wage and in demand sector industries that afford them opportunities for professional growth and career development.

The VR Transition Units (one each on St. Thomas and St. Croix) provide coordinated activities for transitioning students to assist them in preparing for jobs in integrated work settings. Transition Unit staff will assist with the implementation goals of the IPE as developed by the student's VR Counselor. VIDDRS will engage in collaborative initiatives to facilitate provision of pre—employment services as required.

Students leaving for college will be provided with those assistive or technological devices necessary for their successful achievement of their post—secondary educational goals. Similarly, those clients entering the workforce will be assisted with the provision of assistive technology services to improve their performance in the workplace.

The State Agency will also partner with the Department of Education to hold joint training sessions for parents of students in the Special Education Program and plan educational and informational meetings with teachers, counselors and coordinators of the education Department. VIDDRS will provide information about the Vocational Rehabilitation program.

**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.**

VIDDRS will work collaboratively with VIUCEDD to facilitate opportunities for VR consumers to have access to AT services. VIDDRS recognizes the importance of technology in the business world. The full utilization of AT services and devices are needed to assist individuals with disabilities to achieve their full potential. VIDDRS will continue to provide these services through our partnership with local vendors as required to facilitate achievement of client goals. Eligible persons with disabilities in the Virgin Islands receive devices from the Medical Assistance Program. This includes visual aids, prosthetic and other devices to improve mobility. Under the VIUCEDD persons may qualify to receive interest loans to purchase assistive technology. The local telephone company also provides telephone services for the hearing impaired and the elderly population.

**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.**

Resources in the Virgin Islands are limited in relation to availability in other jurisdictions across the United States; this is due mainly to our geographical location from the continental United States. This has created a challenge for persons with disabilities and the VI Vocational Rehabilitation Program. A comprehensive database should be established to identify those persons that are minorities and have been marginalized by society. This way provides an avenue to those individuals that are over looked. Counselors will be encouraged to seek out opportunities for professional growth and career development that will effect change in the life of the consumer.

In program year 2019 and 2020, VIDDRS will connect with various community, civic and church groups to identify services needed by the minority and underserved populations.

**4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).**

The methods used to improve and expand VR services for students with disabilities include the following initiatives. VIDDRS in both districts (St. Thomas/St. John and St.

Croix) is slated to provide coordinated activities for transitioning students to assist them in preparing for jobs in integrated work settings. Staff will assist with the implementation goals of the IPE as developed by the student's VR Counselor. VIDDRS will engage in collaborative initiatives to facilitate provision of pre-employment services as required. Students leaving for college will be provided with those assistive or technological devices necessary for their successful achievement of their post-secondary educational goals. Similarly, those clients entering the workforce will be assisted with the provision of assistive technology services to improve their performance in the workplace.

The State Agency will partner with the Department of Education to hold joint training sessions for parents of students in the Special Education Program and plan educational and informational meetings with teachers, counselors and coordinators of the education Department. VIDDRS will provide information about the Vocational Rehabilitation program.

#### **5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.**

For program year 2019 & 2020, the state agency plans to increase employment and skill level of consumers to include youths by delivering a more integrated approach through the use of the One Stop. VIDDRS will Improve the program's visabilty through outreach and social mediums. Implement an electronic case management system that will enhance collaboration with partners and program's reporting. VIDDRS will be more active in terms of lobbying new employers to become VR partners while providing sensitivity training to educate on the needs of the population. Regular consumer assessments conducted by VISRC and VISILC will be encouraged to assist in identifying service gaps.

#### **6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.**

As indicated previously in section B, the information was captured however, VIDDRS is unable to provide a complete breakdown of the six common performance mearsures.

#### **7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.**

For program 2019 and 2020, VIDDRS plans to remain engaged in the workforce development for both employers and consumers alike. VIDDRS intends to have a more job driven workforce investment in the One Stop delivery by involving all it's partners and utilizing the partner collaboration as strategy that will ultimately improve the statewide workforce development system. Monthly meetings and regular trainings with core partner programs will continue collaborating to provide an improved systematic approach. The joint agency team will conduct outreach to employers to provide information on the services and programs available to them through the Workforce System. VR is a full partner at the table to ensure that partners are knowledgeable about the needs and accommodations required by persons with disabilities in order to facilitate an integrated workforce.

## **8. How the agency's strategies will be used to:**

### **A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

For program 2019 and 2020, VIDDRS will continue its efforts to ensure that persons with disabilities are integrated into the fiber of the community as outlined in the 2016 CSNA. Employment being the outcome for all persons involved. VIDDRS role is to help level the field for persons with disabilities so that partner agencies are able to approach employers and identify opportunities for employment. VIDDRS will continue to foster relationships with new employers while maintaining partnerships with participating employers. VIDDRS will encourage consumers to actively advocate for their needs.

### **B. support innovation and expansion activities; and**

VIDDRS utilizes the support innovation and expansion funds to assist with activities under the VISRC and VISILC.

### **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.**

VIDDRS will continue providing services through the One Stop Centers and various avenues to overcome barriers relating to access of the State VR and SE 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.**

Majority of the goals outlined in the 2016 stateplan as it relates to VR and SE services were achieved through various methods and strategies. VIDDRS maintained collaboration with stakeholders, community partners and providers to ensure that the program's goals were carried out. The program also remained visible within the community interacting, educating and promoting the available services. The held various activities such as an employment fair that provided an opportunity for the program to highlight it's achievements and plans to forge ahead servicing the population in program year 2019 and beyond.

#### **B. Describe the factors that impeded the achievement of the goals and priorities.**

The lack of appropriate personnel as well as providers are major factors that has impede the achievement of goals and objectives previously outlined in the 2016 Stateplan. The

Designated State Agency continues to face challenges as it relates to securing and maintaining adequate staff.

**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.**

Significant progress was made from program year 2016 as it relates to the program's goals. The program was successful in providing employment training for pre transitioning students, increased the number of consumers applying for services through more outreach efforts and collaborated with partners in the VI Workforce Development System. In conjunction with VIUCEDD, several forums were held to educate persons with disabilities about the various services. In reference to Supported Employment Services, several new initiatives are being discussed to address the short fall in these services.

**B. Describe the factors that impeded the achievement of the goals and priorities.**

The continued lack of appropriate staff has impeded the achievement of the program's goals and priorities. Since the last submission, VIDDRS has experienced a high turnover in staff. Consequently, the program has several vacancies that need to be filled in order to successfully achieve said goals.

**3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.**

In program year 2016, as part of the WIOA requirements, through the One-Stop system the VR program offered Transition planning for youth; Educational/informational workshops to interested students, parent and advocates on the Vocational Rehabilitation Process and where referrals may be accepted; Development of an Individual Plan of Employment (IPE) with eligible clients; for students, before they leave the school setting; Exploratory career opportunities in community-based businesses; and utilize employer engagement and outreach efforts to tailor positive employment outcomes for the most significantly disabled individuals. The Vocational Rehabilitation program provides the following activities to eligible individuals with disabilities: job exploration counseling; work-based learning opportunities; counseling on post-secondary educational opportunities; workplace readiness training; and instruction in self-advocacy.

In 2018, the VIDDRS remains committed to providing consumers with employment related services that lead to successful employment outcomes. VIDDRS is committed to improving the number of individuals achieving employment outcome during the current program year in comparison with previous years. VIDDRS focuses on increasing the rehabilitation rate which is the percentage of individuals receiving services under an individualized employment plan. Another major performance indicator is to increase self sufficiency and independence for persons with disabilities by providing the necessary supports to achieve competitive employment outcomes. The access to services for all persons is measured by the ratio of service to minorities and non minorities. VIDDRS has

performed well on the performance accountability indicators based on previous reports and continue to increase across the programs to meet or exceed level.

#### **4. How the funds reserved for innovation and expansion (I&E) activities were utilized.**

VIDDRS supported VISRC and VISILC activities with these funds in program years 2016, 2017 and 2018. Through the use of these funds the state has made progress in the development of productive relationships with collaborative partners in the community. VIDDRS is actively involved in discussions with the Workforce Investment Board in the development of their Strategic Plan and various board initiatives. Additionally, there is ongoing discussions with the Division of Special Education State Office collaboration on mutually beneficial projects. Collaboration on this level has had a positive impact on achievement of established goals. These relationships will facilitate consistency in the implementation of services territory-wide.

#### **q. Quality, Scope, and Extent of Supported Employment Services.**

Include the following:

##### **1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.**

The Designated State agency has provided Supported Employment Services through our CRP and also through the Department of Health to the most significant disabled. VIDDRS is pursuing an agreement with the Virgin Islands University Center for Excellence in Developmental Disabilities, VIUCEDD. The provider agrees to increase employment readiness of people with disabilities residing in the USVI by providing on-the-job training with a qualified job coach who is competent in disability-related employment needs and supports. A preliminary file review will be conducted to assess the Supported Employment Trainee's knowledge, skill, and ability to enable a custom match of an employment site and job coach. Provider will identify 3-5 employment placement sites and train 5 job coaches in each district (St. Thomas/St. John and St. Croix) during the initial phase of the project. Job coaches will acclimate trainees to the work environment and provide any support that will allow the trainee to successfully integrate into a long term job setting. Job coaches will complete a rigorous job coach training program to gain competency in supporting persons with disabilities and facilitating job choice. Supported Employment Trainees will have the opportunity to learn employment skills, expectations, and etiquette in order to secure meaningful employment while fostering social relationships with peers or customers with or without disabilities. Provider will conduct a Person Centered Planning Meeting to collaboratively empower trainees in gaining permanent and meaningful employment. These meetings will serve as a platform for stakeholders to discuss roles, responsibilities, and strategies for improving employment outlook for trainees. Provider will conduct sensitivity training to give employment managers and staff a clear understanding of how to facilitate and understand the needs of people with disabilities in the workplace. Sensitivity training

provides an opportunity to address any concerns businesses may have in relation to employing persons with disabilities. Provider shall aid in the acquisition of assistive technology tools, resources, and supports that will allow trainees with disabilities to increase, maintain, or improve the functional capabilities and independence in the workplace.

## **2. The timing of transition to extended services.**

The timing of transition to extended services will be determined after eligibility is established, a service plan is developed and all other interventions have been exhausted. Participants will receive extended support services for 90 days after placement is made. The State Agency will be responsible for creating a support system within the workplace and regular monitoring to provide further support as needed.

## **Certifications**

Name of designated State agency or designated State unit, as appropriate **Division of Disabilities & Rehabilitation Services**

Name of designated State agency **Department of Human Services**

Full Name of Authorized Representative: **Felecia L. Blyden**

Title of Authorized Representative: **Commissioner**

### **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    **Government of the Virgin Islands, Department of Human Services**

Full Name of Authorized Representative:    **Felecia L. Blyden**

Title of Authorized Representative:    **Commissioner**

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.

### **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 **Virgin Islands Department of Human Services**

Full Name of Authorized Representative: **Felecia L. Blyden**

Title of Authorized Representative: **Commissioner**

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      **Yes**
- 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,**

- xxxv. has developed and will implement,**
  - A. strategies to address the needs identified in the assessments; and**
  - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and**
- xxxvi. 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:**

- xxxvii. 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**

- xxxviii. 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](http://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.

## **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 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
<b>Adults</b>	33.00	Baseline	35.00	Baseline
<b>Dislocated Workers</b>	54.00	Baseline	56.00	Baseline
<b>Youth</b>	37.00	Baseline	39.00	Baseline
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	54.00	Baseline	55.00	Baseline
<b>Vocational Rehabilitation</b>	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
<b>Adults</b>	37.00	Baseline	39.00	Baseline
<b>Dislocated Workers</b>	47.00	Baseline	49.00	Baseline
<b>Youth</b>	40.00	Baseline	40.00	Baseline
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	47.00	Baseline	49.00	Baseline
<b>Vocational Rehabilitation</b>	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
<b>Adults</b>	4,800.00	Baseline	4,800.00	Baseline
<b>Dislocated Workers</b>	5,500.00	Baseline	5,500.00	Baseline

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Youth</b>	Baseline	Baseline	Baseline	Baseline
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	5,500.00	Baseline	5,500.00	Baseline
<b>Vocational Rehabilitation</b>	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
<b>Adults</b>	63.00	Baseline	65.00	Baseline
<b>Dislocated Workers</b>	50.00	Baseline	55.00	Baseline
<b>Youth</b>	43.00	Baseline	45.00	Baseline
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	n/a	n/a	n/a	n/a

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Vocational Rehabilitation</b>	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
<b>Adults</b>	Baseline	Baseline	Baseline	Baseline
<b>Dislocated Workers</b>	Baseline	Baseline	Baseline	Baseline
<b>Youth</b>	Baseline	Baseline	Baseline	Baseline
<b>Adult Education</b>	7.00	37.00	11.00	38.00
<b>Wagner-Peyser</b>	n/a	n/a	n/a	n/a
<b>Vocational Rehabilitation</b>	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
<b>Line 1 (enter the measure information in the comments below)</b>	61.80	Baseline	62.00	Baseline
<b>Line 2</b>	58.90	Baseline	60.00	Baseline
<b>Line 3</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 4</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 5</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 6</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

1. Retention with Same Employer in the 2nd and 4th Quarters after Exit Rate
2. Repeat Business Customers Rate

**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)**