WIOA STATE PLAN FOR
THE COMMONWEALTH OF KENTUCKY

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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 U.S. Secretary of Labor that outlines a four-year workforce development strategy for the State's workforce development system. The publicly-funded workforce 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 jobseekers 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 Literacy 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. 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))

* 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.

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.* While discussion of and strategies for every target population is not expected, States must address as many as are applicable to their State's population and look beyond strategies for the general population.

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

I. WIOA STATE PLAN TYPE

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

Unified State Plan. This plan includes the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program. No

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

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined 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.) Yes

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

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

Kentucky's economy, influenced by the 2008 national recession, experienced a decrease of 79,300 jobs, or –4.3 percent, between 2000 and 2010. Kentucky started a slow job recovery in 2010. Prior to the recession, between 1997 and 2007, total employment in Kentucky grew by 134,300 jobs or 7.8 percent. Kentucky Occupational Projections for 2012 to 2022 forecast total employment to grow by 229,350 jobs or 11.6 percent as Kentucky adds back jobs lost during the recession and adds new jobs as well.

Kentucky's unemployment rate was 5.3 percent in 1997 and reached a low of 4.2 percent in 2000. Before the recession of 2008, the unemployment rate rose to 5.2 percent and peaked in 2003 at 6.1 percent. It declined to 5.4 percent by 2007. At the start of the recession in 2008, it grew to 6.4 per–cent and peaked at 10.3 percent in 2009 before falling slightly to 10.2 percent in 2010. In 2014, it had fallen to an annual rate of 6.5 percent. In January 2014, the unemployment rate stood at 7.5 percent but had fallen to 5.5 percent that December. The latest monthly unemployment data, December 2015, shows a further drop to 5.3 percent. An unemployment rate of 5 percent is considered full employment due to the turnover in employment. Kentucky is entering a period when the movement of the large Baby Boom age cohort, now in their 50s and 60s, are exiting the workforce. The significantly smaller age cohort of Generation Xer's, now in their 30s and 40s, is replacing Baby Boomers and will increasingly put a strain on employers' ability to replace existing employees and attract new employees in emerging industry sectors.

Annual job openings are expected to average 69,000 between 2012 and 2022. Annual job openings reflect both new jobs added and replacement of workers in existing jobs as they leave those jobs,

attributed growth or separation in the 2012 to 2022 Kentucky Occupational Projections. Job growth is projected to account for 24,000 jobs annually, while 45,000 job losses are projected to be from separations. Job turnover and the retirement of Baby Boomers are both factors in job separations.

The greatest projected employment growth between 2012 and 2022, 33,000 jobs or 10.1 percent, will be in office and administrative support services sector, which includes temporary workers in this sector and 28,000 jobs or 22.5 percent in healthcare practitioners and technical occupations. Unfortunately, there is not employment data for “1099” employees or “gig workers,” who, along with temporary workers, are an increasing population share of workers. The “1099” employees and the “gig workers” are self–employed and not covered by unemployment insurance (UI), and therefore not shown in employee data. Other employment growth areas include computer and mathematical occupations: 6,700 jobs or 19.5 percent; health care support occupations, 12,800 jobs or 23.9 percent; food preparation and serving occupations, 14,500 jobs or 9.0 percent; and sales and related occupations, 16,100 jobs or 18.5 percent.

Kentucky’s educational attainment levels continue to increase with persons aged 25+ with a high school degree or above rising from 74.1 percent in 2000 to 83.5 percent as indicated in the 2010–14

American Community Survey (ACS) from the U.S. Census. The education and skills needed vary in these occupations from higher educational levels with higher pay to lower educational levels with low levels of pay. The Kentucky Occupational Projections indicate that higher education levels are seeing a greater percentage of growth with people with bachelor’s degrees increasing by 45,000 or 15.3 percent; those with associate degrees growing at 17,000 or 19.9 percent; and people with post-secondary non–degree awards increasing by 20,000 or 16.4 percent. While many job openings (88,000) are for those with a high school degree or GED only, this segment is only growing at 10 percent, and openings for those with less than a high school degree (43,000), climbing by only 8.7 percent. The U.S. Bureau of Labor Statistics (BLS) research has shown that as education levels rise, unemployment rates go down and pay goes up. Therefore the importance of education and training is critical for employees to improve their life chances.

In July 2015, the Kentucky Chamber of Commerce released the Kentucky’s Workforce Challenges: the Employer’s Perspective report, based on a survey of Kentucky chamber members. The following challenges were identified by employers.

• Lack of employer engagement: Insufficient involvement by employers to affect change in training programs that address demand–side needs.

• Identifying the local contact: A lack of clarity about the community–level service delivery of state programs, particularly in regard to which agency or individual is in charge.

• Lack of promotion for available programs: The need for greater communication and outreach to employers and job seekers about available programs, how to access information, the need for specific training and skill development and related issues.

• Identifying who’s in charge of money/programs? Ongoing concerns with governance, management and coordination of workforce programs.

• Missing soft skills: The need for improved employability skills, or soft skills, such as attendance, communication and teamwork, among job seekers.

• Drugs in the workplace: Increasing difficulties in finding drug–free job applicants.

• Not using job credentials properly: Inconsistent use of credentials by employers, job seekers and educational institutions.

• Inability to coordinating programs: Insufficient coordination among educational institutions, economic development agencies and workforce programs.

In response to a question regarding the state of the workforce as it relates to their individual company employment needs, employers responded as follows:

• 27 percent have trouble finding people with good soft skills,

• 23 percent have trouble finding people with the right technical skills,

• 17 percent indicated there is a generational difference in work ethic,

• 15 percent said potential employees cannot pass a drug test,

• 10 percent indicated employees have good skills but need retraining for specific technical skills

• 8 percent indicated the overall workforce has good skills.

The chamber of commerce report showed that Kentucky employers need a workforce system that:

• responds efficiently to employers' needs for workers by employment sector/industry/skill set;

• is driven by accurate data on employers' hiring needs;

• provides flexibility in training and retraining programs;

• is accessible and user–friendly for employers; and

• provides clear, coordinated information on available public programs and supports.

In the area of service delivery, employers indicated that it is difficult to determine where to go or whom to talk to at the community level to meet their employment needs. This is linked to the organizational structure of the state's workforce system.

Employers indicated that they want to provide more input on the development of the state and local workforce plans by working more with the state workforce board and the Education and Workforce Development Cabinet on employer–led initiatives. They also want to be better informed about the availability of workforce programs.

In the area of employability, employers said one of their top concerns is having employees with good soft skills such as understanding the importance of showing up for work, taking responsibility for their actions, managing their time properly and communicating effectively.

Employers also listed the growing problem of drug use among job applicants. While drug abuse is not unique to Kentucky, it is a major problem in the Commonwealth. According to the survey, 15 percent

of employers said that applicants are unable to pass a drug test, so they are not viable candidates for employers regardless of their skills.

Employers asked that the state workforce system work with them in the area of credentialing by sec–

tors so that employees have the skills needed for the workplace.

This chamber of commerce report outlines the needs of employers, providing Kentucky's workforce system viable information for making needed changes. In October 2015, the Kentucky Education and Workforce Development Cabinet partnered with the Kentucky Chamber of Commerce to host a Work– force Summit. Experts from industry and government shared insights and information about building a talent pipeline of workers; creating an employer–led collaborative to address specific workforce needs; using data to make decisions about training and hiring; and developing programs that let people learn new skills while gaining experience on the job. This collaborative effort is another step forward in ad– dressing the challenges and unmet needs identified by employers in the Commonwealth.

Subsequently, the Kentucky Department of Workforce Investment held a WIOA State Plan Partner Round Table at the Kentucky Chamber of Commerce. Employers and partners from Adult Education, Economic Development, and Vocational Rehabilitation, the Kentucky Workforce Investment Board, the Kentucky Department of Education and local workforce development areas participated. There were several prevalent themes that emerged from the round table discussion.

The top theme identified during the round table event was a lack of soft skills or employability skills, echoing an issue identified in the chamber survey.

The consensus of the group was intervention in this area needs to occur early in child development and continue throughout grades K–12. The group placed an emphasis on early intervention in the Career Pathways system for students. The Kentucky Federation for Advanced Manufacturing Education (FAME) project, a partnership of regional manufacturers whose purpose is to implement dual–track apprenticeship–style training, was highlighted by several individuals attending the round table as a model to replicate.

Another topic was ensuring a direct connection between occupational areas of demand and careers. Employers want to be actively engaged in this alignment process with the educational system. The group understands the differences in rural and urban areas of the state and that different connection approaches are needed to reach both of these areas.

Issues surrounding barriers to employment, such as substance abuse and criminal backgrounds and other socio–economic factors, were also identified by round table participants. The group highlighted the fact that there is an untapped labor pool of viable candidates in individuals with these barriers, as well as individuals with disabilities. Advances in technology allowing for needed accommodations have increased employability and skill sets of people with disabilities in the workplace. In partnership with the Office of Vocational Rehabilitation, Kentucky Adult Education provides information to local programs to assist students with barriers to employment to access the services for which they are eligible.

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’.

Kentucky has 10 workforce development areas (WDAs), each with unique employment trends. Un–employment rates and educational attainment vary significantly across the 10 WDAs. The larger and more urban WDAs have a greater employment percentage growth, lower unemployment rates and higher educational levels compared to the more rural WDAs. The improvement in the unemployment rates following the recession show the disparity in the economic recovery among WDAs. Educational levels are increasing across all of the 10 areas and the more rural WDAs, and those in eastern Kentucky have closed the educational attainment gap slightly but still trail the state level and the level in the larger urban WDAs. Additionally, the rural WDAs are experiencing limited or no population growth while the larger and more urban WDAs are growing much faster.

Partners who attended the State Plan Round table discussion identified the importance of addressing the gaps in opportunities and resources across the Commonwealth, a major priority for the workforce system over the next four years.

According to BLS, Kentucky’s seasonally adjusted unemployment rate was 5.3 percent in December 2015, representing a net change of –0.2 percentage points over the past year. Compared with neigh– boring states, Kentucky’s unemployment rate in December 2015 was higher than Virginia (4.2 per– cent), Missouri (4.4 percent), Indiana (4.4 percent) and Ohio (4.7 percent) and lower than Tennessee (5.6 percent), Illinois (5.9 percent) and West Virginia (6.3 percent).

While the state unemployment rate provides useful information on the general economic condition of Kentucky, it is important to note that there is wide variation in unemployment rates at the county

level. For example, of the 120 counties in Kentucky, Woodford County had the lowest unemployment in the state in December 2015 at 3.5 percent while Magoffin County recorded the highest at 15.5 percent.

In Kentucky's metropolitan areas, the BLS data for December 2015 shows that unemployment rates do not vary as much. For example, the following rates were reported for December 2015, Lexington (3.7 percent), Louisville (4.2 percent), Bowling Green (4.3 percent), Owensboro (4.5 percent), Elizabethtown (4.7 percent) and northern Kentucky/Cincinnati area (4.3 percent). As a secondary source of information about the employment picture, the June 2014 New York Times article "Where are the Hardest Places to Live in the U.S.?" listed several counties in Kentucky as having disproportionately high unemployment rates, including Magoffin County at 16.5 percent; Jackson County at 14.4 percent; Knott, Harlan, Letcher and McCreary counties at more than 13 percent; Clay, Perry and Wolfe counties at more than 12 percent; and additional areas reporting unemployment rates in the 10 to 11 percent range. Eastern Kentucky as a region was highlighted as fraught with challenges, such as lacking college graduates and high rates of unemployment, disability, poor health indicators and low median income.

Bluegrass

The Bluegrass WDA is projected to have employment growth from 380,303 to 403,006 jobs or 5.97 percent between 2012 and 2022 with 12,156 annual job openings, 3,303 from growth and 8,852 from separations. The unemployment rate reached 9.2 percent in 2009, dropped to 5.4 percent in 2014 and was 4.4 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 1,949 jobs; followed by office and administrative occupations, 1,423 jobs; and sales and related occupations, 1,358 jobs. At the higher education level, healthcare practitioners and technical occupations, 862 jobs; and educational, training and library occupations, 961 jobs, are also growing.

The Bluegrass WDA ranks third in people ages 25+ with a high school degree or above, rising from 79 percent to 86.1 percent between 2000 and the 2010–14 ACS.

Cumberlands

The Cumberlands WDA is projected to have employment growth from 108,577 jobs to 115,533 jobs or 6.41 percent between 2012 and 2022 with 3,518 annual job openings, 1,004 from growth and 2,514 from separations. The unemployment rate reached 11.8 percent in 2010, dropped to 8 percent in 2014 and was 6.9 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in office and administrative support occupations, 471 jobs; followed by sales and related occupations, 411 jobs; and food preparation and serving occupations, 371 jobs. At the higher education level, healthcare practitioners and technical occupations, 331 jobs; and education, training and library occupations, 186 jobs; are also growing.

The Cumberlands WDA ranks ninth in people ages 25+ with a high school degree or more, rising from 61.6 percent in 2000 to 75.1 percent in the 2010–14 ACS.

EKCEP

The EKCEP WDA is projected to have employment growth from 119,361 jobs to 121,340 jobs or 1.66 percent between 2012 and 2022 with 3,618 annual job openings, 855 from growth and 2,763 from separations. The unemployment rate, which reached 13.5 percent in 2013 due to declines in coal mining employment, dropped to 10.8 percent in 2014, and was 10.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in office and administrative support occupations, 450 jobs; followed by healthcare practitioners and technical occupations,

386 jobs; and sales and related occupations, 385 jobs. At the higher education level, education, training and library occupations with 332 jobs, is also growing along with the healthcare practitioners and technical occupations.

The EKCEP WDA ranks 10th in people ages 25+ with a high school degree or more, rising from 57.8 percent in 2000 to 71.2 percent in 2010–14 ACS.

Green River

The Green River WDA is projected to have employment growth from 91,084 jobs to 104,991 jobs or 15.27 percent between 2012 and 2022 with 3,682 annual job openings, 1,589 from growth and 2,093 from separations. The unemployment rate reached 9.9 percent in 2009, dropped to 6.1 percent in 2014, and was 5.4 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 524 jobs, followed by sales and related occupations, 428 jobs, and production occupations, 381 jobs. At the higher education level, healthcare practitioners and technical occupations, 257 jobs, and education, training and library occupations, 221 jobs, are also growing.

The Green River WDA ranks fifth in persons ages 25+ with a high school degree or above, rising from 77.1 percent to 84.4 percent between 2000 and the 2010–14 ACS.

KentuckianaWorks

The KentuckianaWorks WDA is projected to have employment growth from 526,472 jobs to 566,485 jobs or 7.6 percent between 2012 and 2022 with 17,281 annual job openings, 5,017 from growth and 12,264 from separations. The unemployment rate dropped from 10.1 percent in 2009 to 5.9 percent in 2014, and was 4.7 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 2,120 jobs, followed by office and administrative support occupations, 2,023 jobs and sales and related occupations, 1,904 jobs. At the higher education level, healthcare practitioners and technical occupations, 1,335 jobs, and education, training and library occupations, 801 jobs, are also growing.

The KentuckianaWorks WDA ranks second in persons ages 25+ with a high school degree or above, rising from 81.3 percent to 88 percent between the 2000 and 2010–14 ACS.

Lincoln Trail

The Lincoln Trail WDA is projected to have employment growth from 95,567 jobs to 96,801 jobs or 1.29 percent between 2012 and 2022 with 2,961 annual job openings, 773 from growth and 2,188 from separations. The unemployment rate dropped from 11.8 percent in 2009 to 6.6 percent in 2014, and was 5.3 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 439 jobs, followed by sales and related occupations, 361 jobs. At the higher education level, education, training and library occupations, 209 jobs, and healthcare practitioners and technical occupations, 197 jobs, are also growing.

The Lincoln Trail WDA ranks fourth in persons ages 25+ with a high school degree and above, rising from 76.1 percent to 85.8 percent between 2000 and the 2010–14 ACS.

Northern Kentucky

The Northern Kentucky WDA is projected to have employment growth from 184,758 jobs to 194,796 jobs or 5.43 percent between 2012 and 2022 with 5,798 annual job openings, 1,357 from growth and 4,441 from separations. The unemployment rate dropped from 9.9 percent in 2009 to 5.5 percent in 2014, and was 4.6 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 941 jobs, followed by office and administrative support occupations, 841 jobs, and sales and related occupations, 692. At the higher education levels, education, training and library occupations, 335 jobs, and healthcare practitioners and technical occupations, 298 jobs, are also growing.

The Northern Kentucky WDA ranks first in persons with a high school degree or above, rising from 80.6 percent to 88.5 percent between 2000 and the 2010–2014 ACS.

South Central

The South Central WDA is projected to have employment growth from 119,704 jobs to 133,339 jobs or 11.39 percent between 2012 and 2022 with 4,297 annual job openings, 1,492 from growth and 2,805 from separations. The unemployment rate fell from 11.5 percent in 2009 to 6 percent in 2014, and was 4.8 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 558 jobs, followed by office and administrative support occupations, 526 jobs, and sales and related occupations, 520 jobs. At the higher education level, healthcare practitioners and technical occupations, 261 jobs, and education, training and library occupations, 237 jobs, are also growing.

The South Central WDA ranks eighth in persons ages 25 + with a high school degree and above, rising from 70.3 percent to 81.3 percent between 2000 and the 2010–14 ACS.

TENCO

The TENCO WDA is projected to have employment growth from 67,124 jobs to 69,359 jobs or 3.33 percent between 2012 and 2022 with 2,204 annual job openings, 601 from growth and 1,603 from

separations. The unemployment rate dropped from 11.4 percent in 2010 to 7.9 percent in 2014, and was 7.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 347 jobs; followed by healthcare practitioners and technical occupations, 301 jobs, and office and administrative support occupations, 272 jobs. At the higher education level, education, training and library occupations, 144 jobs, along with healthcare practitioners and technical occupations mentioned above, are also growing.

The TENCO WDA ranks seventh in persons ages 25+ with a high school degree and above, rising from 71.6 percent to 82.1 percent between 2000 and the 2010–14 ACS.

West Kentucky

The West Kentucky WDA is projected to have employment growth from 129,142 jobs to 132,341

jobs or 2.48 percent between 2012 and 2022 with 4,132 annual job openings, 1,078 from growth and 3,054 for separations. The unemployment rate reached 10.3 percent in 2009, dropped to 6.9 percent in 2014, and was 6.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in sales and related occupations, 565 jobs; followed by transportation and material moving occupations, 500 jobs, and office and administrative support services, 440 jobs. At the higher education level, healthcare practitioners and technical occupations, 317 jobs, is also growing.

The West Kentucky WDA ranks sixth in persons ages 25+ with a high school degree or above, rising from 74.2 percent to 84 percent between 2000 and the 2010–14 ACS.

Individuals with Disabilities

According to data from the 2012 ACS, published in the annual Compendium of Disability Statistics, 17 percent of Kentucky civilians living in the community report having a disability, including 15.5 percent of residents of working age (18–64). This is higher than the national average (12.3 percent all, 10.2 percent working age). The rate of Kentuckians reporting a disability remained relatively stable from 2011 through 2012, growing at 1.1 percent (on par with the national average of 1.2 percent).

Employment rates are far lower for individuals with disabilities than in the general population. As of January 2015, the employment rate for the civil, non–institutionalized population 16 years and older was 68.2 percent and the unemployment rate was 5.9 percent (BLS, 2015). For adults with disabilities, the employment rate was 19.6 percent and the unemployment rate was 17.3 percent.

The most recent Kentucky–specific statistics for individuals with disabilities and employment are found in the 2013 “Disability Statistics Compendium,” produced by The National Institute on Disability at the University of New Hampshire. According to 2012 ACS data, Kentucky residents with disabilities are employed at reduced rates compared to residents without disabilities.

In addition, the 2012 ACS provides information on the employment gap between individuals with dis– abilities and those without, and poverty rates. It shows an employment gap in Kentucky of 46.7

per– cent and a poverty rate of 34.9 percent for adults with disabilities, compared to a poverty rate of 15.3 percent for adults without disabilities. These statistics underscore the relationship between disability, unemployment and poverty that is observed in Kentucky and nationwide.

Kentucky ranks near the bottom among states for labor force participation at 56.4 percent. The labor force participation rate varies substantially by region with labor force participation in eastern Kentucky substantially lower than in other parts of the state. This low regional labor force participation is due to economic transformation as coal jobs disappear and to a related informal economy that offers informal opportunities that do not officially represent labor force participation in those calculations.

The new administration is targeting increased labor force participation as a priority. If Kentucky was to increase its ranking among states from 46th to 25th, this would equate to approximately 150,000 more Kentuckians joining the labor force. This goal is one that the new administration is publicly targeting in early workforce development discussions.

Skill gaps exist in Kentucky for the educational attainment levels in the high school diploma or less category. There are many more people in this educational attainment category than available jobs. See graph at kwib.ky.gov/supplydemandjobs.pdf.

While nearly 50 percent of Kentuckians age 25 or older have a high school diploma or less, only 38 percent of newly created jobs will require only this level of educational attainment.

While 28.4 percent of Kentucky's age 25–plus population is considered middle–skilled (some college through an associate degree), 34 percent of new jobs in Kentucky will be middle–skill jobs. Only 22.2 percent of Kentucky's age 25–plus population is considered highly–skilled (bachelor's degree or more), but 28 percent of new jobs in Kentucky will be high–skill jobs.

In the publication Help Wanted 2012: Addressing the Skills Gap by The Institute for a Competitive Workforce (ICW), a nonprofit, nonpartisan, 501(c)(3) affiliate of the U.S. Chamber of Commerce, Dave Adkisson wrote that there was a widening skills gap where the education and skills levels of Kentuckians don't meet the supply of jobs. This issue will become even more critical as thousands of Baby Boomers retire, leaving many well paying positions unfilled.

According to the National Skills Coalition (NSC), middle–skill jobs requiring an education after high school but not a four–year degree, make up the largest part of both Kentucky and U.S. labor markets. Key industries in Kentucky are unable to find enough sufficiently trained workers to fill these jobs. Fifty–eight percent of all jobs in 2012 were middle skill. NSC projects that between 2010–20, 54 percent of job openings will be middle skill; 29 percent will be high skill; and 17 percent will be low skill. Although 58 percent of Kentucky's labor market is middle skill only 48 percent of the state's workers are trained at that level.

The "No College=Low Wages" July 2014 report from the Kentucky Center for Education and Work–force Statistics (KCEWS) indicates that more than two–thirds of Kentucky's recent public high school graduates attended a college or university in some capacity within three years. Approximately 60 percent of those who didn't pursue post-secondary education entered Kentucky's workforce. The remainder most likely moved out of state, joined the military, worked in agriculture or some other capacity which isn't reported to the state.

The Kentucky Cabinet for Economic Development published the Kentucky Economic Development Guide in 2015 that contained a section called Closing the Skills Gap: The Workforce of the Future. In the guide, employers indicated that they are constantly in need of skilled and educated workers. Finding and hiring skilled labor is a challenge for Kentucky employers. Brookings' 2013 analysis of the regional economy emphasized the Bluegrass Region of Kentucky, a 22–county area stretching from Louisville to Lexington, as particularly acute.

The Kentucky Community and Technical College System (KCTCS) is the largest provider of post-secondary education and workforce training in the state. KCTCS provides services to more than 6,000 businesses and nearly 62,000 employees annually. Kentucky is committed to closing the skills gap. This requires bringing education and workforce together to define what closing the skills gap is.

It is essential that business, education, government and nonprofit partners work together to strengthen the talent pipeline and invest in the education of Kentucky's youth. Kentucky is committed to ensuring that instructional efforts are aligned to meet the needs of the business community in the Commonwealth. As a nation, it is clear that there is a skills gap in the science, technology, engineering and mathematics (STEM) areas. In Kentucky, those are areas where gaps exist as well.

Kentucky is working in various ways to develop a skilled workforce by combining education and training with on–the–job experience. One example of this is through the Kentucky Skills Network (KSN). KSN is a collaborative partnership of the Education and Workforce Development Cabinet, the Economic Development Cabinet, the Labor Cabinet, adult education and KCTCS. The KSN consists of dedicated workforce professionals developing customized, solutions–based plans to serve employer and industry needs.

These regional KSN teams focus on the identified skills needs of key industries identified through targeted sector strategies and employer driven partnerships, and on developing immediate and long term strategies to fill identified skill gaps. Through the partnerships involved with this network of resources, KSN teams are able to provide funding for on–the–job training's developed in conjunction with employers, customized training incentives, pre–apprenticeship and apprenticeship training, short–term classroom training's, and various other resources in order to position Kentucky's workforce for global competition.

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.

Kentucky offers a wide range of workforce education and training activities tailored to meet the needs of employers and job seekers in varied and unique communities across the state. The 11 certified full–service centers and three certified affiliate Kentucky Career Center (KCC) offices are the store– front, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one–stop partner services reach into the fabric and daily lives of those communities. An analysis of partner programs is provided below.

Employment Services

Kentucky issued a statewide co–enrollment policy in 2015. Co–enrollment allows partners to leverage resources while providing a more comprehensive service delivery strategy that meets the needs of customers with several barriers to employment. All adults and dislocated workers who receive KCC services other than self–service and informational activities must be registered and considered a participant for WIOA Title I services.

Career centers offer a full array of employment services to help adults and dislocated workers. UI claims can be made via the Internet or through a dedicated call center. Staff–assisted re–employment services are provided to UI claimants through case management activities such as assessment, individual employment plans, provision of labor market information and re–employment workshops.

Employers and job seekers are encouraged to use the self–service functions offered in the Focus Career and Focus Talent online systems for labor exchange activities, however staff also assist with services for customers desiring or in need of facilitated or staff–assisted service. The Burning Glass

suite, Focus Talent and Focus Career, uses artificial intelligence to provide accurate descriptions of job duties and job skills using industry recognized terms and also helps to ensure compliance with EEO and non–discrimination laws. Trained staff is available to provide individual service to customers upon request or in unique situations that require specialized assistance.

Customers using Focus in PY 2014 are broken down as follows:

• The number of active job seekers who created a Focus Career account – 58,226

• The number of employers who posted jobs in Focus Talent – 5,834

• The number of jobs posted in Focus Talent by the above employers (Talent Jobs) – 48,344

• The number of external jobs available through Focus Career – 715,864

Staff–assisted services to employers include hosting, sponsoring and collaborating to provide job fairs, screening and referrals of qualified job applicants and job order writing, and assistance with EEO compliance. Offices are strategically located throughout the Commonwealth within a couple of hours or less from any location in the state, and customers have access to online services 24 hours a day, seven days a week.

If customers are ready for employment after receiving career services, staff members assist them with job search and placement. If customers are determined to need individualized career or training services, they are referred to core and/or other partners to meet their identified needs.

WIA/WIOA Kentucky is improving the efficiency and effectiveness of its workforce services and programs as evidenced by the PY 2014 data, indicating Kentucky was 0.2 percentage points below the national unemployment rate. The number of dislocated worker participants remains well below the average of the previous 10–year period as the economy continues to improve. In fact, the number of dislocated workers served was at its lowest point since 2004.

The number of WIA–enrolled dislocated workers served in PY 2014 was 3,406 – a decline of 1,097 from the previous year for an approximate 24 percent decrease. This is a noticeable decline since PY 2009–PY 2013 when an average of 8,991 dislocated workers was served.

PY 2014 WIA–enrolled adult participants receiving intensive and training services showed a 16 per–cent increase from PY 2013. The number of adult customers seeking services (other than intensive and training) dropped 20 percent or 42,372 – from 212,043 to 169,671.

Recent statewide initiatives have focused on sector strategies and business services re–design. Following completion of its contract with Thomas P. Miller and Associates, the state implemented a business services framework developed in collaboration with the Local Workforce Investment Boards (LWIBs). A statewide training institute was conducted to educate and retrain those currently in the system as well as new partners. Resources were made available to each Local Workforce Investment Area (LWIA) to support specific operational adjustments and training needs to align with the new direction. OET has a dedicated business services staff lead at the state level.

Each of the 10 local areas must have at least one comprehensive KCC that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA

Title II – Adult Education (AEFLA program), WIOA Title III – Wagner–Peyser Act employment services and WIOA Title IV – Vocational Rehabilitation Program and other required partners. In addition to the core programs for individuals with multiple needs to access the services, the following partner programs are often available to provide access through the one–stops: Career and Technical Education (CTE), 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 Farm Worker Jobs Program, Senior Community Service Employment Program, Temporary Assistance for Needy Families (TANF), Trade Adjustment Assistance Programs, Unemployment Compensation Programs and Youth Build. The governor intends to actively encourage TANF to co–locate in KCC offices but as an optional partner, not a mandatory one.

WIOA training will focus on the 30–plus state and local LWDA identified sectors. In addition to providing training service and follow–up, WIOA staff–assisted services will focus on providing:

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

• diagnostic testing and use of other assessment tools and

• 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 participant to achieve his or her employment goals, including the list of information about the eligible training providers (as described in proposed § 680.180),

• group counseling,

• individual counseling,

• career planning,

• short–term, pre–vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for un–subsidized employment or training,

• internships and work experiences that are linked to careers (as described in proposed § 680.170),

• workforce preparation activities,

• financial literacy services as described in sec. 129(b)(2)(D) of WIOA and proposed § 681.500,

• out–of–area job search assistance and relocation assistance, and

• English language acquisition and integrated education and training programs.

Kentucky Adult Education

Kentucky Adult Education (KYAE) is uniquely poised to help the 367,000 adults in the Commonwealth without a high school diploma or its recognized equivalent to get a job, keep a job and advance in the workplace. Extensive planning and implementation of professional development to programs serving all 120 counties equips instructors to deliver high–quality, standards–based instruction in the context of workforce preparation, which is achieved by the integration of the KYAE Employability Standards. KYAE dedicates multiple resources to support instructors in providing contextualized instructional experiences that concurrently cover academic skills and essential skills. Within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills employers seek. These and continued efforts will better equip students with the essential employability skills that employers seek, which are critical to workplace success across all sectors and all levels of jobs. Regardless of a student's career path, every student served can benefit from opportunities to learn, apply and develop confidence in demonstrating these skills.

To further support the acquisition of employability skills, KYAE also provides access to a Worldwide Interactive Network (WIN) suite of college and career readiness preparation tools, at no cost to local programs. This resource was purchased jointly through a partnership with the Kentucky Department for Workforce Investment and provides access to any state agency outside of the K–12 system.

In 2016, KYAE will launch regional pilots to explore options for GED® credential–seeking students to concurrently complete training and acquire on–the–job experience in healthcare and manufacturing. With strong collaborations with the Area Health Education Centers, Kentucky Association of Manufacturers and multiple state partners, KYAE will identify replicable approaches to helping students secure jobs with family–sustaining wages.

KYAE is also working with WIOA partners to implement Team Based Case Management (TBCM) to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within KCC and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners. See also Adult Education and Literacy Programs, Workforce Preparation and Integrated Education and Training.

Vocational Rehabilitation

The Office of Vocational Rehabilitation (OVR) provides support for education and training to eligible consumers in a number of ways.

OVR can provide supports for specific and appropriate job–related education and training if it is needed to prepare the consumer for a vocational goal that is aligned with the consumer's interests, strengths and abilities. The goal is identified through a vocational assessment and is agreed upon between the consumer and a VR counselor in the Individual Plan for Employment. The education and training can occur in a variety of settings including, but not limited to, two–year community and technical colleges, four–year baccalaureate institutions, short–term training programs such as truck–driving schools, intensive training programs offered by community rehabilitation programs (CRPs) and other providers, and individualized training through supported employment providers. The supports OVR can provide can include, but are not limited to, tuition assistance, assistance with books and other supplies, note keeping, sign language interpreting, tutoring, rehabilitation technology, and other appropriate supports determined on an individualized basis.

Through guidance, counseling and partnering with KYAE, vocational rehabilitation counselors assist consumers in identifying their strengths and abilities, dealing with disability–related functional limitations, learning problem solving, and working through employment–related issues on their own. VR counselors train consumers to be self–advocates, making them aware of related laws such as the Americans with Disabilities Act (ADA), and their rights under those laws, particularly as they relate to workplace accommodations. OVR also assists consumers with disability–related work issues and assisted technology options in the workplace. OVR, principally through its job placement staff, provides disability awareness training to employers. Job placement specialists provide employers with resources they can access for assistance in accommodations and work with employers on appropriate methods of interviewing potential employees with disabilities.

Beyond training to develop specific job skills, OVR staff works with consumers on interviewing skills, resume writing, and job searches, often using mock interviewing as a tool to prepare them for job interviews and to know the types of questions that employers may ask. Consumers are also trained on what questions can and cannot be asked in an interview to someone with a disability and to someone with a criminal record by law. OVR prepares consumers for the barriers and struggles they may face when they start trying to find employment and help them to find employers that will work with them.

OVR staff also advises consumers on how to write resumes that will appeal to an employer and teaches them how to search for a job and discover the hidden job markets. OVR also uses different work sites as community–based job training and work adjustment while providing a training stipend for the hours spent on the work site. This can particularly help with soft skills, such as being on time for work, filling out a timesheet, using email, and dealing with co–workers and supervisors. In addition to utilizing its own staff, OVR enlists community rehabilitation programs to develop these soft skills in many of its consumers. OVR can also provide eligible KYAE students with needed supports to re– move barriers impeding their GED preparation and preparation for post–secondary training programs.

OVR can work with consumers on internships, apprenticeships, and on–the–job training arrangements as additional options on the career pathway to employment. These options allow individuals to train while being actual employees.

OVR also provides training directly at the residential training center it operates, the Carl D. Perkins Vocational Training Center (CDPVTC). Soft skills are taught as a part of the Work Adjustment Program (WAP) at the center. CDPVTC also offers the Academic and Life Skills Program of Higher Achievement (ALPHA) and the GED program. The ALPHA program provides instruction and support for students who want to complete vocational training or post–secondary education. Some students may also require a GED to gain employment or continue their education.

The Life Enhancement Program (LEP) at CDPVTC can help fill in necessary steps in the career path– way by providing classes in anger management and stress management, among others. A number of short–term options are available at the center for consumers who may not want or be able to attend college. These short–term training options include: auto lube/detail, cosmetology, child care development, custodial/building maintenance, food service, grounds–keeping, industrial truck operation, and materials management. The center is intended for individuals who need intensive supports and ancillary services such as physical therapy, speech therapy, and occupational therapy, among others, all provided on–site.

Services related to education and training provided by OVR must be focused on individuals with disabilities achieving competitive integrated employment goals that match their interests, skills and abilities.

Blind Services

The Office for the Blind (OFB) specializes in services to the blind and visually impaired, providing education and training to its consumers through a variety of settings, including but not limited to the following: community and technical colleges and four–year baccalaureate institutions resulting in a degree; short–term training programs resulting in an industry–recognized certificate or license; job readiness training including specific and individualized blindness skill training through the Charles W. McDowell Rehabilitation Center in Louisville; intensive training programs offered by community rehabilitation programs, and other providers; and individualized training through supported employment providers.

The process of determining the type of training and education needed to make a consumer successful in obtaining employment is very individualized. Each consumer works with a qualified VR to identify a vocational goal that takes into account their interests, abilities and aptitudes. It is important to determine disability–related functional limitations, and to promote self–advocacy through information about the ADA and their rights for workplace accommodations. An individual may be referred for a vocational evaluation to help identify an appropriate vocational goal. The VR counselor and/or the vocational evaluator use up–to–date labor market information compiled by the Office of Employment and Training (OET) during the counseling process to ensure that a job exists regionally for that vocational goal.

An Individualized Plan for Employment is a document created by and agreed upon by the consumer and the VR counselor, and serves to guide the provision of services that the consumer requires to become successfully employed. OFB can provide tuition assistance, assistance with books and other supplies, assisted technology such as laptop computers, tablets, braille writers, pocket recorders for note taking, closed–circuit televisions to magnify documents, hand–held magnifiers, and computer software including screen readers and magnification (Zoomtext), speech (JAWS, Window Eyes) and Braille displays. Depending on the individual consumer’s needs, services can be provided for tutoring, and other appropriate supports that remove barriers from the learning environment.

Beyond training, the OFB works with consumers on interviewing skills, resume writing and job searches. Using a mock interview format, consumers are also trained on what questions, by law, can and cannot be asked in an interview, and how to respond if they are asked. In addition, consumers are taught how to discuss their visual disability in an interview situation in terms of what their abilities are, and what assisted technologies they may use to accomplish their work.

High school students receive services that can take them into post–secondary educational institutions or other, short–term training sites. As with the adult population, they receive tuition assistance and all the supports and assisted technologies required to be successful in making this transition.

Using the “work early, work often” philosophy, the OFB provides specific pre–employment transition services (pre–ETS) and transition services to students and youth to prepare them for future occupations. VR counselors and staff provide the following education and training opportunities for consumers aged 14–24, considered students and youth: guidance and counseling about training and

education opportunities, aid in career exploration, vocational evaluations, job–readiness skills programs including blindness skills programs, and engagement in integrated competitive work experiences. The Summer Work Program, the McDowell Youth Boot Camp, and the World of Work (as described in more detail in the Employer section of the Vocational Rehabilitation part of the Combined Plan), provide training opportunities for consumers falling in the 14–21 age range. These programs can particularly help with soft skills, such as being on time for work, filling out a time sheet, using email, and dealing with co–workers and supervisors.

OFB can work with consumers on registered apprenticeships through the Kentucky Department of Labor, internships, and on–the–job training arrangements as additional options on the career pathway to employment.

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.

Strengths

• Partnership and collaboration environment – Kentucky has built a strong foundation of partnership and collaboration among core and combined programs, local workforce development boards, and employers. The WorkSmart Kentucky Plan of the previous Kentucky Workforce Investment Board, and the newly developed Economic Competitiveness Agenda, together set a tone and a set of strategies that will enable the workforce development activities of Kentucky's system to progress and serve individuals and employers more effectively over the next four years. Kentucky Adult Education programs, with a presence in all 120 counties, are integral to assisting individuals with low skills in improving their academic functional levels to attain GED diplomas and earn Kentucky Essential Skills Certificates and National Career Readiness Certificates, allowing them to compete for jobs seeking these qualifications.

• Employer services – The Kentucky Skills Network and the work done by local career centers to attract and serve employers are also strengths that Kentucky will be able to leverage and ensure that in a tightening labor market with complex skill needs and gaps, employers' talent needs are met in ways that benefit individual job seekers and the Commonwealth as a whole.

• System transformation efforts taking root – Employer and individual service transformation efforts, most recently the co–enrollment work described above, will enable Kentucky to meet the requirements and challenges of WIOA and the 21st–century economy.

• Strong rehabilitation programs, and an inclusive case management and career pathway approach – WIOA's expectation of integration and comprehensive services will be well served by the work already done in Kentucky to insure that customer needs are met in a holistic way. Team–based case management and Project CASE are two examples of the initial success of integrated activities, and a strong platform from which to implement WIOA in the coming years.

Weaknesses

• Aging technology coupled with inadequate resources – Like many states, Kentucky will be challenged in the years ahead by the need to replace outdated and siloed case management and reporting systems.

• Uneven resources across the Commonwealth – In the January 2016 State Plan partner round–table, many participants agreed that delivering the integrated service model could be stronger if Kentucky could better address the challenges of an uneven landscape of resource constraints and job loss in some areas, versus opportunity and job growth in others.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

On the positive side, Kentucky has strong partnerships and a network of certified career centers that will assist in delivering the workforce activities described above.

Capacity limits and challenges include:

• A budget environment with low likelihood of securing state funds for workforce efforts, and escalating technology, pension and staffing costs that are not supported through growth in either federal or state funds.

• Technology challenges in that the capacity to deliver on the integrated service model and ideal may be limited by Kentucky's ability to implement system–wide case management and reporting solutions.

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.

Over the past six years, the Kentucky Workforce Investment Board, in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations, has engaged in an aggressive effort to implement the strategic initiatives outlined in the WorkSmart Kentucky plan adopted in 2010 and updated in 2013. The plan has served as a blueprint for transforming Kentucky's workforce services focused on adapting to the changing needs of employers. The Bevin Administration welcomes the opportunity for continued alignment of Kentucky's education and workforce systems with the goal of establishing dynamic, employer–led workforce development in Kentucky. The administration's goals include establishing employer collaborative efforts arranged by both region and industry. These groups will examine current and future needs for skills and training and identify effective talent development systems. Information will be provided in real time to the workforce system in order to help align resources effectively and efficiently. This administration will work to make career development an integrated element of government services with a vision of increasing labor force participation and growing Kentucky's economy. Over the next four years, the administration will work with the Kentucky Workforce Innovation Board (KWIB) on a new strategic plan and setting clearly defined goals. These goals will inform subsequent modifications of the State Plan and achieve the continuing transformation of Kentucky's workforce system through innovative practices. This will enhance sustainable economic and job growth to improve the lives of Kentuckians.

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—

- Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers of employment* and other populations.**
- 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.

WIOA provides federal funds to assist states and local workforce development systems to increase the employment, retention, earnings and occupational skill attainment of workers, particularly those individuals with barriers to employment. Kentucky has programs and supports in place in serving individuals with barriers to employment. Over the past six years, initiatives in place under the WorkSmart plan have increased the collaborative partnerships of the workforce system. This will allow individuals with significant barriers to employment opportunities to succeed in training programs to enter in-demand occupations. All Kentuckians will have access to employment in a fulfilling and meaningful career. Individuals with barriers to employment, as defined by the WIOA and Kentucky, include the following.

Long-term Unemployed In Kentucky, transitional jobs are a new type of work-based training allowed under WIOA. Transitional jobs are subsidized time-limited work experiences in public, private or nonprofit sectors for barriers-to-employment individuals who are chronically unemployed or have an inconsistent work history and are combined with comprehensive career and supportive services. The goal of transitional jobs is to establish a work history for the individual who demonstrates work-place success and develops the skills that lead to entry into and retention in unsubsidized employment. When individuals apply for unemployment, they are required to register in Focus Career, Kentucky's employment website. The Kentucky Employment Network (KEN) works with unemployment insurance (UI) customers who are profiled as likely to exhaust UI benefits. KEN consists of a workshop that informs the customer of the programs available through the Kentucky Career Center (KCC). Re-employment Services and Eligibility Assessment (RESEA) works with UI customers who are profiled as likely to exhaust UI benefits. The grant activities consist of KCC orientation, job search overview, Individual Employment Plan and referral to job services. Kentucky's KCCGO! National Emergency Grant received in June of 2014 has provided the state with a chance to test and deliver comprehensive services and career pathways to the long-term unemployed. The focus of this

grant is to serve 1,700 long-term unemployed, likely to exhaust UI benefits, and/or profiled dislocated workers. Services include on-the-job training, customized training and apprenticeships. Funds are used to provide services such as coaching, counseling and direct job placement. In addition to expanding work-based learning strategies, funds may be used to further develop and strengthen partnerships between workforce and industry organizations and align services with other federal, state and local programs. This grant expires Sept. 30, 2016, but Kentucky has submitted a no-cost, period of performance extension request. If approved, the grant will go on through June 30, 2017.

Homeless Individuals KCC staff and Jobs for Veterans State Grant (JVSG) staff collaboratively address homeless veteran needs across the state. Additionally, homeless individuals receive adult WIOA priority of service, as reflected in Kentucky's Priority of Service policy No. 16-006. All local areas receiving youth formula funds provide services to eligible youth who determine homelessness to be a barrier. Local referral processes, per infrastructure agreements, help with identifying additional community support for homeless individuals. Serving this population effectively requires a strong partnership with state and local human service partners. This kind of partnership is of great interest to the new administration and is likely to be a priority over the next four years.

Displaced Homemaker The Office of Employment and Training (OET) provides WIOA basic career services statewide through the KCC offices. WIOA individualized career and training services may be provided to the displaced homemaker who is determined to be a dislocated worker. Individual dislocated worker status is based on: • Individual has been providing unpaid services to family members in the home and has been dependent on the income of another family member but is no longer supported by that income; or • The individual is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station or the service-connected death or disability of the member Additionally, the individual is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. Eligibility for these services is determined by WIOA career planners, located in KCC offices across the state. Local boards, under WIOA, have an increased focus and collaboration with TANF. It is anticipated that this collaboration will result in increased awareness, identification and referrals.

Older Individuals In Kentucky, Experience Works offers employment training services through the Senior Community Service Employment Program (SCSEP) to low-income older workers in 60 counties in Kentucky. Experience Works partners with local 501 (c)(3) not-for-profit agencies in each of the counties we serve as training sites for participants. Experience Works also actively collaborate with local and public employers to create permanent employment opportunities for older workers who want to re-enter the workforce.

Ex-offenders One of the specified barriers in the Act is the ex-offender. In serving this target population, the core partner agencies will coordinate and better align services with criminal justice agencies in serving ex-offenders. Innovative pilot programs will receive funding through a set-aside in the governor's discretionary budget. OVR and OFB work closely with this target population in providing services, supports and referrals to other programs as needed. Kentucky Adult Education partners with the Department of Corrections to serve both full service jail correctional offenders and state adult institution inmates. Adult educators provide educational services to those in jail based on cooperative agreements with jailers. KCTCS faculty is commissioned to serve state adult correctional institution populations; however, adult educators support those educational experiences, offering evening classes for offenders. Current LWDA local plans indicate a variety of involvement and engagement with the ex-offender population and a keen awareness of the needs of these

individuals. For example, the TENCO LWDA states in its plan: “Offenders often have a difficult time locating employment. Therefore, TENCO will reach out to our local detention center and prison to determine if job preparation training would be considered beneficial.” Another LWDA, KentuckianaWorks, indicated in its KCC service delivery agreement that the Kentucky Department of Corrections was one of its required one-stop partners. The partner program was listed as Reentry by Design/Big Brothers Big Sisters: Mentoring Children of Incarcerated Parents; Program Authority-Second Chance Act of 2007 Programs. Other transitional local plans indicate linkages and referral processes for ex-offenders. Jobs for Veterans State Grant (JVSG) is a $2.4 million grant administered by OET with staff located in the Kentucky Career Center offices statewide. Those who are both veterans and ex-offenders fall within a category specified to be served under this grant. Currently, the state coordinator receives a monthly list of every incarcerated veteran in Kentucky from the Department of Corrections; those in local jails and state facilities, with their release dates. The nearest disabled veterans outreach program specialist (DVOP) reaches out to these individuals to offer re-entry employment preparation and support services prior to release, when possible. After release, JVSG staff work with the each individual from their KCC office. KCC partners with the Department of Corrections (DOC) and Adult Education to provide training and assessments toward achieving a National Career Readiness Certificate (NCRC) for anyone during incarceration. On Jan. 1, 2016, DOC began offering 30 days of “good time” off on sentences of individuals who earn an NCRC. After release, KCC offers a complete portfolio of services to ex-offenders. As a population with barriers to employment, they are entitled to additional WIOA services facilitated OET’s NCRC coordinator. Work Opportunity Tax Credit (WOTC) - A special tax credit is available to employers who hire qualified ex-felons. The qualified ex-felon is an individual who has been convicted of a felony or released from incarceration for a felony conviction within 12 months prior to the individual’s start date.

Persons with disabilities, including youth OVR and OFB provide many supports for education and training to those who are eligible. Both agencies provide supports for specific and appropriate job-related education and training if it is needed to prepare someone for a vocational goal that is aligned with his or her interests, strengths and abilities inclusive of students and youth. The goal is identified through a vocational assessment and is agreed upon between the person and a VR counselor in the Individual Plan for Employment.

Youth in, or formerly in, foster care Kentucky will use funds to ensure that all youth program elements are made available to youth. The state supports the local workforce areas in designing youth programs tailored to the needs of in-school- and out-of-school youth in local communities. OET youth program staff members disseminate updates and guidance from the U.S. Department of Labor and others. Areas have designed special referral processes for youth who come into one-stops, and one area has developed a one-stop career center specifically for youth. Eligible WIOA youth with this barrier are described as an individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement. The Kentucky Workforce Innovation Board (KWIB) strategic plan has incorporated a variety of approaches for expanding and enhancing outreach to youth. An example is the High School Outreach initiative designed to increase communication and collaboration between workforce boards and boards of education, technical education, post-secondary education and economic development. Another example is a recent collaboration with the Cabinet for Health and Family Services (CHFS) to assist youth in career exploration and planning as they complete summer jobs in CHFS local offices.

English language learners Throughout the Kentucky Career Center offices, services are provided to all participants regardless of what barriers they face, including Limited English Proficiency (LEP). If a customer requires LEP services, all KCC staff have access anytime to phone translation services through Interpretalk. Information on how to access this system in located within the OET's Limited English Proficiency Plan, which is housed in the Team of Experts section of the KCC website. Additionally, the KCC Team of Experts site houses many other forms and materials needed for LEP individuals and have been translated. If a customer has additional document or form translation needs, KCC staff may send these documents to the OET Equal Opportunity Office to be translated into the necessary language. Posters in both Spanish and English are available in all KCC offices notifying individuals of their rights to service and the proper channels to follow if they feel this need has not been met. Adult English language learners, including individuals who may have earned degrees in other countries, may receive services that enable them to achieve competency in English language and acquire the basic and more advanced skills needed to function effectively as parents, workers and citizens. This includes English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. It may also include workforce training.

Migrant/seasonal farm workers Kentucky has a unified migrant seasonal farm worker (MSFW) program that unites MSFW outreach representatives. Its mission is to support agricultural employers and farm workers through a highly effective labor exchange system while ensuring that employer and worker stakeholders are aware of their rights, responsibilities and protections using an efficient and collaborative service delivery process.

Single parents/pregnant women WIOA youth formula funds will be used to address the needs of eligible youth who have the identified barrier as pregnant or parenting. Career Center partners will work closely with Department of Community Based Services (DCBS) to assure customers have knowledge and access to needed resources. One-stop partners are directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with DCBS. Paths to Promise (P2P) is a pilot program with a robust research component serving eight counties in Eastern Kentucky. The pilot includes moving eligible students into AOKY career pathways. The subsequent location of employment and training funds will be dedicated to providing support services to students pursuing education and training in urban areas across the state.

Veterans Each career center office, along with each of the 10 local areas, provides "Priority of Service" to veterans for all Department of Labor funded programs. Each customer entering the local office receives a questionnaire that is used to determine whether the customer is priority-of-service eligible. If the customer is an eligible "covered person," he/she receives a fact sheet listing all of the services and programs along with the program's qualifications, which must abide by the Priority of Service mandate. The covered person is then seen by the first available staff person or referred to the disabled veterans program specialists if they are determined to have one of the significant barriers to employment as specified by the appropriate veterans program letters. Additionally, Kentucky's Focus Career system automatically contacts veterans matched to new job orders 24 hours before non-veterans.

Individuals facing substantial cultural barriers English Literacy and Civics (EL/C) programs in Kentucky continue to use a variety of activities and instructional methods to enhance non-English speaking student's effective communication skills and civic practices. Additionally, programs sponsor cultural activities, such as holiday and international celebrations during which students are invited to bring indigenous food and share their own cultural traditions. These efforts help non-native English speakers navigate and participate in their children's educational experiences, access services and participate in community activities.

Low Income Services provided to low-income individuals are reflected in Kentucky's WIOA Priority of Service policy that provides guidance on the service requirement for Title I Adults for both individualized career services and training services. Priority applies to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient. A low-income individual is defined in Section 3(36) means an individual who: Eligible WIOA in-school youth must be low-income, unless a local area applies the 5 percent low-income exception. WIOA out-of-school youth are not required to be low-income unless the barrier requires additional assistance to enter or complete an education program or hold employment or is a recipient of a secondary school diploma or its recognized equivalent and is basic skills deficient or an English language learner. Service priorities for all populations with barriers to employment The WorkSmart Kentucky Plan has driven significant changes and improvements in the workforce system since 2010, as well as informed other related strategic initiatives like Kentucky's participation in the NGA Talent Pipeline Academy. The following 2010-13 goals will continue to inform and guide the system during this transition period and to build career pathways for individuals with barriers to employment. To provide determining factors for the goals of Kentucky's strategic plan, a series of objectives was developed. Each set of objectives supports a specific goal and provides the framework for the development of action steps as well as a basis for monitoring and evaluating the implementation of this plan. Align Kentucky's workforce development system with its education objectives. • Increase communication and collaboration between workforce boards and boards of education, technical education, post-secondary education and economic development; • increase the number of post-secondary and work ready high school graduates; • promote educational options, including technical education, two-year and four-year college, apprenticeships and specialty training to younger students; • increase awareness of educational and skills requirements for high-demand jobs, as well as those in emerging industries; and • establish the concept of life-long learning as a norm in the 21st century. Align Kentucky's workforce development system with economic development strategies. • Increase communication and collaboration between workforce boards and economic development agencies; • develop "rapid response" framework for new jobs based on model for layoffs; • refine and promote evolving methods of projecting jobs and training needs of the future; and • increase opportunities for entrepreneurship in a culture of innovation.

Simplify the workforce development service delivery system. Transform the workforce system. • Simplify online services and focus on innovative user-friendly applications; • promote a truer identity of the unemployment office; • increase the awareness and use of online job matching and training services; • increase use of job portal by employers and job seekers; • reduce confusion and information overload for those unfamiliar with the system; and • increase communication among all service delivery points. Improve service to achieve a customer-centered delivery system. • Increase awareness that clients of the workforce system include those with jobs to fill as well as those seeking a job; • decrease wait time for services, increase use of workforce system as a resource for employers to identify, screen, match, interview and prepare candidates for work; • provide customer service training to all service delivery staff; • increase use of online tools and resources; • provide up-to-date resources for all clients; • increase contacts with employers and economic development agencies regarding future workforce needs; and • develop benchmarks and base-line standards for consistency within the system (physical, program and customer services) while allowing for local and regional adaptation.

Working under a grant from the NGA Policy Academy for Aligning the Education and Training Pipeline to the Needs of the Economy, in 2015 Kentucky assembled a team including key leaders from economic development, workforce and education together with the Kentucky Chamber of Commerce to develop an Economic Competitiveness Agenda. The agenda showcases two large projects: Career Pathways and Sector Strategies. Both efforts are still actively underway and are

reflective of a true system mindset, integrating education, economic development and workforce development policy and practice. The following goals of the Economic 2015 Competitiveness Agenda spring from the WorkSmart Kentucky Plan and will inform the new administration and new KWIB as together they sustain and expand the competitiveness of Kentucky's economy and engage in a new round of strategic planning. Goal 1: Career Pathways and Sector Strategies – Collaborate with business and industry to define career pathways for critical state and regional sectors. • Refresh our state and regional sectors requiring a skilled workforce and lead to well-paying jobs; • Establish an employer-led partnership model to encourage regional solutions that combine the resources from grade K-12, higher education, adult education, business and industry to implement career pathways aligned to industry sectors; • Collaborate with business and industry to define the pathways and clearly define skills and competencies required for successful completion of courses through an employer-led processes; • Establish clearly defined assessments and measure of skills and competencies that lead to stackable certifications meeting requirements of business and industry; • Create a regular employer-led review process of career pathways, coursework and assessments/measurements to ensure alignment with business and industry needs; • Continue to support models such as KY FAME and integrate dual credit within that framework; • Collaborate with the vocational rehabilitation agencies on the Career Pathways grant through the Rehabilitation Services administration; • Increase educational attainment for populations with barriers; close educational achievement gaps for low-income, minority, and under-prepared students; and increase workforce participation in high demand occupations through expanded partnerships. Goal 2: Work-Based Learning Infrastructure – Create a state-level framework to facilitate employer engagement in work-based learning and ensure consistency in definitions used across the education and training continuum partners regarding definition. • define it • governance structure that is partnership-based • standardized continuum • asset map • identify best practices at every level • create Kentucky model • implement and model • communication strategy

Goal 3: Workforce Services Infrastructure Realignment – Continue to evaluate and realign services and support structures to expand on efforts to build a truly customer-centric model at the local level. • Streamline business customer resources with a dual customer focus for job seekers and employers by aligning training, education and employer needs; • Align and coordinate workforce and education programs that will be accessible for all individuals including populations with barriers to employment assuring that everyone has access to a marketable skill set and the level of education needed; • Regionalize service delivery where boxes fit on top of each other, aligning programs and services to benefit all customers and maximizing the impact of partner resources; • High quality standards/performance metrics and reporting related to education and training resources; • Merge state- and locally-based area technology centers and more closely align their operations and offerings with the community college system; • Provide career counseling at every high school and career center that provides access to training and education programs based on local, regional and state labor market trends. Goal 4: Data and Performance-Informed Decision Making – Ensure the collection of the right data to inform policy and practice among the partners to create an efficient and effective talent pipeline. • Identify what data we have and what we need (data mapping); • Work closely with core partners to develop performance accountability measures that effectively serve Kentuckians inclusive of individuals with barriers to employment; • Develop and execute required data sharing agreements with partners; • Accountability model for education continuum – process and progress measures; • Use data to develop creative state financial strategies (i.e. KEES, non-traditional students, sector-driven) that support credential and educational attainment of target populations; • Ensure adequate analysis and reporting of required common metrics. Other goals will inform the next four years of workforce system strategy and transformation. Stronger by Degrees for 2016-21 is a six-year plan to intensify Kentucky's strong focus on improving opportunity for citizens and building a stronger economy through increased educational attainment at all levels - certificates, associate and bachelor degrees and more. This plan is the product of hundreds of hours of work and

thought from hundreds of contributors, including members of the Council on Post-secondary Education, campus leaders, faculty members, students, state agencies, policy leaders, representatives from the business community, the Kentucky Higher Education Assistance Authority, the Education Professional Standards Board, P-12 educators and administrators, and the public at large through a series of policy forums and town hall meetings: • Improve the diversity and inclusiveness of Kentucky's campuses through the statewide diversity planning process and related initiatives. • Partner with Kentucky's P-12 system to increase the number of students ready to enter a post-secondary degree or certification program. • Increase participation in post-secondary education, particularly among traditionally under-served populations. • Improve the education and skill levels of Kentucky Adult Education students to prepare them for careers and/or post-secondary education. • Expand financial access to post-secondary education. • Kentucky will be stronger by ensuring that many more individuals complete a post-secondary degree or credential, and that they graduate with the skills and abilities to be productive, engaged citizens.

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.)

This is ongoing and will be finalized once federal guidance is received.

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.

The Kentucky Chamber of Commerce report referenced earlier in this plan also included a recommendation to conduct an independent review and assessment of the workforce investment system. The new administration is currently reviewing this recommendation and will determine a best course of action that includes both qualitative and quantitative reviews. Once the assessment is developed and completed, Kentucky will analyze the results, evaluate the programs and services offered to employers and job seekers and identify service trends. Information gained from this and other assessments will be used in strategic planning process and goal setting. The Kentucky Workforce Innovation Board (KWIB) will embark in the fall of 2016 on a strategic planning process that may include some form of survey or assessment. KWIB data gathering and strategic planning will also help Kentucky implement the WIOA requirements in building its strategic vision and goals for the state workforce system. The Economic Competitiveness Agenda includes the following focus on data and performance informed decision making: “Ensure the collection of the right data to inform policy and practice among the partners to create an efficient and effective talent pipeline.” Ongoing assessment from multiple sources will provide the framework needed to measure program and service effectiveness, efficiency and satisfaction. Kentucky will build a workforce investment system assessment that combines the results of the independent review and the collection of common performance measures and aligns those results with program improvements and innovations. Basic service delivery performance standards will be set to continuously improve. New comprehensive WIOA service delivery ideas and standards will be added over time to help ensure that common measure and customer satisfaction results go up over time. Kentucky will add to this basic approach and develop broader continuous improvement activities for across the workforce system. Kentucky will evaluate statewide cross-program common data elements and gain information on the job seeker and employer programs, services and processes on an ongoing basis. This provides the assurance that the strategies and action steps in place add value to the services delivery process and there is evidence of continuous improvement. This will allow the Kentucky Workforce Innovation Board, along with the core program and additional partners, to be committed to an aligned cohesive service delivery system with a shared understanding of policy and performance.

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). "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23).

The WorkSmart Kentucky plan demonstrates a commitment to leveraging state and federal resources focused on workforce investment across state government. The process to develop the strategic plan involved all board members representing a variety of agencies, businesses and community partners. Focus groups consisting of business people, customers and staff were conducted. Each of the 25 action steps included in the WorkSmart plan is grounded in partnerships across state government.

The WorkSmart Kentucky plan maximized business and industry involvement, as well as partner agency and local workforce professional participation in the development of the strategies, goals and vision. This extensive engagement process created a sense of ownership in the plan. A critical success factor for this project is the engagement of the employer community with economic development, educators, elected officials and the workforce system. A primary goal of the KWIB strategic plan is to align the state's workforce development system with economic development strategies.

Kentucky plans to develop and implement strategies in five areas named in the multi–partner NGA Talent Pipeline Academy Economic Competitiveness agenda.

Under the first of the five, the Career Pathways and Sector Strategies pillar, Kentucky will collaborate with business and industry to define career pathways for critical state and regional sectors.

Career Pathways

The WorkSmart Kentucky plan includes several strategies that will continue to inform career pathway and sector work in the Commonwealth including:

• connect career pathways for all levels of education based upon data–driven information and employer demands;

• increase communication and collaboration between education, workforce boards and economic development agencies as specifically related to industry demand and supply of the needed talent pipeline;

• develop sector based "rapid response" framework for career pathway initiatives; and

• implement a sector strategy culture as a focal lens for services, resources, and delivery.

Over the next four years, Kentucky will build upon the above strategies and:

• support the development of employer–led collaborative as recommended by the Kentucky Chamber of Commerce to guide workforce initiatives in cooperation with business and industry associations;

• refresh our state and regional sectors requiring a skilled workforce and leading to well–paying jobs;

• establish an employer–led partnership model to encourage regional solutions that combine the resources from K–12, higher education, adult education, and business and industry to implement career pathways aligned to industry sectors;

• collaborate with business and industry to define the pathways and clearly define skills and competencies required for successful completion of courses through employer–led processes;

• establish clearly defined assessments and measures of skills and competencies that lead to stackable certifications meeting requirements of business and industry;

• create a regular, employer–led review process of career pathways, course work and assessments/measurements to ensure alignment with business and industry needs; and

• continue to support models such as KY FAME and integrate dual credit within that framework.

The Career Pathways program aligns major education, training and workforce development programs to meet the skill needs of students, job seekers and workers and the skill requirements of employers

in high–demand industries and occupations. In 2002, the Ford Foundation selected the KCTCS to participate in its Community College Bridges to Opportunity Initiative. The “Bridges Hypothesis” was developed by the Ford Foundation to address the fact that the separation of remedial, workforce and academic missions fail to promote economic and academic advancement for disadvantaged students. Several key stakeholders were engaged in the implementation and institutionalization of strategically designed state education policy initiatives.

KCTCS embraced the Career Pathways model as a strategy for achieving this mission integration. The goal of the Career Pathways program is to link academic credits and credentials with a seamless system of career exploration and preparation and skill upgrades, and to provide multiple entry and exit points spanning secondary, post–secondary, and adult and workplace education.

In Kentucky, the Career Pathways program is developed, implemented and maintained through partnerships among secondary and post–secondary education and employer partners.

The Career Pathways program includes rigorous academic and career courses beginning in high school and leading to an associate degree and/or industry–recognized certificate or licensure, and/or a baccalaureate degree and beyond. The program connects academic and career courses with sup–port services that enable students to combine school and work and advance over time to better jobs and higher levels of education and training.

Accelerating Opportunity

Accelerating Opportunity is aimed at creating effective pathways to credentials for low–skilled adults (testing at a sixth–12th academic grade level) so they can earn the credentials they need to get a family sustaining job. The initiative seeks to reform how education is delivered to low–skilled adults by integrating basic skills education with technical training while providing wrap around services that include instructional and career supports for adult learners. The initiative is informed by I–BEST, an accelerated, integrated instructional model in which adult education and technical instructors work together in the classroom.

Project Creating Access to Successful Employment (Project CASE)

Kentucky strategies have and will continue to support WIOA's focus on low–income adults and youth who have limited skills, lack work experience, and face other barriers to economic success. VR is a full and actively engaged partner in the Kentucky workforce system. OFB and the OVR are actively engaged in the planning process, on committees and staff, serving as project directors on some of the KWIB initiatives. They are advocates in the workforce system for individuals with disabilities. Please refer to the Vocational Rehabilitation section of this combined plan for a comprehensive listing of goals and strategies.

In October 2015, the Kentucky OFB/KCC was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR–eligible individuals, including youth with disabilities, to acquire marketable skills and recognized post–secondary credentials necessary to secure competitive, integrated employment in high–demand, high–quality occupations.

This five–year grant award of nearly $4.4 million is named Project CASE (Creating Access to Successful Employment). Project CASE has strong support from the leadership of OFB, OVR, OET, KYAE and the Department of Education.

Project CASE activities are consistent with the section 101(d) of WIOA, with focus on improved alignment of federal programs to strengthen the capacity of state workforce systems to meet emerging employers' needs with appropriately skilled and credentialed individuals. Project CASE provides a solid strategy for providing individuals with disabilities who face barriers to employment with workforce investment activities, education and supportive services to enter and retain employment.

Career Pathways initiatives in Kentucky over the past decade have created partnerships between industry and education at the secondary and post–secondary levels, and forged important links to strengthen local economies. Project CASE will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives and can prepare for and obtain jobs in high–wage, high–demand occupations.

By maintaining a focus on family–sustaining wages and jobs in high growth occupational sectors, the KCC will promote program activities across agencies that create a greater collective impact.

Sector Strategies

In 2011 the Commonwealth embarked on a comprehensive effort to identify targeted sectors and address the skill gaps in those sectors through sector strategies. The list of industries was compiled from a thorough and professional review of economic and workforce information. A detailed

assessment was conducted based on commonly used data sets to reflect the strengths of Kentucky's economy. The following targeted sectors were identified:

• Automobile and Aircraft Manufacturing

• Transportation, Distribution and Logistics

• Business Services and Research and Development

• Health Care/Social Assistance

• Energy Creation/Transmission

Since that time, Kentucky has engaged in a clear shift toward aligning around industry sectors, introducing sector–focused strategies, and enhancing business services for employer customers. This shift is evident to varying degrees, and over the next four years the workforce, economic development and education systems will reassess priority sectors at both state and regional levels on sector–based approaches and will reinforce sector strategies as the career center's service framework.

While there is certainly traction with the industry sector strategy focus, in Kentucky it is more concentrated at the regional/leadership level than at the service delivery level. Closer to the service delivery level, sector strategies appear more "embedded" with WIOA staff. They are generally more familiar with their regional target sectors, and with how target industry sectors inform training decisions and service delivery. In the area of business services for employer customers, there are opportunities to better engage all core program staff.

In the next four years, Kentucky will strive to embed industry sector strategies focus at the service delivery level through communications, training, and the consideration and implementation of possible structural/organizational changes. This review is necessary to ensure knowledge and penetration of Kentucky's industry sector focus and related strategies at the service delivery level, maximizing value and impact for both employer and individual customers.

This effort may include any number of areas, such as:

• How sector strategies inform career advising, job search and job matching services;

• How sector strategies shift the focus from transactional labor exchange with employers (i.e., filling job orders) and "one–off" job placement to sustained and scaled relationships with groups of employer's in targeted sectors;

• How labor market information (LMI) and other sources of regional labor market intelligence should be integrated into service design and delivery for both employer and individual customers; and

• How centers can organize staff serving both individual and employer customers by targeted industry sector (or sectors), or at least assign staff to be liaisons to, and familiar with, target sectors.

Kentucky is in the process of updating its sector toolkit and taking other steps designed to enhance and embed the sector approach, including:

• emphasizing long–term sustainability of partnerships;

• identifying and focusing on existing active training consortia and assist them with taking on the characteristics and roles of industry partnerships;

• hosting a summit–type event with networking and peer–to–peer learning exchange opportunities with active partnerships and consortia;

• enhancing resource materials with case studies highlighting best practices such as science technology engineering and math programs, and centers of excellence;

• coordinating with education partners for joint opportunities to promote and enhance industry partnerships;

• focusing on a funding mix to include federal and state funding streams, such as Kentucky WINS, Bluegrass State Skills Corporation (BSSC) and exploration of new opportunities via the state general fund budgeting process;

• featuring Industry Partnership grant recipients at KWIB meetings as invited speakers;

• leveraging connections and participation with Accelerating Opportunity initiative;

• considering awarding additional points for partnerships engaged with Work Ready Communities to scores for grant opportunities offered by the workforce system and our partners; and

• conducting follow–up analysis of data on a regular basis at the discretion of the Sector Strategies Steering Committee to determine if the targeted sectors are still appropriate as economic conditions change.

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).

Kentucky's Economic Competitiveness agenda includes four pillars that will set a strong framework for workforce system improvements in the coming four years.

Work–Based Learning Infrastructure – Create a state level framework to facilitate employer engagement in work–based learning and ensure consistency across the education and training continuum partners regarding definition, etc.

In developing this common framework, Kentucky will be guided by the WorkSmart Kentucky Plan's strategy to increase communication and collaboration between workforce boards and boards of education, technical education, and post–secondary education. Kentucky will take the following series of steps to ensure that the infrastructure is designed and implemented to more quickly and effectively close the skill gap between individuals leaving training and education programs and employers' talent needs.

• Define what infrastructure can be put in place to make it easy for employers across the Common–wealth to engage in offering work–based learning models, wherever they are located, whatever their size and sector?

• Build a governance structure that is partnership–based.

• Identify a standardized continuum of work–based learning models using common terminology.

• Asset map what exists.

• Identify and disseminate best practices at every level (i.e. K–12, Commonwealth College).

• Create an innovative, "Kentucky Proud" structure of work–based learning.

• Facilitate a unified work–based learning marketing approach via an umbrella brand which will tie the KCC branding standards together and be inclusive of a variety of earn and learn options, such as apprenticeships, paid internships, and on–the–job training.

Apprenticeships

A variety of partnerships are needed to market the benefits of earn and learn opportunities, including registered apprenticeships (union and non–union) to Kentucky business. The apprenticeship approach to skills development for a wide variety of occupations in Kentucky has yet to reach its potential as a tool for building a highly skilled workforce, helping business and industry increase their competitiveness, and providing sustainable wages for Kentuckians willing to work hard to raise their standard of living.

Using existing and new partnerships among workforce, economic development, education and business entities will allow Kentucky to promote the benefits to business, industry and the potential apprentice, and to identify and address the positive aspects of apprenticeship and the misconceptions that restrict its implementation. These opportunities must be understood and promoted by the business service teams of each local workforce investment board, KCTCS Workforce Solutions and other state partner agencies to become an integral part of the solutions–based business services model.

Workforce Services Infrastructure Realignment – Continue to evaluate and realign services and sup– port structures to expand on efforts to build a truly customer–centric model at the local level.

The WorkSmart Kentucky Strategic Plan includes a focus on

• reducing confusion and information overload for those working with and in the system;

• transforming the identity of the “unemployment office” to being a place known for “employment” resources; and

• increasing the use of the workforce system as a resource for employers to identify, match, interview and prepare candidates for work.

Over the next four years, Kentucky will build upon preliminary TBCM efforts and expand those efforts with a common technology platform and additional organizational and structural changes and improvements.

The purpose of the initiative is to set standards for establishing a system of collaborative case management among KCC partners. A steering committee representing all partner agencies directs this initiative. TBCM builds on the functional alignment within career centers and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partner agencies.

The initiative is one of the actions from the 2010 WorkSmart Kentucky Strategic Plan and is closely connected to the centers’ Customer Flow Project and other initiatives. Throughout 2015, the TBCM Steering Committee met on a regular basis and completed several activities to advance the plan. The activities included stakeholder surveys, an opinion leaders input session, development of common tools, a leadership meeting, regional planning sessions and a trainer’s session. The objective of the project is to develop common service delivery tools and processes that will foster coordinated and seamless service delivery.

Kentucky Career Center Customer Flow

Initial goals of the Kentucky Career Center Customer Flow project are to improve customer flow through the career center offices, increase the efficiency and effectiveness of career center services, and enhance the value received by customers from their experience with career center offices and their receipt of center services. This initiative focuses on both individual (job seeker/worker) and employer customers. It is a critical component of the Commonwealth’s work to ensure the KCC system’s ability to deliver on its brand promise, and it will offer a solid platform from which to evaluate and implement workforce services infrastructure realignment efforts over the next four years.

Data and Performance–Informed Decision Making – Ensure the collection of the right data to inform policy and practice among the partners to create an efficient and effective talent pipeline.

The WorkSmart Kentucky plan includes a focus on refining and promoting evolving methods of projecting jobs and training needs of the future and on developing a system of benchmarks and base–line metrics for consistency within the system (physical, program and customer services) while allowing for local and regional adaptation.

The Economic Competitiveness Agenda went on to prioritize the following strategies:

• identify what data Kentucky has and what it needs;

• convene a data council, possibly under the auspices of the KCEWS;

• develop and implement an accountability model for education continuum–process and progress measures;

• explore creative state financial strategies (i.e. KEES, non–traditional students, sector–driven); and

• implement WIOA and Kentucky's common metrics.

Kentucky Career Center Certification

Kentucky Career Center Certification ensures consistent, high–quality services to employers and job seekers and accountability for results. Additionally, it aligns career center activities with the collocation of services and integrated intake, assessment and case management as mandated by the WIOA. Six key documents must be included in a career center's application package: the Memorandum of Understanding (MOU), Business Services Functional Organizational Chart, Standard Operations Procedures (SOP), Career Center Functional Organizational Chart, ADA Compliance letter and Career Center Staff Development Plan. Other documents referenced as documentation/evidence on the application/review form shall be made available on request of the review team during the on–site visit. Some documents may be used several times to satisfy different measurements and may be cross referenced.

The documentation is critical because it provides objective evidence that the standards and measures are being met and is a good example of the data–informed decision making outlined above. Implementation of the Kentucky Career Center Certification standards has provided a framework to foster enhanced integration of and coordination among system partners, programs and services. As required under WIOA, one comprehensive center in each workforce area has obtained certification and, in some areas, affiliate sites as well. Kentucky will expand its efforts for this initiative.

Communications

Develop and implement a cross agency communication strategy that reinforces the education, economic development and workforce development activities and accomplishment toward our vision for a world–class talent pipeline.

Under the WorkSmart Kentucky Plan, Kentucky promised to:

• increase communication among all partners and service delivery points; and

• increase the quality, awareness and use of online job matching and training services.

The Economic Competitiveness Agenda identifies the following possible communication strategies:

• develop talent pipeline, career pathway, and opportunity messages for key audiences, both employer and individual customers and core and extended partners;

• identify and convene “champions” (led by business); and

• develop effective messaging tools.

Work Ready Communities

This initiative, while strategic and highly collaborative, has produced tremendous messaging and communication value for the Commonwealth. In order for Kentucky to remain competitive for targeted industry sectors, communities must promote the availability of a skilled workforce. To provide business and industry with the assurance of the availability of this resource, counties across Kentucky have come together to review data, identify and achieve improvements in critical indicators, and gain certification as work ready.

Communities must apply for this certification and meet certain high standards for education attainment and credentialing in order to receive the status. Once certified, communities receive a certificate and a sign template that may be used to create signs for posting at gateway points and business areas within the community. Achievement of Work Ready status is announced by the Governor and communicated to the media and appropriate state agencies. Communities also have the right to use this status in their marketing and promotion.

In regard to the weaknesses of aging technology and uneven resources across the Commonwealth, Kentucky is prioritizing investments in new technology solutions in its planned workforce initiatives over the next four years. Job search, job matching, case management and claims processing services have to be delivered from platforms that meet current standards for user experience and effectiveness. Kentucky is actively testing new approaches and intends to allocate the governor’s discretionary funds and pursue other funding options to address fundamental technology weaknesses.

Technology investments are prioritized in part due to the identified challenge of uneven resources across the Commonwealth. Better technology can’t substitute for unevenness in opportunities and services, but it can help bridge gaps and provide a better starting point regardless of location. In addition, Kentucky plans to explore innovative solutions to maximize opportunity across the Common– wealth, including better alignment of resources between grades K–12, post–secondary and workforce services to ensure that assistance is within closer reach of all Kentuckians.

III. OPERATIONAL PLANNING ELEMENTS

The Unified or Combined State Plan must include an Operational Planning Elements section that support 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).

The Kentucky Workforce Innovation Board (KWIB) serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of the federal Workforce Innovation and Opportunity Act of 2014. The most crucial element for the Board's success is aligning the many facets of workforce development – business, labor, public education, higher education, economic development, youth activities and employment and training to cohesively create a system for Kentucky to progressively grow its economy.

Gov. Matt Bevin is currently being advised by the KWIB, which was created by Executive Order in July 2015. The KWIB was created by the previous governor and continues to move forward under Bevin's direction. Specifically, the KWIB is being advised by an executive committee and several standing committees.

The executive committee provides and discusses overall direction to the KWIB. Standing committees will be enacted related to:

• performance and metrics,

• policy and operations,

• best practices review, and

• business and education partnerships.

Each committee meets between quarterly KWIB meetings to update the WorkSmart Kentucky strategic plan so that it continues to align with this state plan. The new administration and the new KWIB are working to manage and update the plan and planning process.

The KWIB will be convening several stakeholder groups to address the following:

• talent supply/demand,

• performance of the overall workforce delivery system, and

• best approaches to address economic growth for Kentucky.

The information gained in those sessions will assist in advisement for updating the current strategic plan.

Last fall, the KWIB began providing policy and technical assistance to local areas as related to WIOA implementation. Currently, KWIB is providing regional assistance and will be growing into a full implementation mode with the revision of the WorkSmart Kentucky plan in March 2016.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

WIOA emphasizes the alignment and integration of services through core partners that include the adult, dislocated worker and youth programs; Wagner-Peyser; Adult Education; and Vocational Rehabilitation. The Kentucky workforce system fully aligns programs strategically via its organizational structure (Titles I, III and IV in same Department, Kentucky Workforce Innovation Board (KWIB) participation and Cabinet-level discussions and project development, as well as in the Kentucky Career Center system in the seamless provision of services to business customers and job seekers. KWIB and core partners will work together to develop policies and coordinate the delivery of services outlined in this Combined Plan.

System Administration Alignment A critical component of this alignment effort is the partnership between the local workforce development boards and the state agencies (Office of Vocational Rehabilitation, Office of Employment and Training, Office for the Blind and Kentucky Adult Education (KYAE)). This partnership has been the foundation of the existing certification and impact efforts described below. Focusing on shared staff training, regional planning and new initiatives, as identified by the new administration, will allow this partnership to continue to expand and benefit employer and individual customers and the quality of the services they receive. All the core partners played a role in the work of the WorkSmart Plan initiatives and were a part of the Combined Plan workgroup. The Kentucky Department of Workforce Investment held a WIOA State Plan partner round table at the Kentucky Chamber of Commerce. Employers and partners from Adult Education, Economic Development, and Vocational Rehabilitation, the Kentucky Workforce Investment Board, the Kentucky Department of Education and local workforce development areas participated. There were several prevalent themes that emerged from the round table discussion. As WIOA and other workforce policy and programs are developed over the next four years, core and additional partners will share information and planning tasks to ensure effective and aligned results. On a local level in the ten workforce areas there are established work teams and committees consisting of representation of all the core partners working to align the core programs through local efforts. Locally, the core partners along with optional partners work together to establish resource sharing agreements for each area. Additionally, in the development of memorandums of understanding work teams with representation from each partner come to agreements that further clarify roles, responsibilities and decision-making processes in the Career Center offices. Kentucky is working on co-location of the core partners in office locations across the state. The Kentucky Career Center Certification effort was a core WorkSmart Kentucky strategy and has gained a good deal of traction. Each local workforce area has at least one certified full-service center. Centers at varying points along the certification continuum report a number of positive results from the process, including enhanced partner collaboration, more functionally aligned center staff and services and better coordinated center management and operations. Kentucky will meet WIOA's certification requirements using this previously developed model. Another alignment strategy that has already

begun and will be expanded over the next four years is the Team Based Case Management (TBCM) initiative. The purpose of the TBCM initiative is to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within the centers and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partner agencies. To strengthen this project, Kentucky's consultant coordinated activities in recognition of and alignment with other key actions in the WorkSmart Kentucky Strategic Plan including Kentucky Career Center Customer Flow, Kentucky Career Center Certification, and Partner for Success and Workforce Academy. Services to Employers are aligned among the core partners through the Business Services teams of the Kentucky Skills Network. Since the implementation of the WorkSmart Kentucky Strategic Plan, a priority has been developing unified and collaborative approach to service delivery in our business services model. It is critical that all the government agencies working to meet the employment needs of business and industry work together taking a solutions-based approach to meeting their needs. This is being done through regional Business Services Teams. WIOA Performance Outcomes Measures Group is a work group made up of the core partners to develop cross-program common measures and address all issues and concerns regarding data collection and reporting. The group is facilitated by the Kentucky Center for Workforce Statistics (KCEWS). The Partner for Success initiative brought together all agencies in the Department of Workforce Investment to develop a unified approach to delivering services. The goal was to create networking opportunities, create awareness of the services each partnering agency delivers and assemble the full array of services delivered to customers in a manner that is efficient, effective and holistic. A top priority of the current Governor's Discretionary Budget is to advance the work of training of state staff and partners. The new effort will build on previous Workforce Academy curriculum that provided training for all partners at every level of the system. Training has been and will continue to be held regionally inclusive of local level staff covering topics such as WIOA implementation, customer flow, local labor market information, transformational leadership and system transformation.

Workforce System Planning, Training and Development

Alignment among program and partners is an outcome of a comprehensive approach to WIOA service delivery and implementation, as shown above. Service Delivery among Core Partners Each of the 10 local areas must have at least one comprehensive KCC office that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II – Adult Education (AEFLA program), WIOA Title III – Wagner-Peyser Act employment services and WIOA Title IV – Vocational Rehabilitation Program and other required partners. KCC has established reciprocal referral services which allow for more efficient services to individuals with disabilities. OVR has implemented an information and referral system to ensure that individuals with disabilities will be provided accurate vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for securing, retaining or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them. Kentucky Adult Education provides information to local programs to assist students with barriers to employment to access the services for which they are eligible. Through Project CASE, a program developed from the use of Federal grant funding through the Rehabilitation Services Administration, the vocational rehabilitation offices of OFB and OVR will have stronger coordination and collaboration with the Youth Career Center offices and other Kentucky Career Center offices in the EKCEP and KentuckianaWorks regions. Adult Education is an active partner in CASE providing supports through the AOKY program. Accelerating Opportunity is aimed at creating effective pathways to credentials for low-skilled adults (testing at a sixth-12th academic grade level) so they can earn the credentials they need to get a family sustaining job. The

initiative seeks to reform how education is delivered to low-skilled adults by integrating basic skills education with technical training while providing wrap around services that include instructional and career supports for adult learners. The initiative is informed by I-BEST, an accelerated, integrated instructional model in which adult education and technical instructors work together in the classroom. Career and Technical Education is closely aligned with the project as well. Kentucky will use funds to ensure that all youth program elements are made available to youth. The state supports the local workforce areas in designing youth programs tailored to the needs of in-school and out-of-school youth in local communities. Local areas encourage youth to use one-stop services as needed. Areas have designed special referral processes for youth who come into one-stops and one area has developed a one-stop career center specifically for youth. Vocational Rehabilitation staff will provide high quality services and communication to transition students and youth, provide accurate and timely information related to work incentives and long-term supports for Social Security recipients, increase and improve job placement options and opportunities for persons served, strengthen and expand competitive integrated employment opportunities by implementing Section 511 of WIOA, improve programmatic and physical accessibility to workforce investment system partners and career center offices, communicate and cooperate with workforce partners on accountability measures discussed in Section 116 of WIOA and seek to meet the standards of WIOA, expand opportunities for increased services, such as supported employment, provide options for transportation and information related to medical services available to consumers, and provide a more timely and efficient process for accessing services. All partners will participate in training on all youth-related programs and services to ensure that cross-referral and comprehensive services are delivered to youth across the state. Kentucky is currently testing a common intake and service delivery approach based on a Sales Force platform. The initial test will focus on one particular grant and several local career center offices. Additional building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with Adult Education will be added as priorities are determined and funding becomes available. Kentucky implemented a WIOA Title I Adult and Dislocated Worker - Wagner Peyser co-enrollment policy and service delivery approach on July 1, 2015, thus ensuring that services to career center customers are comprehensive and holistic. Additional policy development, training and data analysis will occur during this plan period to ensure that the co-enrollment approach benefits customers and that partners are playing appropriate roles and engaged in effective process.

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.

In the support of activities identified in (A), Kentucky will leverage the services, activities and resources of other partners provided under employment, training and education. Kentucky has a track record of approaches that are customer–centered that require and facilitate alignment. This coordination of activities will assure there is not duplication of services.

Initiatives such as TBCM and Kentucky Career Center certification were designed and implemented to align core and optional partners around the needs of individual customers. The Kentucky Skills Network model was designed and implemented to align core and optional partners with the needs of employer customers. The NGA Policy Academy – Economic Competitiveness Agenda establishes alignment among education, workforce, labor (apprenticeship) and economic development partners

to serve both individual and employer customers. Over the next four years, with sparks from both WIOA and a new administration, Kentucky will build on those foundations, prioritizing alignment and investing in strategies that assure that services aren't duplicative and maximize customer service and results.

KCC partners will work closely with Department of Community Based Services (DCBS) to assure customers have knowledge and access to needed resources. One–stop partners are directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with DCBS. Paths to Promise (P2P) is a pilot program with a robust research component serving eight counties in Eastern Kentucky. The pilot includes moving eligible students into AOKY career pathways. The subsequent allocation of employment and training funds will be dedicated to providing support services to students pursuing education and training in urban areas across the state.

The core partner agencies will coordinate and better align services with Criminal Justice agencies in serving ex–offenders. OVR and OFB work closely with this target population in providing services, supports and referrals to other programs as needed.

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 to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

The Customer Flow initiative focuses on both individual job seeker and employer customers. The Customer Flow effort is a critical component to ensuring the KCC system's ability to deliver on the following brand promise:

As a team of experts, we are dedicated to providing Kentucky employers with a qualified, skilled workforce and the people of Kentucky with career, job training and educational opportunities. With the unique ability to connect employees and employers through the combined efforts of state and local partners, we will become a valuable, competitive and best–in–class asset in the growth of our regional and national economy. By guiding, empowering and inspiring our customers, we will continue our mission to create success stories across the Commonwealth.

Kentucky's statewide goal, through the Customer Flow project, is to improve customer flow through the centers and to enhance the value received by customers from their experience with the centers. Kentucky will continue its work in this area to facilitate customer flow enhancements and improve customer experiences/value through clear and direct policy guidance and performance expectations that address identified themes from this project. Career Center Customer Flow and service delivery issues thematic areas are:

• enhancing industry sector focus and business services;

• re–orienting KCC focus and developing staff; and

• organizing and integrating services and needs for more service diversity.

Kentucky plans to further support this initiative in the upcoming year with the provision of technical assistance funds to the 10 workforce areas in addressing the findings and recommendations identified through this initiative.

The career center offices engage and leverage all system partners for customers. Kentucky continues to set knowledge and competency expectations related to WIOA so that all core career center staff, regardless of program or agency affiliation can provide information regarding supportive services for individuals identified in section II (a) (1) (B). The career center partners have established reciprocal referral services which allow for more efficient services to be provided to individuals with barriers to employment.

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. The activities described shall conform to the statutory requirements of each program.

The KSN is a partnership of local and state workforce development organizations dedicated to providing proactive business services and industry skills development. Through local Business Service Teams, the KSN has laid a foundation for coordinated employer services that will be leveraged in the coming four years.

The KSN offers a streamlined approach to assisting companies with recruiting talent, training new and existing employees, and developing tomorrow's workforce. Consisting of four primary entities from the Kentucky Cabinet for Economic Development, Kentucky Education and Workforce Development Cabinet (i.e. OVR, OFB, OET), Kentucky Labor Cabinet, and the KCTCS, the KSN exists to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The mission of the KSN has the following four primary components:

• single point of contact approach,

• streamlined workforce resources,

• unified marketing and information and

• talent/workforce development pipeline.

KSN local business service teams are designed to provide a primary point of contact for employer customers. The partner with the best/most established relationship with an employer should maintain responsibility and communication with the customer and engage other partners in order to provide streamlined solutions–based business services plans. The structure of the KSN business services teams is comprised of three levels, each of which may act as a point of entry for contact with companies. Level one consists of the state team and includes one representative from each of the four core partners. These individuals synergize to ensure that companies receive unified and coordinated information and services related to their workforce development needs. Level two

includes the Business Services Team leads (BST), as identified by their Local Workforce Development Board (LWDB). These BST leads are individuals who are dedicated to business services as a primary function of their job. Typically, BST leads represent the LWDB. Through the Kentucky Career Center Certification initiative, workforce system partners now have a consistent organization model for business services. BST leads are KCC system partner personnel responsible for forming relationships with companies in their local areas and performing business services. Level three includes all local representatives from the Cabinet for Economic Development, KCTCS Work–force Solutions and the KCC.

The KSN brings together workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Through such options as reimbursable grants and tax credits for classroom training, on–the–job training, tuition and certification training, train–the–trainer travel, and entry–level and skills–upgrade training, Kentucky has resources that allow flexible and customizable training specific to company needs.

Early in 2016, KSN partners will gain access to a customer relationship management system based on a sales force platform. Phase one will allow shared access to employer contact and needs, and Phase two later in 2016–17 will give KSN partners the ability to add and assess employer programs and resources via the Sales Force application.

In addition to leveraging and expanding the KSN effort, Kentucky expects a great deal of new activity assessing and addressing employer needs via existing partnerships with business organizations like the Kentucky Chamber of Commerce, and most importantly, through new strategies and initiatives crafted by the new administration.

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).

Engagement of Kentucky's education partners has been continuous under the project agenda of the former KWIB's WorkSmart Kentucky plan, and is accelerating under the pillars of the NGA Talent Pipeline Academy agenda, with both KCTCS and the CTE unit of KDE serving as core partners in that effort. The priority focus of all workforce partners is on building a work–based learning infrastructure that is employer–defined and seamlessly delivered by an interlocking series of steps that begin early in the education pipeline and continue through careers and lifelong learning.

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.

Kentucky will continue to strengthen data sharing across state agencies and workforce development partners, including all levels of education and proprietary providers to better understand education and employment outcomes and to support the spread of employer best practices.

To create a diversified and comprehensive base of education and training providers, OET leadership has been intentional in the creation of partnerships across the spectrum of training providers. This is evident in both policy and practice from the formation of the Eligible Training Provider Listing (ETPL) Steering Committee to ongoing participation in statewide discussions centering on the importance of creating job–driven services.

From the perspective of training providers, staff members went to great lengths to ensure that representation from a host of industries and training providers were included, and perspectives were gathered. ETPL staff has partnered with many state agencies and groups to make sure that all were represented and that everyone understood the process. Represented agencies include:

• Kentucky Department of Education, Office of Career and Technical Education

• Kentucky Council on Postsecondary Education

• Kentucky Commission on Proprietary Education

• Association of Independent Kentucky Colleges and Universities

• Kentucky Department of Labor, Division of Employment Standards (Apprenticeship Programs)

• Kentucky Adult Education

Representatives from these agencies, as well as independent training providers, also make up the ETPL Steering Committee, which is a sub–function of KWIB. This group assists with making sure the listing is comprehensive of services available to prospective participants, as well as accessible to all.

Most recently, the ETPL coordinator was asked to serve on the KWIB Business and Education Alignment Committee. This group will assist with identifying and implementing comprehensive strategies to align education with industry needs, thus fulfilling the supply and demand of the state's job market.

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).

Given the skill development needs voiced by employers and in evidence with many job seekers, enhancing community and technical college partnerships to increase training and development options for KCC customers appears to be a significant need. This will be an area of focus to strengthen and sustain partnerships with community and technical colleges to expand "bridge" and post–secondary and training and education options for job seekers, and to expand market–driven training programs for employers. Kentucky will build on the initial success of the Accelerating Opportunity/GED credential initiative and will take additional steps to more fully engage KCTCS and the CTE programs of local districts and the KDE.

KDE supports the development of career pathways through the Carl D. Perkins State Plan. Local CTE programs are required to have an advisory committee that guides the curriculum and industry

certifications for students. This network allows secondary and post–secondary institutions to create rigorous pathways that incorporate work–based learning and accelerated opportunities like dual–credit.

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.

In most areas of Kentucky, training investments have been quite explicitly linked to target industry sectors and high–demand occupations. In many cases, these investments are individual training accounts (ITAs). An area of focus for the Career Centers will be to expand their use of alternate training modalities, specifically employer–driven and work–based models that might be shorter–term, more modular in nature, and more explicitly tied to the attainment of "stackable" credentials. Certainly, registered apprenticeships, on–the–job training, and customized training are all approaches that could be targeted for increased use and expansion, perhaps in partnership with KCTCS and others.

Kentucky Department of Education (KDE)

KDE requires all secondary CTE programs to report on career pathway opportunities for students. The career pathway process encourages dual–credit courses along with industry certifications and credentialing. KDE works closely with state–level CTE task force groups composed of KWIB representation and business and industry to review industry certification requirements for high school students. The certifications/credentials are then endorsed by the KWIB. This ensures the certificates and/or credentials will lead to employment and/or post–secondary credit. Kentucky also created the Tech Ready Careers for Kentucky (TRACK) pre–apprenticeship program. Kentucky is the only state in the nation that has a state–wide agreement for registered apprenticeship opportunities that begin in high school. The areas include carpentry, electricity and manufacturing. The models vary based on the need of industry but lead to credentialing, apprenticeship credit, and/or post–secondary credit at an accredited institution while students are in high school.

Kentucky Adult Education

KYAE, an agency in the Kentucky Council on Post–secondary Education (CPE), is strategically positioned to create significant post–secondary education linkages. These linkages are important in recruiting students and helping them transition to post–secondary education, as well as to assist with planning and providing professional training and development for adult educators. The usual and customary services of KYAE, which services in all 120 counties, include addressing academic deficiencies and equipping students for success in the next level of college and/or achievement via preparation for college, the National Career Readiness Certificate and the Kentucky Essential Skills Certificate.

Accelerating Opportunity Kentucky (AOKY)

Together with its partners, Department for Workforce Investment and KCTCS, KYAE created and vetted a modified accelerating opportunity framework. The program is designed to accelerate adult education by concurrently enrolling eligible students in post–secondary education and adult

education, while integrating foundational academic and technical skills. Unique and recognized–as–effective characteristics of the model include: the working relationship between adult educators and technical faculty, comprehensive and intensive wraparound services that ensure students' successful navigation of systems, the renewed focus of improving students' opportunities to participate in work–based activities, and access to job placement services. Additionally, there has been a renewed effort to ensure employers are engaged upfront to reinforce what jobs are in demand and what skills are necessary for the job, supporting more work–related activities, and enhancing the potential for job placement.

Workforce Preparation As a result of the extended pilot for Essential Skills, nearly one–third of the state's local adult education programs received coaching and training on integrating essential employability skills with academic instruction. KYAE dedicated multiple resources to support this training, including CTE's Perkins leadership grant funds. Consequently, within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills (often referred to as soft skills, e.g., collaboration, communication and critical thinking) employers seek. At the end of the program year, through the use of WIA Incentive Funds, KYAE and the Department of Workforce Investment renewed their contract for Worldwide Interactive Network's (WIN) online curricula course ware that now provides not only WorkKeys/National Career Readiness Certificate (NCRC) preparation, but soft skills and College and Career Ready System–based curricula tracks. Along with the administration of badge–supported curricula and assessments, the essential skills track concludes with a Kentucky Essential Skills Certificate (KESC). (See also Adult Basic Education and Literacy Programs, Workforce Preparation.) KYAE is represented on several boards and committees, and plays an active role in several initiatives in the Commonwealth. The vice president of KYAE is an active proxy member of the KWIB participating in quarterly KWIB meetings and commits to initiatives, such as the accelerated learning program GED Express, to collaboratively advance workforce education and skill development in the Commonwealth. A KYAE staff member serves on the Work Ready Communities Steering Committee, promoting adult education programs' participation in the local application to achieve Work Ready Communities certification by: decreasing the population without a high school diploma or its equivalent; increasing NCRC awards; and contextualizing academic skills with employability skills (beginning with pilot programs and an expedited roll–out in 2014–15 to Work Ready Communities In Progress as a priority). KYAE programs prepare students to take the ACT WorkKeys assessment to earn the NCRC, a standardized credential that validates reading, mathematics and locating information skills for specific occupations. KYAE programs use WIN's online curriculum aligned with the WorkKeys assessment within an academic program of study and defrays the cost of the certificate for adult education students. KYAE includes the NCRC as a performance target and will continue to focus on it as a stack– able credential throughout the students' educational journey. KYAE is supportive of the KCC system vision and collaborates with KCC offices across the Commonwealth (e.g., co–location, common intake and referral processes, etc.). The KSN is a unique partnership between the Cabinet for Economic Development, Education and Workforce Development Cabinet including KCC, the Labor Cabinet and KCTCS. The network is dedicated to assessing employer skills needs and designing and delivering effective workforce solutions. Local KYAE programs are available to provide services in cases where potential or current employees are eligible for adult education. KYAE's vice president is also a proxy board member of the BSSC, which was established in 1984 by the Kentucky General Assembly as an independent, de jure corporation to stimulate economic development through programs of skills training to meet the needs of business and industry. KYAE partners with the Department of Corrections to serve both full–service jails' correctional offenders and state adult institution inmates. Adult educators provide educational services to jails based on cooperative agreements with jailers. KCTCS faculty is commissioned to serve state adult correction–al institution populations; however, adult educators support those educational experiences, offering evening classes for offenders.

KYAE's vice president and the Kentucky Department for Library and Archives' (KDLA) commissioner distributed a memorandum encouraging local adult education and public libraries to strategically partner in their attempts to reach our target population in alternate venues. KYAE also coordinated with KDLA during a pilot program to explore best practices of forging these partnerships and promoting use of Kentucky Educational Television's (KET) Fast Forward online GED test preparation.

Additionally, KYAE partnered with the Kentucky Virtual Library (KYVL) and KCTCS to contract with the National Resources Open College and Career project to offer customized tracks of Network Re–sources Open College and Career's (NROC) EdReady, including GED testing, Kentucky Online Testing (KYOTE), and other college–ready placement testing. KYAE will conduct a pilot project, including evaluation, to determine best practices involving occupational training partners beyond its work with KCTCS, e.g., employers, healthcare associations, and emergency medical technicians. (See also Adult Basic Education and Literacy, Integrated Education and Training.) This will also entail assembling a work group to coordinate and align occupational training resources to be used throughout all career pathways endeavors.

Integrated English Literacy and Citizenship (IEL/C) grants awarded during the fiscal 2015–16 program year included a work–related goal. KYAE wanted programs that typically serve students with these grants to begin formulating ways to transition them into Adult Basic Education (ABE) with the goal that other ABE students have of entering post–secondary education and/or a career pathway, thereby integrating English Literacy and Citizenship education with moving toward self–sufficiency.

English Literacy and Civics (EL/C) programs in Kentucky continue to use a variety of activities and instructional methods to enhance non–English speaking student's effective communication skills and civic practices. Additionally, programs sponsor cultural activities, such as holiday and international celebrations during which students are invited to bring indigenous food and share their own cultural traditions. These efforts help non–native English speakers navigate and participate in their children's educational experiences, access services and participate in community activities.

KYAE is also working with WIOA partners to implement TBCM to set standards for establishing a system of collaborative case management among career center partners. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners.

KYAE is also directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with Department for Community–Based Services (DCBS). Paths to Promise (P2P) is a pilot program with a robust research component serving eight counties in Eastern Kentucky. The pilot includes moving eligible students into AOKY career pathways. The subsequent allocation of employment and training funds will be dedicated to providing support services to students pursuing education and training in urban areas across the state.

Project CASE is a collaborative effort between state vocational rehabilitation agencies, adult education, secondary and post–secondary education, career centers, employers and other partners to demonstrate how career pathways can help individuals with disabilities acquire the marketable skills and attain recognized credentials that lead to employment in high–demand occupations. In Kentucky, two pilot projects are planned in the Metro Louisville and Eastern Kentucky Concentrated Employment Program (EKCEP) regions; these will engage seven and 23 counties respectively.

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.

Coordination between the workforce and economic development entities, both state and local, is strong. That coordination is supported by the two major initiatives described throughout this plan. The NGA Policy Academy on Aligning the Education and Training Pipeline to the Needs of the Economy and Kentucky Skills Network provide strategic (NGA) and structural (KSN) basis for meaningful coordination and shared vision and activities.

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.).

Existing legacy case management systems across OET, OVR and OFB are disparate and insular. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans:

• Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.

• Conversion to a cross–agency, common case–management system will be executed as current legacy transactional systems are retired. The system will be built using the same technology deployed for the common intake process.

This long–range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system.

New data–linkages will greatly enhance Kentucky's ability to make real–time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements.

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

Existing legacy case management systems across WIOA Title I, Wagner Peyser, Vocational Rehabilitation and Adult Education are disparate and insular: Currently, the Office of Employment and Training (OET), the Office of Vocational Rehabilitation (OVR) and the Office for the Blind (OFB) are supported by insular case management systems that respond to requests for the following programs: • Wagner Peyser Labor Exchange (Employ Kentucky Operating System - EKOS) • Unemployment Insurance – both benefits and tax/collections (Mainframe and Kentucky's Electronic Workplace for Employment Services – KEWES) • Veterans Program • Migrant and Seasonal Farm Workers Program • National Emergency Grants • High Growth Job Training • Foreign Labor Certification • Health Care Tax Credit System • Trade Adjustment Act • Work Opportunities Tax Credit • Workforce Innovation and Opportunity Act of 2014 (WIOA) • Student data • Customer records, services provided and costs of services for individuals with disabilities and blindness – Case

Management System – CMS • Social Security Reimbursement tracking and processing • Social Security Ticket to Work assignment tracking and processing

The agencies share many customers. However, agency case management systems have a number of constraints prohibiting data sharing among the sister agencies, as well as with employers, job seekers and training providers. The following information provides high-level overviews of each system:

EKOS Kentucky is a member of a multi-state consortium, America's One-Stop Operating System (AOSOS), which supports a web-based system for its Workforce Investment Act of 1998 data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities. Kentucky's system is called the Employ Kentucky Operating System (EKOS), which can also generate ad hoc reports built using Enterprise Business Intelligence and Crystal Report. In July 2016, Kentucky ceased WIA data collection and reporting, and begin working to implement WIOA data collection and reporting. There is also a telephonic component within EKOS known as Outbound. Outbound allows claimants and employers to receive telephonic notification regarding job fairs, job vacancies and job postings, among other services.

Focus Suites EKOS is complemented by and integrated with Burning Glass Technologies' Focus Suite products: Focus Talent, Focus Career, Focus Assist and Focus Explorer. Focus Talent puts employee recruitment and account management in the hands of employers. Burning Glass Technologies' patented artificial intelligence powers the search and job-match engine using a combination of candidate workplace and transferrable skills and education. Focus Career helps the job seeker (Wagner Peyser, Title I, Title IV and UI customers) to build or enhance a resume, then analyze that resume to identify pertinent open job orders so the job seeker can set up automatic email alerts when a job match is made. Both Focus Talent and Focus Career are self-service systems. However, there is a staff assist module. Focus Assist helps OET staff members support employers and job seekers through internal dashboards and menus should those users desire additional assistance. Finally, Focus Explorer, another self-service medium, is a career counseling tool for job seekers to discover in-demand jobs, skill requirements, certifications and education coursework. It is critical to understand the integration of EKOS and the Focus Suite system. They share information regarding job seekers, job search, job matching, job posting as well as receive/share external job postings from America's Job Exchange (AJE)/Job Central and spidered jobs from Burning Glass feeds. Also important to note is that unemployment insurance claimants who are required to perform work searches must create an EKOS account and enter a resume in Focus Career or risk losing benefit eligibility.

Labor/Insight Labor/Insight is another Burning Glass Technologies application used by OET staff. Labor/Insight enables real-time access to a comprehensive database that can track employer hiring by industry, occupation, education and skills, at a national, state or regional level. It can also quantify market demand for specific job qualifications. Labor/Insight is hosted by Burning Glass Technologies.

CMS The Case Management System (CMS) supports consumer case management activities, authorizes related payment transactions, generates reports/report information and contains a Social Security Reimbursement subsystem for all Title IV consumers, both for OFB and OVR. Consumer information, including confidential medical information, is collected to open a case within the respective agency. Agency services are based on the signed Individualized Plan for Employment between consumer and agency counselor. The system can attach scanned case documents, record staff provided services, staff activities, track comparable benefits, track consumer education and

training advancements. There is a Social Security Reimbursement module within CMS that enables each respective agency to seek reimbursement for the cost of the services provided to agency consumers receiving Social Security Disability Insurance (SSDI) benefits or Supplemental Security Income (SSI) payments. There is a Maximus module that generates files that are submitted to Social Security for the Ticket to Work program and tracks responses and ticket assignments. In July 2016, Kentucky ceased WIA data collection and reporting and began working to implement WIOA data collection and reporting requirements in addition to other USDOE and state reporting. CMS is a staff only application with a web front end. An interface exists between CMS and eMARS, the state's payment system, to enable processing of payments to, and refunds from, vendors. The system is Section 508 and Bobby compliant and staff use screen readers such as JAWS, ZoomText and WindowEyes, as well as speech recognition software such as Dragon Naturally Speaking.

Kentucky Adult Education Reporting System The Kentucky Adult Education Reporting System (KAERS) is a nationally-recognized student management system designed and maintained through Kentucky Adult Education and the Council on Postsecondary Education. It is used by all Title II adult education programs to record programmatic, student and fiscal agent information with a student portal for students to view their data and online curriculum. KAERS also has a reporting tool used to enhance program performance, a real-time student tracking function, and integrates external data sources. Data from KAERS is submitted, on a regular basis, to the Office of Career, Technical, and Adult Education (OCTAE) and KCEWS.

Comprehensive Workforce Development System The Department for Workforce Investment has begun planning for a future comprehensive workforce development system to provide continuous evaluation by multiple agencies to facilitate and coordinate comprehensive, efficient and effective service delivery required to meet individual client needs. Kentucky took the first step toward this vision in August 2016 when it issued a Request for Information (RFI) to determine the availability of integrated technology solutions with the following characteristics: Characteristics: • Common intake • Continuous client evaluation and assessment • Common case management of workforce services (i.e. UI, employment, vocational and blind services) • Reporting (Federally mandated, ad-hoc and analytical) • Review and Issuance of UI benefits

Kentucky is also considering options to join a UI systems consortium in the near future. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans: • Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency. • Conversion to a cross-agency, common case-management system will be executed as current legacy transactional systems are retired. The system will be built using the same technology deployed for the common intake process. This long-range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data-linkages will greatly enhance Kentucky's ability to make real-time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements. KCEWS collects accurate education and workforce data in the Kentucky Longitudinal Data System (KLDS) linking the data and

generating timely reports about student performance through employment to guide decision makers in improving Kentucky's education system and training programs (KRS 151B.132, 2). KCEWS currently collects data from key state agencies, such as KYAE, OFB, OVR and post-secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132, 4). Additional transactional data collected will be added as data systems at state agencies are updated to reflect any changes required to measure the impact of education and workforce programs. Staffs at lead state agencies have access to their and other common data through KCEWS' Web Intelligence Business Objects Platform (WEBI). Additionally, KCEWS has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133, 5).

* 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, DESCRIBE THE STATE'S PROCESS FOR DEVELOPING GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM, INCLUDING BENCHMARKS, AND ITS GUIDANCE TO ASSIST LOCAL BOARDS, CHIEF ELECTED OFFICIALS, AND LOCAL ONE-STOP PARTNERS IN DETERMINING EQUITABLE AND STABLE METHODS OF FUNDING INFRASTRUCTURE IN ACCORDANCE WITH SEC. 121(H)(1)(B). BEGINNING WITH THE STATE PLAN MODIFICATION IN 2018 AND FOR SUBSEQUENT STATE PLANS AND STATE PLAN MODIFICATIONS, THE STATE MUST ALSO INCLUDE SUCH GUIDELINES.

Kentucky is currently testing a common intake and service delivery approach based on a Sales Force platform. The initial test will focus on one particular grant and several local career centers. Additional building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with KYAE will be added as priorities are determined and funding becomes available.

Kentucky's co–enrollment policy addresses the required co–enrollment of participants under WIOA Title 1 Adult and Dislocated Worker programs and Wagner–Peyser. Beginning July 1, 2015, all adults and dislocated workers who received KCC services other than self–service and informational activities were required to be registered and considered a participant for WIOA Title I services.

The WIOA and Wagner–Peyser co–enrollment system process occurs through an automated process within EKOS, Kentucky's Management Information System, provided that the appropriate activities and verification are provided on the customer's record. Staff members ensure that the correct activities are recorded for the respective programs as well as verify that date of birth and veterans information are correctly documented in EKOS. Customers will then be co–enrolled and counted in both WIOA and Wagner–Peyser Performance Measures.

The state has established a standard for paperless WIOA Adult and Dislocated Worker and Wagner–Peyser program registration based on the definition of self–attestation and implemented through Focus Career, which is the customer registration program. Once a customer has registered in the Focus Career system, the information is shared and integrated into EKOS. If the customer is receiving services at a KCC office, staff will log into EKOS and select the date of birth/veteran verification tab in the Customer Detail module. The staff will then verify the customer's date of birth and veteran information, if applicable. Staff will also record the activity or activities that have been completed. Once this process has been completed, and an overnight batch process takes place looking at activities that have been placed on the record that would trigger a co–enrollment, the customer will be co–enrolled into both WIOA and Wagner–Peyser.

Kentucky's Memorandum of Understanding (MOU) and Resource Sharing Agreement (RSA) guidance policy was issued Dec.17, 2014 with an effective date of July 1, 2015. The interim, from issuance to implementation, allowed for a very active and engaged period of time for planning, partner engagement and technical assistance sessions. The policy directed that local workforce development boards (LWDB) develop a MOU, with the agreement of the chief elected official, and the KCC partners concerning the operation of the KCC system. The policy included a MOU template to develop the agreement along with all required attachments.

LWDAs met with partners to discuss and define the services to be provided by KCC, funding of services and operating costs, referral methods between partners, duration of the MOU and procedures for amending the MOU. The MOUs were required to include the RSA describing how funding of the infrastructure costs of KCC would be managed and details regarding the “fair share” costs of each partner. Downloadable templates and attachments were incorporated into the policy and accessible from an internal Team of Experts website. Included in the downloadable documents was a PowerPoint detailing step–by–step instructions. The final pages of the PowerPoint included the process and templates for quarterly partner budget reconciliation. The policy and documents are posted on the KWIB website – Kentucky WIOA Guidelines and Information www.kwib.ky.gov/ky_wioa.htm.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

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

In Kentucky, the workforce system is composed of employment and training programs that provide services to job seekers and employers. The Education and Workforce Development Cabinet includes the Department of Workforce Investment that is composed of OVR, OFB and OET.

OET provides support and oversight to several activities and programs authorized under Section 112(b)(8)(A). Integrating components of the Trade Act program with the WIOA dislocated worker program further enhances operational collaboration of workforce investment activities. By housing education and other training initiatives, duplication of services is reduced. A focus on re–employment services is facilitated by unemployment insurance, Wagner–Peyser and WIOA services in OET.

Kentucky has identified four regions in the state consisting of central, east, south central and the west region. Kentucky has 10 Local Workforce Investment Areas governed by local workforce investment boards. The local boards, in collaboration with Wagner–Peyser funded staff and the governor's Workforce Investment Board, administer the state's public workforce system. Other vital partners are the community and technical colleges that provide career and technical education and adult education. Kentucky Adult Education programs have a presence in all 120 counties.

Kentucky has built a strong foundation of partnership and collaboration among core and combined programs, local workforce development boards and employers. The WorkSmart Kentucky Plan of the previous Kentucky Workforce Investment Board, and the newly developed Economic Competitiveness Agenda, together set a tone and a set of strategies that will enable the workforce development activities of Kentucky's system to make progress and serve individuals and employers more effectively over the next four years.

The 11 certified full–service centers and three certified affiliate Kentucky Career Center (KCC) offices provide job seekers and employers access to services. The career center offices offer a full array of employment services to help adults and dislocated workers.

The local workforce areas (LWIA) are responsible for their respective areas and oversee the operations of those programs. Kentucky is committed to ensuring that LWIAs are responsible stewards of state and federal dollars. The area workforce plans describe how services are delivered on a local level. The 10 areas are: Bluegrass, South Central, Cumberlands, Eastern Kentucky Concentrated Employment Program Inc. (EKCEP), Green River, KentucianaWorks, Lincoln Trail, Northern Kentucky and TENCO.

Each of the 10 local areas has one certified comprehensive career center office that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II – Adult Education (AEFLA program), WIOA Title III – Wagner–Peyser Act employment services and WIOA Title IV – Vocational Rehabilitation Program and other required partners.

Kentucky is early only four months into a new administration and the identification of workforce priorities and initiatives. At this time, the organizational structure is in process of review. The organizational chart can be found here: kwib.ky.gov/orgchart.pdf

B. STATE BOARD

Provide a description of the State Board, including—

The Kentucky Workforce Innovation Board (KWIB) serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of the federal Workforce Innovation and Opportunity Act of 2014. The most crucial element for the Board's success is aligning the many facets of workforce development – business, labor, public education, higher education, economic development, youth activities and employment and training to cohesively create a system for Kentucky to progressively grow its economy.

1. MEMBERSHIP ROSTER

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

CURRENT BOARD MEMBERS

• Governor Matt Bevin

• Hal Heiner, Secretary, Education and Workforce Development Cabinet • Erik Dunnigan, Acting Secretary, Cabinet for Economic Development

• Derrick Ramsey, Secretary, Labor Cabinet

• Bob King, President, Council on Post–secondary Education

• Jay Box, President, Kentucky Community and Technical College System

• Stephen Pruitt, Commissioner, Kentucky Department of Education

The governor has appointed the following individuals to serve as members of the board for terms expiring June 30, 2016:

• Peter Feil of Stober Drives Inc., representing manufacturing

• Terry Spears of Community Trust Bank in Pikeville, representing business

• Scott Pierce, a union affiliate representing engineering trades

• James Neihof of Shelby County school district, representing youth

• George Steele, mayor of Grayson, representing local government

• Michael Hale, Barren County judge executive, representing local government

The governor has appointed the following individuals to serve as members of the board for terms expiring June 30, 2017:

• Heidi Margulis of Humana, representing health care services

• Kurt Krug, INOAC USA Inc., representing manufacturing

• Rodney Hitch of East Kentucky Power Cooperative, representing energy

• Patrick Murphy of United Parcel Service, representing distribution

• John Baines of HAHN Automation Inc., representing information technology

• David Boggs of Opportunity for Work and Learning, representing the offender community

• Sharon Fields, who is self–employed, representing persons with disabilities

• John Thacker of the National Conference of Firemen and Oilers, representing transportation trade

• Parvin Gibbs, representing veterans and the military

The governor has appointed the following individuals to serve as members of the board for terms expiring June 30, 2018:

• Rep. Larry Clark, representing the Kentucky House of Representatives • Sen. Jimmy Higdon, representing the Kentucky State Senate

• Ashley Miller of Athena Health and Wellness, representing health care services

• Jason Luring of Catalent Pharma Solutions, representing manufacturing

• Bill Weier of Fives Machining Systems Inc., representing manufacturing

• Lynn Parrish of Marwood Land Company, representing energy

• Marlin Jiranek of Atlas Development Group LCC, representing entrepreneurship

• Carla Webster of Xerox, representing information technology

• Steve Willinghurst of Louisville Electrical Joint Apprenticeship and Training Committee, representing electrical trades

• Amy Luttrell of Goodwill Industries of Kentucky, representing disadvantaged populations

The governor has appointed the following individuals to serve as members of the board for terms expiring June 30, 2019:

• Ruth Brinkley of KentuckyOne Health, representing health care

• Hugh Haydon (Chairman of the Board) of Kentucky Bioprocessing LCC, representing manufacturing

• Mike Price of Toyota Motor Manufacturing, representing manufacturing

• Robert Southard of Southern Star Central Gas Pipeline, representing energy

• Danette Wilder of Sealing Life Technology, representing entrepreneurship

• Madison Silvert of the Greater Owensboro Economic Development Corp., representing business

• Freddy Peralta of KyTrade Computer Services, representing information technology

• Debbie Morris of Heaven Hill Brands, representing food and beverage–distillery

• Sharon Furches of Furches Farms, representing agriculture

• Jared Arnett of Shaping Our Appalachian Region Inc., representing disadvantaged populations

2. BOARD ACTIVITIES

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

A comprehensive new member orientation occurred for all new members inclusive of their role on the board and the purpose and scope of work required of the board. An overview of the work of the previous board was highlighted.

Additionally, the executive director of the board met individually with each KWIB member to discuss specific interests, priorities and thoughts about progressing Kentucky's workforce system forward.

The board chair established an executive committee. Members were invited to participate in regional training orientations set up throughout the state which would assist in establishing relationships be–tween the state and local board members.

A strategic planning session of the board is being planned for early spring. At this session an in–depth review of the WorkSmart Kentucky plan will occur. This will provide the framework to establish new initiatives and goals that align with the NGA vision and efforts outlined in this section. Additionally, it will reflect the new vision set forth by the new gubernatorial leadership.

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

A. ASSESSMENT OF CORE PROGRAMS

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

The Kentucky Center for Education and Workforce Statistics (KCEWS) and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability. An approach Kentucky is actively exploring would house all data required for these reports in the Kentucky Longitudinal Data System (KLDS). The priority is to identify and deploy a third–party, non–agency entity to receive, clean and report from multiple data sources in the short term and ultimately assist in the development of common reports when the common system is implemented.

Kentucky assesses the overall effectiveness of the workforce investment system in relation to the strategic vision and goals of the WorkSmart Kentucky and Economic Competitiveness plans, seeking integration of activities and information from all the core programs. The ultimate goal is to increase the long–term employment outcomes for individuals seeking services, especially those with barriers to employment, to improve services to employers and demonstrate continuous improvement. Kentucky will assess the effectiveness, physical and programmatic accessibility in accordance with Section 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), and continuous improvement of the career center.

Kentucky has a certification process in place to ensure that KCC offices are ready to serve all qualified persons in the regional and local areas as expected. The certification policy is fundamental to aligning programs, policies and activities in the workforce system. Workforce agencies and partners are engaged in this assessment and continuous high–quality improvements to ensure that all related activities are being coordinated in a way that allows partners to review relevant information and take action to improve the system.

KCEWS works with all relevant state agencies to integrate data storage activities which, hitherto, were being carried out separately. This ensures that data about all persons seeking services from any of the core programs are captured and matched so as to avoid duplication of service delivery. Not only does this help track the workforce services provided, it also enables evaluation of those services – for example, the employment status of eligible training program completions several years out.

Storing all WIOA–related data in a common data warehouse will enhance data retrieval and analysis, which will help KCC to efficiently assess the quality of our workforce service providers. Kentucky will review data to track provider success in meeting the targets in the following areas:

• learning gains;

• entry into employment in required quarters;

• obtaining a secondary credential and enrollment into post–secondary or training;

• obtaining a secondary credential and gaining employment; and

• gaining a post–secondary credential.

Having all core programs' data integrated will enable service providers to conduct regular audits to determine which program service providers are challenged in meeting targets and in need of technical assistance beyond the standard leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

KCEWS and state agencies will continue to work with KWIB to ensure required reports for the performance accountability are completed to the best of the state's ability.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

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

To ensure success, Kentucky requires partnerships between career center offices and representatives of the core and local providers such as adult education centers, career and technical education centers, community colleges and local economic development.

The activities of all career center programs and activities will be assessed through the following mechanisms:

• state and local level fiscal and programmatic monitoring;

• surveys of stakeholders;

• data validation; and

• analysis of data.

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 an assessment 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.

Kentucky will develop an appropriate process to ensure adaptation of strategies when subsequent plan modifications occur. In the past, KWIB, in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations, engaged in an aggressive effort to implement the strategic initiatives outlined in the WorkSmart Kentucky plan adopted in 2010 and updated in 2013. The plan has served as a blueprint for transforming Kentucky's workforce services focused on adapting to the changing needs of employers to create a

demand–driven, business–led, solutions–based publicly funded talent development system for the Commonwealth. Through the work of these initiatives assessment has occurred on several levels for the core programs for several areas.

As a result of key initiatives such as certification, Customer Flow, TBCM and the Workforce Academy, several assessment strategies have been implemented. For example under the Workforce Academy initiative assessment, training strategies have been implemented for certification, Labor Market Information and Transformational Leadership. Two main focus areas over the past two years were Customer Flow and TBCM.

Customer Flow

In July 2014, Kentucky partnered with Maher & Maher to support its career center Customer Flow initiative. Project activities were assessed to determine the state of Customer Flow at that time. Site visits were conducted in each of the 10 career center offices throughout the state. Online surveys were conducted of individual and employer career center system customers to gather their input on the center services they most commonly used and their perceptions of the quality and value of those services. Maher & Maher facilitated a work group meeting of state and local career center system stakeholders to discuss observations from the center visits and survey responses and develop recommendations and potential solutions and strategies for the identified needs and challenges. A comprehensive report was submitted to the state regarding the site visits, surveys and the work–group discussions that contained recommendations for career center customer flow and service delivery enhancements and improvements. In addition, each workforce area received an individual site visit report specific to their location. The recommended areas followed three thematic areas of focus:

• enhancing industry sector focus and business services;

• re–orienting career center office focus and developing staff; and • integrating and diversifying services. Each of the thematic areas contained several action steps or strategies for marked areas of improvement. Kentucky plans to further support this initiative in the upcoming year with the provision of technical assistance funds to the 10 workforce areas to address the findings and recommendations identified through this initiative.

Team Based Case Management

The purpose of the TBCM initiative is to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within career centers and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partner agencies. Vendors worked to coordinate activities under this initiative.

Through its assessment, consultants identified other key actions in the WorkSmart Kentucky Strategic Plan including Kentucky Career Center Customer Flow, Kentucky Career Center certification, Partner for Success and Workforce Academy that aligned closely with the TBCM initiative. WIOA, which was passed during this project, works well with the TBCM initiative because it also emphasizes and strengthens the alignment and integration of services through core partners.

The strategy or approach under this initiative was the development of a steering committee representing all partner agencies. The following three–phased approach was used.

• Phase I: Review and analysis focused on understanding the current status, review of current materials and tools, and best practices research.

• Phase II: Identification and prioritization concentrated on developing the vision and direction for the project (including a stakeholder survey, opinion leaders session, and development of common tools)

• Phase III: Implementation planned on moving the initiative forward through a leadership session, planning sessions and a trainer's session.

All three phases have been completed and Kentucky is in the process of implementing the strategies outlined under each phase in the final report. Local implementation teams have been formed in each workforce area.

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.

KCEWS and state agencies will partner on a comprehensive approach to evaluation and research. KCEWS has the capacity and expertise to convene the various partners to ensure coordination and effectiveness. Performance accountability measures the following indicators from respective core programs: • job seekers receiving services in required quarters;

• job seekers receiving referrals to partner services in required quarters;

• customers placed in employment in required quarters;

• employer contacts made in required quarter;

• median earnings of customers placed in employment;

• credential attainment;

• measurable skill gains; and

• effectiveness in serving employers.

Evaluation will be conducted based on the indicators listed above. Previously, Kentucky used surveys to measure effectiveness in serving employers in the state. In addition to surveys assessing employer satisfaction, an approach is being considered including a more customizable "point–menu" system awarding points based on the degree of intensity and the value of workforce services provided. Services earning high points would clearly reflect deeper relationships with employers and activities that are the result of longer term relationships.

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—

1. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3),

Youth Funds – WIOA Title I youth funds are allocated to the LWDAs using the formulas and methodologies prescribed in Section 128(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

• Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in all areas of substantial unemployment in the State;

• Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and

• Relative number of disadvantaged youth in each LWDA compared to the total number of disadvantaged youth in the State. Note: Kentucky has one LWDA that is a designated rural concentrated employment program. The state applies the 90 percent hold–harmless provision contained in WIOA, Section 128(b)(2)(A)(ii).

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

Adult Funds – WIOA Title 1 adult funds are allocated to the LWDAs using the formulas and methodologies prescribed in Section 133(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

• Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in areas of substantial unemployment in the State;

• Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and

• Relative number of disadvantaged adults in each LWDA compared to the total number of disadvantaged adults in the State. The state applies the 90 percent hold harmless provision contained in WIOA, Section 133(b)(2)(A)(ii).

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

Dislocated Worker Funds - WIOA Title 1 dislocated worker funds are allocated to the LWDAs in accordance with WIOA section 133(b)(2) and TEGL 29-14. The method used to allocate the dislocated worker funds to the LWDAs divides the total dislocated worker funds received by the state into two pools. One pool equals 50 percent of the total received and allocated to the local areas as follows: • 30 percent based on unemployment insurance data, • 40 percent based on unemployment concentrations, • 2 percent based on plant mass layoffs, • 13.5 percent based on declining industries, • .5 percent based on farmer-rancher economic hardship data, and • 14 percent based on long-term unemployment. The other pool equals 10 percent of the total received and allocated to the local areas as follows: • 60 percent based on unemployment concentrations; and • 40 percent based on declining industries. The state is updating its policy that reiterates the language for the distribution of dislocated worker funds that each region is guaranteed to receive an allocation percentage for a year that is no less than 90% of the average allocation percentage of the local area for the prior two years as contained in WIOA, Section 133(b)(2)(B)(iii). The policy should be updated no later than Sept. 30, 2016. The governor may elect to adjust the percentage of the pool amounts or the allocation percentages used to distribute the pools.

B. FOR TITLE II:

1. 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.

Request for Proposal Process and Timeline:

Kentucky Adult Education (KYAE) is the state's eligible agency for adult education programs. KYAE is responsible for administering the funds and providing program/performance oversight to grantees. Eligible providers of local KYAE services, approved under Workforce Investment Act of 1998 requirements, will continue to receive funding through June 30, 2017, as long as they adhere to state and federal grant expectations, as measured through annual applications, financial reports and program performance reports. Competitive process: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess and award multi-year grants (four-year awards) to eligible providers throughout the state. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entities described above and an employer(s). Regionally-focused/Statewide services: KYAE will encourage applicants to focus regionally using the local workforce innovation board areas as a framework. While the regional areas vary in configuration (number of counties represented), KYAE will ensure all Kentucky counties have access

to adult education services. Whereas it will encourage realizing greater efficiencies through regionally-focused, student-needs-driven and industry-sector-focused, and flexible and consolidated, service delivery models, resulting in enhanced performance and accountability. Funding will be distributed based on population needs and performance.

Demonstrated effectiveness: In order for KYAE reviewers to determine “demonstrated effectiveness”, all applicants will be required to provide data illustrating their ability to improve skills of basic-skills-deficient adults in applicable academic areas related to the RFP. Previous grantees will be expected to use data from Kentucky Adult Education Reporting System (KAERS) and explain how they met performance measures (established by KYAE) for all student levels, as well as English language learners. New organizations applying for AEFLA funds will be required to provide information and data illustrating their ability to improve the knowledge and skills needed to transition adult students to additional education and training and/or employment. Applications that do not provide adequate evidence, as indicated by the reviewer team scores using the reviewer rubric, will be eliminated from consideration. Additionally, all applicants will be expected to describe service delivery models that maximize effective employment and efficient use of resources. Current timeline: • February 2017: Release four-year federal AEFLA Request for Proposals • February 2017 - March 2017: KYAE provides technical assistance through bidder conferences to potential eligible providers • January 2017 - March 2017: Recruit candidates to review and score RFP • March 2017: Due date for RFP grant applications • March - April 2017: Reviewers review and score (in small, consensus-building groups) RFP grant applications • April 2017: KYAE conduct review of budget and other grant requirements for approved (based on score) grant applications • April - May 2017: KYAE announces AEFLA grant applicants that will receive funding • July 1, 2017: AEFLA grant providers begin grant cycle, programming, and funding

Multi-year grants: KYAE will award multi-year grant to eligible local providers through a competitive RFP process for the purpose of developing, implementing and improving adult education with the state. The grants will be for a minimum of a four-year cycle that applies to all programs.

2. 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 KYAE RFPs for all programs competed will adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers) and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement, application and application and review processes will be in effective for all applicants. All applicants will be treated the same manner. The application process will be designed so that direct application to the state eligible agency is clearly evident, customary and non-negotiable. The grant will be awarded directly to eligible and approved service providers and not through third-party agreements.

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 Rehabilitation Act defines the amount of funds each state receives to provide vocational rehabilitation services in Sec. 8 (a). The funding is based on the ratio of the per capita income of each state to the per capita income of the United States for the three most recent consecutive years for which data is available. The funding allotment has a minimum of 33.3 percent and a maximum of 75 percent and is promulgated by the secretary of the U.S. Department of Education from Oct. 1–Dec. 31 of each even numbered year and is in effect beginning the following federal fiscal year.

Section 101(a)(2)(A)(i) describes under what circumstances states may have two separate vocational rehabilitation agencies when allowable under state law: one agency to serve individuals who are blind and one agency to serve individuals with other disabilities.

Section 101(a)(2)(A)(ii) states, “the Commissioner, on the request of a state, may authorize the designated state agency to share funding and administrative responsibility with another agency of the state or with a local agency in order to permit the agencies to carry out a joint program to provide services to individuals with disabilities, and may waive compliance, with respect to vocational rehabilitation services furnished under the joint program, with the requirement of paragraph (4) that the plan be in effect in all political subdivisions of the state.” Kentucky is one of the states authorized to have two vocational rehabilitation units.

The current funding distribution is 14 percent for OFB and 86 percent for OVR. The current distribution is based upon the number of consumers historically served and the average cost per case for each agency. Upon the request of either OFB or OVR, the proportion of funding for each agency may be renegotiated at the state level after public input and upon approval of the change in the state plan.

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.

1. 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.

Kentucky has the following goals for data alignment and integration:

• development and implementation of a common intake process,

• integration with underlying transactional systems currently in place,

• implementation of a common case management system to ultimately replace the current program–specific transactional systems, and

• reporting from a common data repository.

Existing legacy case management systems across OET, OVR and OFB and utilized by the Local Workforce Development Boards are disparate and insular. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following goals:

• Develop or create a reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.

• Convert to a cross–agency common case management system will be executed as current legacy transactional systems are retired. The common case management system will be built using the same technology deployed for the common intake process.

This long–range plan solidifies an endurable and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data linkages will greatly enhance Kentucky's ability to make real–time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement.

More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data

repository built upon the same technology used for the intake and case management processes is integral to this plan as it ensures standardization and integrity of mandated state and federal reporting requirements.

KCEWS collects accurate education and workforce data in the KLDS in order to link the data and generate timely reports about student performance through employment to be used to guide decision makers in improving Kentucky's education system and training programs. (KRS 151B.132,2). KCEWS currently collects data from key State agencies, such as KYAE, OFB and OVR and, post–secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132, 4).

Additional transactional data collected will be added as data systems at State agencies are updated to reflect any changes required to measure the impact of education and workforce programs. The staff at lead state agencies has access to their and other common data through KCEWS' Web Intelligence Business Objects Platform (WEBI). Additionally, KCEWS has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133, 5).

2. 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.

Kentucky is currently testing a common intake and service delivery approach based on a sales force platform. The initial test will focus on one particular grant and several local career centers. Building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with KYAE will be added as priorities are determine and funding becomes available.

3. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER PROGRAMS (INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.) AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS, INCLUDING UNEMPLOYED INDIVIDUALS.

The Kentucky Education and Workforce Development Cabinet works closely with the governor and will continue to do so as plans for the above goals are finalized and implemented to ensure that Board expertise and leadership knowledge are incorporated.

KCEWS will work with the state board to ensure data and metrics are presented in a timely, accurate fashion. This information will be used to inform the governor about the successes and risks of implementation.

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

KCEWS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability. An approach Kentucky is actively exploring would house all data required for these reports in the KLDS. The priority is to identify and deploy a third–party, non–agency entity to receive, clean and report from multiple data

sources in the short term and ultimately to assist in the development of common reports when the common system is implemented.

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. Separately, the Departments of Labor and Education anticipate working with States to inform future guidance and possible information collection(s) on these accountability systems. 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.

KCEWS, along with state agencies and the state board, will have access to pre-training and post–training program information for all individuals receiving services. These measures include entry and exit data, post–secondary data and employment data.

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.)

UI wage record data is already included in the Kentucky Longitudinal Data System and will be used as a key outcome indicator for all training programs, consistent with federal and Kentucky state laws.

Kentucky will continue to use UI wage record data, consistent with federal and Kentucky state law, to validate employment information for the Quarterly Census of Employment and Wages (QCEW) program. QCEW uses this information to meet its federal program deliverables and also provides labor market information on the number of establishments, employment and wages by industry (North American Industry Classification System) within the state.

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.

Only authorized staff may access UI wage record and UI claimant data. Requests for access follow a stringent process that is examined first by the Office of Employment and Training. Upon agency approval, requests are sent to Security Administration within the Commonwealth Office of Technology for approval. Once access has been approved, all users are assigned a unique user

name and password. Users access authentication is performed through Active Directory domain controller and multi-level security policies through Resource Access Control Facility (RACF) procedures. In addition, multiple levels, internal and external, of firewall protection prohibit unauthorized access. Finally, annual audits are performed by the Office of the Auditor of Public Accounts, Commonwealth of Kentucky that focus on application security measures and data protection.

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.

Each career center office, along with each of the 10 LWDBs, has received Title 38 U.S.C. 4215(b) and 20 CFR Parts 1010, which provide "Priority of Service" to veterans for all Department of Labor funded programs. Each local career center office has a priority of service poster prominently displayed near the entrance, which defines priority of service and describes who is eligible. Additionally, each customer entering the local office receives a questionnaire used to determine if the customer is priority-of-service eligible. If the customer is an eligible "covered person," he/she receives a fact sheet listing all of the services and programs along with the program's qualifications, which must abide by the Priority of Service mandate. The covered person is then seen by the first available staff person. Additionally, Kentucky's Focus Career system automatically contacts veterans matched to new job orders 24 hours before non-veterans.

Eligible veterans and eligible persons who are determined to have a significant barrier to employment, as defined in VPL 03-14 changes 1 and 2 or most current guidance, are referred to the Disabled Veterans Outreach Program specialist (DVOP). Additionally, any eligible veterans or eligible persons who are part of a designated additional population by the Assistant Secretary, as defined in VPL 04-14 or current guidance, will be referred to the DVOP. These referrals will be made following an initial identification of an SBE through the registration process. Customers registering electronically using Kentucky's Focus Career module will be asked a series of questions to determine if they are priority of service eligible. If they are identified as a covered person, they are presented with a screen defining priority of service and directed to their local career center for further information on services and programs.

Kentucky uses a variety of methods to track the priority of service provision. The state's veterans coordinator analyzes the States Performance Outcome Data each quarter to compare veterans' service rates to non-veterans' service rates. The Managers' Quarterly Report, Compliance Evaluation Reports and the Monthly Veterans' Activities Report are used to monitor priority of service.

Twenty percent of the offices will have a compliance evaluation performed annually. All offices are monitored quarterly through agency reports, which are supplemented by annual self-assessments completed by each local office manager and the Jobs for Veterans State Grant staff. Technical assistance will be provided by the veterans' program coordinator for under-performing offices. Ongoing deficiencies will result in training and corrective action being taken by the program coordinator. The compliance evaluation will determine if the office is adhering to state policy guidance. Additionally, the compliance evaluation will check referral rates, placement rates and staff-assisted service rates for covered persons versus non-covered persons. Case management files, along with veteran outreach activities and internal routing and procedures for services to covered persons, are evaluated to determine if priority of service is being delivered to veterans. Any deficiencies are recorded and a corrective action plan is prepared in collaboration with the state director of Veterans' Employment and Training.

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.

Accessibility is addressed on several levels and venues in the KCC. Given that OFB and OVR staffs are housed in many of the career center offices and are a central part of the workforce programs, there is a heightened sense of assuring this topic is addressed. Accessibility is a part of the required certification process under II. Career Center (office) Management: Physical Infrastructure and Accessibility. The standards that apply to this are as follows:

Standard 1: Career Center offices are accessible so that all customers can fully use services and resources. (ADA compliant checklist) KCC offices:

• are fully ADA compliant;

• are feasible (As new center locations are selected, KCC offices are located in areas that are convenient for their customers, close to major highways, on public transportation routes, centrally–located, close to heavily–trafficked areas such as malls and shopping centers, etc.);

• provide assistive technology to assist customers with disabilities (visual, hearing or physical) so they can access computers and other KCC resources/services;

• evaluate assistive technology annually to ensure that it is up–to–date and fully functioning.

• provide free parking and inclusive parking spaces that are adequate for the average level of customer traffic, especially for individuals with disabilities; and

• make services accessible to customers who have language and literacy barriers (non–English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers).

For assistive technology, the objective is to design a computer workstation/kiosk that can be used by individuals with the widest possible range of abilities and/or circumstances. Kentucky follows the guidelines set forth by the Job Accommodation Network, One–Stop Disability Resource Manual. All Kentucky Career Center offices are expected to ensure universal access to programs and activities for all eligible individuals. Kentucky has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age.

OET will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101–336, and applicable federal regulations related to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the U.S. Department of Labor Final Rule on Federal Executive Order 11246.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR 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.

Services have to be accessible to customers who have language and literacy barriers (e.g. non–English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers). Kentucky will provide English learners access to services that assist them in achieving competence in writing, speaking and understanding English.

KCC core programs and partners will work together to increase opportunities in the educational and workforce system for individuals who are English language learners. Adult Education will play a key role as a partner for learners in the Kentucky workforce system. Career center staff will need to be knowledgeable of resources for the English language learner to acquire fundamental literacy skills. These available resources will allow job seekers to improve their skills and be ready for post–secondary education or training, job advancement and economic self–sufficiency.

All Kentucky Career Center offices take necessary steps to ensure that each individual center is in full compliance with federal regulations. Services are available to all customers in their native language when possible. All Kentucky Career Center staff are trained in using interpretation services (Language Lane Telephone Services), as well as the proper staff to have materials translated for customers.

Staff members at each career center office serves as an equal opportunity officer. Staff members receive annual training on the delivery of services to ESL individuals, including proper use of phone interpretation services and obtaining translated materials. This process is overseen by the state's equal opportunity officer and outlined within the Methods of Administration plan filed with the Department of Labor, Civil Rights Center. Additionally, OET has a Limited English Proficiency Policy that addresses procedures for both translation and interpretation for staff and is accessible to all partners on the KCC Team of Experts Web portal.

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.

Planning meetings were held jointly with core program staff quarterly for the past 18 months since the enactment of WIOA. The combined state plan programs in Kentucky, in addition to the core programs administered by the Department of Workforce are: Trade Adjustment Assistance (TAA), Jobs for Veterans State Grants (JVSG), Unemployment Insurance and Adult Education under Title II. There was representation at the planning meetings from all core program staff. Leadership from all the combined state programs played an active role in the planning process. Team assignments for different sections of the state plan were given to staff members based on their areas of program expertise. Executive leadership of the combined state plan programs has participated in the WIOA plan work group and writing subcommittees.

Combined state plan program staffs are engaged through WIOA implementation work groups and continue to provide valuable input on multi–agency and partner teams. Vocational Rehabilitation, JVSG, UI and TAA staffs are co–housed with the OET's Division of Workforce Employment Services (Title I) in the same building which enhances communication and opportunities for strategic planning.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

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

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

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

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

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

6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes

7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes

8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B--

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Kentucky identifies four regions and 10 local workforce areas delivering services as related to WIOA. The four workforce regions have been identified as: • Central Region consisting of the Northern Kentucky, Kentuckiana Works, Lincoln Trail and Bluegrass local workforce development areas. • East Region consisting of the Eastern Kentucky Concentrated Employment Program (EKCEP) and Ten County Area (TENCO) local workforce development areas. • South Central Region consisting of the South Central and Cumberlands local workforce development areas. • West Region consisting of the Green River and West Kentucky workforce development areas. Map of LWDA's and regions can be found here: kwib.ky.gov/LWDARegions.jpg

The 10 local workforce areas are:

• Bluegrass Local Workforce Area composed of Anderson, Bourbon, Boyle, Clark, Estill, Fayette, Franklin, Garrard, Harrison, Jessamine, Lincoln, Madison, Mercer, Nicholas, Powell, Scott and Woodford counties.

• Cumberlands Local Workforce Area composed of Adair, Casey, Clinton, Cumberland, Green, McCreary, Pulaski, Russell, Taylor and Wayne counties.

• Eastern Kentucky Concentrated Employment Program Local Workforce Area composed of Bell, Breathitt, Carter, Clay, Elliot, Floyd, Harlan, Jackson, Johnson, Knott, Knox, Lawrence, Lee, Leslie, Letcher, Magoffin, Martin, Menifee, Morgan, Owsley, Perry, Pike and Wolfe counties.

• Kentuckiana Works – Greater Louisville Local Workforce Area composed of Jefferson, Bullitt, Henry, Oldham, Spencer, Shelby and Trimble counties.

• Green River Local Workforce Area composed of Daviess, Hancock, Henderson, McLean, Ohio, Union and Webster counties.

• Lincoln Trail Local Workforce Area composed of Breckinridge, Grayson, Hardin, Larue, Marion, Meade, Nelson and Washington counties.

• Northern Kentucky Local Workforce Area composed of Boone, Campbell, Carroll, Gallatin, Grant, Kenton, Owen and Pendleton counties.

• South Central Local Workforce Area composed of Barren, Hart, Metcalfe, Monroe, Allen, Butler, Edmon– son, Logan, Simpson and Warren counties.

• TENCO Local Workforce Area composed of Bath, Boyd, Bracken, Fleming, Greenup, Lewis, Mason, Montgomery, Robertson and Rowan counties.

• Western Kentucky Local Workforce Area composed of Ballard, Caldwell, Calloway, Carlisle, Christian, Crittenden, Fulton, Graves, Hickman, Hopkins, Livingston, Lyon, Marshall, McCracken, Muhlenberg, Todd and Trigg counties.

Map of LWDA's for Kentucky can be found here: kwib.ky.gov/LWDAMap.jpg

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.

WIOA Title 1, Chapter 2, Section 106 outlines the requirements and process for the determination of regions and local areas including identification, types of regions, initial designation, subsequent designation, process, considerations, designation on recommendation by the state board and appeals.

Per Training and Employment Guidance Letter (TEGL) 27–14 issued by the U.S. Department of Labor on April 15, 2015, "the governor must develop a policy for designation of local workforce development areas. The purpose of a local area is to serve as a jurisdiction for the administration of workforce development activities using Adult, Dislocated Worker and Youth funds allocated by the State and to coordinate efforts related to the other core programs at a local community level. WIOA Section 106(b) establishes that the governor must designate local workforce development areas (local areas) in or– der for the State to receive Adult, Dislocated Worker and Youth funding under Title I subtitle B. … The governor must follow the requirements provided in this guidance until the final regulations take effect."

By July 1, 2015, the governor, in consultation with the Kentucky Workforce Investment Board or its successor (state board), developed a policy and procedure for the designation of all local areas, as well as a policy for the designation of new local areas. The policy included:

• consultation with the state board;

• consultation with the chief elected officials and affected local boards; and

• consideration of comments received through a public comment process.

The public comment period offered adequate time for public comment prior to the designation of the local workforce development area and provided an opportunity for representatives of interested business, education and labor organizations to have input into the development of the formation of the local area.

Specifically, Kentucky took a precise and comprehensive approach to area designation as follows:

• A request was made to the governor for a local area designation..

• KWIB established a steering committee.

• The steering committee developed draft recommendations for consideration based upon data, fiscal integrity and performance of current local areas.

• The Department of Workforce Investment completed local input and public comment sessions and period on recommendations.

• The steering committee considered feedback, federal guidance, reviewed data, performance and fiscal integrity once again and finalized recommendations

. • KWIB reviewed the public input received and the final recommendations from the steering committee.

• KWIB made a recommendation to the governor on region and local area designations.

• The governor issued an executive order on regions and local area designation/re–designation.

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

The appeal process is outlined as follows.

• A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area under WIOA Section 106(b)(2) or (3) by the governor may submit an appeal to the state board. 29 U.S.C.A. § 3121(b)(5).

• The appeal shall be filed no later than thirty days after receipt of the denial of designation of an area as a local area by the governor.

• The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

• A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the state board may request a review by the U.S. Department of Labor Secretary.

• The request for review shall be filed no later than 30 days after receipt of written notification of the denial from the state board. The request for review shall be submitted by certified mail, return receipt requested, to the secretary, U.S. Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the request for review shall be simultaneously provided to the state board in care of the Executive Director, Kentucky Workforce Investment Board, Education and Workforce Development Cabinet, 500 Mero St., Third Floor, Frankfort, KY 40601 and the Executive Director, Office of Employment and Training, 275 East Main St., Frankfort, KY 40621.

• On review, the U.S. Department of Labor secretary shall consider whether:

o The unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State plan, or

o The unit or grant recipient meets the requirements for designation as a local area under 29 U.S.C.A. § 3121(a)(2) or (a)(3), as appropriate.

• The request for review shall be conducted in accordance with procedures established by the U.S. Department of Labor secretary.

• The U.S. Department of Labor has confirmed that there is no appeal available regarding determinations under WIOA Section 106(b)(4).

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

The appeal process is outlined as follows: • A one-stop partner administering a program described in section 102(b)(2)(D)(i)(IV) may appeal a determination regarding the portion of funds provided by submitting an appeal to the state board.

• The appeal shall be filed with the Board no later than ten business days after receipt of the determination regarding funding.

• The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

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.

Early and ongoing system governance policies and guidance are collaboratively developed and are posted at www.kwib.ky.gov/wioa_planning.htm.

POLICY NAME: Workforce Innovation and Opportunity Act -

Interlocal Agreements, Chief Local Elected Official and Local Elected Official Roles and Responsibilities

Policy Number: 15-002

Date of Issue: March 4, 2015

Effective Date: March 4, 2015

For more info contact: Division Director, Workforce and Employment Services, Office of Employment and Training (OET), 502-564-5331.

Applies /Of Interest To: Local Workforce Development Boards (LWDBs), Local Workforce Development Areas (LWDAs) staff, Chief Local Elected Officials and Local Elected Officials.

Subject Workforce Innovation and Opportunity Act– Interlocal Agreements and Chief Local Elected Official and Local Elected Official Roles and Responsibilities Purpose This policy provides guidance and clarification to LWDAs relating to the Interlocal Agreement process and the roles and responsibilities under WIOA.

Definitions Chief Local Elected Official (CLEO) - The CLEO is the chief local elected official(s) elected among the consortium of Local Elected Officials representing the Local Elected Officials in the local Workforce Development Area (LWDA).

Local Elected Official (LEO) - The LEOs are the local elected officials of a county. The highest elected official in counties and counties with merged government shall be considered the LEO for their respective county.

Local Workforce Development Board (LWDB) - means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

Interlocal Agreement - a written agreement that specifies the responsibilities of the CLEO and the individual LEO(s).

Background The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law 133-128, July 22, 2014) enacted by the Congress of the United States, provides for federal funds to be granted to states, and for each state's Governor to designate LWDA within the state for the delivery of services and programs under the Act.

WIOA Section 107 provides guidance and direction on the role of the CLEO and LEO in the LWDA as designated by the Governor. OET issuances provide support and clarification to the Act.

Realizing that local employment and training programs cannot be fully effective or implemented without intergovernmental coordination for such reasons that programs and their implementation cross governmental, departmental, agency and political jurisdictions, the LEOs shall enter into a written Interlocal Agreement. The Kentucky Interlocal Cooperation Act, KRS 65.210 through 65.300, permits local governmental units, upon approval by each fiscal court and the Department for Local Government, to make the most efficient use of their powers by enabling them to cooperate with other localities on a basis of mutual advantage and to thereby provide services and facilities in a manner and form that will best accord with geographic, economic, population and other factors which influence the needs and development of local communities.

Policy INTERLOCAL AGREEMENT

As noted in WIOA Section 107(c)(1)(B), when a LWDA includes more than one unit of government, the LEO of each unit may execute a written agreement that specifies the responsibilities of the CLEO and the individual LEO(s):

WIOA Section 107(c)(1)(B) MULTIPLE UNITS OF LOCAL GOVERNMENT IN AREA.—

(i) IN GENERAL.—In a case in which a local area includes more than one unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual chief elected officials—

(I) In the appointment of the members of the local board from the individuals nominated or recommended to be such members in accordance with the criteria established under subsection (b); and

(II) In carrying out any other responsibilities assigned to such officials under this title.

(ii)LACK OF AGREEMENT.—If after a reasonable effort, the chief elected officials are unable to reach agreement as provided under clause (i), the Governor may appoint the members of the local board from individuals so nominated or recommended.

Additional OET Guidance/Clarification:

An Interlocal Agreement is required for each LWDA.

The above policy applies except in such areas designated as Concentrated Employment Programs:

In the case of an area that was designated as a local area in accordance with section 116(a)(2)(B) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), and that remains a local area on that date, the governing body of the concentrated employment program involved shall act in consultation with the chief elected official [CLEO] in the local area to appoint members of the local board, in accordance with the State criteria established under subsection (b), and to carry out any other responsibility relating to workforce investment activities assigned to such official under this Act. (WIOA § 107(c)(1)(C)).

All LEOs in a workforce area must enter into an agreement that determines how the LWDB nominees will be selected, appointed, removed or reappointed. The process must be documented in the Interlocal Agreement. The LEOs shall enter into an Interlocal

Agreement as a requirement to appoint the LWDB.

In addition to the Interlocal Agreement, the LEOs also shall enter into a Partnership Agreement with the LWDB. The Interlocal Agreement and the Partnership Agreement which are the two governing documents must be consistent. The requirement for consistency applies to any item that is addressed in both governing documents. Both agreements are dynamic documents that can, and should, be amended when a need or desire arises and the respective signatories agree.

Interlocal Agreement Required Inclusions. LEOs must enter into an agreement with each other that, at a minimum, include the following sections:

(1) State the purpose of the Agreement. Describe the purpose and the term of the Interlocal Agreement (not to exceed five years).

(2) Designation of a Chief Local Elected Official. The CLEOs are required by WIOA to approve or provide guidance on a number of LWDB activities. Therefore the Commonwealth requires LEOs to

select a CLEO who will act on behalf of the other LEOs and to include the following information in the Interlocal Agreement:

a) Selection/appointment process and term of the CLEO, which must include steps to ensure that his/her duties would not create or be perceived to create a conflict of interest between the consortium of LEOs, LWDB, fiscal agent or administrative entity; and

b) The designation of the CLEO to serve as the signatory for the LEOs;

c) Outline decisions that may be made by the CLEO on behalf of the LEOs; and

d) Name, title, and contact information of the appointed CLEO.

To avoid conflict of interest, the CLEO shall not serve as the highest ranking officer on any Board or other entity that governs the fiscal agent or service delivery provider.

(3) Participating Local Elected Officials. The agreement must contain the name, representation, contact information and signature of each LEO in the local area. The Interlocal Agreement shall require a governing board of LEOs and bylaws and shall not be administratively attached to the fiscal agent, grant sub-recipient, one-stop operator, or service provider.

The LEO governing board shall require a 65% super-majority to take the following actions:

• Selection of the CLEO;

• Designation of the fiscal agent or grant sub-recipient;

• Authorization for the CLEO to request the Governor's consent for the LWDB to be the direct service provider;

• Approval of the LWDB annual budget; and

• Selection of the one-stop operator.

(4) Dispute Resolution. The Interlocal Agreement must state how disputes among LEOs will be resolved regarding LWDB board appointments and carrying out other 4 responsibilities under WIOA.

(5) Fiscal Agent or Grant Sub-recipient Designation. The LEO governing board may designate an entity to serve as the local fiscal agent or local grant sub-recipient for WIOA funds. In making such designation, the LEOs shall carry out a competitive procurement process conducted by the Department of Workforce Investment for fiscal agent services or grant sub-recipient services, including a Request for Proposals that has been reviewed and approved by the Department of Workforce Investment and which provides that proposals will be evaluated and ranked based upon criteria including but not limited to quality of services, demonstrated experience of quality service delivery, cost, conflict of interest policies, and history of fiscal integrity.

Such designation shall not relieve the LEOs of the liability for any misuse of grant funds as apportioned in the Interlocal Agreement.

(6) Grant Recipient/Liability of Funds. The Interlocal Agreement must indicate the LEOs' acknowledgement of financial liability as noted in WIA 107(d)(12)(B)(i)(I) and outline the process for determining each LEO's share of responsibility. This determination could be based on allocation, population, expenditures, or other criteria determined by the LEOs.

The Interlocal Agreement must contain a detailed process for reconciling disallowed costs. In most cases, liability for costs which are recommended for dis-allowance and which are not resolved, rest with the entity responsible for incurring the cost. In the event the entity responsible cannot or will not assume the liability, the Interlocal Agreement must provide the process on how funds will be reimbursed.

(7) Local Area Service Delivery Provider. As authorized in WIOA Section 107(g)(2), a LWDB may provide career services described in WIOA Section 134(c)(2) through a one-stop delivery system or be designated or certified as a one-stop operator only with the agreement of the CLEO and the Governor. See WIOA Policy regarding LWDB Member Nomination Guidelines, OET Confirmation Process and Board Certification by the (effective 7/1/2015) for conditions to obtain the Governor's consent including a competitive procurement.

In cases where the LWDB does not seek to provide career services, WIOA Section 121(d)(2) states that to be eligible to receive funds under this subtitle to operate a one-stop center, an entity (which may be a consortium of entities) shall be designated or certified as a one-stop operator through a competitive process. This process shall be outlined in the Partnership Agreement between the LEOs and the LWDB.

(8) Communication. Describe the process and procedures the CLEO will utilize to keep the LEOs informed regarding LWDB activities. Determine how many times a year the LEOs will meet and how often a joint meeting with the LWDB will be held.

(9) LWDB Budget Approval. Describe the process for reviewing and approving the LWDB annual budget among the LEOs. (WIOA Section 107(d)(12)(A).

(10) LWDB Member Representation. Outline how LEOs will ensure LWDB representation is fair and equitable across the LWDA and in accordance with WIOA Policy regarding LWDB Member Nomination Guidelines, OET Confirmation Process and Board Certification—effective 7/1/2015.

Describe the process for determining the initial size of the LWDB and for selecting, appointing, removing or reappointing LWDB members.

Describe the process to determine the terms of office for Board members. LWDB appointments do not require the signature of all the LEOs, but rather only the signature of the designated CLEO is required, as stated in the Interlocal Agreement.

(11) Selection of a New Chief Local Elected Official. When a new CLEO is selected in accordance with the Interlocal Agreement, the newly selected CLEO must submit to the LWDB and the OET, a written statement acknowledging that he/she:

a) Has read, understands and will comply with the current Interlocal Agreement; and

b) Apprises OET of the change in CLEO designation.

(12) Election of a New Local Elected Official. When a new LEO is elected within the LWDA, the newly elected official must submit to the LWDB a written statement acknowledging that he or she:

a) Has read, understands, and will comply with the current Interlocal Agreement; and

b) Reserves the option to request negotiations to amend the Interlocal Agreement at any time during the official's tenure as a LEO.

(13) Amendment or Change to the Interlocal Agreement. Outline the process to be used for amendments or changes to the Interlocal Agreement. All amendments or changes must be submitted to the LWDB and the OET after approval by the Department of Local Government in accordance with KRS 65. 210 through 65.300.

(14) Single County Local Areas. If any single county local area is designated, the LEO shall execute a written agreement that specifies his or her liability in accordance with WIOA.

(15) Interlocal Agreement KRS requirements. Upon completion of the Interlocal Agreement and all LEO signatures have been recorded on the Interlocal Agreement and approved by each fiscal court, the Agreement shall be sent to the Department for Local Government for approval in accordance with the provisions of KRS 65.210 through 65.300.

Required Action

Upon final approval by all LEOs and the Department for Local Government, the final document shall be submitted to the OET.

Other References

Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law 133-128, July 22, 2014); WIOA—LWDB Member Nomination Guidelines, OET Confirmation Process and Board Certification (effective 7/1/2015); The Kentucky Interlocal Cooperation Act, KRS 65.210 through 65.300.

SECTION I –

REQUIRED PARTNERSHIP AGREEMENT CONTENTS – JOINT DUTIES FUNCTIONS AND RESPONSIBILITES

Describe how the LEOs and LWDB will develop and submit a local plan and collaborate with other LWDBs and LEOs to prepare a regional plan for submission to the Governor (WIOA Section 107(d)(1)).

Describe how the LEOs and LWDBs will:

Conduct oversight for local youth workforce investment activities, local employment and training activities, and the one-stop delivery system in the local area. (WIOA 107(8)(A)(i)).

Ensure the appropriate use and management of the funds provided under subtitle B for the activities and system described in clause (i) and for workforce development activities. (WIOA 107(8)(A)(ii)).

Ensure the appropriate use, management, and investment of funds to maximize performance outcomes under section 116. (WIOA 107(8)(B)).

Describe how the LEOs and LWDB will prepare for negotiations with the State on local performance accountability measures. (WIOA Section 107(9)).

Describe how the LEOs and LWDB will designate or certify one-stop operators and the grounds and process for any subsequent termination for cause of the eligibility of such operators.

(WIOA 107(10)(A)(i,ii)).

Describe how the LWDB will develop a local area budget and the process for obtaining CLEO approval.

(WIOA 107(12)(A)).

Describe how operational issues and concerns relating to the designated fiscal agent/grant sub recipient shall be addressed.

Describe the process and procedures to be followed in the event there are unresolved disputes between the LEOs and the LWDB.

3/04/2015

SECTION II -

OTHER ADDITIONAL TOPICS THE PARTIES MAY CHOOSE TO ADDRESS

This confirms that the CLEO, representing the LEOs and the Chair, representing the LWDB, are authorized to sign this agreement, understand the agreement, and agree to the terms and conditions contained in this agreement.

This also confirms that the LEOs and the LWDB have read, understood and agree on the functions, duties and responsibilities of the LEOs (represented by the CLEO) and the LWDB (represented by the Chair) as outlined in WIOA, Public Law 113-128 and in the policies issued by the Office of Employment and Training (OET).

It is further understood that updates and changes that affect this agreement (e.g. changes of CLEO, LWDB chair, policy revision/updates/additions), will require that this agreement be updated and reflect those amendments in Section III of this document. Any amendment must be submitted to OET for prior approval.

CLEO – Print name: Board Chair – Print Name:

CLEO – Signature: Board Chair – Signature:

Date:

ATTACHMENT 1 – WIOA LOCAL BOARDS POLICY

SEC. 3. DEFINITIONS (Most relevant to Boards). Workforce Innovation and Opportunity Act, 29 U.S.C. 3101 et. seq.

(1) ADMINISTRATIVE COSTS.—The term ‘‘administrative costs’’ means expenditures incurred by State boards and local boards, direct recipients (including State grant recipients under subtitle B of title I and recipients of awards under subtitles C and D of title I), local grant recipients, local fiscal agents or local grant sub-recipients, and one-stop operators in the performance of administrative functions and in carrying out activities under title I that are not related to the direct provision of

workforce investment services (including services to participants and employers). Such costs include both personnel and non-personnel costs and both direct and indirect costs.

(9) CHIEF ELECTED OFFICIAL.—The term ‘‘chief elected official’’ means—

(A) the chief elected executive officer of a unit of general local government in a local area; and

(B) in a case in which a local area includes more than 1 unit of general local government, the individuals designated under the agreement described in section

107(c)(1)(B).

(12) CORE PROGRAM.—The term ‘‘core programs’’ means a program authorized under a core program provision.

(13) CORE PROGRAM PROVISION.—The term ‘‘core program

provision’’ means—

(A) Chapters 2 and 3 of subtitle B of title I (relating to youth workforce investment activities and adult and dislocated worker employment and training activities);

(B) Title II (relating to adult education and literacy activities);

(C) Sections 1 through 13 of the Wagner-Peyser Act

(29 U.S.C. 49 et seq.) (relating to employment services); and

(D) Title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), other than section 112 or part C of that Title (29 U.S.C. 732, 741) (relating to Vocational Rehabilitation services).

(14) CUSTOMIZED TRAINING.—The term ‘‘customized training’’ means training—

(A) that is designed to meet the specific requirements of an employer (including a group of employers);

(B) That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and

(C) for which the employer pays—

(i) A significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and such other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities; and

(ii) In the case of customized training (as defined in sub-paragraphs (A) and (B)) involving an employer located in multiple local areas in the State, a significant portion of the cost of the training, as determined by the Governor of the State, taking into account the size of the employer and such other factors as the Governor determines to be appropriate.

(23) IN-DEMAND INDUSTRY SECTOR OR OCCUPATION.—

(A) IN GENERAL.—The term ‘‘in-demand industry sector or occupation’’ means—

(i) An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or

(ii) An occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

(B) DETERMINATION.—The determination of whether an industry sector or occupation is in-demand under this paragraph shall be made by the State board or local board, as appropriate, using State and regional business and labor market projections, including the use of labor market information.

(26) INDUSTRY OR SECTOR PARTNERSHIP.—The term ‘‘industry or sector partnership’’ means a workforce collaborative, convened by or acting in partnership with a State board or local board, that—

(A) Organizes key stakeholders in an industry cluster into a working group that focuses on the shared goals and human resources needs of the industry cluster and that includes, at the appropriate stage of development of the partnership—

(i) Representatives of multiple businesses or other employers in the industry cluster, including small and medium-sized employers when practicable;

(ii) 1 or more representatives of a recognized State labor organization or central labor council, or another labor representative, as appropriate; and (iii) 1 or more representatives of an institution of higher education with, or another provider of, education or training programs that support the industry cluster; and

(B) May include representatives of—

(i) State or local government;

(ii) State or local economic development agencies;

(iii) State boards or local boards, as appropriate;

(iv) A State workforce agency or other entity providing employment services;

(v) Other State or local agencies;

(vi) Business or trade associations;

(vii) Economic development organizations;

(viii) Nonprofit organizations, community-based organizations, or intermediaries;

(ix)Philanthropic organizations;

(x) Industry associations; and

(xi) Other organizations, as determined to be necessary by the members comprising the industry or sector partnership.

(33) LOCAL BOARD.—The term ‘‘local board’’ means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

42) ONE-STOP PARTNER.—The term ‘‘one-stop partner’’ means—

(A) An entity described in section 121(b)(1); and

(B) An entity described in section 121(b)(2) that is participating, with the approval of the local board and chief elected official, in the operation of a one-stop delivery system.

(47) PAY-FOR-PERFORMANCE CONTRACT STRATEGY.—The term ‘‘pay-for-performance contract strategy’’ means a procurement strategy that uses pay-for-performance contracts in the provision of training services described in section 134(c)(3) or activities described in section 129(c)(2), and includes—

(A) Contracts, each of which shall specify a fixed amount that will be paid to an eligible service provider (which may include a local or national community-based organization or intermediary, community college, or other training provider, that is eligible under section 122 or 123, as appropriate) based on the achievement of specified levels of performance on the primary indicators of performance described in section 116(b)(2)(A) for target populations as identified by the local board (including individuals with barriers to employment), within a defined timetable, and which may provide for bonus payments to such service provider to expand capacity to provide effective training;

(B) A strategy for independently validating the achievement of the performance described in subparagraph (A); and

(C) A description of how the State or local area will reallocate funds not paid to a provider because the achievement of the performance described in subparagraph (A) did not occur, for further activities related to such a procurement strategy, subject to section 189(g)(4).

(67) WORKFORCE DEVELOPMENT SYSTEM.—The term ‘‘workforce development system’’ means a system that makes available the core programs, the other one-stop partner programs ,and any other programs providing employment and training services as identified by a State board or local board.

POLICY NAME: Workforce Innovation and Opportunity Act – Local Elected Official(s) and Local Workforce Development Board Partnership

Agreement

Policy Number: 15-003

Date of Issue: March 4, 2015

Effective Date: October 1, 2015

For more info contact: Division Director, Workforce and Employment

Services, Office of Employment and Training (OET), 502-564-5331

Applies /Of Interest To: Local Workforce Development Boards, Local

Workforce Development Boards' staff, and Local Elected Officials

Subject Policy on Local Elected Official (LEO) and Local Workforce Development Boards (LWDBs)Partnership Agreement Purpose This policy provides additional guidance relating to the LEOs and LWDBs per Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128. The governance and operation of the Local Workforce Development System is contingent on a successful partnership between the LEOs and the LWDB related to their respective roles which are outlined in this policy and partnership agreement template. This policy and template are provided to ensure that the necessary regulatory and operational elements are described, included and understood by both parties. LEOs and LWDBs may include additional agreed upon expectations. This partnership agreement will facilitate the delivery of optimal workforce development services for individuals and employers within the Local Workforce Development Areas.

Definitions Chief Local Elected Official (CLEO) - The CLEO is the chief local elected official(s) elected among the consortium of LEOs representing the LEOs in the Workforce Development Area.

Local Elected Official (LEO) - The LEOs are the local elected officials of a county. The highest elected official in counties and counties with merged government shall be considered the LEO for their respective county.

Local Workforce Development Board (LWDB) - means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

Background This policy and template provide the initial foundation for understanding the separate and shared functions of LEOs and LWDBs envisioned under WIOA.

POLICY NAME: Workforce Innovation and Opportunity Act (WIOA) – Local Workforce Development Board (LWDB) Member Nomination Guidelines, Office of Employment and Training (OET/agency) Confirmation Process and Board Certification

Policy Number: 15-001

Effective Date: July 1, 2015

OET Division Director, 502-782-3147

Applies /Of Interest To: Local Workforce Development Boards (LWDBs),

Local Workforce Development Areas (LWDAs) staff, State Workforce Investment Board, Chief Elected Officials (CEOs) and Chief Local Elected Official (CLEO)

Subject Policy on Local Workforce Development Board Member Nominations and Appointments process, OET confirmation process, and Board Certification Purpose This policy provides guidance and clarification to LWDBs regarding local board membership, OET board confirmation process and board certification Background Replaces Workforce Investment Act (WIA) guidance, policies and processes relating to Local Workforce Investment Boards (LWIBs) - referred to as “Local Workforce Development Boards” in WIOA.

Definitions See Attachment 1 for most relevant definitions relating to this topic.

Policy LOCAL WORKFORCE DEVELOPMENT BOARDS (Sec. 107.)

ESTABLISHMENT (WIOA Sec. 107 (a)); Except as provided in subsection (c)(2)(A), there shall be established, and certified by the Governor of the State, a local workforce development board in each local area of a State to carry out the functions described in subsection (d) (and any functions specified for the local board under this Act or the provisions establishing a core program) for such area.

MEMBERSHIP (WIOA Sec. 107(b)(1) (2) (3) (4)(5) (6))

(1) STATE CRITERIA.— The Governor, in partnership with the State board, shall establish criteria for use by chief elected officials in the local areas for appointment of members of the local boards in such local areas in accordance with the requirements of paragraph (2).

(2) COMPOSITION.—Such criteria shall require that, at a minimum—

(A) BUSINESS REPRESENTATIVES- A majority [51%] of the members of each local board shall be representatives of business in the local area, who—(i) are owners of businesses, chief executives or operating officers of businesses, or other business executives or employers with optimum policy making or hiring authority; (ii) represent businesses, including small businesses, or organizations representing businesses described in this clause, that provide employment opportunities that, at a minimum, include high-quality, work-relevant training and development in in-demand industry sectors or occupations in the local area; and (iii) are appointed from among individuals nominated by local business organizations and business trade associations.

Additional OET Guidance/Clarification Representatives from private not-for-profit entities that operate as businesses and are employers may be considered business sector members on the local WDB. The not-for profit entities should align with the key industry sectors for the state and the local area, as identified in the WDB local plan.

Representatives from proprietary schools cannot be considered a business sector member.

MINIMUM number of business representatives: Ten (10)

(B) WORKFORCE REPRESENTATIVES (Labor, Community Based Organization and Youth Serving Organizations) - Not less than 20 percent of the members of each local board shall be representatives of the workforce within the local area, who—(i) shall include representatives of labor organizations (for a local area in which employees are represented by labor organizations), who have been nominated by local labor federations, or (for a local area in which no employees are represented by such organizations) other representatives of employees; (ii) shall include a representative, who shall be a member of a labor organization or a training director, from a joint labor-management apprenticeship program, or if no such joint program exists in the area, such a representative of an apprenticeship program in the area, if such a program exists;(iii) may include representatives of community based organizations that have demonstrated experience and expertise in addressing the employment needs of individuals with barriers to employment, including organizations that serve veterans or that provide or support competitive integrated employment for individuals with disabilities; and (iv) may include representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth;

Additional OET Guidance/Clarification

MINIMUM number of workforce representatives: Four (4)

Where possible, align membership with designated state and/or local sectors.

(C) EDUCATION AND TRAINING REPRESENTATIVES - Each local board shall include representatives of entities administering education and training activities in the local area, who— (i) shall include a representative of eligible providers administering adult education and literacy activities under title II; (ii) shall include a representative of institutions of higher education providing workforce investment activities (including community colleges); (iii) may include representatives of local educational agencies, and of community-based organizations with demonstrated experience and expertise in addressing the education or training needs of individuals with barriers to employment;

Additional OET Guidance/Clarification MINIMUM number of education and training representatives:

Two (2)

(D) GOVERNMENT AND ECONOMIC DEVELOPMENT REPRESENTATIVES - Each local board

shall include representatives of governmental and economic and community development entities serving the local area, who—(i) shall include a representative of economic and community development entities; (ii) shall include an appropriate representative from the

State employment service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area; (iii) shall include an appropriate representative of the programs carried out under Title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), other than section 112 or part C of that title (29 U.S.C. 732, 741), serving the local area; (iv) may include representatives of agencies or entities administering programs serving the local area relating to transportation,

housing, and public assistance; and (v) may include representatives of philanthropic organizations serving the local area.

Additional OET Guidance/Clarification MINIMUM number of government and economic development representatives: Three (3)

E) OTHER MEMBERS - Each local board may include such other individuals or representatives of entities as the chief elected official in the local area may determine to be appropriate.

(3) CHAIRPERSON.—The members of the local board shall elect a chairperson for the local board from among the representatives described in paragraph (2)(A) [BUSINESS]

4) STANDING COMMITTEES —

A) IN GENERAL—The local board may designate and direct the activities of standing committees to provide information and to assist the local board in carrying out activities under this section. Such standing committees shall be chaired by a member of the local board, may include other members of the local board, and shall include other individuals appointed by the local board who are not members of the local board and who the local board determines have appropriate experience and expertise. At a minimum, the local board may designate each of the following: (i) A standing committee to provide information and assist with operational and other issues relating to the one-stop delivery system, which may include members representatives of the one-stop partners. (ii) A standing committee to provide information and to assist with planning, operational, and other issues relating to the provision of services to youth, which shall include community based organizations with a demonstrated record of success in serving eligible youth. (iii) A standing committee to provide information and to assist with operational and other issues relating to the provision of services to individuals with disabilities, including issues relating to compliance with section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding providing programmatic and physical access to the services, programs, and activities of the one-stop delivery system, as well as appropriate training for staff on providing supports for or accommodations to, and finding employment opportunities for, individuals with disabilities.

(B) ADDITIONAL COMMITTEES.—The local board may designate standing committees in addition to the standing committees specified in subparagraph (A).

Additional – OET Guidance/Clarification

Committees are encouraged to include non-board members

Committees should be private-sector led

(C) DESIGNATION OF ENTITY.—Nothing in this paragraph shall be construed to prohibit the designation of an existing (as of the date of enactment of this Act) entity, such as an effective youth council, to fulfill the requirements of this paragraph as long as the entity meets the requirements of this paragraph.

(5) AUTHORITY OF BOARD MEMBERS.—Members of the board that represent organizations, agencies, or other entities shall be individuals with optimum policymaking authority within the organizations, agencies, or entities. The members of the board shall represent diverse geographic areas within the local area.

(6) SPECIAL RULE.—If there are multiple eligible providers serving the local area by administering adult education and literacy activities under title II, or multiple institutions of higher education serving the local area by providing workforce investment activities, each representative on the local board described in clause (i) or (ii) of paragraph (2)(C), respectively, shall be appointed from among individuals nominated by local providers representing such providers or institutions, respectively.

Additional – OET Guidance/Clarification

1) Quorum - A quorum shall be defined as :

A simple majority (51%) of members, excluding vacancies AND

Of those members in attendance, no fewer than 51% are a combination of business and workforce representatives.

2) Appointments – LWDB member appointments must be signed by the appointing CLEO and submitted to the Administrative Entity. (Attachment A)

3) Change in Status – Acknowledgement that LWDB members who no longer hold the position or status that made them eligible Local Board members must resign or be removed by the CLEOs immediately as a representative of that entity; i.e. no longer work in the private sector, or no longer with an educational institution, etc.;

4) Mid-Term Appointment – LWDB members replacing out-going members mid-term will serve the remainder of the out-going member term.

5) Vacancies - LWDB vacancies must be filled within a reasonable amount of time of the vacancy as determined y the LWDA, but no later than 90 days from occurrence. The CLEO in a LWDA is authorized to make all re-appointments of members. Re-appointments must be made within a reasonable amount of time of the term expiration, but no later than 90 days. Any action taken by a LWDB, with a vacancy or term expiration beyond the time period described in the LWDB by laws or later than the 90 days per this policy shall be void unless the LWDB has an approved waiver from the Office of Employment and Training prior to the LWDB meeting.

Waivers are to be requested in writing to the Division Director of Workforce and Employment Services, Office of Employment and Training with an explanation of why a vacancy was not filled in the defined time frame and a description of the process underway to fill the vacancy.

6) Removal - LWDB members must be removed by the CLEO if any of the following occurs: documented violation of conflict of interest, failure to meet LWDB member representation requirements defined in the WIOA and this policy, or documented proof of fraud and/or abuse.

LWDB members may be removed for other factors outlined in the LWDB bylaws such as attendance. OET strongly encourages LWDBs to establish and enforce attendance guidelines for its members. The bylaws must define the specific criteria that will be used to establish just cause for such removal and the process that will be required to document proof, and the steps regarding filing an appeal and arbitration.

7) Proxy - If a member of a local board is unable to attend a meeting and wishes to send a proxy. That proxy must be from the same category of representation/membership as the member.

APPOINTMENT AND CERTIFICATION OF BOARD – (WIOA Sec. 107 (c))

(1) APPOINTMENT OF BOARD MEMBERS AND ASSIGNMENT OF RESPONSIBILITIES.—

(A) IN GENERAL.—The chief elected official in a local area is authorized to appoint the members of the local board for such area, in accordance with the State criteria established under subsection (b) [MEMBERSHIP].

(B) MULTIPLE UNITS OF LOCAL GOVERNMENT IN AREA.—(i) IN GENERAL.—In a case in which a local area includes more than 1 unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual chief elected officials— (I) in the appointment of the members of the local board from the individuals nominated or recommended to be such members in accordance with the criteria established under subsection (b); and (II) in carrying out any other responsibilities assigned to such officials under this title. (ii) LACK OF AGREEMENT.—If, after a reasonable effort, the chief elected officials are unable to reach agreement as provided under clause (i), the Governor may appoint the members of the local board from individuals so nominated or recommended.

(C) CONCENTRATED EMPLOYMENT PROGRAMS.—In the case of an area that was designated as a local area in accordance with section 116(a)(2)(B) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), and that remains a local area on that date, the governing body of the concentrated employment program involved shall act in consultation with the chief elected official in the local area to appoint members of the local board, in accordance with the State criteria established under subsection (b), and to carry out any other responsibility relating to workforce investment activities assigned to such official under this Act.

(2) CERTIFICATION

(A) IN GENERAL.—The Governor shall, once every two years, certify one local board for each local area in the State.

(B) CRITERIA.—Such certification shall be based on criteria established under subsection (b),

and for a second or subsequent certification, the extent to which the local board has ensured that workforce investment activities carried out in the local area have enabled the local area to meet the corresponding performance accountability measures and achieve sustained fiscal integrity, as defined in section 106(e)(2).

(C) FAILURE TO ACHIEVE CERTIFICATION.—Failure of a local board to achieve certification shall result in appointment and certification of a new local board for the local area pursuant to the process described in paragraph (1) and this paragraph.

(3) DE-CERTIFICATION

(A) FRAUD, ABUSE, FAILURE TO CARRY OUT FUNCTIONS.—Notwithstanding paragraph (2), the Governor shall have the authority to de-certify a local board at any time after providing notice and an

opportunity for comment, for— (i) fraud or abuse; or (ii) failure to carry out the functions specified for the local board in subsection (d).

(B) NONPERFORMANCE.—Notwithstanding paragraph (2), the Governor may decertify a local board if a local area fails to meet the local performance accountability measures for such local area in accordance with section 116(c) for 2 consecutive program years.

(C) REORGANIZATION PLAN.—If the Governor decertifies a local board for a local area under subparagraph (A) or (B), the Governor may require that a new local board be appointed and certified for the local area pursuant to a reorganization plan developed by the Governor, in consultation with the chief elected official in the local area and in accordance with the criteria established under subsection (b).

FUNCTIONS OF LOCAL BOARD (WIOA Sec. 107 (d))

Consistent with section 108 [LOCAL PLAN], the functions of the local board shall include the following:

(Details for each function listed below are in Sec. 107 (d))

1. Local Plan

2. Workforce Research and Regional Labor Market Analysis

3. Convening, Brokering, Leveraging

4. Employer Engagement

5. Career Pathways Development

6. Proven and Promising Practices

7. Technology

8. Program Oversight

9. Negotiation of Local Performance Accountability Measures

10. Selection of Operators and Providers

11. Coordination with Education Providers

12. Budget and Administration

13. Accessibility for Individuals with Disabilities

Additional – OET Guidance/Clarification

LWDBs By-laws to include: LWDB and CLEO agreements with the fiscal agent or grant sub recipient on payment processes and procedures

LWDBs establish by-laws reflecting regional focus per WIOA guidelines

SUNSHINE PROVISION (WIOA Sec. 107 (e))

The local board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the local board, including information regarding the local plan prior to submission of the plan, and regarding membership, the designation and certification of one-stop operators, and the award of grants or contracts to eligible providers of youth workforce investment activities, and on request, minutes of formal meetings of the local board.

STAFF (WIOA Sec. 107 (f))

(1) IN GENERAL.—The local board may hire a director and other staff to assist in carrying out the functions described in subsection (d) using funds available under sections 128(b) and 133(b) as described in section 128(b)(4).

(2) QUALIFICATIONS.—The local board shall establish and apply a set of objective qualifications for the position of director that ensures that the individual selected has the requisite knowledge, skills, and abilities, to meet identified benchmarks and to assist in effectively carrying out the functions of the local board.

(3) LIMITATION ON RATE.—The director and staff described in paragraph (1) shall be subject to the limitations on the payment of salaries and bonuses described in section 194(15).

LIMITATIONS (WIOA Sec. 107 (g))

(1) TRAINING SERVICES.

(A) IN GENERAL.—No local board may provide training services.

(2) CAREER SERVICES; DESIGNATION OR CERTIFICATION AS ONE-STOP OPERATORS.

—A local board may provide career services through a one-stop delivery system or be designated or certified as a one-stop operator only with the agreement of the chief elected official in the local area and the Governor.

Additional – OET Guidance/Clarification

To secure the Governor’s agreement, the local board must:

conduct a competitive procurement process facilitated by the Department of Workforce Investment for the provision of career services or designation/certification as the one-stop operator; use a process and RFP that has been reviewed and approved by the Department of Workforce Investment; be identified as the highest scorer at the completion of the process; and in cases where the local board has previously provided services, have met performance accountability measures and achieved sustained fiscal integrity.

(3) LIMITATION ON AUTHORITY.—Nothing in this Act shall be construed to provide a local board with the authority to mandate curricula for schools.

CONFLICT OF INTEREST (WIOA Sec. 107 (h)

A member of a local board, or a member of a standing committee, may not (1) vote on a matter under consideration by the local board—(A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the State plan.

ALTERNATIVE ENTITY (WIOA Sec. 107 (i)

The State will not recognize or use any alternative local entity.

OET PROCESSES AND PROCEDURES

OET developed form, Attachment A, must be completed for all LWDB member nominations/appointments and be signed by the appointing CLEO and submitted to the Administrative Entity.

OET Review and Confirmation Process OET will review and confirm that the composition of each LWDB, including the nomination and appointment process, complies with the criteria outlined in Section 107 of the WIOA and with OET policy. The composition of each LWDB will be evaluated annually during the local planning cycle/annual monitoring, reflected in the Appointment and Certification of Board (WIOA Sec. 107 (b) and (c)) and of this policy.

This includes the review of:

The OET created Nomination/Appointment form that must be completed for all LWDB member nominations/appointments, be signed by the appointing CLEO and submitted to the Administrative Entity. (Attachment A).

LWDB Roster Forms to be kept current and electronically updated as vacancies are filled, by a designated LWDA staff on the OET/”Team of Experts” website. (Attachment B).

Procedural Available for OET monitoring

Guidance Workforce Innovation and Opportunity Act (WIOA). H.R. 803 Required Action

LWDAs should review current processes and procedures for compliance per effective date of this policy. Supersedes/ Replaces Public Law 105-220 Workforce Investment Act (WIA) of 1998; WIA Regulations, 20 CFR Part 652 et al,WIA Guidance Memo 03B

Other References

WIA Guidance Memo 03B

Technology Implications

Approved policy located on the Kentucky Career Center website/Team of Experts page.

POLICY NAME: Identification of Regions and Designation of Local Workforce Development Areas

Policy Number: 15-004

Date of Issue: May 14, 2015

Effective Date: May 14, 2015

For more info contact: Department of Workforce Investment Commissioner, 502-564-0372

Applies /Of Interest To: Local Workforce Development Boards (LWDBs),

Local Workforce Development Areas (LWDAs) staff, Chief Local Elected Officials (CLEOs) and Local Elected Officials (LEOs)

Purpose To establish policy for identification of regions and designation of local workforce development areas in compliance with the Workforce Innovation and Opportunity Act (WIOA) (Public Law 133-128, July 22, 2014).

Background WIOA Title 1, Chapter 2, Section 106 outlines the requirements and process for the determination of regions and local areas including identification, types of regions, initial designation, subsequent designation, process, considerations, designation on recommendation by the State Board, and appeals.

Per Training and Employment Guidance Letter (TEGL) 27-14 issued by the US Department of Labor on April 15, 2015, “the Governor must develop a policy for designation of local workforce development areas. The purpose of a local area is to serve as a jurisdiction for the administration of workforce development activities using Adult, Dislocated Worker, and Youth funds allocated by the State and to coordinate efforts related to the other core programs at a local community level. WIOA Section 106(b) establishes that the Governor must designate local workforce development areas (local areas) in order for the State to receive Adult, Dislocated Worker, and Youth funding under Title I subtitle B. The Governor must follow the requirements provided in this guidance until the final regulations take effect.”

By July 1, 2015, the Governor, in consultation with the Kentucky Workforce Investment Board or its successor (State Board), must develop a policy and procedure for the designation of all local areas, as well as a policy for the designation of new local areas. The policy must include:

a. Consultation with the State Board;

b. Consultation with the chief elected officials and affected Local Boards; and

c. Consideration of comments received through a public comment process.

The public comment period must offer adequate time for public comment prior to designation of the local workforce development area and provide an opportunity for representatives of interested business, education, and labor organizations to have input into the development of the formation of

the local area. Definitions In addition to the definitions of “performed successfully” and “sustained fiscal integrity” in

WIOA, Section 106(e), the following definitions apply for the purpose of determining initial local area designations in accordance with TEGL 27-14, section 5.C.:

Performed successfully- the local area met or exceeded the levels of performance the Governor negotiated with the local board and chief elected official and the local area has not failed any individual measure for the last two consecutive program years before the enactment of WIOA (per TEGL 27-14) Exceeded- when the actual performance achieved against an individual performance measure is in excess of 100 percent of the negotiated level of performance for the measure (per TEGL 25-13);

Met- when the actual performance achieved against an individual performance measure falls in the range of 80 to 100 percent of the negotiated level of performance for the measure (per TEGL 25-13);

Failed- when the actual performance achieved against an individual performance measure is less than 80 percent of the negotiated level of performance (per TEGL 25-13).

Sustained Fiscal Integrity- the Secretary of the US Department of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two year period preceding the determination (per TEGL 27-14).

Policy IDENTIFICATION OF REGIONS

As noted in WIOA Section 106(a)(1) and (2), the Commonwealth shall identify regions:

(a) REGIONS.—

(1) IDENTIFICATION.—Before the second full program year after the date of enactment of this Act, in order for a State to receive an allotment under section 127(b) or 132(b) and as part of the process for developing the State plan, a State shall identify regions in the State after consultation with the local boards and chief elected officials in the local areas and consistent with the considerations described in subsection (b)(1)(B).

(2) TYPES OF REGIONS.—For purposes of this Act, the State shall identify—

(A) which regions are comprised of 1 local area that is aligned with the region;

(B) which regions are comprised of 2 or more local areas that are (collectively) aligned with the region (referred to as planning regions, consistent with section 3); and (C) which, of the regions described in subparagraph (B), are interstate areas contained within 2 or more States, and consist of labor market areas, economic development areas, or other appropriate contiguous subareas of those States.

LOCAL AREAS

As outlined in WIOA Section 106(b)(1) through (5), the Governor must designate local areas

in accordance with the following:

(b) LOCAL AREAS.—

(1) IN GENERAL.—

(A) PROCESS.—Except as provided in subsection (d), and consistent with paragraphs (2) and (3), in order for a State to receive an allotment under section 127(b) or 132(b), the Governor of the State shall designate local workforce development areas within the State— (i) through consultation with the State board; and (ii) after consultation with chief elected officials and local boards, and after consideration of comments received through the public comment process as described in section 102(b)(2)(E)(iii)(II).

(B) CONSIDERATIONS.—The Governor shall designate local areas (except for those local areas described in paragraphs (2) and (3)) based on considerations consisting of the extent to which the areas—(i) are consistent with labor market areas in the State;

(ii) are consistent with regional economic development areas in the State; and

(iii) have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of this Act, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools.

(2) INITIAL DESIGNATION.—During the first 2 full program years following the date of enactment of this Act, the Governor shall approve a request for initial designation as a local area from any area that was designated as a local area for purposes of the Workforce Investment Act of 1998 for the 2-year period preceding the date of enactment of this Act, performed successfully, and sustained fiscal integrity.

(3) SUBSEQUENT DESIGNATION.—After the period for which a local area is initially designated under paragraph (2), the Governor shall approve a request for subsequent designation as a local area from such local area, if such area—(A) performed successfully;

(B) sustained fiscal integrity; and (C) in the case of a local area in a planning region, met the requirements described in subsection (c)(1).

(4) DESIGNATION ON RECOMMENDATION OF STATE BOARD. — The Governor may approve a request from any unit of general local government (including a combination of such units) for designation of an area as a local area if the State board determines, based on the considerations described in paragraph (1)(B), and recommends to the Governor, that such area should be so designated.

(5) APPEALS.—A unit of general local government (including a combination of such units) or grant recipient that requests but is not granted designation of an area as a local area under paragraph (2) or (3) may submit an appeal to the State board under an appeal process established in the State plan. If the appeal does not result in such a designation, the Secretary of Labor, after receiving a request for review from the unit or grant recipient and on determining that the unit or grant recipient was not accorded procedural rights under the appeals process described in the State plan, as specified in section 102(b)(2)(D)(i)(III), or that the area meets the requirements of paragraph (2) or (3), may require that the area be designated as a local area under such paragraph.

Additional OET Guidance/Clarification for Regions and Local Areas:

In accordance with WIOA, Section 106(b)(4) and TEGL 27-14, change 1, section 2.A., at any time the CLEO and LWDB from any unit of general local government or combination of units may submit a request for designation as a workforce development area. The State Board must determine if the request for a new local area meets the considerations required in WIOA section 106(b)(4) and TEGL 27-14, section 5.B. and recommend to the Governor approval or denial of the request. The Governor may approve or deny the request, after reviewing the State Board's recommendation and the considerations, and notify in writing the CLEO and LWDB. As authorized by TEGL 27-14, change 1, section 2.B., a Concentrated Employment Program (CEP) grant recipient that requested designation as a local are in accordance with Workforce Investment Act (WIA) section 116(a)(2)(B) and which was designated a local area for the two year period preceding the date of enactment of WIOA may request designation as a local area under WIOA in accordance with the procedures in 5.C. of TEGL No. 27-14. Any such requests for initial designation are subject to the requirements in WIOA section 106(b)(2) that the CEP local area performed successfully and sustained fiscal integrity.

The process for identification of regions and designation of local areas is as follows:

- For a designation of a local area, request made to Governor.
- Establish Steering Committee;
- Steering Committee develops draft recommendations for consideration;
- DWI completes local input and public comment process on recommendations and any other alternatives;
- Steering Committee considers feedback, federal guidance and finalizes recommendations;
- KWIB reviews the input received and the final recommendations from the Steering Committee;
- KWIB makes recommendation to the Governor on region and local area designations;
- Governor issues Executive Order on regions and local area designation/re-designation; and
- Appeals process is initiated for initial and subsequent designation requests.

The appeal process is outlined as follows:

1) A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area under WIOA Section 106(b)(2) or (3) by the Governor may submit an appeal to the State Board. 29 U.S.C.A. § 3121(b)(5).

2) The appeal shall be filed no later than thirty days after receipt of the denial of designation of an area as a local area by the Governor.

3) The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

4) A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the State Board may request a review by the United States Department of Labor Secretary.

5) The request for review shall be filed no later than thirty days after receipt of written notification of the denial from the State Board. The request for review shall be submitted by certified mail, return receipt requested, to the Secretary, United States Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the request for review shall be simultaneously provided to the State Board in care of the Executive Director, Kentucky Workforce Investment Board, Education and Workforce Development Cabinet, 500 Mero Street, 3rd Floor, Frankfort, KY 40601 and the

Executive Director, Office of Employment and Training, 275 East Main, Frankfort, Kentucky 40621.

6) On review, the United States Department of Labor Secretary shall consider whether:

a. The unit or grant recipient was not accorded procedural rights under the appeal

process set forth in the State plan, or

b. The unit or grant recipient meets the requirements for designation as a local

area under 29 U.S.C.A. § 3121(a)(2) or (a)(3), as appropriate.

7) The request for review shall be conducted in accordance with procedures

established by the United States Department of Labor Secretary.

8) The United States Department of Labor has confirmed that there is no appeal

available regarding determinations under WIOA Section 106(b)(4).

Process to Date:

Prior to the issuance of TEGL 27-14, the following activities occurred in accordance with a process adopted by the State Board in November 2014 regarding regional and local area designation based on WIOA Section 106. A Steering Committee was formed including State Board members, state

partners, local partners, core programs and stakeholders to consider requests and regions. The Steering

Committee utilized the criteria outlined in Section 106 and other relevant factors to make an initial recommendation on regions and local areas for designation and any re-designation.

Once draft recommendations were formed, a meeting with the current CLEOs was held by the Department of Workforce Investment (DWI). Then a series of three regional convening's in the Eastern, Western and Central part of the Commonwealth were conducted by DWI. The

three convening's included a LEOs session, a Local Workforce Investment Board (LWIB) members session and a Stakeholders session open to system customers, staff, partners and stakeholders. In addition, the recommendations were posted for public comment at the same time.

After the input sessions were completed by DWI, the Steering Committee met to consider the input received through the multiple forums and insights from State Board WIOA policies and made final recommendations.

The KWIB will review the Steering Committee recommendations and processes.

Determinations by the KWIB will then go to the Governor for review and final action.

Other References

Training and Employment Guidance Letter 25-13

Training and Employment Guidance Letter 27-14

Programmatic and administrative requirements are in a Grantee–Sub–grantee Agreement executed by DWI/OET and each LWDA requiring compliance with all federal and state laws, regulations and any special state requirements.

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

Kentucky will support system transformation and innovation by reviewing results of current and recent projects to identify those that have good results and could benefit from additional resources. Kentucky also will prioritize technology infrastructure to ensure that both individual and employer services are supported by modern, integrated contact and case management platforms and by adequate staff and customer training. The new governor and his administration will identify new areas of interest and priority that also will be addressed using set aside funding.

Workers who are dislocated due to plant closures and layoffs receive Rapid Response services. Early intervention plays an important role in successful re–employment and can help workers and communities adjust to the effects of layoffs and plant closings. For many workers who have been

dislocated, Rapid Response encompasses strategies and activities necessary to (1) plan for and respond to as quickly as possible following either an announcement of a closure or layoff, or mass job dislocation resulting from a disaster, natural or otherwise; and (2) deliver services to enable dislocated workers to transition to new employment as quickly as possible.

The state Rapid Response unit within the Office of Employment and Training (OET) ensures that Rapid Response is provided by the local workforce delivery area and serves as the primary contact for all Rapid Response activities.

The Rapid Response activity in the state is designed to connect the displaced worker to services that will assist transition to new employment following a permanent closure or mass layoff, approved trade–impacted events or a natural or other disaster resulting in a mass job dislocation.

Each local workforce development area has a Rapid Response team responsible for the coordination of activities with the local workforce investment board and appropriate locally elected officials.

The team has a local area coordinator who is responsible for reporting Rapid Response activities through EKOS, a comprehensive integrated management and reporting system that allows one–stop partners to share information on one–stop activities.

OET allocates funding to the local areas for Rapid Response services.

OET receives notices of impending layoffs via WARN Act notices, media releases, the governor's office and referral for services from supporting partners, i.e. KCED, Labor Market Information programs, local boards and chief elected officials. OET informs local Rapid Response team coordinators of the impending layoff, and they contact the company to develop an appropriate plan for the employer, communities and workers.

In addition to alerting the local Rapid Response team coordinator, impending layoff notices are communicated to cabinet leadership, KCED, WIOA directors, OET regional managers and others specifically requesting to be included on the notification list. Relevant local community agencies are notified.

This decentralized Rapid Response process allows for a quicker response at the local level. The local Rapid Response team coordinator (or designee) ensures that Rapid Response services are provided as quickly as possible. The local coordinator immediately contacts the company upon learning of an actual or possible dislocation.

Whenever possible, all contact occurs prior to a layoff date, is onsite at the company and is on company time. The team is trained to react quickly and offer a customizable service that fits the needs of the employees and the company.

The local Rapid Response team's first step is an on–site employer meeting with the company to explain the Rapid Response process and services and how the services can be most successful. The team discusses resources and services available to help the employer manage the layoff and identify the specific needs of the affected employees.

Using information gained from the employer assessment and onsite meeting, the Rapid Response team develops a plan of action for delivering necessary services to the workers. An appropriate

specialized service plan for Rapid Response is then developed. Employee Rapid Response services may include specialized workshops, job fairs and/or other enhanced services at the request of the company or local officials.

Rapid Response activities include services from the following agencies:

• state and local economic development

• state and local Unemployment Insurance Benefit Programs

• Labor Market Information programs of OET, KYAE, CPE, OVR

• local health departments

• Trade Adjustment Assistance Program

• the USDOL Employee Benefit Security Administration • LWIOA one–stop system Dislocated Worker Program services

There is a seamless transition between Rapid Response services and the one–stop activities for affected workers by immediately directing the affected workers at the Rapid Response service to the local one–stop system for supportive services.

Employees and employers receive one–stop service information during their respective service sessions. Employee service sessions offer filing information for unemployment benefits and assessments of need. Employees are registered with Focus Career at a Rapid Response event prior to layoff when possible. Having all Rapid Response service sessions conducted at the local level allows one–stop staff to make a personal connection and build relationships with employees and employers.

Also during the initial on–site meeting, the local coordinator assesses whether the employer meets the criteria of a trade impacted employer in accordance with the standards established by the Trade Adjustment Assistance Act as amended. The local coordinator assists the employer with the completion and submission of a trade petition to the Office of Trade Adjustment Assistance.

States also should describe any layoff aversion strategies they have implemented to address at–risk companies and workers.

As for statewide layoff aversion strategies, OET within the Kentucky Career Center, provides workforce development solutions throughout the business cycle to all customers including work–based alternative training models, layoff aversion strategies and Rapid Response. These were implemented to address at–risk companies and workers. Kentucky's dedicated Business Services Teams have the established relationships, resources and networks with employers for customizing the best service plans, including layoff aversion, to meet the employer's needs for seamless service delivery using the collective resources of the Commonwealth's workforce development system. The goal is to provide support to companies not only as they are downsizing but during the whole business life cycle.

Kentucky's state Rapid Response functions as a service of our Business Services Teams within OET and partner agencies. All business services team partners refer to Rapid Response as a last resort after all other layoff aversion strategies have been exhausted.

Business Services Teams engage in several partnerships to expand the range and quality of the services available to companies and affected workers and to develop an effective layoff aversion early layoff–warning network.

Partnerships have been established with KCED, the Labor Market Information programs of OET, local boards and chief elected officials to meet the needs of the employer and employee. The Business Services Team's positive, proactive business–friendly service is promoted when layoff aversion services can provide labor pool data to KCED.

The data is used to verify an existing skilled workforce in a particular area for employers wishing to relocate to the area or to expand and/or upgrade operations. Useful information can be gleaned from a variety of sources including labor market information to identify declining sectors.

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.

Rapid response encompasses strategies and activities necessary to (1) quickly respond following a closure or layoff announcement or to a mass job dislocation resulting from a disaster, natural or otherwise; and (2) enable dislocated workers to transition to new employment as quickly as possible. In cases of natural disasters, the provisions of Rapid Response emergency assistance are adapted to the particular disaster; the Kentucky Career Center (KCC) Rapid Response Unit collaboratively assists at the direction of the Kentucky Emergency Management (KEM) at http://kyem.ky.gov/ and Federal Emergency management Association (FEMA) at www.fema.gov/. If reasonable, necessary and allowable, rapid response may provide guidance and/or financial assistance to establish local community transition teams to assist the impacted community in organizing support for the dislocated workers and in meeting the basic needs of their families, including heat, shelter, food, clothing and other necessities and services that are beyond the resources and abilities of KCC. Beyond an immediate and initial response by rapid response if deemed necessary, KCC Rapid Response Unit will coordinate with KEM and FEMA to organize and manage the delivery of services for the project, including the local workforce development area local Rapid Response teams. This would include coordination and submission of an application for a National Dislocated Worker Grant, if needed. The following guidelines will be followed with who is responsible for the action, as a result of a disaster: 1. Identify the local WIOA area(s) affected and the specific counties – KCC state Rapid Response Unit; 2. Contact appropriate WIOA area designees for both the workforce development board and fiscal agent – KCC state Rapid Response Unit; 3. Reach out to KEM and FEMA – KCC state Rapid Response Unit; 4. Ensure strong communication and collaboration between the KCC Rapid Response efforts and the work of KEM/ FEMA- KCC state Rapid Response Unit; 5. Discuss extent of the disaster and current dislocated worker fund availability – Kentucky Career Center state Rapid Response Unit; 6. Discuss projected participant service levels and re-employment needs to address the results of the disaster – KCC state Rapid Response Unit; 7. Provide a copy of the rapid response additional assistance funding request forms to the local WIOA area(s) for additional needed funds – KCC state Rapid Response Unit; 8. Process and review the Rapid Response additional assistance application and process accordingly for a recommendation to fund – KCC state Rapid Response Unit ; 9. Inform local WIOA area designee that award has been approved by KCC Rapid Response Unit; and 10. Consider applying for a national dislocated worker grant – KCC state

Rapid Response Unit The policies and protocols developed through this collaboration will be used in the event of any additional significant natural disaster.

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.

In Kentucky, the Rapid Response program operates in essentially the same manner regardless of whether a TAA petition or certification is involved.

The state extends Rapid Response services to all worker groups (or on an individual basis, if applicable) covered by a TAA petition just as it provides Rapid Response services to any worker group that has been or will be permanently laid off.

In most cases, the state and its local Rapid Response team are already aware of a given dislocation event and Rapid Response activities are underway before a TAA petition is filed. If a TAA petition is the first notice of a dislocation event, the state will notify the local Rapid Response team, which will contact the employer and associated union(s) to plan worker transition services.

The minimum level of services extended must conform to established requirements described in the Statewide Activities section. When Rapid Response is extended to potentially TAA eligible worker groups, basic TAA program information must be shared, including the program enrollment process should certification occur. If the state does not have access to the worker group prior to layoff; the state will use UI claimant information to identify potentially affected workers. In this situation, the local Rapid Response team will be required to extend outreach to the laid off workers using contact information obtained from UI.

At minimum, the outreach materials must include information about the WIOA Dislocated Worker Program and basic information explaining the TAA program.

A local area may request Rapid Response funding in the form of Dislocation Grants and Additional Assistance Grants to serve potentially TAA–eligible worker groups in the same manner it requests funds for all other worker groups. The only difference is that Additional Assistance funding can’t be used to fund training once a worker group is covered by a TAA certification. If a TAA petition is certified, the state’s TAA program is responsible for identifying individuals potentially eligible under the certification through worker lists supplied by the employer and/or UI claimant information.

The TAA program then uses a standard mailer to contact the potentially eligible individuals, inviting them to attend a Trade Orientation Session to learn about program benefits and register. At Trade Orientation Sessions, TAA program staff review program benefits, the process for accessing the

benefits, and critical deadlines. Orientation participants are also provided written materials and referred to a handbook that covers the TAA program benefits, specific to the participant's TAA amendment year.

A representative from the WIOA Dislocated Worker program is present during orientation sessions to cover basic information about that program, enrollment and an explanation of the advantages of dual enrollment.

Kentucky is committed to continually exploring ways to make TAA program information more user friendly and improve coordination between the TAA and WIOA programs. Rapid Response teams are familiar with benefits and services offered under the trade program and attend all local or statewide trade training's.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. 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.

WIOA's primary focus beyond reauthorizing core workforce investment programs is to get employers and employer associations more actively involved in planning and providing training. Legislation reforms the system to promote training for existing, in-demand jobs and training aligned with business needs, and state and local economic development plans. Registered apprenticeship, on-the-job training (OJT), incumbent worker training, transitional jobs, work experience and customized training are all alternative work-based training services offered in Kentucky. These work-based training models are customized to meet job seeker and employer needs. Registered Apprenticeship (RA) is an important component of potential training and employment services that the Kentucky workforce system can provide to customers. Today, the need for skilled tradesmen or craftsmen in Kentucky is more critical than ever. Apprenticeship is a training system that produces highly skilled workers who are able to meet the demands of employers who are competing in a highly competitive environment. The U.S. economy faces increasing competitive global pressure daily. Kentucky not only finds itself economically competing with other states but with the entire manufacturing world. The most important asset any region or state must possess in today's competitive market is a highly trained and skilled workforce. One significant way to create and maintain a skilled workforce is through a highly effective on-the-job apprenticeship training program. A unique feature of the apprenticeship concept is that on-the-job training is supplemented with technical classroom instruction. Qualified journey workers guide apprentices to develop their chosen trade or skill and learn the techniques, materials and equipment associated with that trade. Classroom instruction that provides training in theoretical and technical aspects of the trade is required. Minimum class time is 144 hours for each year of apprenticeship, but may be higher for some trades. Apprentices are generally evaluated every six months and receive pay raises based upon their proven progress in skill development as well as their classroom proficiency. When a registered apprenticeship program sponsor verifies that the apprentice has fulfilled all requirements of the training program, the Labor Cabinet will issue a completion certificate. This nationally recognized certification verifies apprenticeship completion as a fully qualified skilled worker in the trade. We encourage local areas to use RA, and it should be used more often as a career pathway for job seekers and as a job-driven strategy for employers and industries. RA is funded through several mechanisms. In Kentucky, RA programs are more directly connected to the public workforce system. RA programs automatically qualify to be placed on the Kentucky Eligible Training Provider List (ETPL), allowing workforce development to support participants in RA programs and more directly connect those programs to one-stop centers. Registered Apprenticeship Benefits For employers: • skilled workers trained to industry/employer specifications to produce high quality results, • reduced turnover, • increased productivity, • industry's need to remain competitive by investing in the development and continuous upgrade of the skills of its workforce, • reduced worker compensation costs due to an emphasis on safety training, and • compliance with federal and state equal opportunity requirements facilitated. For apprentices and journey workers: • jobs that usually pay higher wages, • higher quality of life and skills versatility, • portable credentials recognized nationally and often globally, and • opportunity for college credit and future degrees. For Kentucky: • highly skilled workforce, • increased competitive edge in a global economy, • system to contribute to and sustain economic growth, and • decreased need to import skilled workers. On-the-Job Training In Kentucky, OJT is time limited contractual

training that is provided by an employer in the public, private non-profit, or private sectors to a customer that is paid while engaged in productive work in a job that: • provides knowledge or skills essential to the full adequate performance of the job; and • is made available through a program that provides reimbursement to the employer of • up to 50 percent of the wage rate of the participant, except as provided in WIOA section 134(c)(3) (H), for the extraordinary costs of providing the training and additional supervision related to the training; and • is limited in duration as appropriate to the occupation for which the customer is being trained, taking into account the content of the training, the prior work experience of the customer, and the service strategy of the customer, as appropriate. Positive features of OJT are: The customer begins training as a permanent employee with the employer and is subject to the same conditions of employment as other similarly employed customers; and • The customer starts earning a wage immediately and receives employer sponsored benefits when they are available; benefits such as health insurance, retirement, etc. • The customer receives training in a production setting, under appropriate supervision, gaining knowledge of the job and acquiring and applying occupational skills while performing on the job. Training time leads to greater proficiency in the occupation for which the training is being provided. OJT is a critical tool that helps Kentucky job seekers enter into successful employment. OJT continues to be a key method of delivering training services to our adults and dislocated workers. WIOA directs states and local areas to provide up to 50 percent of the wage rate of the customer to employers for the costs of training while the customer is in the program. Additionally, Kentucky and LWDAs have the flexibility under WIOA to increase the reimbursement level to up to 75 percent taking into account the following factors: • characteristics of the customer (e.g. length of unemployment, current skill level and barriers to employment); • size of the employer (e.g. small and medium-sized business often have more barriers to participation at lower reimbursement rates); • quality of employer-provided training and advancement opportunities; and • Other factors the state or local boards may determine appropriate (e.g. the number of employees participating in the training, wage and benefit levels of the employees (both pre- and post- participation earnings)), and relation of the training to the competitiveness of the customer).

Incumbent worker training In Kentucky, Incumbent worker training (IWT) provides both workers and employers with the opportunity to build and maintain a high quality workforce. Incumbent worker training is used to help avert potential layoffs of employees or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers. Kentucky defines an incumbent worker as a participant who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship and has an established employment history with the employer for six months or more. IWT is an in-demand industry sector or occupation training designed to meet the special requirements of an employer (or group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting workers in obtaining the skills necessary to retain employment and conducted with a commitment by the employer to retain or avert laying off incumbent worker(s) who are trained to increase the competitiveness of the employee and/or employer. Under section 134(d)(4) of WIOA, local areas use up to 20 percent of their adult and dislocated worker funds to provide for the federal share of the cost of providing Incumbent Worker training. IWT needs take into account the following factors: • characteristics of program participants • relationship of the training to the competitiveness of a participant and the employer • Other factors the state or local boards may determine appropriate (e.g., the number of employees participating in the training, wage and benefit levels of those employees (both pre- and post-participation earnings)) and the existence of other training and advancement opportunities provided by the employer). Employers are required to pay for a significant cost of the training for participants in incumbent worker training; this can be done through both cash and/or in-kind payments. The wages paid to participants while in training may be considered as a source of matching funds. Official payroll records documenting the worker’s hours and wages must be used to determine the amount of the employer’s share of cost. Rules for

matching funds are provided in the Uniform Guidance and DOL exceptions at 2 CFR 200.306 and 2 CFR 2900.8, respectively. Under section 134(d)(4) (D) of WIOA, the minimum amount of employer share in the Incumbent Worker Training depends on the size of the employer: • Employers with 50 or fewer employees the employer must contribute at least 10 percent of the cost; • Employers with 51 to 100 employees the employer must contribute at least 25 percent of the cost; • Employers with more than 100 employees the employer must contribute to at least 50 percent of the cost. Transitional Jobs In Kentucky, transitional jobs are a new type of work-based training allowed under WIOA. Transitional jobs are subsidized time-limited work experiences in public, private or nonprofit sectors for barriers-to-employment individuals who are chronically unemployed or have an inconsistent work history and are combined with comprehensive career and supportive services. The goal of transitional jobs is to establish a work history for the individual who demonstrates work- place success and develops the skills that lead to entry into and retention in unsubsidized employment. Unlike OJT, there is no assumption that the individual will be retained in his or her transitional job after the experience is over, though that would be a successful experience and outcome. Under section 134(d) (5) of WIOA, local areas may use up to 10 percent of their adult and dislocated worker funds to provide transitional jobs to customers.

A Transitional Job is: • time limited, wage paid work • supportive services • skills development • job development and retention services The goals of a Transitional Job are: • stabilize with income • learn experientially • address barriers build work history • access incentives • develop skills • transition to permanent employment Transitional Jobs benefit: • youth not working or in school • people reentering from prison • people who are homeless • long-term recipients of public assistance Other benefits of Transitional Jobs and subsidized employment are: • economic stimulus • increased tax payment • benefits to employers • reduced recidivism

Work Experience In Kentucky, work experience is a planned, structured, time-limited learning experience that takes places in a workplace for a customer who needs assistance in becoming accustomed to basic work requirements. A work experience may be paid or unpaid, as appropriate. A work experience may be provided in the private for-profit, non-profit or public sectors. Labor standards apply to any work experience in which an employee/employer relationship exists under applicable law. Work experiences help customers obtain the needed skills to succeed in the workplace. Work experience for a customer in WIOA is classified as an Individualized Career Service, and work experiences provide a helpful means for a customer to gain experience that leads to unsubsidized employment. Customers may be referred for full or part-time work experiences depending on a customer's assessed needs.

Customized training Customized training in Kentucky is a means by which a single employer or group of employers identify skills needed in their workforce and obtain skills training in a customized format. Custom training can be designed for both employed and unemployed training participants. The purpose of customized training is to tailor it to the needs of the employer rather than offer a "cookie-cutter" approach to training. Customization occurs in the training modality as well as when and where the training is offered. Customized Training is for existing or newly created industry partnerships that identify a common set of skills needed in applicants. The training can be delivered pre-hire for customers who otherwise meet the hiring qualifications for that group of employers. The training is delivered as either an individualized career service for the participant and the employer. The commitment on behalf of the employer is to offer interviews to anyone who completes the training program. Customized Training is designed primarily for the individual who does not have the related education, training or work experience required to obtain employment. It may be provided in various occupational areas and lowers the employer's risk in hiring and training new personnel. For the WIOA eligible participant, Customized Training allows him or her to gain the knowledge and

skills necessary to perform a job after he or she has been hired and retain employment. Kentucky's local workforce development areas use this variety of training models for WIOA-eligible youth and unemployed or underemployed adults and dislocated workers as a service through Kentucky Career Center Business Service teams, a partnership of state agencies, local workforce development boards, education stakeholders and nonprofit partners. The customized use of these work based alternative training models is determined based on the best method to meet the needs of the participant and the employer. A comprehensive needs assessment for the employer and the trainee is completed and a cross analysis for which work based alternative training model should be considered and implemented for success of the trainee and the best service for the employer. Kentucky Career Center Business Service teams, statewide, strive for the service goal to help employers find, train and keep the best talent and assists Kentuckians finding, obtaining and keeping the very best jobs.

2. DESCRIBE HOW THE STATE WILL INCORPORATE REGISTERED APPRENTICESHIP INTO ITS STRATEGY AND SERVICES.

To provide better and more diverse opportunities to WIOA eligible participants, an enhanced effort has been made to increase the awareness and accessibility to registered apprenticeship (RA) programs within the Commonwealth.

A strategic partnership between the Education and Workforce Development Cabinet's Department of Workforce Investment and the Labor Cabinet's Department of Workplace Standards (DWS) ensures thorough communications and promotes a clearer path for participants to succeed with the job–driven opportunities that registered apprenticeship programs offer.

This integration will be facilitated and planned out through:

• discussions between the Department of Workforce Investment and DWS leadership staff pursuing ways for both agencies to increase access to registered apprenticeship programs.

• discussions with Eligible Training Provider List (ETPL) staff and registered apprenticeship staff to ensure proper delivery of information to both apprenticeship programs and local workforce agencies regarding ETPL and RA requirements.

• ETPL staff presentations at RA conferences and other meetings discussing ETPL requirements and providing on–site assistance with registering RA programs.

• training for career center regional leadership regarding programs and available offerings.

• presentations by DWS staff to ETPL coordinators from each of the 10 local workforce agencies so staff is well versed in sharing basic information about the RA program, including occupations eligible for apprenticeship programs, sponsors in their respective areas and the application process with area career planners.

• training's for business service teams so they can promote the development and implementation of new RA programs to employers and direct them to the appropriate DWS staff when necessary.

3. PROVIDE THE PROCEDURE, ELIGIBILITY CRITERIA, AND INFORMATION REQUIREMENTS FOR DETERMINING TRAINING PROVIDER INITIAL AND

CONTINUED ELIGIBILITY, INCLUDING REGISTERED APPRENTICESHIP PROGRAMS (WIOA SECTION 122).

Overview of Kentucky ETPL System

In August 2015, Kentucky unveiled its new Eligible Training Provider Listing (ETPL) website. This site represents an overhaul of the Kentucky system and a renewed emphasis on ETPL and providing the highest level of services to qualified participants. The system, which is web-based, represents a shift from the paper application system and allows for increased oversight, enhanced reporting and a much greater ease of access for all stakeholders. This system, managed by the state ETPL coordinator, allows for all partners to operate easily within the framework of one system, thus significantly enhancing operational effectiveness. The system has been received positively from both providers and local workforce areas and praised for its ease of usage by WIOA participants. The application process within the system is also managed by the coordinator, as well as the approval process. This represents a drastic change in process, as previously the provider application process was handled solely at the local area level, and only the coordinator, who works in the central office, was responsible for collecting local information to create and disseminate the state list. Another added benefit of the system is creating a uniform application process for providers statewide, whereas in the past there were varying procedures and protocols across the state. Providers can access the system at one point and make their programs available statewide. The system also fulfills the requirement of making the state list public by housing an advanced search engine, allowing anyone the ability to search programs and offerings in a variety of useful ways. As you can see, the system allows for a wide-ranging variety of searches so the end-user can make the best informed decision possible. And, because the engine is housed within the same platform that provider and state staff use for the application process, all information is real-time and current and not dependent on an upload or other process. This is a major upgrade from previous versions as the searchable database was only updated periodically when information was submitted. Another helpful feature is the ability for the end-user to print results from any searches or queries they may have performed. From the perspective of the provider, this system creates a far more efficient way to provide information to the state. Previously, providers would submit multiple paper copies to local areas each year to gain access to the system. Making changes was difficult and time consuming and often times the same information was submitted year after year. With the new system, the provider enters information regarding the agency and programs once and will have the opportunity each year to go in and resubmit or edit. Also, providers can go in at any time during the year and request to add a new offering to accommodate students, and this can be approved and live on the site within minutes. Application Process (excluding Registered Apprenticeship programs) The majority of the application process, with two slight variations, is the same for all programs (non-RA) across the board. The entire process is conducted completely online and can be used from a wide array of platforms and machines. The application process falls into the submission of three types of information: 1. information regarding the training provider agency, 2. information about program offering, and 3. student data collection. Currently, components one and two are collected on the ETPL website as outlined in the previous section. At this time, component three is collected through a partner agency, the Kentucky Center for Education and Workforce Statistics. More detailed information regarding that agency and process will follow. The following is an overview of the steps involved in completing the application process. Step 1: Creation of account on ETPL website (https://etpl.ky.gov). During this phase, providers are asked to create an account to access the system, along with basic information. This allows a security mechanism to eliminate duplicate accounts and only allow access to the system to legitimate providers. Providers must give basic information such as Federal Employee Identification Number, an email address and designate their “Provider Type.” Providers fall under one of four categories: • HEA Title IV funded school, •

proprietary schools, • registered apprenticeship, or • other (includes non-profits and schools such as cosmetology, faith based and mortuary science schools that do not fall under the purview of proprietary education). The provider type is very important moving forward as the requirements of the application vary slightly based on provider types. For example, if a school selects “proprietary,” then it must include certification from the Kentucky Commission on Proprietary Education later in the application process to continue. Another example is for providers associated with the Registered Apprenticeship Program, which will be discussed later in this document. Upon completion, the provider submits the account information for approval. Once the information is reviewed by the state ETPL coordinator, approval is sent to the provider and they may now access the system. Step 2: Complete the provider application. The provider application is located within the ETPL system, and captures pertinent information about the training provider. Providers must complete this step successfully before training programs will be considered for approval and inclusion. Information collected on the application includes: • year institution established • proprietary license number (if applicable) • refund policy information • narrative discussions regarding: o ability to provide training to individuals who are employed o ability to provide training to individuals with barriers to employment o how the provider is partnered with local businesses o how training services are aligned with local in-demand industry sectors and in-demand occupations • compliance with Americans with Disabilities Act (ADA) • proposed training site accessibility to those with limited mobility o how student data is collected for submission Additionally, within this section providers are required to submit a copy of the Equal Opportunity Employment Plan or other agency policy addressing non-discriminatory practices, as well as a copy of the agency’s Limited English Proficiency Plan (LEP) or other documentation of a strategic effort to provide services to those with limited English proficiency. This allows for EO monitoring to be completed via desk audit with every program on the list initially. Step 3: Complete program application. Providers will complete an application for each program they wish to be included on the ETPL. Information collected includes: • program name • classification of instructional programs code • training program description • how long the program has been in existence • plans to track student data for program for submission HEA program approval • degree/certificate to be awarded • training program length • online availability • training program costs (tuition, fees, textbooks, supplies, miscellaneous) • training program address information (Providers with programs at multiple locations/campuses do not have to submit multiple applications. Instead, they can list multiple locations for each program.)

Step 4: Register and upload student level data with the Kentucky Center for Education and Workforce Statistics (KCEWS). KCEWS was created in 2012 to expand upon the work of the Kentucky P-20 Data Collaborative, including maintaining the Kentucky Longitudinal Data System (KLDS), which facilitates the integration of data from the Kentucky Department of Education (KDE), the Council on Post-secondary Education (CPE), the Educational Professional Standards Board (EPSB), the Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Education and Workforce Development Cabinet. KCEWS has the authority to collect and link data to evaluate education and workforce efforts in the Commonwealth. This includes developing reports and providing statistical data about these efforts so policy makers, agencies, and the general public can make better informed decisions about Kentucky’s education systems and training programs, KRS 151B.132. The center must also ensure compliance with the federal Family Education Rights and Privacy Act, 20 U.S.C. sec 1232g, and all other relevant federal and state privacy laws, KRS 151B.133(12). Because of its expertise in data collection and an established systemic infrastructure, KCEWS was the ideal partner for OET to collect student level data to be used for determining performance data for the ETPL. Providers are given detailed instructions on how to register, as well as templates for submitting student data. Colleges and universities that submit their student level data to CPE are exempt from this step, as KCEWS already has access to that data. Application Process for Registered Apprenticeship Programs

Because of the difference in the nature and oversight of the programs, the path for application is somewhat different for RA programs. By WIOA statute, all RA programs that express interest in being listed on the ETPL must be included (WIOA Section 122). RA providers still must create an account and register for the ETPL site as other providers must. However, they do not have the provider application as their inclusion in the state RA listing serves as approval. They do, however, complete a modified application. This process allows interested RA programs to be fully included in the ETPL yet does not subject them to the full application process that other schools must complete. Once the program applies, and inclusion is re-verified with current standing on the state RA listing, the program is approved and placed on the website. Approval Process Once the provider has completed all necessary steps within the ETPL website and successfully uploaded the required student data, the state ETPL coordinator will begin the process of reviewing and approving programs. Initial Eligibility Programs that meet all requirements and fall within one of the in-demand industry sectors utilized within the 10 local Workforce Development Areas will be approved. The requirements are as follows: 1. Submission of Student Level Data for requested time period 2. Submission of Provider Equal Employer Opportunity (EEO) Policy and Plan for Working with Limited English Proficient (LEP) individuals 3. Assurance of Americans with Disability Act (ADA) Compliance 4. Program falls within industry sector currently being utilized by one of the 10 local Workforce Development Areas 5. Submission of requested program information for each program, including narrative discussions regarding: —ability to provide training to individuals who are employed —ability to provide training to individuals with barriers to employment —how the provider is partnered with local businesses —how training services are aligned with local in-demand industry sectors and in-demand occupations 6. Submission of all related training program costs and expenses Programs will have initial eligibility for a one federal program year (Oct. 1 through Sept. 30). At the end of the initial year, programs will be held to subsequent eligibility requirements. Registered Apprenticeship programs are exempt from this process. They will follow the guidelines set forth previously in this document. Programs that do not meet all requirements or fail to send complete information will be placed in pending status until the requirements met. Programs that fall under the “Proprietary” category can also be placed in pending status if there is an issue with their good standing status with the Commission on Proprietary Education. Once resolved, they can be placed in good standing immediately. Subsequent Eligibility Determination Programs will be evaluated on a biannual basis to determine subsequent eligibility. As of July 1, 2016, the current standards for subsequent eligibility for providers will be set at meeting benchmarks of at least 50 percent completion rates with a 20 percent entered employment rate. These rates are calculated based on student data information submitted each year. It is anticipated that as more data is collected, these rates will change and additional benchmarks will be developed.

Removal from ETPL

Programs may be removed from the ETPL by one of two manners:

• in writing, request to be removed from the ETPL for any reason, at any time or

• for willfully and knowingly submitting false information.

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 FUNDING BY THE ADULT FORMULA PROGRAM.

The preliminary policy requires local areas to record the priority of service category in the state's case management system (EKOS). Local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. OET will conduct semi–annual desktop reviews and provide technical assistance to local areas that do not have the 50 percent or more, per the preliminary policy, of their adult participants enrolled into one of the priority categories. Participants served as incumbent workers are excluded from the priority calculation.

Local Workforce Development Areas (LWDAs) must develop policies to ensure compliance with WIOA priority of service requirements. Policies must include strategies by KCC operators and service providers to recruit individuals in the priority of service categories and how they will provide appropriate services to meet those population needs.

Operators are to regularly review the percentages of WIOA Title I Adult participants who are priority participants and adjust strategies as needed to reach the goal of enrolling at least 50 percent of adults as priority participants, per the preliminary policy.

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

Kentucky's Policy 16-008, Transfer of Funds between the Adult and Dislocated Worker Formula Funds, was developed by the Kentucky Career Center (KCC) Inter-agency Policy and Guidance Committee. It was distributed to and reviewed by system stakeholders and approved by the Committee and management. It is posted on the KCC Team of Experts website.

This policy provides the guidance and parameters for transferring up to 100 percent of a program year allocation for adult employment and training activities, and up to 100 percent of a program year allocation for dislocated worker employment and training services between the two programs. This authority is provided under WIOA as long as the request meets the governor's approval.

The policy includes the following information: 1. Requesting of funds – The transfer request must be submitted on the form attached to the policy and contain the following information: • situation necessitating the transfer (e.g. depletion of current funds, why a need to transfer, etc.); • how the funds transfer will impact the participant levels in both programs; • transfer's effect on potential

recipients of services under each funding stream; and • description of expected impact of WIOA performance outcomes for both funding streams.

The form must indicate the grant numbers (From and To), amounts currently obligated, balances and amount of unobligated, as applicable.

The policy includes information on: • Funds not subject to transfer: Adult or dislocated worker funds reallocated by OET; funds awarded to the state under a National Dislocated Worker Grant (NDWG); funds reserved under the governor's 15 percent discretionary rules; and youth funds. • Considerations: Transfer requests may be submitted anytime during the two-year life of the funds. Funds transferred must stay within the original year of obligation and within their respective obligation time period. Accordingly, local areas cannot transfer funds between program years. In addition, local areas must ensure that its funds are not overdrawn during the time a transfer takes place. If this condition occurs, the transfer will not be approved. • Implications of transferring 100 percent of funds: Local areas may not apply for additional assistance funds based on the contention of dislocated worker allocation "formula insufficiency" resulting from the transfer. However, if a local area transfers 100 percent of its dislocated worker formula funds and a dislocation event occurs in the local area (e.g., specific employer layoff or disaster that changes the local economic conditions), the state will consider a local area request for additional assistance funds on a case by case basis. • Monitoring: At the local level, the workforce development area and/or the fiscal agent must conduct oversight of the transfer of WIOA adult and dislocated worker funds to ensure the transfer is being completed per the policy. Through the state's monitoring system, fiscal monitors will review the area's transfer of adult and dislocated worker funds during the annual on-site monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process. • Submission process: LWDAs shall submit the completed form to the performance unit mailbox, performanceunit@ky.gov, for processing. • References: §683.130

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 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.*

* Sec. 102(b)(2)(D)(i)(V)

The awarding of grants in a competitive or non–competitive process is completed in accordance with the Kentucky's procurement policy. When considering the ability of providers to meet performance accountability measures based on primary indicators of performance for the youth program, local boards will review performance history, stability of the program, collaboration with service providers and other components. Performance will be reviewed and analyzed at both the state and local level to ensure the youth elements are being made available to all youth and that youth are meeting the expectations outlined in the grants.

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, AND COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Kentucky is very early in the planning process in developing comprehensive, integrated out–of–school youth strategies. The state has a project identified using the current governor's discretionary funds to support state and regional level efforts to restructure youth service strategies around in–school youth and out–of–school youth. The plan is to emphasize building a state–level work–based learning continuum with consistent definitions, performance metrics and high–quality service indicators across multiple state level partners. Additionally resources will also be provided on a regional basis to assist in service redesign, training for service providers and employer outreach efforts.

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.*

* Sec. 102(b)(2)(D)(i)(I)

Kentucky will use funds to ensure that all youth program elements are made available to youth. The Commonwealth supports the local workforce areas in designing youth programs tailored to the needs of in–school and out–of school youth in local communities. Monitoring and technical assistance continue to be provided to ensure that local area policies and procedures meet requirements of the WIOA youth program design. Dedicated OET youth program staff disseminate

updates and guidance from the U.S. Department of Labor and others. Performance information, reports and training are provided to staff. Best practices are shared at all levels, including presentations at regional DOL events.

Local areas encourage youth to use one–stop services as needed. Areas have designed special referral processes for youth who come into one–stops and one area has developed a one–stop career center specifically for youth.

KWDB's strategic plan has incorporated a variety of approaches for expanding and enhancing outreach to youth. An example is the High School Outreach initiative designed to increase

communication and collaboration between workforce boards and boards of education, technical education, post–secondary education and economic development.

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).

The local board, with assistance from state level staff, shall establish a definition and eligibility documentation requirements for the "requires additional assistance to complete an educational program, or to secure and hold employment." The state has defined "requires additional assistance to complete an educational program, or to secure and hold employment" as:

• Has been fired from a job within the 12 months prior to application OR

• No previous work experience/never held a job OR

• Has never held a full–time job (30+ hours per week) for more than 13 consecutive weeks OR

• Difficulty with social interaction or behavioral problems OR

• History of family disruptions, such as divorce, legally separated parents, family violence, alcohol or drug abuse; one or more parents incarcerated OR

• A student participating in an alternative program/setting OR

• Has chronic attendance or discipline problems OR

• Functioning at least one or more grade levels below his/her age group in the areas of reading and math (for youth 18–24 if they are functioning at grade 11 or under) OR

• A student who has failed two or more subjects during the prior two years of school attendance OR

• One or more parent lacks high school diploma/GED

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.

158.030 "Common school" defined – Attendance at public school and primary school program – Advancement without regard to age – Local boards to adopt policy establishing petition and evaluation process for students who do not meet age requirements.

(1) "Common school" means an elementary or secondary school of the state supported in whole or in part by public taxation. No school shall be deemed a "common school" or receive support from public taxation unless the school is taught by a certified teacher for a minimum school term as defined by KRS 158.070 and every child residing in the district who satisfies the age requirements of this section has had the privilege of attending it. Provided, however, that any child who is 6 years of age, or who may become 6 years of age by October 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by October 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(2) Beginning with the 2017–18 school year, any child who is 6 years of age, or who may become 6 years of age by Aug. 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by Aug. 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(3) Each local school board shall adopt a policy to permit a parent or guardian to petition the board to allow a student to attend public school who does not meet the age requirements of subsection (1) or (2) of this section. The policy shall include an evaluation process that will help determine a student's readiness for school and shall ensure that any tuition amount charged under this policy is the same amount charged to a student who meets the age requirements of subsection (1) or (2) of this section. Students enrolled under this policy shall be included in a school's average daily attendance for purposes of funding as provided in KRS 157.310 to 157.440.

6. IF NOT USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE SPECIFIC STATE DEFINITION.

Kentucky's Policy 16-009, Definition of Basic Skills Deficient, was developed by the Kentucky Career Center (KCC) Inter-Agency Policy and Guidance Committee in collaboration with Adult Education. It was distributed to and reviewed by system stakeholders and approved by the committee and management for posting to the KCC Team of Experts website.

This policy is to provide direction on a statewide and system-wide understanding of the term "basic skills deficient." In addition to the definition provided by the Workforce Innovation and Opportunities Act (WIOA) 3(5)(A)(B), Kentucky seeks to expand and further clarify the definition for (B).

The policy includes the following information:

Per WIOA 3(5) (A)(B), 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 eighth grade level on a generally accepted standardized test; or (B) is a youth or adult who 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.

For portion (B), the Office of Employment and Training (OET) provides the following additional clarification/guidance for making this determination by defining it as an individual who meets any one of the following: • Lacks a high school diploma or equivalency and is not enrolled in secondary education; or • Scores 8.9 or below on the Tests of Adult Basic Education (TABE); or • Is enrolled in a Title II Adult Education and Family Literacy Act (AEFLA) program (including enrolled for English as a Second Language (ESL)); or • Has poor English language skills (and would be appropriate for ESL even if the individual isn’t enrolled at the time of WIOA entry into participation); or • The case manager makes observations of deficient functioning and records those observations as justification in a case note.

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 also include:

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES, INCLUDING AN IDENTIFICATION OF SUCCESSFUL PROVIDERS OF SUCH ACTIVITIES. (WIOA SECTION 108(B)(9).)

This section does not apply as Kentucky is not a single–area state.

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 PROCESS USED TO:

A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

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;

Kentucky has not requested any waivers under WIOA, but seeks continuation of previously approved applicable waivers as specified in TEGL 1–15.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

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

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

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

Partner for Success

This initiative seeks to move the state from a confederated set of agencies to a unified system focused on investment in workforce. The initiative seeks to streamline services to employers and customers and leverage resources and share the credit for outcomes while providing opportunities for individuals at all levels of the system to take ownership in the vision, direction and return on investment made by the department.

Workforce Academy

This initiative seeks to address and improve customer service at all levels of the Commonwealth's workforce system. The Workforce Academy seeks to achieve system–wide consistency in its approach to customer service and has contracted an outside consulting firm to develop the plan for customer service re–training and roll–out to all staff across the state

Employ Kentucky Operating System (EKOS) Training

The EKOS allows staff to document services provided to our customers. Training is provided within two months of hire and a refresher course is offered three months after basic training is completed. This training is provided in connection with Focus/Career and Focus/Talent training. Service training is provided to experienced staff as an advanced EKOS training.

Focus Suites

This system allows customers to search for jobs, employers to post jobs and search for candidates and enables staff to view and monitor the activity for eligibility compliance while ensuring customers and employers have provided all necessary information for the system to properly function. Focus/Career and Focus/Talent training is provided within two months of hire and a refresher course is offered three months after basic training is completed. This training is provided in connection with EKOS training. Job Order Writing Training and Focus/Assist training are provided to staff with job order writing responsibilities. Training takes place as determined by local office management.

Unemployment Insurance Claimstaker Training

Unemployment insurance benefits are a big part of the services provided to our customers across the state who experience job loss through no fault of their own. Claimstaker training encompasses assisting customers with filing and managing their unemployment insurance benefits claim. Training will be divided into three levels, basic, intermediate and advanced. New staff will receive basic training within three months of hire. Once staff has completed their initial probation period of six months, they will take intermediate training within three months of their probation completion. Experienced staff will receive advanced training at the local management's discretion to ensure all staff is properly trained on current issues and advanced claimstaker issues to best equip the local offices to effectively handle all issues.

Unemployment Insurance Disputed Claims Investigator Training

Unemployment Insurance benefits are a big part of the services provided to our customers across the state that experience job loss through no fault of their own. Disputed claims investigator training encompasses the disputed claims branch which ultimately reviews disputed unemployment insurance claims to determine customer eligibility to receive benefits. Training is divided into two levels, basic and advanced. New staff in the disputed claims branch will receive basic training within three months of hire. Staff members will receive advanced training at the branch manager's discretion to ensure staff is properly trained to handle advanced issues.

Personal Professional Development Training

All staff has the ability to participate in personal professional development courses offered to the agency by the Governmental Services Center.

Staff can enroll in and attend courses to improve communication, problem–solving and business writing skills and a wide variety of topics to assist them in performing their daily job functions.

Supervisor Training

Upon promotion or hire into a management or supervisory position within the agency, all managers will be enrolled into the KEWDC's Management Academy. The Management Academy currently consists of online courses including: merit system basics, hiring the best, investing in your people, solving problems, effective communication and conflict resolution. The program will eventually be expanded to include three additional courses on various leadership topics.

Program Specific Training

The agency offers a wide range of services tailored toward specific customers including military service veterans, disaster victims and large plant or employer closure customers. Training programs are developed for staff members to ensure they are able to deliver effective services to address customer needs. These training's are developed by the department to effectively deliver services to customers.

Develop Department Policies

As the agency grows, management will continue to review existing policies, adjust them to address current needs and develop new policies as the need arises. This will ensure the agency is operating and utilizing resources as effectively as possible.

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

Unemployment Insurance (UI) and Workforce Employment Services both are under the umbrella of the Department of Workforce Investment. Professional staff members in each area communicate regularly and coordinate any UI law, program or service changes. Kentucky Career Center staff

notify UI of eligibility issues when they arise. Dialogue between the departments of UI and employment services leaders results in shared and agreed upon best practices. When there are changes and/or eligibility issues addressed by Employment Services and WIOA staff members, step–by–step instructions are provided. Written guidance letters and processes are available via webinars, conference calls and informational printed materials.

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.

UI employment services staff members listen to issues from individuals and assist the individuals in the following ways:

• using the UI website for information and other resources available to UI claimants;

• providing current UI basic information, approved by UI, to the individual to assist in determining eligibility for claimant;

• working with the claimant through the online application process.

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

• When individuals apply for unemployment, they are required to register in Focus Career, Kentucky's employment website.

• The Kentucky Employment Network (KEN) works with UI customers who are profiled as likely to exhaust UI benefits. KEN consists of a workshop that informs the customer of the programs available through the Kentucky Career Center.

• Re–employment Services and Eligibility Assessment (RESEA) works with UI customers who are profiled as likely to exhaust UI benefits. The grant activities consist of a Kentucky Career Center orientation, job search overview, Individual Employment Plan (IEP) and referral to job services.

• The KCCGO! Dislocated Worker Grant has offered the opportunity to leverage key KWIB strategic plan initiatives including Unified Business Services, Career Center Certification and Sector Strategies and focus those improvements intensively on the long–term unemployed. The KCCGO! grant made available $4,775,418 to local workforce development areas to provide re–employment services including training costs for OJTs, Internships, Registered Apprenticeships, Accelerating Opportunity Scholarships, Work Experience/Tryout Employment, Customized Training, and other training in targeted sectors.

Customers can come to the local career center for additional services, which may include:

o information, services, assistance, assessments and job search,

o computer and technology skill enhancement,

o resume development,

o interview skills,

o GED assistance,

o educational opportunities,

o short–term training, o career assessments,

o resource room assistance,

o computer access for job searching, writing and printing resumes, online employment applications and assistance with employment opportunities locally, regionally and statewide, and

o outreach, which can include meeting clients elsewhere.

• Registering on the Focus Suites programs (Focus Talent, Focus Career and Focus Assist) assist customers, job seekers and employers to search for jobs and post jobs and Focus Assist allows Kentucky Career Center staff members to assist the customers.

- GED and other educational assistance

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;

Wagner-Peyser (WP) services in local Kentucky Career Center offices are based on an all–inclusive philosophy. There are no eligibility requirements or program specific requirements as a barrier to accessing comprehensive, quality, group and individual services provided by Wagner-Peyser staff.

Workforce Employment Services staff make certain UI claimants stay on track with necessary services to utilize UI while working toward their next employment opportunity. Workforce Employment Services staff enter specific UI claimant information into the Job Service computer database to track services accessed by claimant. UI software captures that data daily to assure claimants are participating in a full range of services to increase the opportunity and goal of employment.

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

State requires UI claimants be registered on the state labor exchange, Focus Career website, within a specific time period to secure UI benefits. The state also requires UI claimants to follow through with additional services, most generally provided by WP staff, and as recommended by WP staff as a criteria to continuation of UI benefits, in a specific timeframe determined by UI and recorded in data base by WP staff.

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

UI claimants are required to complete one documented work search weekly. Work searches can be completed electronically and sent directly to UI, and/or WP. Staff members review work searches to determine if searches fall within the UI guidelines and provide guidance on work search. If an eligibility question arises, WP staff would contact UI and provide information and documentation for UI to determine eligibility issues. UI claimants have access to all comprehensive services, support and assessment services available, as well as individually designed service and guidance, if needed. All technological, individual and group opportunities are available and accessible to assist in job finding and placement.

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

KCC Resource Room, with available computers, and one–on–one assistance for job searching, resume creation, online application assistance is available to all job seekers. When individuals meet with a WP Employment and Training Specialist – referrals are made to partners and WP staff for a wide range of needs to increase current and future employment options. Included would be any

application adaptation or assistance that may be needed for the job seeker and/or UI claimant. Examples include:

• Re–Employment Services – KEN and RESEA provided for UI claimants

• WIOA program referrals provided to eligible participants

• Office of Veterans Services available and referrals to Vets

• On–Site Tech College services for GED assistance and other educational opportunities and options

• WP Employment and Training Specialists provide individual and group services

• WP Career Counselor referrals: assessments, WorkKeys, TABE are examples

• WIOA staff for eligible job seekers – services may include short term training to increase employment options and opportunities

• All referrals are entered into the database for informational purpose and follow up with job seekers.

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.

Farm workers in the state of Kentucky have unique needs of finding employment outside farm work and meeting their training needs. Currently the Commonwealth of Kentucky helps MSFW find employment through the 11 certified full service career centers throughout the state. These Career Centers offer services to help with resume preparation, interviewing skills, completion of applications and other services provided by Career center partners. The Career centers also provide training to develop the skills today's employers want. These training may be provided through the Career Center or the many partners. The partners included but are not limited to the KCTCS, WIOA, OVR, OTB, Kentucky Farm Works Program, Experience Works 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.

In Kentucky, the five top labor–intensive crops are tobacco, produce, livestock, row crops and industrial hemp.

Because agricultural employers continually need more workers, employers rely heavily on hiring foreign workers due to the scarcity of a local agricultural workforce.

Tobacco companies are reducing the number and size of contracts with farmers. Most reduction in tobacco has taken place in the western part of the state with reduction up 25 percent. There is a projected increase in the production of industrial hemp. Over the next three years, there will be increase in the production of industrial hemp from 2,500 acres to more than 200,000.

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.

Mexico is the predominate country of origin of the MSFW in Kentucky, and most of these workers speak Spanish. This information must take into account data supplied by WIOA section 167 of the 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 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.

Because this population is so transient, outreach to Migrant Education Program could be a source to contact additional farmworkers. The Migrant Education Program is an organization that reaches out to the children of farmworkers, so by using this organization, KCC could reach another cohort of the population. Kentucky will continue to reach out to other agencies to provide the best services possible to MSFWs.

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.

The MSFW Program works with all KCC statewide partners to ensure that MSFW participants receive all the services provided by KCC. All MSFW participants are made aware of farmworker 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.

KCC services including vocational rehabilitation; blind services; employment and UI services; the Kentucky Farmworker Program; and Experience Works, a service offering training through the Senior Community Service Employment Program (SCSEP) to low–income older workers in 60

counties in Kentucky, are available to all MSFW participants. All MSFWs have access to the KCC offices.

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.

Staff members provide outreach to MSFWs at the more than 32 certified and uncertified KCC offices across the state. KCC provides the job seekers with one–on–one employment services including resume writing, interviewing techniques and job– application completion. Additionally KCC provides a Web–based program, Focus Career, that helps the job seeker develop a resume and track job leads on the Internet. Staff members also are active in the regional business service teams and have a Web– based program called Focus Talent that allows employers to search online for qualified candidates.

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

KCC and the Kentucky MSFW program work closely with the Kentucky Farmworker (NFJR Grantee) program to employ farmworkers throughout Kentucky in full–time employment outside agriculture and high paying job within agriculture. The Kentucky MSFW program also works with Migrant Education and migrant health programs to provided needed services the MSFW participants.

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:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

KCC provides the job seekers with one–on–one employment services including resume writing, interviewing techniques and job application completion. Additionally, KCC provides the job seeker with a Web–based program, Focus Career, which helps develop a resume and track job leads online.

Staff members are active in the regional business service teams and have a Web–based program, Focus Talent, that allows employers to search online for qualified candidates

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

Posters are located in all KCC offices with instructions on how and where to file a complaint.

(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

Information on the Agricultural Recruitment System is provided at employer meetings and at agricultural trade shows.

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).

NFJP staff will continue have access to the systems used by the Kentucky Career Centers. KCC began establishing relationships with Kentucky Migrant Education Program and the Kentucky Migrant Health Care System over the last year. KCC will continue to build a better working relationship with both agencies.

(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.

KCC will provide a copy of the AOP to NFJP grantees along with other agencies and organizations for comment and suggestion.

The agencies that will provide a copy of the AOP are:

• Kentucky Farm Worker Programs Inc.

• Kentucky Migrant Education Program

• Kentucky Migrant Health Care Program

• Kentucky Farm Bureau Federation

• Agriculture Workforce Management Association, Inc.

(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.

KCC has met its goals in regards to services to the MSFWs identified in the job service system. KCC plans to work with the other agencies to better reach the MSFW population and make it aware of KCC services.

(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.

KCC representatives were not able to attend Migrant Education and Health Care programs functions last year due to schedule conflicts and lack of adequate staffing.

(E) STATE MONITOR ADVOCATE

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

The state monitor advocate has been involved with the AOP.

F. WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

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

2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; Yes

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The 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)).

Kentucky was one of the first states to adopt the National Governors Association, Council of Chief State School Officers' Common Core State Standards at all educational levels (P-12), postsecondary and adult education. Kentucky Adult Education (KYAE) recognizes the critical need for aligning adult education curricula to meet the higher demands of College and Career Ready Standards (CCRS), a subset of state standards recognized by the Office of Career, Technical and Adult Education (OCTAE).

CCRS offer a common, consistent, and clear understanding of what students are expected to learn. Designed to be robust and relevant to real-world expectations, the CCRS reflect and afford adult students the foundational knowledge, skills, and abilities (which have evolved substantially over the last decade) to pursue postsecondary education and training, as well as career aspirations.

*English Language Learner is an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language and (1) whose native language is a language other than English; or (2) who lives in a family or community environment where a language other than English is the dominant language.

KYAE's standards-based instruction and integration of digital literacy align with the content and format of the fifth edition of the GED test used to award Kentucky's High School Equivalency Diploma. Together, these provide KYAE's students the same opportunities for college and career readiness as graduating high school seniors.

Consequently, KYAE is part of an effort to create a seamless system for students to move from adult education to earning their high school equivalency diplomas and transitioning to postsecondary education and training and/or living wage jobs, ultimately contributing to the economic vitality of the Commonwealth.

To ensure successful instructional effectiveness, KYAE employs comprehensive and intense professional development (PD) (providing offerings required by policy, as well as elective options for professional growth) that encapsulates standards-based andragogy, academic content, contextualization of instruction, digital literacy integration (e.g., Kentucky Educational Television's Fast Forward), effective instructional strategies, and instructional leadership. KYAE PD offerings are available via face-to-face, online, and blended formats.

Additionally, KYAE has forged PD partnerships with: the Collaborative Center for Literacy Development (CCLD) at the University of Kentucky (UK) to provide reading and English Language Arts (ELA) PD, including essential components of reading instruction; the Adult Education Academy at Morehead State University to provide instructional leadership PD and facilitate online programming; and the National Center for Families Learning (NCFL) to provide curricula development and facilitation of online courses, including English Language Acquisition (ELA).

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 the adult education and literacy activities, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of 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.

(b) Local Activities. Modification requests: "The Commonwealth did not describe 'how' it will use the 13 considerations in section 231(e) of WIOA in making funding decisions consistent with Title II of WIOA. The Commonwealth did not identify what activities would be provided concurrently with other activities, if any. The list of local activities is inaccurate in that 'career pathways' is not itself a local AEFLA activity consistent with the definition of 'adult education and literacy activities' in section 203(2) of WIOA."

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]: All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

NOTE TO REVIEW: "CAREER PATHWAYS" MODIFICATION REQUEST: IN ORDER TO PROVIDE CONTEXT, THE BELOW DESCRIBES ALL THREE WIOA COMPONENTS RELATING TO SPECIFIC WORKFORCE ACTIVITIES AND STRATEGIES, INCLUDING WORKFORCE PREPARATION, INTEGRATED EDUCATION AND TRAINING (IET), AND AE'S ROLE IN CAREER PATHWAYS.

Workforce Preparation: KYAE will continue to require standards-based, academic instruction, to be contextualized, at a minimum, by using its Employability Standards. By strengthening contextualized instruction with online curricula courseware [Worldwide Interactive Network's (WIN)], purchased by KYAE's and DWI's Workforce Investment Act incentive funds, students, while in a program of study, may earn a governor-endorsed, Kentucky Essential Skills (KESC). The KESC is achieved through formative and summative assessments and accompanied by an Employability Standards checklist of "demonstrable skills," which the instructor and student will authenticate by signing the document. Consequently, with all programs contextualizing standards-based, academic instruction, they need only to add training partner activities to extend their efforts to implement Integrated Education and Training models and/or provide adult education support within more expansive career pathways programs. Additionally, the state benefits further from the WIN courseware in that one of its educational tracks prepares students to take the WorkKeys tests to earn a National Career Readiness Certificate and another track focuses on College and Career Readiness standards instruction.

Integrated Education and Training (IET): While KYAE is committed with its partners (KCTCS and DWI) to continue to improve and scale up its career pathways program, Accelerating Opportunity Kentucky, it also has explored ways in which less resource-rich areas might partner with organizations in addition to community and technical colleges (e.g., public and private universities, employers, etc.) to offer core adult education services concurrently with occupational training [provided by the aforementioned partner(s)]. While these services may not include all the wraparound support services as a fully articulated career pathways program, defined in WIOA Section 3 (Def. 7), it will provide an opportunity for adult education programs to partner with training organizations to accelerate student learning by attaining adult education support and occupational skills simultaneously.

Therefore, KYAE has piloted an IET model with local adult education programs working in tandem with a healthcare-sector, occupational association. The adult education programs provided workforce preparation, as described above, and collaborated with the association to identify and develop lesson plans/units, leading to options for healthcare-sector-contextualized programming. KYAE continues to explore options with a local adult education grantee (responsible for multiple county programs) that has forged a relationship with a local manufacturing employer. As a result of

this pilot, additional, contextualized lesson plans/units will be developed for the manufacturing sector and available in a shared (statewide) lesson bank.

These experiences will generate best practices, challenges, and recommended modifications to help guide programs who are interested in working collaboratively to provide adult-education-contextualized, standards-based academic instructional support and occupational skills through appropriate training partners.

KYAE will continue to strengthen its partnerships with the DWI's Office of Employment and Training (governs local Career Centers) and KCTCS to extend career pathway strategic opportunities across county lines. While Kentucky tends to be "county-centric," KYAE and its partners have made modifications (including performance incentives) to its CPWs framework to create a mutually beneficial situation for all county partner programs.

As a result, students can receive essential-skills (workforce preparation)-contextualized, standards-based, academic instruction at their local adult education program and concurrently enroll in a career pathway technical course(s) in an in-demand industry sector at a community and technical college that may be located outside their local community/county.

The partners have also determined that the model is greatly enhanced by dedicated coaches who assist students with navigating the postsecondary education system and connecting them to one-stops for workplace activities and job placement.

Initially submitted state plan language:

KYAE will conduct a competitive Request for Proposal (RFP) process for eligible entities to apply for grant awards of adult education funds (both state and federal); these entities will subsequently be awarded multi-year contracts to provide educational services. Eligible providers must provide evidence of demonstrated effectiveness based on criteria present in the RFP. Eligible providers of adult education and literacy activities may include:

• Local educational agency;

• Community-based or faith-based organization;

• Volunteer literacy organization;

• Institution of higher education;

• Public or private nonprofit agency;

• Library;

• Public housing authority;

• Nonprofit institution (not described above) possessing the ability to provide adult education and literacy activities;

• Consortium or coalition of agencies, organizations, institutions, libraries, or authorities (as described above); or

• Partnerships between an employer and an entity described above.

KYAE will ensure, through the application process and public announcements, that all eligible providers have direct and equitable access to apply and compete for these grant awards.

Metropolitan and regional papers will be used statewide to advertise the RFPs. A minimum of one bidders' conference will be hosted for potential applicants to answer questions and clarify criteria contained within the standard RFP.

The RFP will underscore criteria for individual eligibility of adult education services, which include:

• Have attained 16 years of age;

• Are not enrolled or required to be enrolled in secondary school under state law (which is 18 years of age in Kentucky); and

• Who are:

o Basic-skills-deficient;

o Lacking a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or

o An English Language Learner (ELL).

Therefore and hereafter, adult education and literacy activities are defined as programs, activities, and services offered by eligible providers that include:

• Adult education:

o Academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for: attaining a secondary school diploma or its recognized equivalent; transitioning to postsecondary education and training; and obtaining employment

• Literacy:

o Ability to read, write, and speak English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family, and in society

• English Language Acquisition:

o A program of study designed to help eligible individuals who are ELL achieve competency in reading, writing, speaking, and comprehension of the English language, leading to: attaining a secondary school diploma or its equivalent; transitioning to postsecondary education and training; and/or obtaining employment

• **Integrated English literacy and civics education (IEL/C):**

o Services for ELLs that include literacy and ELA, as well as instruction on the rights and responsibilities of citizenship and civic participation; may include workforce training, enabling competency in the English language; and acquisition of basic and advanced skills to function effectively as parents, workers, and citizens

• **Workplace adult education and literacy activities:**

o Services, defined above, offered in collaboration with an employer or employer organization at a workplace or an offsite location designed to improve incumbent worker productivity

Since the downturn in the economy in 2008, adult education delivered in the workplace (employers' work site/incumbent workers) has been minimal. The Kentucky Skills Network is a unique partnership between the Cabinet for Economic Development (KYCED), Education and Workforce Development Cabinet (KEWC), Labor Cabinet (KLC), and Kentucky Community and Technical College System (KCTCS), dedicated to assessing employer skill needs and designing and delivering the best workforce solutions. Local KYAE programs are available to provide services to eligible individuals needing fundamental academic skills support.

• **Family literacy**:

o Activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and better enable parents or family members to support their children's learning needs; must integrate all of the following activities:

*Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;

*Interactive literacy activities between parents or family members and their children;

*Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and

*An age-appropriate education to prepare children for success in school and life experiences

Special rule: Grant funds may not be used 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, with the exception of family literacy.

In providing family literacy activities, 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 other than activities for eligible individuals. (This caveat will be included in the RFP application.)

Eligible providers, subsequent to a local needs assessment, will be expected to offer a minimum of comprehensive services, including adult education and literacy and workforce preparation activities. Expectations of services including English language acquisition, integrated English literacy and

civics, and family literacy will depend upon the providers' service area population of ELLs, community partnerships, and demand for family literacy.

Under WIOA, adult education and literacy services will align with and be integrated in a seamless workforce development system of complementary services. The Act particularly focuses on a renewed engagement of adult education and literacy providers, employers, and occupational trainers to assist adults in becoming literate and obtaining the knowledge and skills essential for employment and self-sufficiency.

Therefore, adult education and literacy providers will need to effectively demonstrate their ability to provide integrated education and training or adult education and literacy activities provided concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Workforce Preparation

KYAE has recently completed hosting train-the-trainer events and has provided an online curricular resource to all programs in order to enhance their contextualized workforce preparation services.

The initiative initially started with an employability skills pilot in which participating program staff were trained to contextualize standards-based, academic instruction with employability skills that had been vetted through focus groups, including an employer focus group.

The recently introduced online curricular resource represents a partnership investment by KYAE and DWI of WIA Workforce Incentive Funds, renewing a contract for Worldwide Interactive Network's (WIN) online curricula courseware. The product not only provides WorkKeys/NCRC preparation, but "soft" skills (essential) and CCRS-based curricula tracks. Along with the administration of badge-supported curricula and assessments, the essential skills track concludes with a Kentucky Essential Skills Certificate (KESC). Additionally, this online courseware is available to other state agencies with the exception of K-12 - where school districts may avail themselves to alternate courseware licenses.

As a result of the pilot, Kentucky Employability Standards were developed by streamlining the initial set of skills and sub-skills that reflected a variety of employment readiness frameworks and were categorized as 21st Century skills of communication, collaboration, and critical-thinking. A lesson repository was established, housing contextualized lesson plans. There are plans to use Carl D. Perkins leadership funds to assist in creating a user-friendly, web-based platform. Perkins funds also contributed to funding the pilot, which included a six-month ramp-up period for programs to sufficiently prepare to execute pilot activities and KYAE to conduct an independent party evaluation.

The KESC was designed to enrich essential-skills-contextualized, standards-based instruction, but it also meets the needs of students, allowing them to celebrate a milestone and earn a stackable credential on their way to pursuing a National Career Readiness Certificate (NCRC) and/or high school equivalency diploma. Therefore, currently, programs are equipped to provide workforce preparation activities; and the RFP will expect applicants to express demonstrated effectiveness in providing workforce preparation activities.

Integrated Education and Training (IET)

Kentucky partners KYAE, KCTCS and the Department for Workforce Investment's Office of Employment and Training (OET), have initiated and nurtured, through an initial three-year grant from Jobs for the Future (JFF), an IET model that has gone several steps further to institutionalize a (CPWs) framework, Accelerating Opportunity (AOKY), which encompasses:

• Determining career pathways, representing viable sector, in-demand, living wage jobs using labor market information (LMI), and aligning with local and regional industry and economic development needs;

• Engaging local sector employers at the front-end of CPWs development; e.g., expression of available and prospective jobs, curricular development input, and recognition of skill advancement through providing students workplace activities and job placement;

• Preparing students through concurrent postsecondary and adult education services; in the context of workforce preparation activities and training for specific occupations or occupational clusters;

• Supplying intensive, comprehensive wraparound services to help students navigate through achieving their education and career goals; e.g., career exploration and planning, referrals to appropriate social agencies, etc.;

• Employing team teaching (adult education instructor and technical faculty) in conjunction with supplemental college- and career-ready, contextualized adult instruction to accelerate the progression of achievement;

• Enabling students to earn a high school equivalency diploma and at least one recognized postsecondary credential during the same timeframe; and

• Providing workforce activities (e.g., internships, job shadowing) and job placement services for successfully completing students.

Furthermore, through KYAE's work with Judith Alamprese and Associates and the Moving Pathways Forward technical assistance grant, KYAE is currently pursuing additional partners to expand opportunities for adult education programs located in areas where diverse community and technical college pathways options are limited in order to leverage current occupational training.

Therefore, KYAE wants to grow and expand the concept of IET in Kentucky beyond AOKY (a more robust IET example) to include prospective collaborations with employers, pre-apprenticeship programs, public and private four-year universities, etc., to support the occupational training element of an IET model by offering a variety of ways students can accelerate their educational and career accomplishments.

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:

a. Adult education and literacy activities;
b. Special education, as determined by the eligible agency;
c. Secondary school credit;
d. Integrated education and training;
e. Career pathways;
f. Concurrent enrollment;
g. Peer tutoring; and
h. 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.

(c) Correction Education and Other Education of Institutionalized Individuals: Modification request: "The Commonwealth provided a response to this element; however, the Commonwealth did not describe how the grants and contracts awarded with Section 225 funds will be competed and will comply with the requirements of Subpart C in Title II of WIOA. The Commonwealth did not describe how it will carry out workforce preparation and transition coaching activities in a way that is consistent with the statute."

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]: All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

Note to Reviewer: Please find below additional language to clarify/modify an understanding of KYAE's intended services for incarcerated adults.

KYAE will adhere to the same competitive process, including assurances of direct and equity access, mentioned above [(b) Local Activities], when competing 225 funds for correctional and other institutional contextualized (workforce preparation), standards-based academic instruction. (See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.)

As part of the grant application, eligible providers will describe and define the adult education academic activities that they will provide through contextualized (workforce preparation skills), standards-based academic instruction and employability/essential skills integration to support incarcerated adults' transitions upon release. Priorities for the Commonwealth will focus on increasing the number of incarcerated adults earning a GED® diploma and securing skills to assist in transition from incarceration to additional education and training and/or employment.

In local areas where full-service jails exist, adult education programs will be expected to partner with their jailer to offer incarcerated adults, at least 10 hours of contextualized (workforce preparations skills), standards-based academic instruction (discretion is given to the adult education program to determine if less than 10 hours of instruction per week is sufficient time to advance students). It is also expected that jailers provide adequate space in a comfortable environment with student access to instructional materials to encourage additional study outside of the classroom setting.

Local providers will also be expected to provide preparation, in a program of study, for WorkKeys assessments associated with earning the National Career Readiness Certificate. The Department of Corrections (DOC) has agreed to provide "good time" for incarcerated adults that earn their NCRC.

While KYAE understands the value of other services, including integrated education and training, career pathways, concurrent enrollment, and peer tutoring, KYAE services will focus on adult education and literacy activities and preparing incarcerated adults for transitioning with employability/essential skills and an NCRC. However, KYAE has strengthened its relationship with DOC resulting in the extension of educational opportunities, including NCRC preparation and together they will continue to look for ways to collaborate in offering critical educational services and support to incarcerated adults.

In agreement with Department of Corrections, incarcerated adults who are likely to leave a correctional institution within five years of participation in the adult education program and/or who are seeking a GED® diploma in the program shall be given priority of services.

Initially submitted state plan language:

• 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 a reducing recidivism goal.

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 five years of participation in the program.

KYAE will employ approaches to inmate educational services to participating inmates that will increase educational levels and equip them with skills to become self-sufficient in an effort to reduce the recidivism rate. Using a two-pronged approach to corrections education, inmates are served both in adult state correctional and local correctional facilities. While KCTCS college faculty typically teach daytime classes for adult correctional inmates, adult education programs partner with these adult facilities to provide evening classes and local jail education services. Correctional adult education students must meet the same eligibility criteria as any other adult student as described above.

Local Corrections Education

KYAE program providers with full-service local jails are required (through RFP expectations and contracts) to provide adult education based on an agreement with the local jailer. The new RFP and contractual agreement process will include a continuation of formula funding based on recommendations from an adult educators' performance model work group on adults without a high school diploma or its equivalent. Priority will be given to state inmates housed in local jails and criminal offenders expected to depart within five years' time.

State Correctional Institutions

KYAE contracts with the Kentucky Department of Corrections (DOC) to help build capacity in serving more inmates in 12 facilities statewide. As part of the contracting process, goals are set reflecting increasing academic gains and high school equivalency attainment. KYAE has worked closely with DOC to alleviate “technical issues” for providing GED testing. DOC decided that each facility would be its own testing site and therefore, both the GED Ready test and GED test are administered within the facility itself.

With the reauthorization of WIOA, the RFP process will include the expectation that the following services are made accessible to inmates based on need and situational feasibility.

These services include:

• Adult education and literacy activities (as defined above), including preparation for earning a high school equivalency diploma;

• Appropriate accommodations for inmates identified with learning differences/disabilities;

• Workforce preparation activities as defined above; and

• Transition coaching and CCR-standards-based instruction.

Most adult correctional facilities provide opportunities for vocational education. However, DOC policies require inmates to possess a high school diploma or its equivalent to qualify. Therefore, KYAE will continue to pursue discussions about possible changes to the policy to enable concurrent enrollment, integrated education and training, and career pathways to accelerate inmate progression through educational and occupational training achievements to better prepare them for release and ability to contribute to society. Additionally, where situationally feasible, instruction may include peer tutoring.

Not less than 82.5 percent of grant funds will be contractually awarded under section 231 to execute section 225, Programs of Corrections Education and Other Institutional Individuals, of which not more than 20 percent of such amount shall be available to execute section 225. Funds may also be used to serve eligible adults in reformatories, work farms, detention centers, or halfway houses.

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.

(d)1. Integrated English Literacy and Civics Education Program (IELC): Modification request: "The plan does not adequately describe how the Commonwealth will establish IELC programs that provide educational services consisting of literacy and English language acquisition integrated with civics education that includes instruction on the rights and responsibilities of citizenship and civic participation."

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]: All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. **[See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]**

Note to Review: Integrating rights and responsibilities of citizenship and civic participation modification request:

KYAE will adhere to the same competitive process, including assurances of direct and equity access, mentioned above [(b) Local Activities], when competing 231 funds for integrated English Literacy and Civics contextualized (workforce preparation), standards-based academic instruction. **(**See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.)

Priorities for the Commonwealth will focus on increasing ELLs' abilities to read, write, speak, and comprehend English, *in addition to building mathematical skills* through 231 funding. Academic

instruction will be supported by adult education College and Career Readiness standards in an effort to retain and transition ELL students into adult education.

Programs' short -term, educational goals for ELLs will promote the same experience of essential/employability-skills-contextualized, standards-based academic instruction as adult education students, *while integrating instruction on rights and responsibilities of citizenship and civic participation.* ELLs' retention and transition to adult education will be facilitated by these instructional enhancements, whereby advancing into adult education instruction will appear seamless to the student.

As ELLs anticipate transitioning to adult basic education will then set longer-term goals of earning a GED® diploma and transition to postsecondary education and training or employment. As ELLs progress, they will have the same opportunities to participate in integrated education and training initiatives and career pathways, as the program works with partners to incorporate work-related activities and fulfill job placements.

Initially submitted state plan language:

With the introduction of a new component to IEL/C, "integration," KYAE plans to improve integration of English literacy and civics education into the comprehensive menu of services programs offer, provided their population needs are met. Adult English language learners, including individuals who may have earned degrees in other countries, may receive services that enable them to achieve competency in English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. This includes English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation; it may also include workforce training.

During program year 2015-16, KYAE required programs applying for and implementing EL/C programs to establish a work-related goal in a first foray into connecting ELL immigrants admitted for permanent residence with work, including "unsubsidized employment in in-demand industries and occupations," workforce preparation activities, etc. Subsequently, the RFP application process will include, at a minimum, that programs: integrate students into workforce preparation activities, as defined by implementing standards-based instruction contextualized using KYAE's Employability Standards; participate in integrated education and training models; and provide assurance of partnerships with local Workforce Innovation Boards (LWIB) and Kentucky Career Centers, in particular, to provide the same opportunities for career exploration and counseling, work-related activities, and job placement.

Additionally, program year 2015-16 performance targets included NCRC awards, for which an expectation would be established for IEL/C programs to pursue as well. The KESC will also be added to performance expectations for the next program year. Programs have integrated digital literacy in program services and some IEL/C students may be interested in AOKY technical pathways as well.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION SERVICES AND HOW THE FUNDS WILL BE USED FOR THOSE SERVICES.

Initially submitted state plan language:

Based on the funding allocation (65 percent) calculated using the state's share of a 10-year average of data of the Office of Immigration Statistics of the Department of Homeland Security for immigrants admitted for legal permanent residence for the 10 most recent years, and the other 35 percent taking into consideration our State's growth by the average of the three most recent years reported by the same data source, a minimum of $60,000 will be dedicated to Integrated English Literacy and Civics (IEL/C).

Funds will be distributed based on a competitive and direct and equitable RFP process with requests for demonstrated effectiveness and justification of a target population.

(d)2. Integrated English Literacy and Civics Education Program (IELC): Modification request: "The plan does not indicate how the grants and contracts with section 243 funds will be competed and will comply with the requirements of Subpart C in Title II of WIOA. The plan does not address the activities that will be funded with section 243 funds."

KYAE will adhere to the same competitive process, including assurances of direct and equity access, mentioned above [(b) Local Activities], when competing 243 funds for integrated English Literacy and Civics programs. The competitive process and direct and equitable access will remain the same for all funding sources, including 243 funds and will comply with the requirements of Subpart C in (See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.)

KYAE plans to compete the IELC 243 funding separately from 231 funding because of the significant change to the historical EL/C model. This will provide areas statewide (*not limited* to providers have been awarded 231 funding), particularly with larger ELL populations, to apply to offer programming designed to conclude with placement in unsubsidized employment. Additionally, KYAE expects to provide training and technical assistance to ensure the enhanced IECL model is successfully implemented.

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.

Alignment of WIOA partners: Kentucky is planning with its WIOA and other service partners to submit a combined plan of action.

KYAE, OET and KCTCS continue to sustain AOKY that was initially funded with a grant from JFF. The partners have worked to hone the model to a framework of which all 16 community and technical colleges and adult education centers and KCC offices can offer. The partners continue to provide training and technical assistance (e.g., team teaching) in an effort to promote continuous improvement. (See also Integrated Education and Training.)

KYAE is also working with WIOA partners to implement team–based case management (TBCM) to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within KCC and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners.

KYAE is also directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with Department for Community–Based Services (DCBS). Paths to Promise (P2P) focuses efforts on a research pilot in eight counties in Eastern Kentucky that includes moving eligible students into AOKY pathways. The other Employment and Training funds proposal includes support services for students pursuing education and training in urban areas.

High quality professional development: Standards–based instruction: One of our professional development contractors, the University of Kentucky's Collaborative Center for Literacy Development (CCLD), conducted research (completed August 2014) on our implementation of Standards–in–Action's (SIA) Unit Four instructional observations and KYAE used the aggregated data trends to inform current and future professional development offerings.

During 2015–16, KYAE revised the SIA Innovations 4 classroom observation tool to include more examples of evidence and to reflect the Teaching Effectiveness Teacher Competencies. The state's program directors will be trained on using the tool in February 2016, then will conduct classroom observation in the spring of 2016, and provide their findings to KYAE. KYAE has contracted with the CCLD to develop data collection tools and present conclusions based on the data analysis. This will be used by KYAE to inform future PD and technical assistance for local programs.

In March 2015, Kentucky's state team, along with the teams from 11 other states, convened in Washington, D.C., for the first of two national workshops. These workshops aimed to "delve into the instructional and institutional implications of CCRS and help to shape the approach that teachers and program leaders should take." In the March workshop, the team learned to evaluate instructional resources by determining their alignment to the key advances in the CCRS. Core instructional actions to effectively implement the CCRS key advances in adult education classrooms were presented as the second part of the initial workshop. Two national coaches were assigned to the Kentucky team to assist in planning for a pilot implementation of these activities with 12 instructors from participating programs. Workshops for evaluating and aligning both mathematics and English/language arts resources were completed for a total of 48 instructors. The pilot continues into

FY2015–16 with the impact of the activities being evaluated and feedback given to the program directors in response to submitted assignments. The purpose of the pilot is to determine which activities and tools from the workshops will be incorporated into future PD.

KYAE recognizes the critical need for aligning adult education curricula to meet the higher demands of the CCRS sanctioned by the Office of Career, Technical, and Adult Education, U.S. Department of Education. It is also crucial that these curricula be aligned to a more relevant GED test and representative of current expectations of college– and career–ready graduating seniors. CCRS provide a consistent, clear understanding of what students are expected to learn. The standards are designed to be robust and relevant to the real world, reflecting the knowledge, skills and abilities needed for continued success. KYAE is part of an effort to create a seamless system for students to move from adult education to earning stackable credentials, including the KESC, NCRC and a high school equivalency diploma. With students fully prepared, Kentucky will be positioned to compete successfully in the global culture and economy.

Technical assistance: The PD model this year focused on instruction, with an emphasis of putting together what has been learned over three years of SIA, to provide the student with a seamless learning experience from diagnostic activities to achievement of goals, including high school equivalency preparation. We are eager to elevate what might have, at one point, appeared to be siloed concepts to unified practical application. Additionally, mathematics, GED preparation, instructional technology, and employment of effective instructional strategies that address ELA shifts and mathematical practices (including differentiated instruction) have been ongoing focus for PD (selection based upon survey results from the field.)

KYAE plans to: streamline required PD; integrate and balance face–to–face and online PD opportunities so program staff may remain in programs and still actively participate in PD and network with peers via technology (e.g., Edmodo, Google Hangouts); and offer elective professional growth opportunities (PGOs) in which staff have expressed interest based on their personal and programs' needs. We envision an overarching umbrella of required PD, followed by program directors' and staffs' thoughtful consideration of what PD they need programmatically and individually. Therefore, more time will be available for selecting and participating in appropriate PGOs and program directors will be charged with strategically scheduling study circles and a lesson collaborative that advance student-centered services. Some of this year's PD (e.g., study circles) will also help inform future PD. PD partners and coaches will be available for technical assistance program visits.

Role of the eligible providers as a one–stop partner access to employment, education and training: KYAE and the Education and Workforce Development Cabinet are collaborating in the development of the Focus Explorer/Burning Glass web–based application in order to further align Kentucky's workforce development system (including KCC) with Kentucky's educational objectives while improving services to provide an online career counseling tool. KYAE's and KCC's students/clients, as well as the population–at–large, will, based on personalized skills gap analysis and career advancement plans, be directly referred to WIOA–approved eligible training providers, including adult education programs. KYAE, in conjunction with its partners, will provide technical assistance and training to local providers in order to first pilot the resource and then roll it out statewide. See also Workforce Preparation about KESC and online curriculum. KYAE has also developed units of instruction to assist instructors in helping students use a career and skills exploration software, FOCUS CAREER.

Assistance in the use of technology: KYAE administered a comprehensive technology self–assessment to programs. The self–assessment will provide programs with a good understanding their current level of technological proficiency, both for the use of technology with students and their staffs' competencies. Subsequently, each program will submit a plan for the next three years outlining efforts for continuous improvement, detailing steps to progress toward the next category of proficiency.

If the program has already achieved the highest level of competency, it will be asked to provide a plan outlining continued efforts to improvement. KYAE will contract through a professional development partner, for the services of an Instructional Technologist who will be responsible for providing technical assistance throughout this planning and implementation process, as well as a plethora of other ways in which s/he will provide technical assistance in using technology to increase efficiencies and as an instructional tool.

KYAE is also working with Kentucky Educational Television on a distance learning pilot to facilitate students' completion of Fast Forward modules in preparation for the GED® test. These students tend to prefer using online curriculum at a distance due to conflicts with work, childcare, transportation, etc., that may prevent them from visiting the adult education center on a regular basis.

Monitoring and evaluation: See Monitoring and Evaluation below (F).

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

Developing content and models for integrated education and training and career pathways: See Integrated Education and Training.

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.

Professional Development Quality Assessment

KYAE continues to use the Kirkpatrick's Four–Level Evaluation Model to inform professional development. As part of their professional development contracts, the KYAE PD contractors track and report items 1–3 below. Item 4 is collected through the Kentucky Adult Education Reporting System (KAERS). The data is collected via the following activities:

1. Questionnaires at the conclusion of a training to survey immediate feedback from training recipients;

2. Pre– and post–tests at trainings to measure what learning objectives were achieved and whether additional training is needed;

3. Observation of demonstrated, on–the–job execution of expected behaviors via a well–informed program director's supervision to reinforce the replacement of old knowledge/processes with the new information/processes provided by the training; and

4. Collection of student data to determine if the training impacted student outcomes.

KYAE has implemented SIA instructor observations and has, over time, gathered feedback and input to modify and refine the observation tools and process.

Monitoring and Evaluation

KYAE built KAERS, a robust, recently enhanced data collection system. KYAE is continuously seeking new ways to analyze and draw conclusions from the data. KYAE expects it will be a larger portion of how to monitor and evaluate program services, professional development, instructional strategies, program efficiencies, etc.

KYAE is strongly committed to helping ensure local program success in producing quality student outcomes based on core indicators of performance. KYAE staff will be monitoring, evaluating, assisting in continuous improvement activities, sharing resources, and providing technical assistance in a myriad of ways, both directly and indirectly. Presented below are some of KYAE's major monitoring, evaluation, and program support components.

• KYAE's program support team members act as liaisons between KYAE and local programs. KYAE provides information on state and federal policy and procedures; monitors and evaluates program performance, and assists in data–informed analysis and program plans for development; provides local programs with information on best practices; and promotes efforts to increase the use and understanding of technology.

• Monitoring activities will continue to take place with particular emphasis on using student data to guide program decisions. KYAE's KAERS system provides a means for real–time monitoring and

evaluation based on program and student data and guides KYAE's technical assistance and program support. Regular desk audits will be conducted for each provider using KAERS data and other available information. This action ensures that both KYAE and the local program directors are aware of data related to their programs.

• Typically, 30 programs are randomly selected for annual audits conducted by the Kentucky Auditor of Public Accounts. The audits consist of both performance and financial reviews and include a review of programs' compliance with KYAE policy. KYAE will continue this practice unless regulatory guidelines dictate differently.

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 **Kentucky Adult Education, Council on Postsecondary Education**

Full Name of Authorized Representative: **Reecie D. Stagnolia**

Title of Authorized Representative: **Vice President for Adult Education, Council on Postsecondary 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

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

_____

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

(1)Related to input and recommendations from the SRC for the OVR portion of the Combined State Plan The SRC met on February 22, 2016 and gave input and recommendations in these areas, and the agency responded to the input and recommendations. Responses are listed below:

The SRC recommended grammatical changes, as well as format changes in our rough draft.

The agency does accept this input and made the changes except for one place where the grammar was corrected already.

The agency rejects changes in the format because we are just putting in the format that we received.

The SRC requested that we define FOCUS and Rapid Response in the parts of the plan in which they are referred. The agency does accept this input and will briefly define the suggested items.

The SRC requested that we define Section 511

The agency does accept this input and will briefly define this item.

The SRC recommended that the agency be more specific when it comes to what other agencies will assist with education on and provision of supported employment services.

The agency does accept this input and will add “and other agencies” after the Arc of Kentucky because we need to utilize more resources for education and funding of Supported Employment services, such as the Kentucky Association of Supporting Employment First (KYAPSE), the Department of Behavioral Health and Developmental and Intellectual Disabilities (BHDDID), the Kentucky Rehabilitation Association (KRA), UK Human Development Institute, EKU Center of Excellence, most of the Comprehensive Care Centers in the state, and many Supported Employment providers.

The SRC recommended that the agency add measures where the goals are mentioned in two places and not just one.

The agency does accept this input and will add the measures to the other section.

The SRC recommended that we make some wording changes to the Coordination with Employers section in the first paragraph.

The agency does accept these changes and will make them. The SRC recommended that we provide Benefits Planning and Analysis as an option when it comes to addressing health insurance concerns.

The agency does accept this input and will add it to the tasks under the goal that deals with ancillary services.

The SRC recommended that the agency specify the number of schools we wish to expand the Community Work Transition Program to.

The agency does accept this input and agrees that the intent should be to expand the program to all schools.

The SRC recommended that the agency offer the Pre–ETS brochure and video for the schools online as well.

The agency does accept this input and will offer both items on the agency website as well as in person.

The SRC recommended that we give more information concerning online classes at Carl D. Perkins Vocational Training Center (CDPVTC) used to enhance the vocational behavior enhancement program.

The agency accepts this input and will put something in Section P as it pertains to progress on Pre–ETS tasks about the online orientation class for new students.

The SRC recommended that the agency provide information and resources for choosing the appropriate college.

The agency does accept this input and will offer brochures for Carl D. Perkins Vocational Training Center and any resources available for choosing the appropriate college.

The SRC recommended that we add something about transgender and sexual orientation to the question and to the answer concerning outreach procedures concerning minorities. The agency cannot change the question it was given to answer by the federal government but does accept this input and will add to its answer the protected classes, including sexual orientation, gender identity, and genetic information that are also listed on the signature statement of its application for services.

The SRC asked if there was collaboration with the school districts to reach all the transition students.

The agency does accept this input and will add more information to the update of the goal that relates to the question.

SRC Input Related to Consumer Satisfaction

As it has in previous years, the SRC conducted a consumer satisfaction survey of individuals whose cases were closed in the previous fiscal year in conjunction with the Human Development Institute at the University of Kentucky.

The agency financed the survey efforts and acted as liaison to the Human Development Institute on behalf of the SRC. The SRC approved changing all references to customer in satisfaction survey to consumer. The agency made the changes in the survey.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

(2)SRC Input Related to Agency Policies and Procedures

The SRC reviewed and approved the agency's proposed changes in the On–the–Job Training policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in the Community–Based Work Transition Program (CBWTP) service fee memorandum.

The agency issued the service fee memorandum.

The SRC reviewed and approved the agency's proposed changes in the Presumptive Eligibility policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in Errors policy with the recommendation that 'best practice' be changed to 'required actions'

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed Pre–Employment Transition Services (Pre–ETS) with some changes, to coincide with recent changes in federal law.

The agency accepted/made the changes and issued the updated policy.

The SRC reviewed and approved the agency's proposed revisions in Supported Employment policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in the Interpreter Service Fee Memorandum (SFM). The agency issued the updated SFM.

The SRC reviewed and approved the agency's proposed policy to put the Hearing Aid Dispensing Fee under the Cost–Sharing guidelines and approved changes in the Cost Sharing Policy and Forms

The agency issued the updated policy and forms

The SRC reviewed and approved the agency's proposed changes in Homemaker Policy and definitions of Competitive Integrated Employment to comply with recent changes in federal law.

The agency issued the updated policy and definitions.

The SRC reviewed and approved the agency's proposed Benefits Planning Policy.

The agency issued the new policy.

The SRC approved the agency's proposal to change the name of the Community–Based Work Transition Program to the Community Work Transition Program.

The agency changed the name.

SRC Input Related to SRC operations

The Executive Committee thoroughly reviewed the SRC by–laws and recommended several changes to the full Council at the September, 2015, meeting. The full council approved the changes. The code of ethics and conflict of interest forms were signed at the December 2015 meeting.

Agency staff made the changes in the by–laws.

SRC Input Related to the Comprehensive Needs Assessment The SRC approved contracting with the University of Kentucky Masters in Rehabilitation Counseling program to complete the triennial Comprehensive Needs Assessment.

Agency staff entered into the contract.

The SRC approved the Comprehensive Needs Assessment produced by the University of Kentucky Masters in Rehabilitation Counseling program.

Agency staff published the assessment.

SRC Input Related to Quality Expectations Report

The SRC approved the Quality Expectations Report.

Agency staff published the report.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

(3) Related to input and recommendations from the SRC for the OVR portion of the Combined State Plan

The SRC recommended that the agency work on pursuing establishment grants to address the lack of coverage of supported employment in certain areas around the state.

The agency rejects this input because the establishment grants were designed to address a number of priorities identified through the Comprehensive Needs Assessment of which unserved areas was only one. The establishment grants currently in place address one or more of these priorities. One establishment grant is being used by one agency to expand their services into two counties it was not serving previously. The other grants are expanding services to specific groups of individuals with disabilities identified in the Comprehensive Needs Assessment. The ideology is that this will also lead to more successful outcomes.

The main reason why there are not new establishment grants to expand into unserved and underserved areas is that the providers typically cannot provide the required match.

The SRC recommended that the agency add more specific information to other supported employment goals.

The agency rejects this input because it feels there is sufficient specificity and more specificity will reduce the agency's ability to respond to needs that may arise during the period of the plan.

The SRC recommended that the agency be more specific about which parts of the state to which it would like to add providers.

The agency rejects this input due to the fact that there is not enough funding to add providers to the unserved portions of the state unless some new SCL/Michelle P provide pop up.

The SRC recommended that the agency add more information to the list of Priorities mentioned in the plan.

The agency rejects this input because the information is located in other places in the plan, and does not feel more specificity is needed or appropriate in the list of Priorities, which the section under question requests. However, the agency will add a date to one of the Priorities in the list. The agency will also improve the wording on some of the Priorities in the list.

The SRC recommended that the agency put in information from the review of the customer satisfaction surveys into the priorities.

The agency rejects this input because it will only be able to get the information from the review. That is the reason we are reviewing them..

The SRC recommended that the agency give more information on the common measures in the strategies/tasks.

The agency rejects this input because we getting ready to track them in the first year because we are responsible for them. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports for common measures reporting. Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress are analyzed, strategies will be developed to improve the performance outcomes.

The SRC recommended that the agency expand on the barrier related to more transition than adult cases being closed before service provision mentioned in the goals and objectives.

The agency rejects this input because it is addressing the barrier as identified in the Statewide Comprehensive Needs Assessment and cannot expand on it until we address it and learn more about it.

The SRC recommended that the agency provide more supports for consumers considering college even if they are not in high school.

The agency rejects this input because supports are identified in the Individual Plan for Employment to meet the need of the consumer and cannot be listed fully.

The SRC recommended that the agency make certain programs at CDPVTC along with the career centers around the state more accessible to those with sensory disorders.

The agency rejects this input concerning the CDPVTC as it already strives to accommodate every student to the best of its ability. The center is especially conscious to accommodate students as it relates to food allergies and concerns. Sensory disorders are not covered under the Americans with Disabilities Act (ADA). The individual coming into the career center would need to plan and bring items with them that can assist with their sensory disorder.

The SRC recommended more specific information on the training module for STEM for KELMS.

The agency rejects this input because more specificity on the STEM training module is not needed here.

The SRC recommended more information on collaborative activities concerning Pre–ETS services and the Department of Education and local school districts.

The agency rejects this input because such collaborative activities have not been identified. Identifying potential collaborative activities will be part of the process.

The SRC asked whether Opportunity Youth Summit and the vocational behavior enhancement program at CDPVTC were similar to or enhancing the Youth Leadership Forum and the Department of Labor program respectively.

The agency rejects this input because the programs mentioned above are agency–specific, stand–alone programs that have no connection to other programs that may exist in other agencies.

The SRC recommended that we define eligible consumers more fully.

The agency rejects this input because it feels further definition is not needed here.

The SRC recommended that we specify the number of trainings related to asset development and financial education will take place.

The agency rejects this input because it cannot specify the number of trainings at this time because it will be limited by staff availability. However, some trainings will be provided online, which can be accessed at any time.

The SRC recommended that we specify the number of business contacts available in our collaboration with the Coalition for Workforce Diversity.

The agency rejects this input due to the fact that we feel the number is unnecessary and difficult to specify since it plans to expand the model statewide.

The SRC recommended that we specify how often we will conduct training events aimed at employers doing business with the federal government on federal guidelines related to hiring individuals with disabilities.

The agency rejects this input because it does not know specifically how often they will be done.

The SRC recommended that we specify how many job coaches and what percentage of transition students will be involved in working together by the last semester of school.

The agency rejects this input because it cannot be specified at this time.

The SRC recommended that we answer the question on how we will expand and improve services to individuals with disabilities.

The agency rejects this input because it feels the question was answered completely. It feels that by using the needs assessment, satisfaction survey, and the case review system we can highlight our needs, strengths, and weaknesses. It can expand on what it does to address the needs and improve what it does to address the weaknesses.

The SRC recommended that we add something about transgender and sexual orientation to the question and to the answer concerning outreach procedures concerning minorities. The agency cannot change the question it was given to answer by the federal government but does accept this input and will add to its answer the protected classes, including sexual orientation, gender identity, and genetic information that are also listed on the signature statement of its application for services.

The SRC recommended that we add SSI to the answer that discusses the SGA Project.

The agency rejects this input because that particular project relates to SSDI recipients only.

The SRC recommended that our answer for innovation and expansion is not necessarily innovation and expansion.

The agency rejects this input because the answer is exactly how we define and code innovation and expansion. .

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;

This agency has not requested a waiver of state wideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

N/A

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

N/A

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the servivces 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;

OVR enters into appropriate agreements with various federal, state, and local agencies and programs. OVR coordinates with other agencies and programs to ensure individuals with disabilities receive appropriate and adequate services. These agencies and programs include:

(1)Veterans Administration for the purpose of providing rehabilitation services including vocational guidance and counseling and job development and placement to veterans with disabilities. Collaboration and coordination of services occur between OVR and the Veterans Administration Rehabilitation and Employment Programs and utilized as a comparable benefit as appropriate.

Kentucky Department of Behavior Health, Developmental, and Intellectual Disabilities for the purpose of enhancing supported employment services to individuals with developmental disabilities and increasing supported employment service providers. Collaboration also occurs to increase state general funds for increased services to this underserved and not served population.

Kentucky Department of Behavior Health, Developmental and Intellectual Disabilities – Substance Abuse Division for the purpose of increasing awareness, identification, and services to individuals with substance abuse and co–occurring disabilities. In 2007 a MOA was developed between OVR and the Substance Abuse Division to increase collaboration on referrals and information sharing as well as coordination of services.

Kentucky Drug Courts for the purpose of facilitating employment and independence goals of individuals with disabilities. Kentucky Cabinet for Health and Family Services for the purpose of educating consumers about their medical coverage options under the Affordable Care Act.

Social Security Administration for the purpose of partnerships on employment incentives through the Ticket to Work and other incentive programs.

Kentucky Department of Education for the purpose of increasing transition services to students with disabilities and increasing awareness to parents of students with disabilities.

Developmental Disabilities Council for the purpose of expanding employment projects.

University Center for Excellence, Human Development Institute with the University of Kentucky for the purpose of collaboration and enhancement of services in supported employment, transition, rehabilitation, technology, and business leadership.

Kentucky Association of Community Employment Services (KACES) for the purpose of increasing services for individuals with disabilities including most significant disabilities and enhancing partnerships with community rehabilitation programs.

Comprehensive Transition Programs for the purpose of providing post–secondary opportunities for students with intellectual disabilities.

The Carl D. Perkins Vocational Training Center cooperates with the Job Corps Center to implement a smooth referral process for the purpose of enhancing education opportunities for students with disabilities

Other federal, state, and local agencies related to the rehabilitation of individuals with disabilities such as the Department of Protection and Advocacy, Department of Probation and Parole, Department of Workers Compensation, Department of Disability Determination.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

(2)The Kentucky Assistive Technology Services (KATS) Network (the state program carried out under Section 4 of the Assistive Technology Act of 1998) for making assistive technology (AT) information, devices and services easily obtainable for people of any age and/or disability, their families, employers and employment service providers, educators, healthcare and social service providers. The Kentucky Office of Vocational Rehabilitation is the lead agency for the KATS Network. The KATS Network in turn collaborates with four non–profit organizations to operate assistive technology regional centers to provide assistive technology demonstrations and device loans. The Carl D. Perkins Vocational Training Center operates a fifth regional center in collaboration with the KATS Network. The KATS Network also collaborates with the Hear Now Foundation hearing aid program and audiologists around the state to facilitate applications for hearing aids for low–income individuals. In addition, the KATS Network collaborates with several healthcare providers and two universities to refurbish and redistribute used durable medical equipment to individuals who need it.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

(3)University of Kentucky AgrAbility Program for the purpose of collaboration with the county extension offices and increased services in rehabilitation technology on the rural farm setting.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

(4)Office of Autism for the purpose of understanding how to better work with consumers and individuals on the Autism Spectrum

The Cabinet for Health and Family Services for the purpose of receiving and referring foster care referrals to OVR field offices in their areas

5. STATE USE CONTRACTING PROGRAMS.

5) We do not collaborate with any state use contracting programs at this time.

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.

1.Plans, Policies, and Procedures

OVR has assigned counselors to each of Kentucky's 174 Local Education Agencies for the purpose of ensuring that all students with disabilities are served. The counselors work with referrals from special education and general education staff as well as the individual with the disability, their family, and other agencies who assist students with disabilities who are in need of transition. These counselors also provide general coordination, information, and outreach activities about vocational rehabilitation services to the local education agency and student for use in transition planning. Service coordination activities may include resource information about vocational rehabilitation, presentations, handouts, and staff development. The counselor works in a collaborative team process along with the local education agency to develop the transition services section of the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) for transitioning students. Thus, the counselor is encouraged to attend IEP meetings or individual plan meetings for 504 students when invited. Both the IEP and IPE will include, if appropriate, a statement of interagency responsibilities or any needed linkages by which the responsibilities of other entities are satisfied. The youth should be prepared to enter the competitive integrated workforce following the provision of necessary and needed services, as reflected in the IPE. The student should have ample opportunity to participate in Pre–ETS services before they graduate. The OVR counselor will engage in providing services that would be most beneficial to an individual in the early stages of employment exploration, such as counseling and self–advocacy training. These services are provided to students who are eligible or who are potentially eligible for VR 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;

2. Formal Interagency Agreement

The Office partners with the Kentucky Department of Education through an interagency cooperative agreement to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Provisions under the cooperative agreement include:

1. Process for making student referrals to the OVR;

2. Determination of eligibility for OVR services;

3. Joint sharing and use of evaluations and assessments;

4. Planning and development of individualized programs (IEP and IPE) as a collaborative team process;

5. Role of educational personnel in transition planning;

6. Role of the OVR counselor in outreach to, identification of, and transition planning for eligible students with disabilities;

7. Use of memoranda of agreement (MOA) at the local level to facilitate and coordinate transition services for secondary students with disabilities;

8. State coordination with agencies in the provision of transition services;

9. A comprehensive system of personnel development for qualified personnel responsible for transition services;

10. Determination of lead agencies;

11. Financial responsibilities;

12. Status of services for an individual student/consumer during a dispute;

13. Agency dispute resolution;

14. Due process for the individual student/consumer.

15. Memoranda of Agreements at the Local Level

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

C. Memoranda of agreements at the local level will be used in order to further the collaborative efforts detailed in the interagency cooperative agreement between the Kentucky Department of Education and the agency. These memoranda of agreements will define the basic tenets of the Community Work Transition Program (CWTP). The rights and responsibilities of OVR and the local education agency for implementing and carrying out the CWTP are also detailed in these memoranda of agreements.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

D. The CWTP is designed to assist eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. Student employment coordinators, funded by the local education agency, refer students to OVR in order to provide pre–employment transition services during their final three years of school. During this time counselors work with the employment coordinators to ensure that community vocational services provided lead to the completion of an individualized vocational evaluation and the development of individualized programs (IEP and IPE) to ensure successful transitioning from high school to post school activities, including employment. Upon completion of the IPE, further community–based vocational services are provided to the student in the form of training for the planned vocational goal. The desired outcome for participants in the CWTP is a post–school outcome or paid employment.

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.

OVR maintains agreements with providers of private, non–profit vocational rehabilitation service providers to support achievement of successful competitive integrated employment outcomes for individuals with disabilities. OVR works with Community Rehabilitation Providers (CRPs) through a vendor application process to ensure quality services to agency consumers. OVR currently works with 65 CRPs providing services resulting in competitive integrated employment outcomes and 85 CRPs providing services resulting in supported employment outcomes. Other agreements with private, non–profit OVR service providers will be made as necessary.

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.

1. Kentucky's fourteen Regional Boards for Mental Health or Individuals with an Intellectual Disability are a primary source for extended services in KY. Cooperative budget planning is done between OVR and the Kentucky Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) so that state funds for all phases of supported employment can be sought by each agency. A cooperative agreement is also in place.

2. The Division of Behavioral Health (DBH) and OVR partnered together, and in 2010, Kentucky became the 12th state to participate in the Dartmouth College, Johnson and Johnson, Supported Employment Initiative to demonstrate the effectiveness of the IPS model for supported employment (Individualized Placement and Support, an Evidence–Based Practice). The first local pilot projects were launched prior to the close of 2010. Through the Dartmouth Project, a new SE funding partner was added when the Greater Cincinnati Health Foundation provided funding for 2 of the local pilots in Northern KY. IPS Supported Employment now includes all 14 Kentucky Community Mental Health Centers. In FY 2016 the partnership with Behavioral Health continues with the addition of 5 IPS sites outside of the Community Mental Health Centers and 2 sites serving those with substance abuse.

3. United Way monies have been utilized in minimal amounts for supported employment services by 16 Supported Employment programs in Kentucky. Ongoing follow–up services are provided through these United Way monies. These dollars are generally not "disability specific" and could assist in expansion of services to groups other than those served by the 14 community mental health centers.

4. Vendorship in the OVR Supported Employment Outcome–based Reimbursement program requires written and verbal verification of the provider's funding for ongoing support services. Monitoring and technical assistance is provided by the Supported Employment Branch to assure that services are provided and funded appropriately. Agreements/contracts are developed annually and reviewed prior to renewal. OVR may provide financial support to providers of supported employment services to establish, develop or improve service programs to eligible consumers through establishment projects, and will adhere to the current procedure outlined in the agency Administrative Policies and Procedures in making funding selections and monitoring establishment projects.

5. The Supported Employment Branch works closely with Kentucky APSE (Association of People Supporting Employment First) and its committees, and the 874K Coalition (a statewide Disability Advocacy Group) in a unified effort to secure additional state dollars for supported employment extended services.

6. The Supported Employment Branch has been active in the development/improvement of Kentucky's Medicaid Waivers to create workable systems for coordinating supported employment services for eligible participants. Expansion of the supports for Community Living Waiver (Kentucky's Medicaid Waivers for individuals with Developmental Disabilities) and the Michelle P Waiver has resulted in increased referrals to OVR for supported employment services for mutually eligible

participants. The self–determination and Participant Directed Services within Medicaid hold much promise for supported employment funding for extended services. A new Medicaid Waiver containing better service definitions and fee structures to support and fund supported employment services rolled out in 2014.

7. The Supported Employment Branch works cooperatively with the Arc of Kentucky, among other groups, such as the Kentucky Association of Supporting Employment First (KYAPSE), the Department of Behavioral Health and Developmental and Intellectual Disabilities (BHDDID), the Kentucky Rehabilitation Association (KRA), UK Human Development Institute, EKU Center of Excellence, most of the Comprehensive Care Centers in the state, and many Supported Employment providers, to educate families about supported employment and enlist their assistance in impacting additional funds for supported employment.

8. OVR continues to advocate for expanded/improved Supported Living services, which are utilized by many supported employment participants to meet their needs for as independent a lifestyle as possible. The Hart Supported Living Program in KY offers very flexible state dollars available for all phases of independent living. However, statewide dollars are very limited.

9. OVR continues to work collaboratively with the Department of Behavioral Health, Developmental and Intellectual Disabilities, the Kentucky Council on Developmental Disabilities, Human Development Institute (HDI) (University of Kentucky), and the Arc of Kentucky to provide quality training on fundamentals of supported employment through the Supported Employment Training Project (SETP). This training is valuable in assuring that personnel who provide supported employment services have the necessary skills, values, and tools to deliver effective services. A leadership program in Supported Employment which has been developed through HDI at the University of Kentucky, which provides advanced training in systematic instruction and Discovery.

10. The Supported Employment Branch staff participates frequently in IEP and Transition Planning meeting for individuals, and in broader scope with Special Education planning units throughout the commonwealth to develop supported employment services for students exiting schools. Again, additional dollars will be needed for extended services in order to adequately serve the students. A pilot project began in 2010 to demonstrate the effectiveness of Supported Employment/Community Rehabilitation Programs agencies working together with Post–Secondary Education programs to include people with developmental disabilities in classes and other college campus activities. This program has now become permanent and has 3 Comprehensive Transition Programs

11. The Supported Employment Branch continues efforts to utilize Social Security Work Incentives, including PASS (Plan for Achieving Self–Support) and IRWE (Impairment Related Work Expenses), for ongoing support/extended services when appropriate. Training opportunities are offered through the University of Kentucky Human Development Institute to provide technical assistance for supported employment personnel to learn more about these work incentive programs. In summary, the following potential funding sources for supported employment have been identified:

Local and county government

Kentucky Commonwealth Council on Developmental Disabilities (grant opportunities only)

United Way

Social Security Work Incentives – Plan for Achieving Self–Support (PASS) and Impairment Related Work Expenses (IRWE)

Natural Supports

Division of Behavioral Health

Division of Developmental and Intellectual Disabilities

Hart Supported Living Funds

Private pay agreements

Supports for Community Living Waiver, Michelle P, and Brain Injury Medicaid Waivers.

Information regarding these potential funding sources is updated and shared by the Supported Employment Branch on a statewide basis to encourage increased funding for all phases of supported employment.

12. We currently have three establishment grants, and one of those has a provider who is using the funds to expand supported employment services. This agency is Down Syndrome of Louisville. They have expanded from one county to three counties. Additionally, there have been 5 other MOA grants awarded to providers to provide supported employment services (IPS model) to individuals with severe mental illness. These grants are from the Department of Behavioral Health with OVR administering them currently. However, if they continue, the Education and Workforce Development Cabinet would have to assume administration over them. The providers include: Bridgehaven, Mental Health America of Northern KY, Transitions, Wellsprings and Independence Place. There were 2 other MOA grants awarded to Mountain Comprehensive Care and Cumberland River Comprehensive Care to implement supported employment services to individuals who have addictions issues.

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

(1) OVR employs 20 job placement specialists across the state. These specialists develop relationships with local employers to facilitate the placement of OVR consumers into open positions. They engage in many activities to develop these relationships including providing technical assistance to employers on hiring individuals with disabilities, providing disability awareness training to employers and their human resource staff, keeping in regular contact with employers, attending meetings of local Chambers of Commerce, Society of Human Resource Managers (SHRM), and other business related groups, among other things. The agency will offer accessibility surveys to employers at no cost. OVR employs a statewide Job Placement Coordinator who coordinates all job placement activities. This staff member trains new job placement specialists, provides technical assistance to the job placement specialists and to districts where there are no job placement specialists, pursues agency–wide relationships with large employers, and acts as the agency contact for the National NET and TAP programs managed by CSAVR. OVR is an invitee at times of the Kentucky Skills Network (KSN), a partnership of local and state workforce development organizations dedicated to providing proactive business services and industry skills development. Through local “Business Service Teams” the KSN has laid a foundation for coordinated employer services that will or can be leveraged in the coming four years. OVR seeks to provide the Kentucky Autism Training to the Business Service Teams. The KSN offers a streamlined approach to assisting companies with recruiting talent, training new and existing employees, and developing tomorrow’s workforce. Consisting of four primary entities from the Kentucky Cabinet for Economic Development, Kentucky Education and Workforce Development Cabinet (including OVR, Office for the Blind, Office of Employment and Training), Kentucky Labor Cabinet, and the Kentucky Community and Technical College System, the KSN exists to provide unified, efficient, quality and seamless work force services and resources to new, existing and expanding companies within the Commonwealth. The mission of the KSN has four primary components:

1) Single point of contact approach

2) Streamlined workforce resources

3) Unified marketing and information

4) Talent/workforce development pipeline

Kentucky Skills Network local business service teams are designed to provide a primary point of contact for employer customers. The partner with the best/most established relationship with an employer should maintain responsibility and communication with the customer and engage other partners in order to provide streamlined solutions–based business services plans. The structure of the KSN business services teams is comprised of three levels, each of which may act as a point of entry for contact with companies. Level one consists of the State team. The State team includes one representative from each of the four core partners (inclusive of OVR):

1) Kentucky Cabinet for Economic Development

2) KCTCS

3) Kentucky Education and Workforce Development Cabinet

4) Kentucky Labor Cabinet

These individuals work together to ensure that companies receive unified and coordinated information and services related to their workforce development needs. The KSN allows for the bringing together of the workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Through such options as reimbursable grants and tax credits for classroom training, on–the–job training, tuition and certification training, train–the–trainer travel, and entry level and skills upgrade training; Kentucky has resources that allow flexible and customizable training specific to company needs. Early in 2016, KSN partners will gain access to a Customer Relationship Management system based on a Sales Force platform. Phase 1 will allow for shared access to employer contact and needs, and Phase 2 later in 2016–2017 will add the capacity for KSN partners to add and assess employer programs and resources via the Sales Force application. OVR, in conjunction with the Kentucky Office for the Blind and Office of Employment and Training, hosted an Employer Summit in 2015 to highlight the benefits of hiring individuals with disabilities as well as the OFCCP regulation requirements. The event was well received with numerous employers seeking additional information on working with the two rehabilitation agencies. This outreach and education with Employers and Businesses across the commonwealth will continue with additional summits convened in regional locations to attract a more diverse employer customer base. The Workforce Partners recognize the regional differences as well as workforce needs and will hold Employer Summits focused specific to the regional sectors and incorporate the post–secondary education institutions as a conduit to meeting the talent pipeline demands. The Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's State Rehabilitation Council (SRC), includes several employers and a representative of the Workforce Investment Board who provide important input on agency policy and activities related to employment. OVR, in conjunction with SCVR, conducts a Job Placement Month annually in October which includes many events around the state that promote collaboration with employers. Regional Employer Recognition Awards are given out during the month to employers who have hired OVR consumers. OVR will also continue to partner with local initiatives like Project SEARCH in Northern Kentucky and the Coalition for Workforce Diversity in Louisville to identify and educate employers willing to develop new programs specifically designed to focus on hiring and training individuals with disabilities.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

(2)As a means of providing Pre–Employment Transition Services, OVR will work with partner agencies in Workforce Development to identify existing apprenticeship programs with employers with which OVR may partner to focus on incorporating students and youth with disabilities into the programs. We do work with the Office of Autism in order to understand how to assist youth on the spectrum with attaining and maintaining employment. A model program focused on creating apprenticeship opportunities for students and youth with disabilities will be developed in such a manner as to be replicated in urban and rural areas alike. This will expand employment opportunities for all the youth and students with disabilities in Kentucky. OVR will continue to participate in an Annual Youth Summit, which provides the opportunity for youth and students with disabilities to meet employers, educators, and service providers. OVR plans to continuously expand the summit to provide employers an opportunity to meet with potential employees or apprenticeship participants.

Other employment–related skill development will be provided with employers being incorporated in that process as much as possible. There will be a Supported Employment Consulting fee available with the Community Work Transition program for seamless transition into competitive integrated employment.

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;

(1)OVR has worked with the Department of Medicaid Services to attempt to expand the Medicaid Works, Kentucky's Medicaid Buy–In program, to maximize the opportunities for OVR consumers to get employed in competitive, integrated employment. Eligibility requirements remain restrictive and very few individuals have qualified for Medicaid Works. OVR still feels a revised buy–in would help more individuals with disabilities become successfully employed. As detailed below in (2), Medicaid Waiver funding is utilized to provide long term supports for supported employment consumers, increasing the numbers of individuals who can benefit from supported employment services.

The Cabinet for Health and Family Services (CHFS) is home to most of the state's human services and health care programs, including Medicaid, the Department for Community Based Services and the Department for Public Health. The agency worked jointly with the Department of Community Based Services within the Cabinet for Health and Family Services in 2015 to develop a referral system and build a stronger partnership as it relates to youth in the Foster Care System. This collaboration was in conjunction with the Office for the Blind and connects the rehabilitation transition services to students enrolled in high school who are also at high risks of drop–out in the schools due to their involvement in the foster care system. The intent is early intervention to address workforce needs and connection to resources and support within the local community. CHFS employees coordinated efforts with both rehabilitation agencies for the second annual Youth Summit held in November 2015. The Summit focused on resources and support services available to youth with disabilities and out–of–school youth. The Summit provided valuable strategies for parents and youth as well as the professionals within the field of student and youth service providers.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

(2) OVR works with the Division of Developmental and Intellectual Disabilities (DIDD) to improve quality Supported Employment Services and provide a smooth transition from VR Supported employment services to Long Term Support Services through the Supports for Community Living (SCL) and Michelle P. Medicaid waivers. KYOVR and DIDD jointly fund the Supported Employment Training Program at the University of Kentucky's Human Development Institute to train all Supported Employment Specialists in the state.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

(3) Beginning in 2010, OVR has partnered with the Division of Behavioral Health (DBH) to implement the Individual Placement Service (IPS) Model, an evidenced based practice in Supported Employment for consumers with severe mental illness. The program started with four pilots and has grown to include all 14 Comprehensive Mental Health Centers (CMHC). In 2015, DBH provided OVR with $250,000 to issue a Request for Proposals to select five pilot sites to implement IPS outside of

the CMHCs. It provided an additional $100,000 to implement IPS for consumers with Substance Abuse.

OVR serves on numerous councils that also have representation from the Department for Medicaid Services, DIDD and DBH, including the Commonwealth Council for Developmental Disabilities.

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 Kentucky Office of Vocational Rehabilitation maintains a system to collect and analyze on an annual basis data on qualified personnel needs and personnel development. The Information in this report reflects the 2015 calendar year and contains data for the number of personnel employed in the provision of vocational rehabilitation services for Kentucky Office of Vocational Rehabilitation (OVR). The Executive Leadership Team (ELT) reviews this information as well as the State Rehabilitation Council. This ensures that the provision of quality services is consistent throughout the Commonwealth. In addition, the number of personnel, category, and qualifications of personnel needed by OVR, and a projection of the numbers of personnel that will be needed in five years are calculated. These calculations are based on projections of the number of individuals to be served. Personnel training files are maintained that contains records of each individual's training activities. Training accomplishments are reviewed annually and utilized in the Employee Performance Evaluation.

OVR has developed and maintains a system for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific need.

Fifty–one individuals or 13% of staff left the agency during FFY 2015 (a 3% increase over the prior year) with 17 of those fifty–one retiring (32%). Of significant importance is the number of those individuals that resigned from the agency during that time at 32 individuals or 63%. This is an alarming amount because it impacts consistency of services, loss of institutional knowledge and loss of training funds that have been spent to provide the education, tools and skills necessary to provide quality services to our consumers. Of the total individuals that left the agency during that year 17 were counselors (33%). Of that number 10 resigned, 6 retired and 1 was terminated during their probationary period. Out of those counselors that left the agency 13 met CSPD at the time of the departure.

The data shows that of the 141 VR counselors employed at the end of 2015 there are 63 (45%) that have been with the agency for less than 5 years and 38% have been with the agency 10 years or longer. The 141 counselors are located in the field offices and Carl D. Perkins Vocational Training Center (CDPVTC).

There were forty–six new hires or 12% during the 2015 fiscal federal year. The following information discusses the length of experience of existing staff at the submission of this plan. If you look at the years of service of the individuals in the agency and compare it from 2013 through 2015, you see how things have changed over time. From 2013 through 2015, those individuals in the agency with years of service of 30 or more years have decreased from 3% to 0.1%. Those with 20–29 years of service have also decreased in those years from 15% to 11%. Individuals with years of service of 10–19 years has remained steady at 30% and risen to 32%. As for those with 5–9 years of

experience, the percentage dropped from 25% to 24% and then made a large drop to 16%. For those with less than 5 years of experience, however, the numbers have gone the opposite direction. The numbers have grown from 27% to 40% over a few years. Based on the above chart, of those with 20+ years of experience there are; 6 administrators, 10 assistants, 3 branch managers, 13 counselors, 1 division director, 3 employment specialists, 5 field administrators, 2 instructors, 2 maintenance personnel, 1 patient aide, 1 rehab tech and 1 speech pathologist. Other factors that must be considered are the individuals with lower years of service for OVR who may have additional service years in state government from previously employment that make them eligible for retirement. In addition, there may be individuals that are eligible for retirement by age, but not qualified under the state government guidelines to retire from the system.

In 2015 the agency developed additional management roles to provide more direct support to field services throughout the state. Through the development of 3 new managerial positions the agency provides regional managers to support the field managers within the districts. The regional managers report directly to the Program Services Division Director. In addition to their responsibility to provide supervision to the field managers located in their region they also provide support to local staff in the absence of that field manager. All three regional managers have previously held counselor and district management positions and all three meet CSPD and are Certified Rehabilitation Counselors. This also increases the career path for employees.

With regard to the district managers that supervise vocational rehabilitation counselors, at the end of 2015 there were 15 managers in place with one retired as of the end of the year. All current managers meet CSPD requirements and obtained their Master of Rehabilitation Counseling. There are 14 of the 15 that are a CRC. We consider the CSPD standard important for the managers as well as the counselors since the managers fill the role of the counselor in case of vacancies to limit the amount of disruption to the services of the consumers being served by the counselor.

OVR must work within the constraints of a state personnel cap. Currently the personnel cap is set at 395 full–time. The following tables show the number of personnel, categories, vacancies, and projected personnel need for the Administrative and Program Staff and the Carl D. Perkins Vocational Training Center.

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

Currently, we require 1 Central Office Administrative person, 26 Field Program Staff, and 21 Carl D. Perkins Vocational Training Center Staff.

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.

In the next five years, we will require 11 Central Office Administrative Staff, 31 Field Program Staff, and 11 Carl D. Perkins Vocational Training Center Staff. There were 35,412 consumers served during 2015 with an average caseload size of 150 for rehabilitation counselors in the field. The average caseload size for counselors located at CDPVTC was 26. Based on the large number of consumers being served all open positions run the risk of overburdening our current staff and potentially create situations where consumers may not be served in an expedient manner. The personnel process for hiring is arduous and finding qualified candidates is difficult. Qualified

applicants apply for positions, but we too frequently encounter hiring issues because applicants refuse to accept the position based on the salaries we can offer for the credentials they hold. The agency makes every effort to fill them with the most qualified candidates. The open positions for VR Counselors are extremely critical to services and the agency established procedures as soon as candidates can be recruited, hired and approved by the Education and Workforce Development Cabinet and State Office of Personnel. All attempts are made to employ rehabilitation professionals certified in their areas of expertise.

Decisions on filling open positions are based on a thorough budget analysis, demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific needs. As positions became vacant the ELT discussed the needs of the program looking at the numbers served in correlation with the number of staff, workload and agency resources.

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

The University of Kentucky (UK) is the only institution in the state that offers a Master's of Rehabilitation Counseling (MRC) program. This is a comprehensive accredited graduate program in rehabilitation counseling. The online Accelerated Distance Learning Master's program can be completed in sixteen months without on–campus attendance and at in–state tuition rates. Participants in the program are eligible to test for rehabilitation counselor certification after completing 75% of their course work in their final semester. OVR partners with this agency so that a large number of individuals throughout the state have direct access to rehabilitation courses. This provides the opportunity for staff to fulfill their Comprehensive System of Personnel Development (CSPD) requirements and build their résumé for promotional opportunities in the Vocational Rehabilitation Counselor series. OVR currently utilizes one out–of–state MRC program at Auburn University in Alabama when the university has CSPD funds available to assist with tuition and stipends necessary for travel. The agency allows the approved participants in the Auburn MRC program to travel to the campus one time per semester as required by the program without utilizing personal time if the travel is approved in advance.

OVR staff participates on the University of Kentucky Advisory Council. The last annual Advisory council meeting was held January 2015. This included a review of the evaluation plan for reaccreditation, the strategies to address issues in need of remediation, an application for accreditation as a Rehabilitation Clinical Counseling program, and feedback was sought from the group on how UK can more efficiently work as partners in preparing students for professional practice. The next meeting is scheduled to take place February 2016.

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

OVR obtains information from UK annually regarding the number of students enrolled and the number graduating from the MRC program with certification or licensure and /or with credentials to qualify for certification or licensure. The following information was provided from UK regarding their

MRC 2015 statistics and includes both on–campus and distance learning students. In the fall of 2014, 117 enrolled and 55 graduated. In the spring of 2015, 78 enrolled and 19 graduated. In the summer of 2015, 58 enrolled and 4 graduated. All of those who graduated achieved eligibility for licensure.

iii. The number of students who graduated during the prior year from each of theose 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.

There were a total of 253 students enrolled in the MRC program during 2015. The information above for 2015 includes 7 OVR employees participating in the accelerated MRC program and 2 individuals participating in the Certificate of Rehabilitation Counseling to meet the CRCC requirements for category R. Of the seven there are 5 that have completed the program successfully, 1 will complete it in the spring of 2016 and the other will complete the program in the fall 2016. The one in the certificate program completed the courses required and the other will complete the coursework in fall 2016.

In addition, OVR had one counselor complete her requirements at Auburn University for the MRC program summer 2015.

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.

OVR aggressively recruits, equips, trains and works to retain qualified professionals through coordination with institutions of higher education, professional and paraprofessional associations including personnel from minority backgrounds and individuals with disabilities. OVR recognizes our staff as our greatest resource and is committed to the provision of training state personnel in assuring the provision of quality services to individuals resulting in positive employment outcomes. OVR will remain current on rehabilitation trends and best practices in the field for the purpose of developing and maintaining its internal training program and securing external training opportunities for its personnel.

OVR utilizes the state of Kentucky's Personnel Career Opportunities System (COS) an online recruitment system in recruitment efforts. OVR strives to achieve a more diverse workforce by recruiting and hiring individuals from protected classes. Recruitment of individuals with disabilities and those from minority backgrounds enables the agency to have highly competent individuals from all segments of society to accomplish its mission. The University of Kentucky's Graduate Program in Rehabilitation Counseling has partnered with Kentucky State University (KSU – a historically black liberal studies public institution) and the two state rehabilitation agencies to create an endorsement curriculum at KSU to recruit students into the field of rehabilitation counseling. UK has a "University Scholars Program" with Kentucky State University (KSU). There were no students from KSU in 2015 that stated an interest in participating in an internship with the OVR. Potential applicants are identified through recruitment, posting, and advertising according to the cultural diversity initiative

and the agency's Affirmative Action goals. When applicants are needed, OVR must request applications from the Kentucky Personnel Cabinet register. Individuals must be on the register identified as qualifying for the position. OVR works to leverage its successful performance in recruiting individuals who are minorities or with disabilities in the following ways:

Work closely with consumer groups, attending local chapter meetings, national meetings.

Hires the most qualified individual realizing that as an agency OVR strives to promote cultural diversity in recruiting disabled or minority candidates inclusive of bilingual candidates.

Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

Ensure that programs are accessible to minorities.

Follow EEO guidelines and Affirmative Action Procedures.

Utilize Division of Consumer Services demographic and population data to determine the number of minorities and individuals with disabilities in regions, and develop strategies to increase recruitment from these regions.

Encourage minorities and individuals with disabilities to play an active role in the Office of Vocational Rehabilitation State Rehabilitation Council, participate in forums and provide input into policy and procedures.

OVR acknowledges the difficulty of recruiting and hiring individuals who are Certified Rehabilitation Counselors. There is a shortage of qualified candidates and the competitive salary expectation of graduates usually exceeds salary constraints of OVR. Additionally, OVR has found it difficult to hire and maintain staff in the rural areas throughout the state because candidates from outside these areas are often unwilling to relocate or have difficulty acclimating to cultural differences.

OVR has a personnel classification system in place that enables salary competitiveness with other states. States surrounding the northern and western borders of Kentucky offer higher entry–level salaries based on state demographics and wage studies. There are certain expectations for Masters Level, Masters with Certification, and a Masters Certification with Limited Managerial Responsibilities for existing staff. The system allows for higher entry–level wages for new hires based on their education, certification and experience levels. OVR works with the University of Kentucky in providing students of the MRC program opportunities to complete their practicum and internship hours with the agency. This is a benefit to the student by giving them an opportunity for hands on field experience as well as a recruitment tool for OVR. In 2015, the agency had 3 UK/MRC practicum/internship students working toward fulfilling their required hours with the agency. These positions were paid internships in Louisville, Elizabethtown and Danville. Unfortunately the agency was unable to parlay these internships into full–time qualified employees. As of December 2015 the paid internship program was suspended due to funding issues and caps on number of employees. However, the agency will continue to work with UK to offer unpaid practicum/internship for MRC students.

The Office of Diversity & Equality (ODE) in collaboration with Governmental Services Center (GSC) has a Minority Management Trainee Program (GMMTP). This is a recruitment and development tool to increase the representation of minority managers in state government. This program offers an

experience that enables participants to cultivate the skills needed to serve Kentucky's citizens in an effective and responsive manner. Participants receive in–depth, practical training through classroom instruction, on–the–job experience and special projects. Individuals must meet the following criteria to be eligible for the program: 1) be an ethnic minority, 2) Have one (1) year of state government service, 3) qualify for a grade 10 or higher job classification and 4) Aspire to be a manager and demonstrate exceptional management potential.

OVR was previously able to offer educational incentives in the form of tuition assistance to counselors who did not meet CSPD. In addition, the agency also provided opportunities for employees in other positions within the agency who held their bachelor degree and had a desire to enter the counseling field to obtain their MRC as well as for potential promotions within the agency. This was not only to meet CSPD standards, but also to encourage staff retention. The educational assistance program was suspended in 2015 due to the loss of the In–Service Training Grants and pending the release of the WIOA regulations. The agency is committed to see through to completion any employees already enrolled in the OVR educational assistance program, but has not opened enrollment for tuition assistance for 2016.

In the past and for the few current employees that we are seeing through to completion of their educational program the office provides assistance with tuition, books, study time allowance per week for staff enrolled in school, flexible hours to access distance learning through state buildings, technology upgrades across the state to allow access to distance learning and registration/examination fees associated with taking the Certified Rehabilitation Counselor examination. In addition, the agency provides training opportunities for maintaining certification requirements through training seminars and professional development conferences. The agency will continue to work with the universities that offer CSPD grants to enable vocational rehabilitation counselors to meet the national standard eligibility to sit for the CRC. At this time, the CSPD standard for the agency will remain educationally eligible to sit for the CRC. This standard will be revisited once the WIOA regulations have been released.

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

OVR has set standards that are consistent with the highest entry–level academic degree needed for any national or state approved or recognized certification, licensing or registration requirements. In the absence of these requirements, other comparable requirements (including state personnel requirements) that apply to the profession or discipline will be considered. The primary focus is for vocational rehabilitation counselors and their managers and the national standard for the profession is a Certified Rehabilitation Counselor. In addition, the paraprofessional is defined as any profession that requires a license or certificate to practice that profession through federal or state requirements.

Although every effort is made to hire individuals that meet the standard set for OVR there are times when hiring someone that does not meet the criteria is in the best interest of serving consumers rather than maintaining a vacancy in the position until person meeting the standard can be located. When this situation occurs the Human Resource Development (HRD) Program Administrator will review the academic transcript of the individual to determine the steps necessary to meet the standards. If the HRD is unable to make the determination then additional assistance is requested from the Council on Rehabilitation Counselor Certification (CRCC).

Those primary certifications currently utilized within OVR are Certified Rehabilitation Counseling (CRCC/CRC), Assistive Technology Professional (ATP/RESNA),Certified Interpreters (RID), and Certified Driver Rehabilitation Specialist (CDRS).

In addition to the above referenced professional positions employed by OVR, the agency also has need of professionals to fulfill medical and specialized services provided at CDPVTC. To fulfill those needs there are additional licensed or certified personnel, such as Driver and Traffic Safety Training Certification that is for those that provide on–the–road driver instructions to students, Certified Daycare Director that is for the childcare program, Kentucky Professional Teaching that is for the vocational instructors, Certified Speech Pathologists, Certified Public Account, and Certified Maintenance Employees and Drivers for plumbing, electric and CDL. Some critical services must be contracted to provide specialized counseling services and those include Licensed Clinical Social Worker, Licensed Alcohol and Drug Abuse Counselor, and Licensed Psychologist. The agency encourages employees to obtain certifications that demonstrate their achievement in their professional field. As such the agency will pay initial certification and ongoing maintenance fees for employees with approved certifications based on their job requirements and will provide opportunities for continuing education courses in areas required for employees to maintain appropriate professional certification. OVR will take steps to re–train and hire personnel to ensure that such personnel meet appropriate professional standards in the state.

Currently in fiscal year 2016 the agency has 140 counselor positions and 14 field manager positions. The agency plans to fill counselor vacancies (10) as budget allows and will fill the one field manager position.

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.

OVR utilizes best practices promoting retention among direct support professionals. At the end of 2015 there were 141 counselors and of that number 110 (78%) met CSPD standards for the agency. Of the 110 counselors that met CSPD 80 (57%) are CRC. The remaining 31 counselors (22%) do not currently meet CSPD standards. Of those counselors not meeting CSPD there are 2 currently in academic programs to meet CSPD. Of the 31 non–CSPD counselors 25 (83%) have been here less than 5 years and two have more than twenty–five years of experience.

2015 Counselor and Administrator Statistics

In 2015, as far as VR counselors are concerned, 111 met CSPD. Of those with an MRC, 70 had a CRC while 17 did not. Of those with other Master’s degrees, 10 had a CRC and 27 did not. Of those with a bachelor’s degree, none had a CRC and 17 did not. As far as Field Administrators are

concerned, 15 met CSPD. Of those with an MRC, 14 had a CRC and 1 did not. There were none with other master's degrees or bachelor's degrees, so the CRC is a non–issue for those groups.

In addition to the above referenced counselors and administrators the agency also has 20 other employees that maintain their CRC. This includes; 1 division director, three 3 regional managers, 2 branch managers, 8 administrators, 4 employment specialists and 2 vocational evaluators.

The agency Rehabilitation Technology Branch provides assistive technology assistance to the field for consumers as well as to employees as needed. The branch manager is certified as an Assistive Technology Professional (ATP). Within the branch there is another ATP certified staff person as well as a Certified Driver Rehabilitation Specialists. Additional services for rehabilitation technology are contracted and that includes another CDRS, Durable Medical Equipment Specialist (DME) and an ATP.

The Carl D. Perkins Vocational Training Center has unique staffing needs based on the residential services that they provide to consumers. In 2015, the center employed 101 personnel to provide services in the residential facility. There are 6 VR Counselors on site and all meet CSPD standards for the agency. They are included in the counts listed in the above chart. Of those counselors on site there are 4 that are CRC. The center employees; vocational evaluators, dorm staff, maintenance personnel, security officers, financial specialists, instructors, certified drivers and medical personnel to meet the diverse needs of the students served in this residential setting.

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The agency believes that a well–trained professional staff is essential in providing quality services to individuals with disabilities and achieving positive employment outcomes for agency consumers. The agency's professional development policy emphasizes education and training. Within three months of employment staff are required to implement career development plans. The goal of career development is to enhance skills to ensure quality services for consumers and to increase their qualifications to allow them to apply for advancement opportunities when they arise. To obtain higher level positions with increase pay the employee must be qualified and assume more duties. In addition to these measures, the agency has also implemented a system of crediting individuals for pursuing professional development opportunities by recognizing it as part of the Employee Performance Plan each year. Assigned points based on the number of clock hours obtained for career development during the calendar year is applied to their employee evaluation. Training plans are based on: federal laws, RSA monitoring findings, agency goals, directions, continuous improvement initiatives, training needs assessment, staff and consumer input. The HRD Program Administrator is charged with the management of CSPD activities as well as the management of the In–service Training Program.

Upon passage of WIOA the agency executive leadership developed training to emphasize Pre–Employment Transition Services based on the new law and agency policy changes. Agency field and program leadership received the training and the assistant director is in the process of traveling to all district offices to train field staff. This training program is approved for Certified Rehabilitation Counselors credits. In addition to the training an informational pamphlet and a video were developed for distribution to all OVR staff and educators throughout the state. This video is available on YouTube and is utilized to educate consumers, parents and educators on the law as it applies to OVR services. The use of the video insures consistency of information delivered in a captioned format, is easily accessible and asynchronously available.

For the past 10 years the agency utilized the Basic Vocational Rehabilitation In–Service Training Grant and Quality Vocational Rehabilitation In–Service Training Grant from the Rehabilitation Services Administration to support educational assistance for employees seeking to meet CSPD. It was also used for professional development opportunities for all staff. Because these grants are no longer available and due to budget constraints within the state the agency has suspended the tuition assistance program for employees.

The budget cuts have brought about a greater emphasis on the online training opportunities as well as webinars and other methods of distance learning that are more cost efficient while still maintaining quality training. The agency has memorandum of agreement with Council on Post–Secondary Education to utilize their online training system with 150 online learning seats available for our use, video streaming services, website assistance and instruction design if needed. In addition, the Commonwealth of Kentucky purchased an enterprise learning management system and implemented it in 2015. The use of the learning management system is restricted to state employees only with plans to open it up for contract personnel to be added at a later date. Until such time the agency continues to utilize Kentucky Virtual Campus (KYVC) to assist with online training to our contract personnel.

The following are examples of in–house curriculums for OVR employees. The majority of these training have been created within OVR, but some are products developed by the Governmental Services Center (GSC) the training group for Kentucky State Government. New employees are required to participate in the following online training initiatives within the first three (3) months of employment, such as New Employee Orientation, The History of Vocational Rehabilitation, Understanding Confidentiality, Confidentiality: What You Need to Know, Kentucky Career Center Orientation, Anti–Harassment, Workplace Violence Prevention, and Executive Branch Ethics.

In addition to the above named online training programs, all CDPVTC employees are required to take additional training programs online to fulfill the requirements for their Commission on Accreditation of Rehabilitation Facilities, such as Identification of Critical Incidents, Promoting Wellness of Consumers, Reporting Abuse & Neglect of Vulnerable Adults, and Consumer rights.

Online training programs that are in the development phase including Customer Service, Self–Employment, Introduction to Vocational Assessment, HDI Intellectual and Developmental Disabilities, and Working with Individuals with Spinal Cord Injuries (HDI Project).

The agency also uses online training and webinars developed by other state entities. Kentucky Employee Assistance Program regularly distributes training opportunities that are shared with our employees. They explore topics such as depression awareness, anxiety disorders and mental health awareness.

The Kentucky Department of Libraries and Archives distributes training online on a monthly basis and the content of these is more general, but beneficial to our staff. These contain topics such as budgeting and dealing with angry customers.

Face to face–training for new employees takes place in three phases. Through the orientation and Skills Enhancement Training (SET) process the new employees receive an overview of the agency mission, philosophy, values, federal and state laws, appropriations, budget and planning, eligibility, assessment, vocational goal development, plan development, pre–employment transition services, confidentiality and ethics, services, supported employment, rehabilitation technology, diversity, disability awareness, Social Security Administration (SSA), Ticket to Work, Workforce Investment Opportunities Act (WIOA), common measures and information, personal care attendants and topics on specific disabilities. Training programs for all staff emphasize informed consumer choice and maximizing consumer direction of individualized rehabilitation plans. In prior years particular importance was placed upon the 1998 Amendments, but the content has now changed to reflect the passage of WIOA. Information regarding to current research is disseminated to all staff via formal training opportunities as well as through other technological resources such as the Internet and email. The agency has a dedicated website for training information delivery to all employees which includes a portal to information on the agency, required trainings for employees, a training calendar and announcements regarding upcoming training initiatives. The agency also encourages staff to utilize the webinars offered through other entities both within and outside of state government. The information for registration and participation is disseminated via email to all staff. One partner in this endeavor is the Human Development Institute (HDI) from the University of Kentucky. In addition to our work with HDI on the Supported Employment Training Project the employees also utilize the webinar series topics offered by them during a spring, summer and fall training program on topics related to the rehabilitation field and specific disabilities. The rehabilitation counselor mentor program was implemented in June 2002 with pilot programs in six districts. There are currently 27 counselors that have been through the training program that serve as mentors in 10 out of 15 districts. Annual recruitment is conducted to increase the number of available mentors and annual training is implemented to assure that they are prepared for their role. Beyond the formal annual training there are other training opportunities provided to continually develop their skills in the program to assure that the needs of the new employees are being addressed. This is also an opportunity to keep them aware of current policies and laws that impact the agency and their work with the employees. College and university level classes have been an integral element in staff career development. The agency has strongly encouraged continuing education to meet CSPD standards and in the past has provided tuition assistance for staff to pursue degrees at the master level. The program is currently suspended due to the loss of the In–Service Training Grants as well as budgetary constraints within the state. The agency will continue to encourage employees to utilize the CSPD grants at the universities to help them achieve their academic goals in rehabilitation. As appropriate the agency will continue to support employee advancement through reclassifications within state government. Instances include academic achievement leading to skill and knowledge increase directly related to their job that will allow them to assume additional duties to reflect their increased skills and expertise. The agency continues to see the retirement of agency leaders and is cognizant of the need for leadership succession. The agency has utilized various opportunities to achieve this goal, including coordinating with the Kentucky Association of Rehabilitation Leadership to provide training to current and future leaders. Three sessions were provided during intensive workshops on leadership topics. The Academy of Leadership Exploration and Preparedness program (ALEAP) is designed to provide staff with opportunities to learn about and develop foundational skills. This is a collaborative program with both OVR and OFB. Staff first must participate in the prerequisite required courses (online and classroom setting of 50–60 hours of instruction) through the State Personnel Governmental Services Center. ALEAP II consists of three face to face sessions on a variety of leadership topics and the completion of a project.

There were 19 employees from OVR that completed ALEAP I in 2014 and of those individual there were 8 that went on to complete ALEAP II in 2015.

In 2014 the Governmental Services Center began offering an opportunity for supervisors or aspiring supervisors to enhance their job skills through a Certificate of Supervisory Essentials (CSE) program. The program “focuses on the most important statutes, regulations, policies, procedures and best practices for supervisors employed by the Commonwealth” (from the CSE manual). There are 11 classes that a part of this program followed by a comprehensive examination at the end. Passing the examination with 80% accuracy is required to receive the certificate. If after taking the exam 3 times without success the candidate must repeat the classes to be eligible to sit for the exam again. Since inception of the program the agency has had 25 employees apply for admittance into the program and all were accepted. Of that number there is 1 that had to discontinue because of lack of time to complete the requirements and 3 of the individuals left the agency prior to completion. Of the remaining participants, 1 has successfully completed the program and passed the examination. The other participants are in progress with two years to complete the coursework and pass the examination.

The Education and Workforce Development Cabinet as a part of the State Workforce Board initiative has also recognized the need for succession planning and is in the process of planning, developing and implementing a leadership project. The curriculum is grounded in five essential leadership competencies identified and prioritized by Kentucky Workforce Leadership. The Leadership Academy combines virtual, physical, and online asynchronous classroom formats over a 5–month curriculum path that uses a team–based, experiential learning model that culminates with a “capstone” case study at the conclusion of the course. Implementation is set for FFY 2016. In addition to the Cabinet WIOA Leadership program, OVR and OFB training coordinators will ensure an additional training component for staff is included that encompasses crucial components specific to the field of leadership and rehabilitation.

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.

In order to disseminate information on rehabilitation best practices, research and the Rehabilitation Act Amendments of 1998 and now the Workforce Investment Opportunities Act, the Office of Vocational Rehabilitation staff received and participated in many training initiatives during 2015. The current information and research in the field of rehabilitation received by the Office of Vocational Rehabilitation is distributed to staff statewide or if applicable posted on our website as a document or as a link to obtain pertinent information. Information on Webinars is distributed to all staff via email on a weekly if not daily basis.

OVR makes every effort to have representation at and participate in national and regional and state training events. In 2015 OVR staff represented the agency at the following: National Rehabilitation Association Annual Conference, Southeast Region National Rehabilitation Association Conference, Kentucky Rehabilitation Association Annual Conference, Kentucky Association of Persons for Supported Employment Conference, University of Kentucky 12th Annual Institute in Assistive Technology Kentucky AHEAD, Kentucky Career Center Youth Summit, the Kentucky Career Center Employer Conference and Kentucky Brain Injury Alliance Conference.

All new hires attend the new employee orientation segments that are face–to–face and complete the required online coursework. Training topics include Rehabilitation Act, The ADA, Diversity, Ethics, Career Development, Confidentiality, Specific Disability Topics, Program Specific Topics (Job Placement, Rehab Tech, Deaf and Hard of Hearing Services, Autism, Mental Illness, Traumatic Brain Injury, Developmental Disabilities), and How to Interpret Psychological Evaluation.

All new counselors receive the following in addition to the above topics, such as Eligibility, IPE, Social Security and Ticket to Work, Assessment, Application/Follow–Up/Closure, Case Management, Pre–Employment Transition Services, and Attendant Care.

All staff participates in a training offered at CDPVTC. This allows them an opportunity to visit the center and better understand the services and programs offered to students when they are referred.

CRC credits were awarded to certified counselors who attend trainings for approved for content area.

The agency also participated in the Department of Workforce Development Cabinet Training for Workforce Academy. The WorkSmart Kentucky Plan lays out the foundation to improve operational collaboration at both the state and local levels. Workforce Staff are involved in the committees and activities of the initiatives. The initiatives are focused on systems change. In 2014 the Workforce Academy provided training for all partners at every level of the system to be demand–driven and solutions based. In 2015 and 2016, Local Labor Market Training is being provided to all workforce staff. Job Seeker Services Staff (case managers, interviewers, job developers and other job–seeker services personnel) attended The Power of LMI in Sector–Based Service Delivery to Job Seekers. The course presented basic understanding of how labor market information can be used to help job seekers understand their immediate job prospects and best, long–term career options and pathways based on stable and growing sectors in the region. Business Services Staff attended The Power of LMI in Sector Based Business Services. The course covered a basic understanding of how labor market information can best be used to support employer services staff in aligning business service strategies with labor market demand within a sector framework. In addition, the Workforce Academy is currently working to develop a leadership training program to focus on succession planning and education current and upcoming leaders on workforce systems, collaborations and partnerships.

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.

The agency has designated counselors to work with our consumers who are deaf. The Rehabilitation Counselors for the Deaf (RCD) have sign language skills. The counselors work with the consumers to meet their communication needs to successfully participate in their rehabilitation plan. In addition, there are rehabilitation counselors who also serve as communication specialists because they have received specific training to meet the needs of consumers who are hard of hearing. The manager of the Deaf and Hard of Hearing Branch works to insure that all employees have adequate American Sign Language skills resources to communicate with consumers who are deaf through the use of staff interpreters or those engaged by contract. OVR makes available FM systems for consumer meetings, trainings, conferences, counseling and other service activities. The FM system works for one speaker and several listeners. In addition, certified sign–language interpreters are available to consumers and employees to ensure full participation in the rehabilitation programs.

ASL and Foreign Language Interpreters are contracted as necessary to ensure that individuals who are deaf or who are from diverse cultural backgrounds and need interpreters to access services will be able to communicate in their native languages. Certified interpreters shall provide interpreter services for the deaf. Voice Description is provided for any videos and classroom teaching techniques. All materials utilized and distributed by the OVR are available in an accessible format, including large print, electronic format, audio recordings, Spanish or Braille with respect to the individual's informed choice. In an effort to assist staff with communication in a foreign language with consumers as needed Language Line is available as a resource.

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.

OVR shall coordinate its CSPD plans within the Kentucky Personnel System, to match the standards and qualifications of our personnel with personnel development under the Individuals with Disabilities Education Act (IDEA), and the standards under the Rehabilitation Act, as amended.

The Kentucky Interagency Transition Council meets on a quarterly basis to address continued fulfillment of the Kentucky Interagency Agreement on Transition Services for Youth with Disabilities. The Office of Vocational Rehabilitation, Office for the Blind and the Department of Education are three of the twelve state agencies that are parties to the agreement. One of the provisions of this agreement is cooperative training and staff development concerning transition issues. OVR staff attend Community Work Transition training offered by the University of Kentucky's Human Development Institute (HDI). In addition, staff attends the Kentucky AHEAD Conference (professionals in post–secondary education providing services to persons with disabilities) each year receiving valuable training and resources.

Rehabilitation counselors work collaboratively with the special education cooperatives, high school education teachers, local directors of special education, and job coaches for students transitioning from high school into employment. OVR Vocational Rehabilitation Counselors attend IEP and ARC meetings working with the team in establishing a vocational goal. This assures the development of the students IPE in conjunction with the vocational rehabilitation IEP. OVR provides support to teaching instructors, school staff and job coaches regarding rehabilitation issues and other areas of expertise such as Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore OVR staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

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;

OVR subcontracted with the University of Kentucky Masters in Rehabilitation Counseling Program to conduct the triennial Comprehensive Statewide Needs Assessment (CSNA) in the Fall and Spring of 2014–2015. The current study was designed to identify service needs, trends in service needs, disability populations who are underserved, trends in disability populations, and recommendations for OVR. Prior to conducting the needs assessment, the research team reviewed data collection instruments from the 2011–2012 iteration. OVR senior staff provided assistance with revisions and updates to the surveys, making improvements to clarity and ensuring that questions would elicit the kind of information that is needed for strategic planning. OVR staff also assisted with survey dissemination, making sure that the survey reached current and previous customers, staff and counselors, and key workforce partners. As a result of these efforts, response rates for the present CSNA iteration were on par with and in some cases exceeded previous needs assessment surveys. In addition to survey data, RSA 911 case data from FY 2011–2013, state–level population data, and interview data from 21 Key Informants who work in areas of disability and public service throughout the state were analyzed. This information was meant to provide context as well as additional areas of consideration for OVR strategic planning efforts.

(A)Study Findings Service Needs and Gaps Based on a thorough review of findings across the survey, interview, and agency data, the following service needs were identified for individuals with disabilities, including those with most significant disabilities. These are Job placement services (including supported employment and customized employment), Health care, including medical and mental health treatment, Benefits and financial planning, Supportive or ancillary services (e.g., transportation, housing),Long–term supports, and Transition services for students and youth / young adults. Comments from key informants who provide services within, or interface with, Kentucky's medical and mental health systems, may serve to clarify the findings related to health care needs. The broad areas of concern related to the limited capacity of our healthcare system, geographic gaps, saturation of providers accepting particular types of insurance and high cost of co–pays making care unaffordable for some people. While the Affordable Care Act (ACA) and resulting expanded number of Kentuckians with insurance coverage has improved the access to medication for many, informants noted that some serious needs still exist and likely will continue to exist because of a lack of capacity to provide care to those who need it. Particularly in more rural areas, respondents noted that some people must travel great lengths to find physical and mental health providers; others do not have access to transportation and thus are not able to receive sufficient care. Another issue identified by informants is related to the saturation of providers because finding treatment for individuals on Medicaid is difficult as providers have capped the number of patients that they will accept. Finally, while more residents have health insurance, copays are often not affordable and thus individuals still do not seek out treatment because of financial strain. Supported Employment and capacity of CRP providers is another major focus of the needs assessment. To this end, an interesting finding was that several OVR districts appear to have limited options when it comes to CRP providers. Four districts (Elizabethtown, Madisonville, West Liberty, and Whitesburg)

only have access to one CRP, and another two districts (Owensboro and Paducah) only have two. This is a concern given that 58% of counselors indicated that they refer for job acquisition services. OVR counselors rated enhancing supported employment programs in areas of the state lacking coverage as the highest priority establishment project.

B. WHO ARE MINORITIES;

Based on a comparison of agency data to state level disability data, no populations of individuals were immediately identified as underserved. This included minority clients, as OVR case closures reflect a higher proportion of minority clients than proportions of individuals from different racial and ethnic groups reflected in census data.

However, case data did reflect lower ratios of clients closing with employment outcomes among minority customers, and this is something the agency will investigate further.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

In an effort to solicit this information, key informants were asked about individuals with disabilities who are not getting the services that they need. Several respondents identified particular groups of individuals with disabilities, including those with Autism Spectrum disorders, physical disabilities (including TBI and Stroke), individuals with moderate to severe disabilities, and individuals with mental illness. Informants also identified individuals at a specific age or life stage (most notably transition students and youth, and older adults), individuals living in rural areas, and some specific populations, such as veterans and college students with disabilities. Respondents were also asked about trends in disability populations and service needs in the future. OVR counselors and staff, CRP respondents, and Career Center staff projected that the following populations will increase: individuals with substance use disorders, individuals with criminal histories, individuals with mental illness, individuals with multiple disabilities, veterans, and individuals with Autism Spectrum Disorders. It further identified a continuing need for vocational rehabilitation services in Appalachian Eastern Kentucky, a traditionally underserved area of the state. It also identified individuals with disabilities with criminal backgrounds as a growing population of individuals seeking vocational rehabilitation services, along with veterans from recent wars in Afghanistan and Iraq, those with substance use disorders, and those with mental illness.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The assessment found the following issues related to services provided to individuals with disabilities through various components of the workforce investment system. Career Center staff required the most training on The Americans with Disabilities Act (ADA), Social Security Work Incentives, Assistive Technology, and OVR Services.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Another area of need identified by respondents related to transition students and youth, particularly those with moderate to severe disabilities. Several needs were identified, including job training and placement, pre–graduation work experiences, and future housing and independent living needs.

Several informants expressed concern over the strain on aging parents of taking care of adult children with severe disabilities. According to these informants, independent living and residential services are areas of need

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Community Rehabilitation Programs The assessment identified the following issues related to services to individuals with disabilities provided by Community Rehabilitation Programs. These issues are anticipated as in–demand service and service needs for CRPs in the next three years. These are Job Placement Services, Transition Services, Skills Training, and Supported Employment Services. ESTABLISHMENT GRANTS This Update to the previous CSNA assessed the need to develop, establish and improve community rehabilitation programs, referred to as establishment projects. OVR surveyed staff, consumers and partners on the use of establishment grants to develop innovative programming. The survey asked if there is a need for OVR to fund establishment projects to maximize relationships with employers, improve outcomes and services for transition youth, improve outcomes and services for Social Security recipients, improve outcomes and services for individuals with behavioral health issues, develop supported employment programs in areas of the state where they currently do not exist, and improve outcomes and services for ex–offenders. Item 1 directly addresses the need for more job placement services and also the continuing prominence of 'Employer Attitudinal Barriers' as a barrier to employment. Item 2 directly addresses the need for transition services. Item 3 is designed to address the need for more benefits planning assistance. Item 5 addresses the continuing need for more supported employment services, particularly in some areas of the state. Items 4 and 6 address serving the two populations of consumers identified by both vocational rehabilitation counselors and community rehabilitation programs as the largest growing populations they have seen over the previous three years. Counselors were asked to evaluate the importance of several areas of need for establishment projects, including service needs, such as supported employment and employer relationships, as well as services targeting particular populations, such as transition youth and social security recipients. Responses were provided on a three–point scale (1=very important, 2=neutral, 3=very unimportant). Average ratings for importance were calculated, and responses indicated that counselors felt that all these areas were important. The highest rated possible establishment project were in the areas of developing supported employment programs in areas of the state where they do not exist, projects to improve outcomes and services for transition youth, and projects to improve outcomes and services for individuals with behavioral health issues. Supported Employment Programs in underserved areas was the highest with a mean of 1.16 with a standard deviation of 0.49. Second, it was improve outcomes for transition youth and improve outcomes and services for individuals with behavioral health issues with a mean of 1.22 and a standard deviation of 0.52. Third, it was maximize relationship with employers and improve outcomes and services for social security recipients with a mean of 1.26 and a standard deviation of 0.58 and 0.55 respectively. Lastly, it was improve outcomes and services to ex–offenders with a mean of 1.36 and a standard deviation of 0.61.

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 .

This category included comments from seven participants on educational issues, pre–college counseling, and transition from high school to college and from school to employment. Comments in

this category reflected concerns about a lack of preparation for high school students with disabilities for either college or employment. As noted by one participant, “not enough is done in high school for youth and their families to prepare for what happens after high school.” Comments also indicated a concern that students with disabilities do not have the self–advocacy skills they need to succeed in college and that “many do not have an understanding of how their disability impacts their educational performance,” and “some also do not have a clear understanding of a good career goal.” As a potential solution to this transition gap, one interviewee suggested involvement with OVR to provide work–related experience or volunteer experiences, or greater community involvement to help develop work skills, social skills, and soft skills.” Link to statewide assessment: http://www.ovr.ky.gov/NR/rdonlyres/0E0F39B7–AA39–4575–913E–9567518866B3/0/compneedsassessment.pdf

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

According to data from the 2012 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.0% of Kentucky civilians living in the community report having a disability, including 15.5% of residents of working age (18–64). This is higher than the national average (12.3% all, 10.2% working age). The rate of Kentuckians reporting a disability remained relatively stable from 2011 through 2012, growing at 1.1% (on par with the national average of 1.2%). According to the last census in 2010, Kentucky's overall population is 4,339,367 people. Using the percentage from ACS and applying to the last population numbers, there is an estimated 737,692 people in the state of Kentucky who have a disability.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

34,780 are estimated to receive services from OVR in FY2016

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

KYOVR estimates the number of eligible individuals who will receive services provided with funds under Part B of Title VI in FY2016 will be 152. This estimate is based on the rate of change and fiscal years previous to 2016. OVR designates Part B of Title IV funds to serve individuals with the most significant disabilities as further reflection of the Office's continued dedication to serving those individuals. The estimates found in the table are based on a trend analysis of data extracted from RSA data, and KYOVR expenditure data from fiscal years 2012–2015. These data sets were analyzed to find the average rates–of–change. These rates–of–change were then applied to calculate estimates for FY2016. Policies, practices, and priorities potentially influencing expenditures were considered in the development of these estimates.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

The number of eligible individuals who are estimated to receive services under Priority Category 1 will be 16,276. Under Priority Category 2, the number will be 10,830. Under Priority Category 3, it will be 6,904. Under Priority Category 4, there are 254 individuals who are estimated to receive services. There are 10 individuals estimated to receive services under Priority Category 5 either. 152 people are estimated to receive services as those who are most significantly disabled and receiving Supported Employment 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

Currently, we have 39 individuals on the waitlist due to being out of selection. However, the possibility of taking people off the waiting list to be served will be considered.

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.

The cost of services for FY 2016 is estimated to be $32,279,943.78. The cost of services per priority category will be: under Priority Category 1, $16,273,336.51, under Priority Category 2, $9,405,161.57, under Priority Category 3, $6,246,213.95, and under Priority Category 4, it will be $70,311.08 and in Priority Category 5, it will be $1465.25. The figures for 4 and 5 are estimated to be the same due to the fact that we are technically not serving those categories and not adding any new consumers in those categories. These cases could be represented by people off the waitlist and older cases before order of selection. The figures in the other categories will go up since we are serving those categories. We are estimated to spend $284,006.71 for those who are most significantly disabled and receiving supported employment services.

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

A Comprehensive Needs Assessment was completed in March 2015 and included surveys of the public, OVR counselors, OVR staff, CRP partners, and Kentucky Workforce Partners. This information was utilized to update the strategic plan and write the goals and priorities. KYOVR Vocational Rehabilitation and Supported Employment Goals and Priorities –

(1) Vocational Rehabilitation Goals–

GOAL I: To continuously improve customer service.

Measure: To meet or exceed customer satisfaction rating from the previous year

GOAL II: To provide Pre–employment transition services (Pre–ETS) to Transition Students (ages 14–21) and other transition services to Transition Youth (ages–16–24) to assist them with transition from high school into competitive integrated employment or post–secondary training.

Measure: To provide specific and specialized services to at least 60% of both transition students and transition youth GOAL III: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities.

Measure: All applicants who receive SSA benefits will receive information on benefits planning and at least 50% of them will receive a benefits analysis.

GOAL IV: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment.

Measure: To attain at least 4500 positive employment outcomes for the Federal Fiscal Year 2016

GOAL V: To implement Section 511 of WIOA.

Measure: Begin implementation on July 1, 2016.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

(2) Supported Employment Goals –

GOAL I: Provide SE training for Counselors and Branch Managers.

GOAL II: Increase utilization of Supported Employment Services.

GOAL III: Recruit more Supported Employment providers

GOAL IV: Seek alternative methods for providing and funding long term support.

GOAL V: Continually monitor CRP quality and compliance. GOAL VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

OVR established its priorities based on all input collected for the Strategic Plan as well as the CSNA.

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

OVR established its priorities based on input from the CSNA.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

Kentucky is currently establishing baselines and developing strategies regarding the State's performance under the performance accountability measures of section 116 of WIOA. The current Kentucky OFB/VR Case Management System (CMS); a web–based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology – a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation.

In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports for common measures reporting.

Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE

REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Provide better customer service in career centers

Develop and implement strategies to improve OVR's performance on the required accountability measures under section 116 of WIOA.

Provide ancillary services to consumers, including options for transportation

Evaluate the current transition program to determine trends and needs

Expand the capacity of the agency to provide Pre–ETS services

Expand Pre–ETS to transition students (ages 14–21) and other transition services to youth (ages 16–24)

Offer benefits planning for individuals with disabilities who are Social Security recipients

Provide information on financial education and asset development

Enhance job placement services

Provide supported employment services that lead to competitive integrated employment and improve the number of successful outcomes for supported employment cases across the state

Develop and apply a process for implementing requirements under Section 511

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.

OVR initially entered order of selection in FY1983 with nine categories and eventually reduced the number of categories to 6 that same year. The agency closed and reopened various categories from 1983–1994, serving as few as three categories and as many as five categories. In 1996, the agency revised the categories for Order of Selection, emphasizing functional limitations and removing a category for public officers injured in the line of duty, while still maintaining 6 categories. At that time, the agency chose to serve 4 categories, based on program analysis, budget analysis and feedback received from the SRC and public forums. In 2009, the agency changed the Order of Selection to combine the last 2 categories to include all individuals with disabilities whose disabilities were considered to be non–significant in terms of functional limitations on the individual's ability to work and live independently. Because of cuts in state funding, the agency reviewed the available data and determined the agency would only serve priority categories 1 and 2 on January 4, 2010. In FY2011, the agency made the decision to reopen Category 3 and to serve all eligible individuals on the waitlist for Category 4. OVR utilizes a multimodal approach to assessing the resources available to allow the agency to provide vocational rehabilitation services to all eligible individuals who apply, such as: • Population data related to disability incidence • Short and Long–term budgetary outlook • Short and Long–term staffing projections • Comprehensive Needs Assessment • Waiting list for services • SRC input • Public Forum Input. The agency carefully analyzes information from these sources to predict its ability to provide quality services to eligible individuals with disabilities as required by the Rehabilitation Act of 1973 as Amended. Because of continued anticipated state funding inadequacy, the agency remains in its current Order of Selection and will continue to serve only Priority Categories 1, 2 & 3. OVR will continually monitor influencing factors to determine if individuals on the waitlist will be served in FY2016 and beyond.

Kentucky's order of selection is as follows:

Category 1: Eligible individuals who have the most significant disabilities.

Category 2: Eligible individuals with significant disabilities who have limitations in three (3) major areas of functional capacities.

Category 3: Eligible individuals with significant disabilities who have limitations in two (2) major areas of functional capacities.

Category 4: Eligible individuals with significant disabilities who have limitations in one (1) major area of functional capacity.

Category 5: All other eligible individuals whose disabilities are non–significant.

For FFY2016, priority categories 1, 2, and 3 are to receive services under the order. KYOVR will continually monitor influencing factors to determine if individuals on the waitlist (priority categories 4, and 5) are to receive services.

POLICIES: OVR has been and will continue to operate under an Order of Selection due to limited resources and will continually evaluate need, funding, and priority categories. Within the Order of Selection the office will continue to accept referrals of and applications from individuals with disabilities. The Order of Selection will in no way regulate the provision or authorization of an assessment for determining eligibility. Any individual who has begun to receive services under an Individualized Plan for Employment will in no way be affected by an Order of Selection. The Order of Selection policy will permit immediate reclassification into a higher category, with Priority Category I being the highest category, whenever circumstances justify the reclassification.

PROCEDURES: When it is determined that OVR will be unable to provide services to all eligible applicants, OVR will implement the Order of Selection. The Executive Director will issue a memorandum with appropriate instructions for office staff. All applicants will be declared eligible or ineligible, as appropriate, on a timely basis. Any person who does not meet the open categories of the Order of Selection will receive information and referral services in accordance to the 1973 Rehabilitation Act, as amended. These services include vocational rehabilitation information and guidance to assist the individual in achieving employment and referral to other Federal and State programs, including other statewide workforce investment programs, which are best suited to meet the individual's specific employment needs. If the eligible individual is assigned to a priority category that is not being served, the case will be placed on a pre–service listing that is essentially a waiting list. A Shortage of Funds letter should be sent to the individual and a copy placed in the case folder. If the individual fails to respond to the agency within thirty (30) days, the case may be closed. At the consumer's request, an Individual Plan for Employment (IPE) may be developed to the extent possible and held so that services may be initiated as quickly as possible if the Order of Selection changes to serve that category. A consumer may remain on the pre–service listing indefinitely. However, counselors are directed to review these cases yearly and follow–up letters may be mailed to individuals to determine if they wish to remain on the waiting list. The individual will be removed from the waiting list at their request. Any person who has begun receiving services under an Individualized Plan for Employment prior to the effective date of an Order of Selection will in no way be affected should the office implement an Order of Selection. The agency will continually monitor the need to change the categories served. Feedback from the SRC and other stakeholders will be sought and considered when making changes to the Order of Selection.

B. THE JUSTIFICATION FOR THE ORDER.

According to data from the 2012 American Community Survey, published in the annual Compendium of Disability Statistics, 17.0% of Kentucky civilians living in the community report having a disability, including 15.5% of residents of working age (18–64). This is higher than the national average (12.3% all, 10.2% working age). The rate of Kentuckians reporting a disability remained relatively stable from 2011 through 2012, growing at 1.1% (on par with the national average of 1.2%). Only 27% of individuals in Kentucky with disabilities are employed. Kentucky and Arkansas share the second highest percentage of individuals with disabilities. Kentucky also shares a second place ranking with Arkansas and Louisiana in percentage of individuals who fall below the poverty line at 17.3%. According to the Social Security Administration, 192,721 Kentuckians receive blind and disabled Supplemental Security Income benefits. The Institute for Community Inclusion (ICI), in 2007, reported the percentage of SSI recipients in Kentucky who were working was 2.7% compared to the national percentage of 7.6% (ICI, 2007). In 2007, Kentucky also had 160,122 Old Age Survivor and Disability Insurance (OASDI) recipients/workers with disabilities. These statistics provide a description of the potentially high demand for OVR services based on the number of individuals in the state with disabilities. A review of internal OVR data that was used to develop a Personnel Plan in 2011 indicated that as the average caseload size increases, the rehabilitation rate tends to

decrease. This review also indicated that as the average caseload size increases so does the average cost of positive employment outcomes, and the average cost of cases closed after being determined eligible for services but before an Individualized Plan for Employment is written. Therefore, a decrease in the average OVR caseload size could correlate to an increased the rehabilitation rate of its consumers, and could also correlate to a decrease in the average cost of two closure statuses. However, state personnel cap issues prevent the hiring of additional VR counselors to decrease caseload size. OVR has implemented strategies to reduce average caseload size such as closure amnesty days, and training and re–training counselors on appropriate case closure practices. Caseload data support that these efforts have been effective at reducing average caseload sizes. At the end of FY2013, the average caseload size for counselors in the agency was 143, which is up to 150 currently. While this number is down significantly from previous fiscal years, it is still high compared to other states. According to the 33rd Institute on Rehabilitation Issues entitled Recruitment and Retention of Vocational Rehabilitation Counselors, the average caseload size, based on a survey of federal/state vocational rehabilitation agencies was 143 (Dew, Alan & Tomlinson, 2008). Adding additional individuals to these already high caseloads through an increase in the categories served in the Order of Selection. Beginning in FY 2010, budget reductions left the agency unable to match all available federal funds. Based on current state funding, the agency anticipates having $10, 800, 000 in matching funds for FY 2016 reducing the available federal amount to $ 41,891,184 including $ 6,283,700 for students with disabilities and will have a total of $52,691,184 in available funds. Based on these projections, the agency will not be able to match $6,447,824 in available funds. The agency will utilize carry forward to offset this loss, while reducing expenditures to cover the remaining loss of funds. Assuming the validity of these projections, by the beginning of FY2015, OVR will be operating at a funding level more than $10,000,000 less than the agency had available in FY2009. Because of this reduction in funds, OVR foresees difficulty providing VR services to all eligible Kentuckians with disabilities. Because the average time for a case to be open is consistently between two and two and a half years, increasing the number of categories served in FY2016 would likely be unsustainable with the anticipated continued inadequacy in available funding in future budget cycles. In fact, unless increased funds are made available in the next biennial budget, the agency will have to review the open categories of the order of selection and make decisions for the future. Information is also presented annually to the SRC and the public during the public meeting seeking input regarding OVR services and feedback from both the SRC and the public support maintaining the current number of categories served in the Order of Selection.

C. THE SERVICE AND OUTCOME GOALS.

FY2012 SERVICE GOALS AND OUTCOMES

Priority Category: 1 Eligible individuals with the most significant disabilities

Active Cases GOAL: 16,726

Active Cases ACTUAL: 16,556

Outcomes GOAL: 1,689

Outcomes ACTUAL: 1,496

Priority Category: II Eligible individuals with a significant disability who have serious limitations in three functional areas Active Cases GOAL: 12,103

Active Cases ACTUAL: 11,839

Outcomes GOAL: 1,549

Outcomes ACTUAL: 1,404

Priority Category: III Eligible individuals with a significant disability who have serious limitations in two functional areas Active Cases GOAL: 6,254

Active Cases ACTUAL: 5,123

Outcomes GOAL: 874

Outcomes ACTUAL: 498

Priority Category: IV Eligible individuals with a significant disability who have a serious limitation in one functional area Active Cases GOAL: 0

Active Cases ACTUAL: 869

Outcomes GOAL: 0

Outcomes ACTUAL: 114

Priority Category: V Eligible individuals with non–significant disabilities that result in permanent limitations

Active Cases GOAL: 0

Active Cases ACTUAL: 15

Outcomes GOAL: 0

Outcomes ACTUAL: 0

TOTALS Active Cases GOAL: 35,083

Active Cases ACTUAL: 34,402

Outcomes GOAL: 4,112

Outcomes ACTUAL: 3,512

ACTUAL SERVICE COSTS FY 2012: $22,825,298.68

FY2013 SERVICE GOALS AND OUTCOMES:

Priority Category: I Eligible individuals with the most significant Disabilities

Active Cases GOAL: 16,946

Active Cases ACTUAL: 17,035

Outcomes GOAL: 1,711

Outcomes ACTUAL: 1,609

Priority Category: II Eligible individuals with a significant disability who have serious limitations in three functional areas Active Cases GOAL: 12,262

Active Cases ACTUAL: 11,235

Outcomes GOAL: 1,569

Outcomes ACTUAL: 1,293

Priority Category: III Eligible individuals with a significant disability who have serious limitations in two functional areas Active Cases GOAL: 6,336

Active Cases ACTUAL: 5,773

Outcomes GOAL: 886

Outcomes ACTUAL: 688

Priority Category: IV Eligible individuals with a significant disability who have serious limitations in one functional area Active Cases GOAL: 0

Active Cases ACTUAL: 692

Outcomes GOAL: 0

Outcomes ACTUAL: 84

Priority Category: V Eligible individuals with non–significant disabilities that result in permanent functional limitations

Active Cases GOAL: 0

Active Cases ACTUAL: 18

Outcomes GOAL: 0

Outcomes ACTUAL: 0

TOTALS Active Cases GOAL: 35,544

Active Cases ACTUAL: 34,753

Outcomes GOAL: 4,166

Outcomes ACTUAL: 3,674

ACTUAL SERVICE COSTS: FY 2013: $25,902,151.75 *Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs These goals reflect the Office's continuing dedication toward serving those individuals with the most significant disabilities. The Agency increased the provision of services to individuals with the most significant disabilities during fiscal year 2013 by 2.9%, and the overall number of active cases increased by 1%. Cases served in Priority Category II decreased by 5.1%, while cases served in Priority Category Level III increased by 12.7%. The number of individuals served from Priority Category Level IV decreased by 20.4%. Positive employment outcomes in Priority Category Level I increased by 7.6%. Based on a review of various factors, the agency attributes the slight increase in cases served to agency outreach to referral sources, and the continuing but tapering effects of the 2011 decision to reopen Priority Category Level III. The increased number of successful outcomes from Priority Category Level I can likely be attributed to improvement in the economy, increased staff training, increased outreach to employers, and the efforts of the Agency's Supported Employment Branch to train, monitor, and provide technical assistance to providers.

FY 2014 SERVICE GOALS AND OUTCOMES:

Priority Category: Employment I Eligible individuals with the most significant disabilities

Active Cases GOAL: 17,169

Active Cases ACTUAL: 16,863

Outcomes GOAL: 1,734

Outcomes ACTUAL: 1,711

Priority Category: II Eligible individuals with a significant disability who have serious limitations in three functional areas Active Cases GOAL: 12,424

Active Cases ACTUAL: 10,787

Outcomes GOAL: 1,590

Outcomes ACTUAL: 1,362

Priority Category: III Eligible individuals with a significant disability who have serious limitations in two functional areas Active Cases GOAL: 6,419

Active Cases ACTUAL: 6,159

Outcomes GOAL: 898

Outcomes ACTUAL: 824

Priority Category: IV Eligible individuals with a significant disability who have serious limitations in one functional area Active Cases GOAL: 0

Active Cases ACTUAL: 460

Outcomes GOAL: 0

Outcomes ACTUAL: 60

Priority Category V: All other eligible individuals whose disabilities are non–significant

Active Cases GOAL: 0

Active Cases ACTUAL: 22

Outcomes GOAL: 0

Outcomes ACTUAL: 0

TOTAL Active Cases GOAL: 36,012

Active Cases ACTUAL: 34,291

Outcomes GOAL: 4,222

Outcomes ACTUAL: 3,957

SERVICE COSTS: FY 2014: $27,023,287.79 *Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs There is a change in the RSA2 from federal fiscal year 2013 to federal fiscal year 2014. In 2013, the costs of field office operations in local communities including rent, travel, etc. was considered field services and reported as part of the cost of staff provided services. In 2014, the updated form and instructions for the RSA2 required that only staff time and purchased services be reported as service costs. The unusually large discrepancy between the service costs for those two fiscal years is due to this change.

FY 2015 SERVICE GOALS AND OUTCOMES:

Priority Category I– Eligible individuals with the most significant disabilities

Active Cases GOAL: 16,098

Active Cases ACTUAL: 16,606

Outcomes GOAL: 1,630

Outcomes ACTUAL: 1,791

Priority Category II– Eligible individuals with a significant disability who have serious limitations in three functional areas Active Cases GOAL: 11,202

Active Cases ACTUAL: 10,691

Outcomes GOAL: 1,459

Outcomes ACTUAL: 1,538

Priority Category III– Eligible individuals with a significant disability who have serious limitations in two functional areas Active Cases GOAL: 6,773

Active Cases ACTUAL: 6,815

Outcomes GOAL: 597

Outcomes ACTUAL: 1,133

Priority Category IV– Eligible individuals with a significant disability who have serious limitations in one functional area Active Cases GOAL: Closed

Active Cases ACTUAL: 254

Outcomes GOAL: 0

Outcomes ACTUAL: 36

Priority Category V– All other eligible individuals whose disabilities are non–significant

Active Cases GOAL: Closed

Active Cases ACTUAL: 10

Outcomes GOAL: 0

Outcomes ACTUAL: 0 TOTAL

Active Cases GOAL: 34,073

Active Cases ACTUAL: 34,376

Outcomes GOAL: 3,686

Outcomes ACTUAL: 4498

SERVICE COSTS: FY 2015 $30,934.376.* *Includes some Title VI funds, Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs The following FY 2016–2020 estimates are based on a trend analysis of data from the previous years, adjusted to

account for the current OOS and anticipated and historic changes in various environmental factors such as budget, personnel, etc. These goals project slight increases in all priority categories except IV and V due to below level funding in the state budget.

FY 2016 SERVICE GOALS:

Priority Category I– Eligible individuals with the most significant disabilities Active Cases GOAL: 16,307

Outcomes GOAL: 1,651

Priority Category II– Eligible individuals with a significant disability who have serious limitations in three functional areas Active Cases GOAL: 11,348

Outcomes GOAL: 1,478

Priority Category III– Eligible individuals with a significant disability who have serious limitations in two functional areas Active Cases GOAL: 6,861

Outcomes GOAL: 605

Priority Category IV– Eligible individuals with a significant disability who have serious limitations in one functional area Active Cases GOAL: Closed

Outcomes GOAL: Closed

Priority Category V– All other eligible individuals whose disabilities are non–significant

Active Cases GOAL: Closed

Outcomes GOAL: Closed

TOTAL Active Cases GOAL: 34,516

Outcomes GOAL: 3,734

SERVICE COSTS ESTIMATE: FY 2016: $31,336,134.74 * Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs

Estimated number of individuals entering services in 2016 with individualized plans for employment= 8,245

Total Estimated Costs: $4,393,550

Estimated number of individuals determined eligible entering services in 2016 = 25,934

Total Estimated Costs: $26,942,584.74

Total Projected Services and Administrative Costs inclusive of facilities, salaries, benefits, outreach activities, and required statewide studies: $52,215,234.76

We do not plan to serve anyone new in categories 4 and 5. We will close 32, however, without employment in Category 4. These would be individuals with existing cases not new cases in this timeframe. We only plan to serve categories 1–3. In Category 1, we plan to serve 16,307 individuals, close 1,651 individuals with employment, 1525 without employment and spend an estimated $16,273,336.51 on consumer services. For Category 2, we plan to serve 11,348 individuals, close 1,478 individuals with employment, 968 individuals without employment, and spend an estimated $9,405,161.57 on consumer services. Lastly, in Category 3, we plan to serve 6,861 individuals, close 605 with employment, 433 without employment, and spend an estimated $6,246,213.95 on consumer services.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

The timeframe will be from 10/1/2015 until 9/30/2016 for each category within the order.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Individuals who require long–term support services or have limitations in four or more major areas of functional capacity are determined to be most significantly disabled and are selected for services before all other individuals with disabilities.

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.

We have decided to maintain our current order of selection even in the cases of an individual who only wishes to maintain employment, so we can be fair to the individuals who are in the order of selection and continue to provide services to those with the most significant disabilities

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.

Goals and Priorities

OVR will distribute funding from Title VI, Part B through its established network of Supported Employment Providers. Yearly agreements are developed with each Supported Employment Provider. Fees–for–service and outcome fees, along with policies and procedures for each, have been developed and will be followed by each Provider. All services are monitored by the Supported Employment Branch Staff, consisting of one Branch Manager and three Supported Employment Consultants. OVR, through the Supported Employment Branch, will assure choice and quality services for its consumers served in supported employment by:

a. thoroughly reviewing all applications for Supported Employment vendor ship;

b. monitoring the ongoing and extended supports provided by each agency;

c. verifying the provider’s ability to fund ongoing supports using funds other than VR;

d. conducting annual reviews of each vendor;

e. being available to consult with individuals, their families, service providers, and others using person–centered planning approaches.

OVR will seek to improve the competency of current and future service providers by:

a. providing technical assistance and training for provider staff (through a contract with University of KY–Human Development Institute’s Supported Employment Training Project);

b. utilizing local teams (where appropriate) to evaluate services and plan for technical assistance;

c. presenting Basics of Supported Employment regularly for agency staff orientation training (Skills Enhancement Training); and h. developing and keeping updated policy and procedural manuals on supported employment for staff via OVR Intranet, and for Providers via Internet and other means.

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

A. The provision of extended services for a period not to exceed 4 years The Office will collaborate with the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) to expand supported employment options to not served and underserved groups. Efforts include: a. participation in Commissions established as a result of state legislation, including Commission on

Services and Supports for Individuals with an Intellectual Disability and other Developmental Disabilities (HB 144); Commission on Services and Supports to People with Mental Illness and Dual Diagnoses (HB 843); and the Advisory Council on Autism Spectrum Disorders; b. development of partnerships with Kentucky Medicaid Waiver Programs (Supports for Community Living, Michelle P, Home and Community Based Waivers, and Acquired Brain Injury Waivers) so that these sources of extended support funding can be fully utilized; and c. utilization of interagency workgroups to develop better understanding and expand awareness of work incentives (such as in SCL Waiver, Social Security, etc.). d. developing and implementing the IPS Supported Employment programs for consumers with severe mental illness within the community mental health centers.

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.

The Office will seek to expand services to not served and underserved counties as well as not served and underserved disability groups, including youth with the most significant disabilities and will encourage continuous improvement in supported employment by monitoring the state fiscal climate for opportunities to partner with KY APSE (Association for Persons in Supporting Employment First) to advocate for increased state funding for extended support services, maximizing the existing dollars for extended support services through collaborative agreements and contracts, increasing knowledge of Kentucky's plan for self–determination strategies, especially within the Medicaid Waiver (Supports for Community Living, Michelle P) programs, continuing partnerships with local Community Mental Health Centers, recruiting new Providers, providing training and technical assistance to new supported employment agencies, and providing consultation and technical assistance to OVR staff and Providers as needed, researching better ways to fund and/or deliver services. For example, an enhanced fee for Vocational Profile development has been developed, piloting and expansion of new programs through establishment projects, and training providers in the use of strategies for individualized services such as customized employment and systematic instruction.

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.

1. The methods to be used to expand and improve services to individuals with disabilities.

Goal 1: To continuously improve customer service

Priority I: Provide better customer service in the career centers Measure: To meet or exceed customer satisfaction rating from the previous year

Barrier/Need to be addressed: Lack of awareness of disability services, including collaboration between agencies Strategies/Tasks

A. Review data from Customer Satisfaction surveys annually by the Executive Leadership Team for trends, discrepancies, and deficiencies;

B. Assess the customer experience on both a qualitative and quantitative level with customer satisfaction surveys on a district level and at CDPVTC;

C. Review and adjust the customer satisfaction survey on an ongoing basis to better measure the consumer’s ability to participate in the rehabilitation process;

D. Review results of Substantial Gainful Activity (SGA) Project for ways to expedite service delivery as part of continual assessment of speed of service;

E. Provide Team–Based Case Management and common forms to all staff;

F. Participate in Team–based Case Management within the Kentucky Career Centers;

G. Co–housing of partners in Career Centers statewide;

H. Align service areas with workforce development boards;

I. Provide training to all career center staff on customer service and disability awareness, in coordination with Workforce Development Boards.

Priority II: Develop and implement strategies to improve OVR’s performance on the required accountability measures under section 116 of WIOA.

Measure: Meeting WIOA accountability standards

Barrier/Need to be addressed: Better cooperation with workforce partners and better communication with consumers Strategies/Tasks

A. Utilize agreements with the Office of Employment and Training (OET) to access wage data in order to capture 2nd and 4th quarter employment data for consumers;

B. Identify new partners and enhance existing partnerships to improve performance outcomes inclusive of Kentucky Center Education & Workforce Statistics (KCEWS);

C. Set baselines and identify successful outcomes and acceptable measureable progress;

D. Develop strategies to improve performance outcomes; Priority III: Provide ancillary services to consumers, including options for transportation

Measure: To increase the number of individuals receiving ancillary services annually.

Barrier/Need to be addressed: Lack of availability of transportation and concerns related to medical coverage

Strategies/Tasks

A. Provide permit training to transition youth at Carl D. Perkins Vocational Training Center (CDPVTC) and seek to replicate it to the KCTCS system;

B. Provide ongoing support to the Kentucky Assistive Loan Corporation (KATLC);

C. Expand the CARAT AT/DME Reuse Project statewide;

D. Develop CARAT as a stand–alone entity with its own source of sustainable funding;

E. Continue implementation of and develop sources of funding to support the Statewide Hearing Aid Assistance and Reuse Project (SHARP);

F. Provide information on the Affordable Care Act for all OVR consumers;

G. Partner with SOAR to increase transportation options in the Appalachian region;

H. Partner with the Medicaid Brokerage System;

I. Provide Benefits Planning and Analysis as an option when it comes to addressing health insurance concerns.

Goal 2: To provide Pre–employment transition services (Pre–ETS) to Transition Students (ages 14–21) and other transition services to Youth (ages 16–24) to assist them with transition from high school into competitive integrated employment or post–secondary training.

Priority I: Evaluate the current transition program to determine trends and needs

Measure: To provide specific and specialized services to at least 60% of both transition students and transition youth Barrier/Need to be addressed: More transition cases closed before service provision than adult cases

Strategies/Tasks

A. Collaborate with the Kentucky Department of Education on the implementation of the College and Career Readiness Initiative;

B. Analyze Post School Outcome Survey results for needs and trends of transition youth;

Priority II: Expand the capacity of the agency to provide Pre–ETS services.

Measure: Utilize 15% of the federal basic support for Pre–ETS Barrier/Need to be addressed: Need more transition services Strategies/Tasks

A. Continue to offer the Community Work Transition Program (CWTP) at a minimum of 54 sites across the state annually and utilize integrated worksites to educate students on workplace readiness, social skills, and independent living;

B. Expand the availability of the CWTP to all school systems that do not currently have it;

C. Designate a Pre–ETS service coordinator for every OVR district (16) as well as a Central Office coordinator;

D. Train school personnel and parents on PETS;

E. Utilize Pre–ETS brochure and video as educational tools to school systems in person as well as making them available online;

F. Develop and implement online classes to augment the vocational behavior enhancement program at Carl D. Perkins Vocational Training Center (CDPVTC);

G. Encourage students to take tours of colleges and universities as well as Carl D. Perkins Vocational Training Center and work with the local school district to provide opportunities and provide guidance and counseling, brochures on the CDPVTC, and any resources available on choosing an appropriate college or university;

H. Coordinate with the Autism Council/Office of Autism to discuss and address the issues of students with Autism;

I. Propose to colleges and universities a college prep program for students with Autism who are between their junior and senior years in high school that will help with acclimation to college life based on the Autism Team's recommendations;

J. Counsel on and refer students to CDPVTC for the Work Adjustment Program to improve social skills and work–related behaviors;

K. Counsel and refer students to the Life Skill Enhancement Program at CDPVTC to assist with social skills and independent living, as well as vocational behavioral enhancement to teach appropriate work behaviors;

L. Provide vocational assessment and use it as a tool to do job exploration counseling;

M. Utilize vocational assessment in order to identify and help provide training under an individualized plan for employment (IPE) for students who are eligible for advanced training in science, technology, engineering, mathematics (including computer science), medicine, law, or business;

N. Develop a training module for counselors on STEM careers and place it on KELMS for counselors to access any time;

O. Provide a letter that lists PETS services and documentation that shows the completion of Pre–ETS services while connecting to all students beginning at age 14;

Priority III: Expand Pre–ETS to transition students (ages 14–21) and other transition services to youth (ages 16–24).

Measure: Utilize 15% of the federal basic support for Pre–ETS Barrier/Need to be addressed: Need better quality transition services Strategies/Tasks

A. Conduct financial education training for students in at least 5 schools as a means of promoting self–advocacy in various regions throughout the state;

B. Conduct at least 5 summer activities for transition youth/students annually in various regions throughout the state; C. Provide work–based learning experiences through the Community Work Transition Program (CWTP), Project SEARCH, Carl D. Perkins Vocational Training Center (CDPVTC) and other programs;

D. Pursue other collaborative activities with the Kentucky Department of Education and local school districts to provide Pre–ETS;

E. Provide substantial funding to each Regional Educational Cooperative to create or enhance their 2015–2016 Transition Conference for students with disabilities;

F. Collaborate with low incidence specialists at the Regional Education Cooperative

G. Work with EKU on the Autism Summer Camp Pilot

H. Partner with the Kentucky Partnership for Families and Children to sponsor students to attend the KPFC Youth Parent Conference

I. Partner with the CRP Integrated Work Experience Program

J. Partner with the Autism Committee to utilize their state funds

K. Partner with the school system and KDE to improve transition outcomes for students who are DHH

L. Coordinate an annual Opportunity Youth Summit

Goal 3: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities

Priority I: Offer benefits planning for individuals with disabilities who are Social Security recipients.

Measure: All applicants who receive SSA benefits will receive information on benefits planning and at least 50% of them will receive a benefits analysis.

Barrier/Need to be addressed: Concerns related to benefits Strategies/Tasks

A. Counselors will address and distribute a Benefits Planning Fact Sheet, developed by the SSA Coordinator for Vocational Rehabilitation, for eligible consumers, especially during discussion of the Individualized Plan for Employment (IPE);

B. Require and monitor continuing education for community work incentive coordinators utilizing OVR's service fee to be monitored by OVR staff;

C. Monitor and continuously review the Benefits Analysis service fee;

D. Encourage Community Rehabilitation Programs and other non–profit partners to consider providing benefits planning services;

E. Utilize WIPA programs in the state for free planning services as appropriate and available;

F. Provide instruction in self–advocacy, benefits planning, and financial readiness at Carl D. Perkins Vocational Training Center (CDPVTC);

G. Work with the Department of Labor on the Apprenticeship Model

Priority II: Build internal capacity to provide information on financial education and asset development

Measure: 89% or higher of all eligible consumers will identify their personal income and assets as their main source of support at closure

Barrier/Need to be addressed: Lack of availability of long–term supports

Strategies/Tasks

A. Conduct at least one Asset Development summit annually;

B. Develop an online financial education and empowerment resource for consumers;

C. Provide financial education and asset development training to field staff both online and in person;

D. Partner with at least three other entities to promote and expand financial empowerment activities for individuals with disabilities;

E. Collaborate with Kentucky Career Centers to provide financial education as appropriate;

Goal 4: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment

Priority I: Enhance Job Placement Services

Measure: To attain at least 4500 positive employment outcomes for the Federal Fiscal Year 2016

Barrier/Need to be addressed: Concerns over the quality of services and the need for job placement services Strategies/Tasks

A. Conduct two placement staff trainings per year emphasizing new federal hiring requirements and making effective employer contacts;

B. Plan and conduct activities for Job Placement Month (October) in each district;

C. Conduct annual monitoring of CRP quality and fiscal compliance;

D. Survey consumers and counselors annually about CRP services and provide feedback;

E. Utilize CRP report cards to assist consumers in choosing providers;

F. Train all staff on FOCUS an online system that assists a job seeker who is accessing the Kentucky Career Center website with resume building and job matching with the job seeker's skills and transferrable abilities;

G. Work with the Kentucky Autism Council and provide the Kentucky Autism Council training to the business service teams;

H. Use results of SGA Project to see how we can expedite job placement and service provision;

I. Utilize sector strategies regional, industry–focused approaches to building skilled workforces that result in job opportunities for all workers across a range of industries;

J. Participate in Project CASE, a five–year, RSA–funded grant to the Office for the Blind (OFB) to identify and recruit eligible consumers from OFB and the Office of Vocational Rehabilitation (OVR) in the Kentuckiana Works and EKCEP Kentucky Career Center areas to pursue career pathways in Information Technology, Manufacturing, Industrial Technology, and the Healthcare, Nursing, and Allied Health fields and provide those consumers with a variety of supports, including job placement assistance after completion of training;

K. Coordinate Rapid Responses to all major community job losses statewide along with other center partners;

L. Participate in the Kentucky Career Center Business Service Teams and make business contacts statewide;

M. Collaborate with the Coalition for Workforce Diversity in Louisville and explore expanding the model statewide;

N. Conduct regular training events aimed at employers doing business with the federal government on federal guidelines for hiring individuals with disabilities;

O. Provide information and referral to career centers for those early in the recovery process from substance abuse;

Priority II: Provide supported employment services that lead to competitive integrated employment and improve the number of successful outcomes for supported employment cases across the state

Measure: Seek to close 537 supported employment cases successfully across the state in fiscal year 2016.

Barrier/Need to be addressed: Need for improved outcomes for supported employment cases

Strategies/Objectives

A. Train staff on new policies related to customized employment and person–centered planning;

B. Require notes to be given to staff by supported employment providers by the 5th day of each month;

C. Recruit more providers for supported employment by holding outreach opportunities for potential providers and support providers for unserved and underserved areas;

D. Seek alternative methods for providing funding for long–term support;

E. Involve job coaches with transition students by the last semester of school;

F. Utilize 50% of the supported employment budget for transition youth and youth with disabilities;

Goal 5: To implement Section 511 of WIOA.

Priority I: Develop and apply a process for implementing requirements under Section 511 by July 1, 2016.

Measure: Begin implementation on July 1, 2016.

Barrier/Need to be addressed: Need to address regulations in WIOA and strengthen/expand competitive employment for individuals with disabilities

Strategies/Tasks

A. Form a Section 511 Implementation Team to insure agency compliance to WIOA requirements related to OVR relationships with sheltered workshops;

B. Gather input from staff, education partners, service providers, individuals with disabilities, their families and other stakeholders:

C. Develop a process of implementation;

D. Monitor the employing entities and make sure they are fulfilling their responsibilities to the people they serve;

E. Document refusal of services by students/families with a closure letter to include follow–up within 6 months to check the status of the individual;

The strategies included in this section were developed for the established goals and priorities. They were developed by the agency's Executive Leadership Team with input from the Comprehensive Needs Assessment, the Statewide Council for Vocational Rehabilitation, the Consumer Satisfaction Survey, and from staff. The Council through its committees and the Executive Leadership Team will quarterly review summarized reports monitoring the agencies performance in meeting the State Plan Goals and Priorities. OVR has quality assurance processes in place to identify areas where improvement and training are needed. Internal and external methods include OVR's Case Review System Crystal Reports, Group Review, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process. In the case review system, district branch managers review one case per VR counselor monthly. Specialized topics will be selected to identify specific trends or policy. Three times annually, a group case review called TRACKS is conducted with all of the counselors reviewing the same case. This provides the opportunity for discussion of strengths and weaknesses related to case management, documentation, service provision, and data input. Case Review Reports are produced annually and our used as part of individual counselor performance reviews. The State Rehabilitation Council conducts an annual Consumer Satisfaction Survey through the Human Development Institute (HDI) at the University of Kentucky. HDI coordinates a telephone survey with the University's Survey Research Center. The purpose of the study is to assess customer satisfaction of all consumers who receive services from KYOVR and whose cases are closed successful and unsuccessful during the federal fiscal year. The Council reviews the survey every year and makes recommendations to the agency on how to improve services. The agency also provides a satisfaction survey to consumers at every visit to a local office and the results of this survey is periodically reviewed by the Executive Leadership Team. The agency's program evaluator produces specific reports at the request of the Executive Leadership Team that are used to further expand and improves services.

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.

The agency currently employs seven Rehabilitation Technologists and one branch manager who provide a full spectrum of Assistive Technology (AT) services throughout the Commonwealth. The AT Branch provides a comprehensive array of services including, but not limited to, the following: assessment, referral, vehicle modifications, home modifications consultations, workplace accommodations consultation, etc. The availability of full time staff allow the opportunity for the consumer to access these services during the assessment phase, during IPE development and implementation and in the job placement phase of the case. The agency partners with the KATS Network, Kentucky AgrAbility and Protection and Advocacy to coordinate a statewide training on current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by OVR staff , AT professionals, educators, Occupational Therapists, Physical Therapists and other professionals that have in interest in, or contact with AT. In FY 2013, OVR took responsibility for the administration of the KATS Network, the Commonwealth's Assistive Technology program. The KATS Network coordinates a statewide network of organizations to enhance the availability of AT devices to individuals with disabilities of any age. There are 5 Regional AT Resource Centers. These sites provide services related to: Device Demonstration, AT Loan, AT Reutilization, Training and Technical Assistance, Public Assistance. The Agency employs a KATS coordinator, and continues to seek opportunities for increased collaboration and growth among the network and OVR. The KATS Network will continue to promote the reuse and reutilization of assistive technology and durable medical equipment through CARAT (Coordinating and Assistive the Reuse of Assistive Technology, a project first funded by a grant through the Health Resource Services Administration (HRSA). The project has been extended to include the entire state. Partners include the Kentucky Appalachian Rural Rehabilitation Network, Appalachian Regional Healthcare, The Center for Excellence in Hazard, the University of Kentucky Physical Therapy Program, the Kentucky Appalachian Rural Rehabilitation Network (KARRN), the Carl D Perkins Vocational Training Center, Spalding University in Louisville, and Lourdes Hospital in Paducah. The agency will continue to seek to expand its services by adding additional staff, continuing to partner with existing AT stakeholders, and increasing professional awareness of assistive technology best practices through training and presentations. The agency is also responsible for the administration of the Kentucky Assistive Technology Loan Corporation, as authorized by the AT Act. This program offers low interest loans for qualified applicants through its relationship with Fifth Third Bank. KATLC can provide loans for modified vehicles, hearing aids, adapted computers, mobility devices, augmentative communication devices or any other type of equipment or home modification that will improve the quality of life or increase the independence of Kentuckians with disabilities. The KATLC is available on a statewide basis to any qualified individual in need of AT services.

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.

OVR staff will take part in teams and committees to come up with ideas for assisting those who are transition students and youth. We have made our goals transition heavy and will utilize staff time and agency budget to provide Pre–ETS.

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).

OVR will analyze current referral and case information data to identify regional trends and compare these trends to census data to determine representativeness of the caseload to the regional population, conduct regional outreach activities to engage and inform underrepresented populations on a regular basis, analyze successful methods of outreach and service to ethnic minority communities and replicate where needed, facilitate adequate communication with non–English speaking applicants and consumers through the use of third–party translation and interpretation services, work with vendors to assist with adequate access to community rehabilitation services and the agency's comprehensive rehabilitation center, and continue to foster relationships with statewide groups representing and serving ethnic minorities, As warranted by the population, the agency will provide specialized training to ensure staff is adequately aware of the language and culture of these populations. The Kentucky Education Cabinet, Department of Workforce Investment, Office of Vocational Rehabilitation does not discriminate on the basis of race, color, national origin, sex, age, religion, type of disability, genetic information, marital status, sexual orientation, gender identity, citizenship, pregnancy, veteran status, or any other status protected by applicable law.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

OVR currently partners with 85 Community Rehabilitation Providers (CRPs) to serve eligible consumers. The Comprehensive Needs assessment again indicated a need for more providers, particularly in rural areas of the state. The CRP/Supported Employment Branch continues to recruit more CRPs. In recent years, OVR conducted competition among eligible organizations for establishment projects to provide services to underserved populations and in underserved areas. Eligible organizations were organizations approved as a Community Rehabilitation Program (CRP) by OVR or it must have attained such status by the beginning date of a Memorandum of Agreement (MOA). In addition, any applicant must be in 'good standing' with the Office of Vocational Rehabilitation and Kentucky State Government. New programs were started in the past year partially with funds from the Division of Behavioral Health (DBH) to serve more individuals with significant mental illness or substance abuse. OVR plans to involve CRPs across the state in providing Pre–Employment Transitions Services through an enhanced service fee schedule which should attract additional providers where needed.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

The current Kentucky OFB/VR Case Management System (CMS); a web–based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology – a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time. With recent improvements in technology, several systems could meet the programmatic and accessibility needs of the agency. The current

CMS system is approaching its useful life expectancy and upgrades to the current system as well as the purchase or licensing of other systems that would meet both the needs of the two vocational rehabilitation agencies and those of common measure reporting are being considered. Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, OFB, and OVR. The ability to capture the performance accountability measures common to all Kentucky Workforce Investment agencies is currently a work in progress. The Department for Workforce Investment (DW), in partnership with a current federal grant, is testing the potential implementation of software that may have the capacity to capture all customer flow information within DWI. The nationally recognized software is currently being customized to the specific needs of DWI agencies and training has staff has been implemented. Also being tested is the capacity of the software to allow for totally paperless consumer files, the ability of the customer/job seeker to access their information from a website for the purposes of updating information, providing information required by the various agencies and having direct access to employment opportunities in their area. DWI will continue to pilot the use of this system with the ultimate goal of transferring all DWI agencies to a common casework system within two years. Regardless of the system that the Agencies choose to implement, innovations that are anticipated include: paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity. There have at least been some conversations concerning paperless case pilot projects. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting. Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

In an effort to assist other components of the statewide workforce investment system in assisting individuals with disabilities, OVR will conduct the following activities: Evaluate the Career Center partnership, on both a statewide and regional level, to analyze strengths, trends, discrepancies, deficiencies and to determine the need for improved local Career Center communication and decision making, accessibility, training, and process improvement. There will be a common website for all the partners to put in information at one time that all partners can access. Each partner can be aware of the progress of each individual's case they share in common. Assist Career Centers in maximizing physical and programmatic accessibility for persons with disabilities to shared Center resources in a cost–effective manner. Accessibility Evaluations are ongoing at our Career Centers by our Rehabilitation Technology Branch. Conduct disability awareness training monthly. This is also an ongoing process within the Career Centers. Seek opportunities for co–training with Workforce partners regarding service strategies for individuals with shared special populations (migrant, substance abuse, criminal background, etc.). Provide information regarding the array of services to individuals with disabilities served within the Kentucky Career Center. Support efforts of the Kentucky Workforce Development Board Strategic Plan related to partnering with Career Center agencies within applicable state and federal law/regulation. The agency, as a part of the statewide workforce development system, is actively available for consultation to improve services to

individuals with disabilities within these programs, and will explore, on an individual and programmatic level, the potential to coordinate supported employment and transition services within these initiatives. Further, the agency will examine its relationship with existing Business Services Teams to provide consultation regarding services to individuals with disabilities. The office will identify and delineate staff roles, responsibilities and available resources and specification of the financial responsibility of each component of the statewide workforce development system with regard to paying for the necessary services that are consistent with State law and Federal requirements. Regional and local office managers work with partner agencies to determine most convenient office hours to serve customers. The office will specify procedures for resolving disputes among such components. The office shall provide for the development of Memorandums of Understanding (MOU) at local levels between the office and local entities carrying out activities through the statewide Workforce Development System. In 2010, the Kentucky Workforce Investment Board partnered with the Education and Workforce Development Cabinet and numerous other cabinets, agencies and outside organizations to adopt the WORKSmart Kentucky Plan. The WORKSmart Kentucky Plan is a blueprint for transforming Kentucky's workforce services focused on adapting to the changing needs of employers to create a demand driven, business–led, solution based publicly–funded talent development system. In August of 2013, the Kentucky Workforce Investment Board voted to update the WORKSmartKentucky Strategic Plan due to the fact that a large number of strategic initiatives had been or were being implemented. OVR participates in the WORKSmart Kentucky Plan in the following ways: Workforce Academy– OVR's Training Coordinator coordinated agency activities related to Workforce Academy. All OVR staff, in FFY 2013, participated in the first phase of Workforce Academy consisting of four modules. All staff members were assigned by cohorts with other workforce staff from the Office for the Blind, Office of Employment and Training, WIA, and other partner staff. All OVR staff participated in the second phase of Workforce Academy, a web–based training, in FFY 2014. (Branding) Outreach Initiative–In order to participate in branding, all OVR staff members use email signatures consistent with the Kentucky Career Center brand. Local agency offices have received signage consistent with the brand. Office staff members receive Career Center business cards upon the fulfillment of new business card orders. The roll–out plan for an external launch of the new marketing brand occurred in 2013. The brand promise was adopted, and customer journeys identified. Events occurred across the state making the public aware of the new brand and the brand promise. Team–Based Case Management– OVR's Director of Program Services serves as a Project Manager for Team Based Case Management. One of OVR's Assistant Directors of Program Services serves on this team. The goals of this work group are to develop and implement a common, intake, referral, and assessment process, and integrate case management and interfaces for all workforce services providers, including OVR. Career Center Customer Flow– An OVR Branch Manager has participated in the Career Center Customer Flow team. Partner for Success– OVR Branch Managers, the Executive Director, and other Executive Leaders participate in Partner for Success trainings. The Partner for Success initiative brought together all the partners in the Department of Workforce Investment to develop a unified approach to delivering holistic services. The goal of these institutes was to create networking opportunities, create awareness of the services each partnering agency delivers and assemble the full array of services delivered to customers in a manner that is efficient, effective and holistic. In, FFY 2013 leadership training was delivered to over seventy–five staff from all of the partner agencies. One Stop Certification– The One–Stop Certification team is made up of all partners representing one–stop services. The Core Team completed Standards for Employer Services, Jobseeker Services, Management Standards and Affiliate Center Standards that were approved by the KWIB and are being implemented. In FFY 2013, base standards were adopted and self–assessments were completed. Technical assistance grants were approved for eight workforce areas. Business Services Redesign– This effort will create a proactive, solutions–based approach to the services offered to the business community. This initiative will promote a coordinated effort toward service delivery in a strategic manner. The objective is to maximize business services

resources by aligning them with economic development goals around business development. We will also work with the Business Service Teams to provide the Kentucky Autism Council training.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

As indicated previously, each GOAL and Priority has various Strategies intended to move the agency towards the achievement of the GOAL and Priority. Each Strategy will have various specific tasks which will lead to the accomplishment of the Strategy and overarching goal. Each task will have an estimated time frame, a staff member assigned to the task and progress will be checked on a monthly basis during agency leadership team meetings. Priority for funding will be given to items on the strategic plan. Progress will be reported to the agency SRC on a quarterly basis.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

OVR will use innovation and expansion funds to support the following activities:

To support the Statewide Council for Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction;

To conduct marketing activities for KYOVR, including the printing of brochures and other materials and the salary of a marketing director;

To provide paid internships for students from the University of Kentucky Master's in Rehabilitation Counseling Program;

To support summer transitions program specifically designed for high school rising juniors and rising seniors who have been diagnosed on the Autism Spectrum who have expressed an interest in transitioning into higher education, as Pre–Employment Transition Service activity. It is anticipated the tasks identified in the current plan would provide expansion and innovation related to Supported Employment, partnerships with business, access to Assistive Technology, asset development programs and community rehabilitation programs. The plan will also focus on innovation related to counselor training, staff recruitment, and quality assurance. OVR has been involved in a number of initiatives and projects in an effort to expand and improve services to individuals with disabilities. There are other projects that are just beginning that should also help expand and improve services. Past, current and planned projects and efforts include:

A project funded by the Institute for Community Inclusion at the University of Massachusetts to develop quality standards to include in the performance plans of front–line vocational rehabilitation counselors. These standards are designed to improve the quality of services provided to consumers. The standards that were developed were incorporated into VR counselor performance plans beginning in federal fiscal year 2014.

An effort to incorporate asset development and financial education strategies into the vocational rehabilitation process. The effort has included several facets. A statewide Assessment Development Summit for Individuals with Disabilities was conducted in Louisville in October of 2012 with the

Statewide Independent Living Council (SILC) and various other partners, followed by four regional summits in Owensboro, Bowling Green, Ashland, and Covington. Agency staff has received numerous training opportunities related to asset development in the last few years. KYOVR has partnered with Louisville Metro government to make their financial empowerment services more inclusive of individuals with disabilities. KYOVR has striven to make benefits planning an integral part of services to individuals who receive Social Security benefits because of disability, instituting a benefits planning fee–for–service that has been well utilized by VR counselors for their consumers. KYOVR has developed a Financial Resources Directory for use by staff and consumers. Agency staff has collaborated with the SILC on an Individual Development Account (IDA) program for car ownership.

A research study funded by the Institute of Community Inclusion (with funds from the Rehabilitation Services Administration) to test the effectiveness of an intervention with 500 individuals who receive SSDI only in obtaining employment at substantial gainful activity (SGA) level. The intervention involves enhanced pacing of services and the early involvement in the process of a team approach that includes the VR counselor, a job placement staff person and a Certified Work Incentive Coordinator. The 500 participants in this study will be enrolled from May 1, 2015, through April 30, 2016.

Participation, along with four other state VR agencies, in a study being conducted by the University of Richmond and George Washington University on the Return on Investment (ROI) of vocational rehabilitation services. The results of the study can hopefully be used to help agency leadership make decisions on where to focus services and resources.

The funding of establishment grants to provided job placement and supported employment services to underserved populations and in underserved areas of the state. Five projects were established in federal fiscal year 2014. Five more projects were recently started with funds from the Division of Behavioral Health to provide supported employment services specifically to individuals with severe mental illness and/or substance abuse. to serve individuals

A project recently funded with $20,000 from the Kentucky Office of Autism to provide disability awareness training to Kentucky Career Center business service teams who can, in turn, train employers.

Two efforts spearheaded by the KATS Network, the state assistive technology project within OVR, to increase access to assistive technology. One, Project CARAT (Coordinating and Assisting the Reuse of Assistive Technology), refurbishes and redistributes durable medical equipment to individuals who need it. The other, Project SHARP (Statewide Hearing Aid Assistance and Reuse Program) assist low income individuals in obtaining hearing aids.

A federal Career Pathways grant recently received by the Kentucky Office for the Blind (OFB) from the Rehabilitation Services Administration. OVR will collaborate with OFB on assisting consumers in three career pathways (healthcare, manufacturing, and information technology) in two of Kentucky Career Centers, Kentuckian Works in the Louisville metropolitan area and the Eastern Kentucky Concentrated Employment Program (EKCEP) in rural Appalachia.

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.

Each overarching GOAL and Strategy is associated with a barrier identified in the state's Comprehensive Statewide Needs Assessment. The tasks identified will attempt to address barriers related to equitable access to and participation of individuals with disabilities, including transition students and transition youth. We will provide increasing and better quality services and communication to consumers, especially transition students and youth, provide accurate and timely information related to work incentives and long–term supports for Social Security recipients, increase and improve job placement options and opportunities for persons served, strengthen and expand competitive integrated employment opportunities by implementing Section 511 of WIOA, improve programmatic and physical accessibility to workforce investment system partners and Career Centers, communicate and cooperate with workforce partners on accountability measures discussed in Section 116 of WIOA and seek to meet the standards of WIOA, expand opportunities for increased services, such as Supported Employment, provide options for transportation and information related to medical services available to consumers, and provide a more timely and efficient process for accessing OVR 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.

1. Vocational Rehabilitation Goals–

Goal I: To continuously improve customer service. We are always doing customer satisfaction surveys for the center and for our career centers. We have more offices that are now housed in career centers rather than stand–alone offices, and more career center certifications have been completed. We are still giving out loans with KATLC and utilizing CARAT and SHARP for assistive technology services for our consumers.

GOAL II: To provide Pre–employment transition services (Pre–ETS) to Transition students (ages 14–21) and other transition services to Youth (ages–16–24) to assist them with transition from high school into competitive integrated employment or post–secondary training. Our OVR counselors are currently providing Pre–ETS services to Transition Students and keeping track of what activities they complete from the list of activities. We discussed the process of getting youth into competitive integrated employment as a marathon and not a relay race where we rush them from place to place. At the very least, we need some steps in between to help them better. The Carl D. Perkins Vocational Training Center will implement an online class as orientation for those students who are entering the center to improve their preparation for the Behavior Intervention and Supports Technique system that is in place. The Pre–ETS activities may be part of this change too. The staff has been trained on Pre–ETS, and we are providing funding to the regional educational cooperatives to provide localized pre–employment transition service trainings via conferences/workshops to all transition students with disabilities across their regions, including underserved populations. By partnering with the cooperatives across the state, we are ensuring all students have an opportunity to participate without regard to their eligibility status as a consumer. With WIOA we can now provide services to ‘potentially eligible’ students so prior to their application we may still provide them post school activity information, including employment, in groups prior to their exit from high school. We have even made a video that can be used for outreach to large groups of students and viewed online to inform them about OVR services. We are also receiving foster care referrals from the Department of Health and Family Services and sending them to our various career centers around the state for application for OVR services.

GOAL III: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities. We have written and passed a new policy on Benefits Planning and Analysis. A fact sheet has been developed for resources in benefits planning that will be given to OVR consumers at time of eligibility or later in the case if they begin receiving Social Security benefits. We are also 8 months in on the SGA project, which gives benefits planning to individuals with SSI and

seeks to help them gain competitive integrated employment. OVR services are completed in an expedited fashion in order to insure quicker service provision.

GOAL IV: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment. We have changed our policy to include competitive integrated employment as a goal instead of just competitive employment. We plan to work with the school systems on this as well.

GOAL V: To implement Section 511 of WIOA. We have team together to look at the best way of implementing this process. We will target students who are not usually referred to OVR while in school, but would have been sent straight to the Sheltered Workshop once out of School, for an early referral to OVR to go through the VR process. Youths out of school but younger than 24 will be referred to an OVR counselor to go through the VR Process. Letters will go out to all 14C Programs in Kentucky in the spring of 2016 explaining section 511 and VR's involvement in the process. Each 14C will be visited by one of the 3 SE Consultants. Educational groups will be set up for all the current employees of the 14C facilities about career exploration and community integrated employment. These will be done every 6 months for the 1st two years and annually thereafter.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Goal I: To continuously improve customer service.

IMPEDIMENTS: The interest rate will be rising on KATLC loans.

GOAL II: To provide Pre–employment transition services (Pre–ETS) to Transition students (ages 14–21) and other transition services to Youth (ages–16–24) to assist them with transition from high school into competitive integrated employment or post–secondary training.

IMPEDIMENTS: We find that the foster care referrals tend to move from place to place quickly, so we have to re–refer them to another office in their new area. It may take time to get an application completed. We have had cursory meetings with our state foster care partners to address this concern and have discussed plans to provide workshops/trainings in the future.

GOAL III: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities.

IMPEDIMENTS: The SGA Project is almost two–thirds of the way done at this point. The WIPA Program for one half of the state is just now up and running.

GOAL IV: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment.

IMPEDIMENTS: No impediments at this time

GOAL V: To implement Section 511 of WIOA.

IMPEDIMENTS: No impediments at this time

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.

GOAL I: Provide SE training for Counselors and Branch Managers.

This training is ongoing for all staff by Central Office and at statewide trainings.

GOAL II: Increase utilization of Supported Employment Services.

There will be a CWTP Supported Employment consulting fee so transition students can have a seamless transition into competitive integrated employment.

GOAL III: Recruit more Supported Employment providers.

OVR will add at least 7 providers in different parts of the state and will look at any and all funding sources to achieve this goal in areas that are unserved or underserved.

GOAL IV: Seek alternative methods for providing and funding long term support.

OVR continually monitors the waiver system and encourages the utilization of Michelle P and the SCL waivers.

GOAL V: Continually monitor CRP quality and compliance.

The monitoring of the quality of progress notes is encouraged by OVR staff.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction.

Fee schedules are consistently looked at and adjusted as required.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

GOAL I: Provide SE training for Counselors and Branch Managers.

IMPEDIMENTS: No impediments at this time

GOAL II: Increase utilization of Supported Employment Services.

IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students.

GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: There is a need for more funding to add providers to parts of the state where there are no providers or very few.

GOAL IV: Seek alternative methods for providing and funding long term support.

IMPEDIMENTS: No impediments at this time

GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction.

IMPEDIMENTS: No impediments at this time

GOAL I: Provide SE training for Counselors and Branch Managers.

IMPEDIMENTS: No impediments at this time

GOAL II: Increase utilization of Supported Employment Services.

IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students.

GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: Finding funding to do this

GOAL IV: Seek alternative methods for providing and funding long term support.

IMPEDIMENTS: No impediments at this time

GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction.

IMPEDIMENTS: No impediments at this time

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

The ability to capture the performance accountability measures common to all Kentucky Workforce Investment agencies is currently a work in progress. The Department for Workforce Investment (DW), in partnership with a current federal grant, is testing the potential implementation of software that may have the capacity to capture all customer flow information within DWI. The nationally recognized software is currently being customized to the specific needs of DWI agencies and training has staff has been implemented. Also being tested is the capacity of the software to allow for totally paperless consumer files, the ability of the customer/job seeker to access their information from a website for the purposes of updating information, providing information required by the various agencies and having direct access to employment opportunities in their area. DWI will

continue to pilot the use of this system with the ultimate goal of transferring all DWI agencies to a common casework system within two years.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

OVR utilized funds reserved for innovation and expansion activities for the following purposes:

To support the activities of the Statewide Council on Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction;

To support the activities of the Kentucky Statewide Independent Living Council (SILC), including all meeting expenses and the salary of a part–time SILC Coordinator (note: the SILC is currently in the process of transitioning from OVR to the Department for Aging and Independent Living (DAIL);

To conduct marketing activities for KYOVR, including the printing of brochures and other materials and the salary of a marketing director;

To provide paid internships for students from the University of Kentucky Master's in Rehabilitation Counseling Program;

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.

(1) Supported employment offers more than just the assistance needed to find and learn a job. It provides the necessary ongoing support to help an individual maintain employment. Kentucky has identified 85 supported employment providers throughout the state. Individualized strategies are also utilized to arrange for supported employment services outside of "organized programs" when necessary (i.e. coworkers at the job site may provide support paid for with various resources; independent supported employment specialists may be hired, etc.). More than three–fourths of Kentucky's 120 counties have access to supported employment programs. The lack of accessible and dependable transportation often limits access to supported job opportunities. Extended support services are provided by each local supported employment program utilizing funds from a myriad of sources, including the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) , the Kentucky Council on Developmental Disabilities, city and county government, United Way, fund–raising campaigns, PASS funding, Medicaid, Supports for Community Living Waiver funds, Michelle P waiver funds and other resources. Most programs utilize a combination of funding sources for the provision of extended support services. Natural supports are encouraged (such as co–worker, peer, etc.) and are carefully monitored by the supported employment provider. Kentucky OVR's partner, the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), has developed a new Medicaid Waiver that would more adequately fund supported employment services for people with developmental disabilities. The new Supports for Community Living Waiver 2 (SCL2) was rolled out during the 2014 calendar year. It has increased the fee structure and modified the service definitions for supported employment. Kentucky's supported employment programs have primarily served individuals with intellectual disability and individuals with chronic mental illness. This is largely due to greater availability of funding for extended support for these two groups. Individuals with other disabilities are served if funding for extended support is available and if the supported employment provider has the expertise to meet that individual's needs for employment training and support. Kentucky has become the 12th state to participate in the Evidence –Based, Johnson and Johnson sponsored, Supported Employment Initiative via Dartmouth College. The goal is to demonstrate the effectiveness of the Individualized Placement and Support (IPS) model for supported employment for people with serious mental illness throughout Kentucky. In July 2011, four sites in Kentucky began pilot site implementation. In 2012, two sites were added. In 2013, three sites were added. In 2014 BHDDID required that all Community Mental Health Centers implement the IPS program as one of the four evidence based practices required in their state plan. A Statewide Coordinator, employed through the University of Kentucky, Human Development Institute, oversees the pilot sites. A second coordinator was hired in late 2013. The Office of Vocational Rehabilitation and the Kentucky Division of Behavioral Health collaborate as Team Leading agencies for the project. The Kentucky Association for Persons in Supported Employment (KY APSE) has been successful in creating greater supported employment awareness among the legislators in Kentucky's General Assembly. These awareness/advocacy efforts will continue with the goal of increased statewide funding allocations and possible supported employment legislation to create a more solid funding base for extended services. QUALITY Pursuant to federal regulations, supported employment services provided by approved vendors must contain these elements: 1) competitive work; 2) integrated work settings; and 3) provision of extended support services. In order to ensure that supported employment services are provided

according to regulation, the following guidelines must be met: 1.Services will be provided for individuals with the most significant disabilities who have a documented need for supported employment services, including extended support services. 2. Work will be performed on a full–time or part–time basis. Each individual in supported employment and his/her OVR counselor shall jointly establish in the IEP IPE an appropriate goal for the number of hours per week that will maximize the individual's vocational potential. 3. Work must take place in integrated settings where most workers do not have disabilities. 4. Wages must be in compliance with Fair Labor Standards Act. Each supported employee will have a goal of earning at least minimum wage. Kentucky's supported employment providers adhere to the following principles: •The supported employment concept assumes that all persons, regardless of degree of disability, have the capacity and should be afforded the opportunity to participate in real employment with appropriate support. •Emphasis is placed on recognizing and maximizing opportunities in the workplace rather than just providing skills training. •The purpose of the program is employment with all of the general expectations of a job such as wages, job security, and performing meaningful work. Job Development, rather than Job Placement is the focus. •Ongoing, extended supports are tailored to meet each individual's needs. •Individuals are offered choices in the selection and maintenance of jobs. Decisions about appropriate services are made jointly with the individual and/or the family, the supported employment provider, and the VR counselor. •Integration on the job site is recognized as necessary and important. Opportunities are available for non–work interactions with non–disabled workers. Interactions with non–disabled co–workers are a part of regular job responsibilities. "Natural supports" are developed and emphasized. •Extended services are proactive, not merely reactive. For example, plans are developed with individuals in anticipation of career advancement rather than merely waiting for a job loss, lay off, company closing, etc., before seeking other opportunities. The primary staff responsible for providing supported employment services are "job coaches," "job trainers," and/or "supported employment specialists." Positions are both full and part–time, depending on the size and service territory of the local provider. Training and Consultation for staff is provided by the Supported Employment Branch according to the needs of the provider. Supported Employment Training Project core values training is required for all vendors in the SE Outcome–based Reimbursement System. This is funded collaboratively using Division of Developmental and Intellectual Disabilities/OVR dollars and is implemented by the Supported Employment Training Project at the University of Kentucky Human Development Institute. Technical assistance is also provided by the Supported Employment Branch staff. A resource manual and other policies and guidelines memorandum were developed for vocational rehabilitation counselors. These are periodically revised and updated so that staff may better understand the rehabilitation process in regard to supported employment. This is a useful tool for supported employment providers as well. Seminars, workshops, and training/awareness sessions are arranged and/or participated in throughout the state with various agencies and organizations that can assist with funding, conversion, employment, and other related supported employment issues. Meetings of this nature are regularly held with such groups as The Arc of Kentucky, the Kentucky Commonwealth Council on Developmental Disabilities, Community Mental Health Centers, Kentucky Consortium for Values Based Training, KY APSE, Kentucky Rehabilitation Association and others. The quality of supported employment outcomes is assessed individually. Such issues as Consumer satisfaction, earnings, benefits, employee and employer satisfaction, the degree of integration, availability of dependable transportation, co–worker support, socialization, work environment, and provision of support services are important. On a regular basis, the Supported Employment Branch staff conducts technical assistance visits with each provider for quality assurance purposes. As well, each supported employment provider has established on–going strategies to measure customer satisfaction. EXTENT As a part of the eligibility determination process for Vocational Rehabilitation services, supported employment will be considered as a possible vocational outcome for individuals with the most significant disabilities. The agency is now in an order of selection, serving individuals with the Most Significant Disabilities in Category 1 first and then those in categories 2 and 3.. The Office of

Vocational Rehabilitation will be able to provide supported employment services through approved vendors and/or individual providers. These services include: A. Development of a Person Centered Employment Plan (PCEP) with recommendations for job–development; B. Individually designed job development services, including assistance with job carving, reasonable accommodation, technology and/or other support strategies; C. Intensive on–the–job skills training and other support services provided by supported employment specialists and/or co–workers and employers; D. Time–unlimited follow–up services (including regular contact with employer, trainee, parent, guardian, or others deemed appropriate); E. Other services needed to support the individual, such as travel, training, employment advocacy, non–employment advocacy, and counseling; F. Development of a Long-Term Support Plan, which includes an outline of the extended support to be provided, and a plan for review and update. The amount, frequency and type of services will be based on the needs of each individual once eligibility is established for supported employment. If off–job–site monitoring is determined to be appropriate, the monitoring, at a minimum, will consist of two meetings per month with the individual and one meeting each month with the employer. Extended long–term follow–up support services will be the responsibility of other relevant state agencies, private organizations, and other sources of funding. These services will be considered and planned for prior to an individual receiving the services listed above. Vendor ships are not approved unless assurance is made of the availability of extended support services. If extended services are not fully assured at the onset of the IPE, the Vocational Rehabilitation counselor and the VR Supported Employment Branch staff will participate with the Provider in making arrangements for these services before the Vocational Rehabilitation case is closed.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Transition from Title VI, Part B funds to various other individually–determined funding sources begins 30 days post–placement in the job. The transition to extended services funding is completed (generally) after 60 days on the job. Monitoring of services continues for a minimum of 30 additional days to assure that the job is stable. Extended services then continue by the Provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Department of Workforce Investment**

Name of designated State agency **Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Buddy Hoskinson**

Title of Authorized Representative: **Executive Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 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 **Kentucky Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Buddy Hoskinson**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code.

Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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 **Kentucky Office of Vocational Rehabiliation**

Full Name of Authorized Representative: **Buddy Hoskinson**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **Yes**

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: **Yes**

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

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,

I. 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
II. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

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:

I. THE COMPREHENSIVE ASSESSMENT OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES CONDUCTED UNDER SECTION 102(B)(1) OF THE REHABILITATION ACT AND FUNDED UNDER TITLE I OF THE REHABILITATION ACT INCLUDES CONSIDERATION OF SUPPORTED EMPLOYMENT AS AN APPROPRIATE EMPLOYMENT OUTCOME, IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 606(B)(7)(B) OF THE REHABILITATION ACT

II. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

_____

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The agency's State Rehabilitation Council (SRC) is established under the Kentucky Revised Statutes 163.470 and meets the requirements of 34 CFR 361.29. The SRC is a valued partner with the Office for the Blind (OFB) participating in the administration of the Vocational Rehabilitation Program under Title I of the Rehabilitation Act of 1973, as amended. The SRC meets quarterly to review policies, program information, and other pertinent issues.

As a part of the agency's commitment, OFB provides funding support for the SRC to be used in reimbursement of expenses to council members, publication of the SRC Annual Report and conducting the Consumer Satisfaction Survey through the University of Kentucky. In FFY 2014, the budget was $73,800. In FFY 2015 the budget was $82,100. The projected budget for FFY 2016 is $43,300. The reduction is due to a budgetary measure splitting the salary for the SRC staff liaison with the Executive Director's Office.

OFB works with the SRC and makes every effort to seek input for needed improvements and recommendations. This occurs through formal and informal communication, as well as the committee work of the members. OFB works in partnership with the SRC in ensuring that individuals served receive the needed services and supports to gain independence through employment and increased skills acquisition.

The State Rehabilitation Council and its subcommittees guide OFB operations. The committees are: Executive, Bylaws and Nominating, Business and Employment Opportunities, Government and Public Relations, Planning, and Consumer Services.

OFB staff gave performance and program operation updates at each SRC quarterly meeting in FFY 2015. OFB reported its performance measures on the standards and indicators, satisfaction survey, numbers served and outcomes for the various programs offered to consumers for 2015, at the October 23, 2015 quarterly meeting. The University of Kentucky Research Program and the Human Development Institute conducted the 2014 Satisfaction Survey and due to scheduling issues were unable to present the results of that survey to the SRC until their October 23, 2015 meeting. The executive summary of results however, was sent to all members on December 12, 2014 and the complete report was distributed in February of 2015.

Input was received and recorded in the written minutes of the committee reports, and of the council, that met on October 24, 2014, January 23, 2015, April 24, 2015, September 24, 2015, and October 23, 2015. The council normally holds its quarterly meetings in January, April, July and October to coincide with the federal reporting quarters. This ensures that they get the most current reporting

information at each meeting. Due to lack of a member quorum, the July 2015 meeting was rescheduled and held September 24, 2015.

SRC Recommendation 1 Order of Selection

OFB conducted statewide public hearings in FFY 2015 to provide consumers, staff, advocates and other interested individuals, the opportunity to share their comments regarding the annual revisions to the State Plan to be in effect from October 1, 2014 through September 30, 2015. The closing of service categories two and three (four was already closed) under the current Order of Selection and changes to the Training Assistance policy were agenda items addressed at each hearing. Copies of the Order of Selection priority categories were made available on the OFB website prior to the hearing for review. The hearings were held in July and August 2015 in Lexington, Covington, Louisville, Paducah and Pikeville and Bowling Green.

Information on changes of the potential closing of additional categories under Order of Selection was sent out to Council members in advance of the July 24, 2015 quarterly meeting. The upcoming public hearings were to be discussed at the meeting. However, the meeting was cancelled due to lack of a member quorum. A statewide press release notified the public of the hearings, noting the times and locations. All members were invited to attend the public hearings and input was gained from those who attended.

In 2015, agency staff and the SRC reviewed, on a quarterly basis, data on numbers served, number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories. Based on fiscal resources, the decision was made to close categories of service two and three, effective October 1, 2015. During FFY 2014, budgets and fiscal resources were reviewed monthly by agency management. Information was presented to the State Rehabilitation Council at each quarterly meeting.

SRC Recommendation 2 for the State Plan Goals and Priorities

The full Council discussed the methods for obtaining input for the 2015 Comprehensive Statewide Needs Assessment. On August 19, 2015 all Council members were sent a short survey to complete to ensure SRC input was gathered for the Needs Assessment. Information gained from the assessment was used for the planning and formulating of goals and strategies submitted in the 2016 State Plan.

The Planning Committee reviewed the input received for the 2016 State Plan in relation to the goals, strategies and innovation and expansion activities existing in the plan. At the October 23, 2015 meeting, a presentation was made to the full SRC and the committee made a recommendation to the SRC to accept the following proposed goals for the FFY 2016 State Plan.

Discussion was held with a suggestion made for an expansion of one of the strategies. A motion was made to send it back to the Committee for re–wording and that the vote be tabled till the January 22, 2016 meeting.

Due to inclement weather the meeting was rescheduled to February 19, 2016. Based on the input received, there were six concise and measurable goal areas set. These goals were based on the Statewide Comprehensive Needs Assessment, Monitoring Reports, the federal Standards and Performance Indicators, real time data through the Case Management System, strategic planning

and other sources of information. The SRC Planning Committee and the Kentucky Office for the Blind have recommended and approved the following Goals at the February 2016 meeting.

1. To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain, or regain competitive employment.

2. Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth.

3. KBE will provide full–time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business.

4. Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

5. Enhance and build Office for the Blind internal and external collaborative relationships and Partnerships to advance opportunities for individuals to progress toward independence and employment.

6. To engage youth, parents, high schools, and other transition specialists in exploring and planning career choices that connects to a full range of post–secondary options for training, career development, and employment. At the September, 24 2015 meeting, the SRC made a recommendation that a report be given at each quarterly meeting on the services of the Accessible Electronic Information Service Program, administered by NFB Newsline ®, for which OFB funds $43,300.

SRC Recommendation 4 Annual Report

The Planning Committee recommended at the October 24, 2014 meeting that the theme for the Annual Report be, “Beyond All Limits”. The full SRC approved the theme. The 2014 Annual Report contained facts that informed the public about OFB and the SRC, such as 2014 program statistics, agency budget update, 2015 State Plan Goals and Priorities, the 2013 Satisfaction Survey results, consumer success stories, employer stories and contact information for the agency. The Annual Report was sent out electronically to all SRC members for their review prior to publication. It was also made available to the public on the OFB website.

SRC Input into CSPD

The SRC had the opportunity to review and comment on the development of plans, policies and procedures for CSPD. There were no changes to the current policies and procedures for CSPD. The CSPD section of the 2015 State Plan was sent to them for review and comments in January.

SRC Response to the WIOA NPRM

The executive director kept the SRC informed and updated on WIOA changes and the NPRM and asked for their comments. Members expressed concern over the 15 percent spending on PETS. They submitted comments individually to RSA during the comment period. The executive director also explained about the four–year unified State Plan and asked for several members to volunteer

for the planning team. OFB accepted and had the same concerns as the SRC with regard to the allocation of 15 percent of budget to PETS and shared that in their NPRM comments.

Government and Public Relations Committee

The Government and Public Relations Committee are given quarterly updates on marketing and outreach events by the OFB staff. They reported these out to the full SRC at every meeting. At the January 23, 2015 meeting, the Government and Public Relations Committee reported that cuts in state funding, would impact the amount of matching funds received by the agency from the federal government. They recommended that SRC members start contacting their legislators to request additional funding for the OFB enable them to draw down full federal funding. SRC Planning Committee

The planning committee was integral in recommending the State Plan Goals and Priorities, as well as making recommendations on the Statewide Needs Assessment and the Consumer Satisfaction Survey process. They gave input at the October 24, 2014 meeting and the January, April and September meetings in 2015. In August 2015, they sent out a survey to the SRC to gain their input for the Needs Assessment. They also were involved with the Public Hearings to give consumers and the public the opportunity to comment on annual revisions to the State Plan for 2016, Order of Selection and the Training Assistance Policy.

Satisfaction Survey Results

A copy of the 2014 Satisfaction Survey Executive Summary, as well as the survey highlights, were distributed to SRC members, via email, prior to the October 23, 2015 SRC meeting, when a representative from the University of Kentucky Human Development Institute, delivered a presentation for the SRC on the Survey results. It was reported that a total of 194 participants responded which was an 86.6 percent response rate. Overall, the results of the study indicated that consumers expressed high degrees of satisfaction with their experiences. Nearly 85 percent of all participating consumers rated services they received through OFB as a 1 or 2, on a five point scale where 1 = “excellent” and 5 = “poor”.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL’S INPUT AND RECOMMENDATIONS; AND

In response to the SRC’s recommendation, OFB held public hearings in July and August 2015 in Lexington, Covington, Louisville, Paducah and Pikeville and Bowling Green to gain input on the State Plan and the closing of service categories under Order of Selection. The OFB leadership was transparent in communicating the agency’s financial status to the council and advocacy organizations’ leadership who were supportive of the decision to close categories. Based on a thorough analysis of OFB’s budget, through an administrative cost review by the executive director, executive leadership team, and the State Rehabilitation Council, as well as public input from the public hearings, priority categories two and three were closed on October 1, 2015. OFB accepted the SRC recommendations for gaining input for the State Plan. As specified by the guidelines of the assessment project plan, a number of data sources were used for this year’s report. Other sources were utilized as well. The SRC members were fully engaged in the 2015 Comprehensive Needs Assessment process, and as time and scheduling allowed, some were able to participate in the focus groups. Members helped plan, collect data, review findings and develop recommendations. The members were given a presentation by staff of the results of the Needs Assessment. OFB requested and accepted their input and recommendations for the setting of goals and priorities from

the Needs Assessment for the State Plan. The full SRC voted and approved the goals for this plan at the February 2016 quarterly meeting. OFB accepted the recommendation and arranged for a representative from NFB Newsline® to make report at each quarterly meeting. The first report was given at the October 23, 2015 meeting. OFB accepted the recommended theme for the 2014 SRC Annual Report and worked with the SRC members on compiling the report assuring that consumer stories would be featured in the report.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

OFB did not reject any of the Council's input or recommendations.

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;

OFB is not requesting a waiver of statewideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

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.

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;

OFB maximizes all available resources in collaboration with all partners and agencies in assisting individuals who are blind and visually impaired to achieve integrated competitive employment.

The agency will assure that the governor, in consultation with other appropriate agencies, will have in place interagency agreements or other mechanisms for interagency coordination between any appropriate public entity including the state Medicaid Program, public institutions of higher education and a component of the statewide workforce investment system. This will ensure the provision of vocational rehabilitation services described in subparagraph (A) other than those specified in paragraph (5) (D), and in paragraph (1) through (4) and (14) of Section 103 (a) of the Rehabilitation Act Amendments of 1998, that are included in the individualized plan for employment of an eligible individual, including the provision of such vocational rehabilitation services during the duration of any dispute.

Such agreements shall include the following:

A description of a method for defining the financial responsibility of a public entity for providing such services, and a provision stating the financial responsibility of such public entity for providing such services.

Information specifying the conditions, terms, and procedures under which the office shall be reimbursed by other public entities for providing such services.

Information specifying procedures for resolving interagency disputes under the agreement.

Information specifying policies and procedures for public entities to determine and identify the interagency coordination responsibilities of each public entity to promote the coordination and timely delivery of vocational rehabilitation services (except those services specified in paragraph (5)(D) and in paragraphs (1) through (4) and (14) of Section 103 (a) of the Act.

Responsibilities of Other Public Entities

If any public entity other than the office is obligated under Federal or State law, or assigned responsibility under State policy or under regulations set forth in the 1998 Amendments to the Act, to provide or pay for any services that are also considered to be vocational rehabilitation services (other than those specified in paragraph (5) (D) and in paragraphs (1) through (4) and (14) of Section 103 (a), such public entity shall fulfill that obligation or responsibility, either directly or by contract or other arrangement.

If a public entity other than the office fails to provide or pay for the services for an eligible individual, the office shall provide or pay for such services to the individual. The office may claim reimbursement for the services from the public entity that failed to provide or pay for such services. Such public entity shall reimburse the office pursuant to the terms of the interagency agreement or other mechanism described in the Rehabilitation Act Amendments of 1998, according to the procedures established in such agreement or mechanism pursuant to the established conditions, terms and procedures of reimbursement.

Signed agreements between respective officials of the public entities that outline and identify the responsibilities of each public entity relating to the provision of services shall be in place.

OFB developed collaborative relationships with several agencies and entities within and without the statewide workforce investment system both private and public agencies and programs. OFB works cooperatively with the following agencies to avoid the duplication of services and enhance the service delivery process for consumers who are blind and visually impaired.

173 school districts statewide consisting of 1,233 schools inclusive of 564 Visually Impaired Students and 18 Deaf Blind ages 3–21.

Nine special education cooperative networks across the state created to enhance educational opportunities for Kentucky's children providing technical assistance, training; professional development, specialized services and research.

Department of Behavioral Health, Intellectual and Developmental Disabilities through their 14 Community Mental Health Centers for supported employment.

The correctional system in assisting consumers with visual disabilities who are offenders.

The Kentucky Business Leadership Network, which is affiliated with the U. S. Business Leadership Network, is to promote enduring partnerships between business and industry and agencies that provide vocational support services for Kentuckians with disabilities (currently inactive but plans are place to reestablish the network).

Community rehabilitation providers in the provision of employment services.

Kentucky Association of Persons in Supporting Employment first whose mission is to "promote the improvement of Supported Employment services for persons with significant disabilities experiencing barriers to employment through education, advocacy, collaboration, policy change, elimination of barriers, empowerment and community participation". OFB has a staff person serving on the State APSE board.

Department of Medicaid Services

Department of Community Based Services–Public Assistance Programs

Local Ophthalmologists and Optometrists and their respective professional associations in accessing needed services for consumers. These are key collaborative relationships that OFB has established. Staff attend state conferences, distribute marketing materials and maintain working relationships with local offices and the area ophthalmologists and optometrists (patient referral and services).

American Printing House for the Blind, the world's largest source for adapted educational and daily living products.

Kentucky School for the Blind, K–12 public school serving Kentucky students who are blind and visually impaired; Short Course program (one to 12 weeks) of specialized instructional is also available to students throughout the school year;

Kentucky Federation of the Blind an advocacy organization that improves blind people's lives through advocacy, education, research, technology, and programs encouraging independence and self–confidence. OFB is involved through representation at their state and national conventions and representation of this advocacy organization sit on the State Rehabilitation Council.

Kentucky American Council of the Blind strives to improve the wellbeing of all blind and visually impaired people by serving as a representative national organization of blind people. OFB is involved through representation at their state and national conventions and representation of this advocacy organization sit on the State Rehabilitation Council.

Local Chambers of Commerce –OFB staff represent the agency across the state on local chamber organizations

International Centers specializing in advocacy and services to the foreign born and serve refugees, asylum seekers, and immigrants (Louisville, Lexington, Bowling Green).

The Veterans Administration– OFB works collaboratively with the VA in planning for needed services due to an increase in visual impairments as a result of injuries associated with the war in Iraq and Afghanistan.

Area Employers in the development of working relationships increasing the number of successful employment outcomes for consumers

University of Kentucky Human Development Institute is a University Center of Excellence established by federal legislation to promote team–based approaches to provide services for individuals with disabilities and their families.

Other community based organizations such as Health clinics, HUD, Diabetes Foundation, The Lions Club and other community resources for consumers

The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

Visually Impaired Preschool Services offering service to infants, toddlers, and preschoolers that are visually impaired; and to maximize each child's developmental potential through direct services, advocacy, and community education

Kentucky Outreach and Information Network (KOIN)– Kentucky Cabinet for Health and Family Services/Department of Public Health planning committee for communication and message distribution to special populations during a public health emergency or other disastrous event.

The Kentucky Functional Needs Collaborative (KFNC) is a project of the Kentucky Department of Public Health. Their goal is to ensure an effective public health emergency response system in Kentucky for populations with functional and access needs.

KY–SPIN is the statewide Parent Training and Information (PTI) center that provides training, information and support to people with all types of disabilities (birth through 26 years old), their parents and families, and the professionals who serve them.

Social Security Administration: Information Exchange Agreement to receive data regarding consumers' work history.

The Office works in coordination with the Statewide Independent Living Council (SILC). A member from SILC sits on the Agency State Rehabilitation Council for the Blind. The Office for the Blind Independent Living Program Manager represents the Agency on the SILC. OFB staff work collaboratively with the Independent Living Centers across the state in the service delivery process for consumers with visual impairments.

In the summer of 2009, the Kentucky Workforce Investment Board began a process to develop a strategic plan to transform Kentucky's workforce development system to meet the challenges of a changing global economy and address the most immediate concerns of the current financial crisis. Kentucky's transformational objectives include 25 initiatives designed to form a user friendly, customer–centric system that brings alignment to education, economic development and workforce activities. The WorkSmart Kentucky Plan lays out the foundation to improve operational collaboration at both the state and local levels. The action steps included in this plan are organized as follows:

System Transformation – These tactics are common to several of the committees, thus are designed to help achieve multiple goals with the same action item. These actions represent some of the best opportunities to impact the system as a whole.

Education Alignment – Tied to the goal of aligning the state's workforce and education systems, these tactics are focused on improving training education attainment.

Economic Development Alignment – Action steps designed to leverage state and local economic development and workforce resources are the focus.

System Simplification– Opportunities to create a simpler, more useable system are identified.

Customer Service – Steps to assure the system meets the needs of both employer and job seeker/employee customer bases are presented.

Over the past three years the Kentucky Workforce Investment Board has seen unprecedented successful implementation of the strategic initiatives, due in large part to the commitment of project champions, managers, the Education and Workforce Development Cabinet, local workforce investment boards, and partner organizations, agencies and cabinets. OFB has been committed to this process and is an active partner in the implementation of the initiatives. OFB is one of three workforce agencies in the Cabinet.

In August of 2013, the Kentucky Workforce Investment Board voted to update the WORKSmartKentucky Strategic Plan earlier than originally anticipated due to the fact that a large number of strategic initiatives had been or were being implemented. The board's decision was based on the fact that changes were occurring at every level of the public workforce development system at a rapid pace and an update would provide an opportunity to check on progress and realign strategies with changing economic and social forces. The updated plan is designed to be used in conjunction with the original WORKSmart Kentucky strategic plan.

Since the implementation of the WorkSmart Kentucky Strategic Plan, a priority has been developing unified and collaborative approach to service delivery in our business services model. It is critical that all the government agencies working to meet the employment needs of business and industry

work together taking a solutions–based approach to meeting their needs. This is being done through regional Business Services Teams.

Reciprocal referral services with the Office of Employment and Training and the Office of Vocational Rehabilitation: OFB, OET and OVR have established reciprocal referral services which allow for more efficient services to individuals with disabilities. OFB and OVR have a memorandum of agreement and jointly plan activities to improve services in the state for individuals with multiple impairments, including individuals with dual sensory loss. The Central Office administrative functions for these three workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners. The office participates in the ten Workforce local boards throughout the state as well as serving on different committees of those boards.

For more details regarding the Workforce initiatives in Kentucky see the Strategic Elements Section of this Combined State Plan.

The office has implemented an information and referral system to ensure that individuals who have visual disabilities will be provided accurate vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for, securing, retaining, or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them.

Appropriate referrals made through the system shall:

Be to the Federal, State or local programs, including programs carried out by other components of the statewide workforce investment system in Kentucky that is best suited to address the specific employment needs of an individual with a disability; and include, for each of these programs, provision to the individual:

- a notice of the referral by the designated State agency to the agency carrying out the program;
- information identifying a specific point of contact within the agency carrying out the program; and
- information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, or regain competitive integrated employment.

All applicants and eligible individuals or, as appropriate, the applicants' representatives or individuals' representatives, will be provided information and support services to assist the applicants and individuals in exercising informed choice throughout the rehabilitation process, consistent with Section 102 (d) of the Rehabilitation Act Amendment of 1998. The Client Assistance Program is available for additional assistance and advocacy during the entire rehabilitation process.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

OFB will make referral and access additional resources through the Kentucky Assistive Technology Service network (KATS) and the Kentucky Assistive Technology Loan Corporation (KATLC) for individuals. The KATS network serves Kentucky residents of all ages with disabilities of all types, their families, employers and employment service providers, educators, health care and social service providers, and others seeking information about assistive technology (AT) and accessible information technology. KATLC is programs funded by both private and public money to help Kentuckians with disabilities obtain assistive technology to improve their independence or quality of life. The Office of Vocational Rehabilitation, the general agency has oversight of both programs. Both programs staff operations are located jointly in the same building as OFB program staff.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

In 2014, the USDA Rural Development invested more than $854 million in rural Kentucky communities across the Commonwealth for the areas of Community Facilities, Housing, Water and Environmental, Business Cooperative Programs and Economic Impact Initiatives. For example, USDA Rural Development partnered with Community Trust Bank to provide Superior Battery with a $10 million Business and Industry Guaranteed Loan for improvements that saved money, increased profits, and saved more than 160 jobs and created 25 new ones.

These jobs are vital to the community. The USDA investment will help Superior Battery grow its business and improve the economic climate. USDA is targeting assistance to the county through its StrikeForce Initiative to help economically distressed rural communities. Agency staff are aware of these programs and provide information and referral to consumers for these programs to meet their individual needs.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

OFB serves out–of–school youth such as high school dropouts, students expelled from school or habitually truant, high school graduates and GED holders who are basic skills, deficient, unemployed or underemployed as well as those enrolled in postsecondary education. This is an area identified to increase outreach and strengthen those existing relationships in order to reach and engage on a higher level out–of–school youth.

In Kentucky the vocational rehabilitation agencies are two of the three workforce programs that are fully integrated into the Kentucky Career Centers. This has strengthened our relationships with the other core programs of the workforce development system. OFB works collaboratively with the following additional agencies and groups of individuals

Juvenile and Criminal Justice Systems. Juvenile Justice is responsible for prevention programs for at–risk–youth, court intake, pre–trial detention, residential placement/treatment services, probation, community aftercare/reintegration programs and youth awaiting adult placement or court.

Faith–based Organization (i.e. churches, Jewish Services, health clinics).

Community organizations like Big Brothers, Big Sisters and other community based organizations

Service Organizations (i.e. Lions, Rotary, Kiwanis, Elks) OFB works closes with the Lions Clubs Chapters across the state.

Kentucky Cabinet for Health and Family Services that administers foster care and the division of family support (Medicaid, Foster Care and Supplemental Nutrition Assistance Program)

Employers

Kentucky Youth Career Center offices are located in Jefferson, Bullitt, and Shelby Counties, and are administered by KentuckianaWorks, the region's Workforce Development Board. Overseeing and coordinating programs in the community for youth ages 16 – 21, the Youth Career Centers offer innovative education, employment and youth empowerment services. The Kentucky Youth Career Center offers resume and interview preparation assistance, GED tutoring and help with testing fees, help applying to colleges and job–training programs, and financial assistance for college and job training. Depending on the need, referrals are made to other community services such as housing, transportation, food, and physical or mental health services. The Kentucky Youth Career Center also fosters connections to mentors as well as other youth, and provides an ongoing series of workshops on life–enhancing topics.

5. STATE USE CONTRACTING PROGRAMS.

Under the state procurement code, administered by the Finance and Administration Cabinet, there are preferences to be given by governmental entities and political subdivisions in purchasing commodities or services from specified entities. Specifically, first preference is given to the products made by the Department of Corrections and Division of Prison Industries. Second preference shall be given either to: (1) the Kentucky Industries for the Blind or any other nonprofit corporation with which the Office for the Blind contracts to further its statutory purposes; or (2) qualified nonprofit agencies for individuals with severe disabilities i.e., Community Rehabilitation Providers (CRP). This means that state and local governmental agencies are to purchase directly from Correctional Industries or an Industries contracted with by OFB and/or a CRP without having to utilize the competitive procurement processes. The Finance and Administration Cabinet is to publicize/distribute a list of those products and services. OFB confers its statutory state use preference upon LC Industries to afford them the preferential procurement opportunities for their products and services, which may expand employment opportunities for individuals who are blind and visually impaired.

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.

OFB works with many agencies to provide transition services and pre–employment transition services to students with disabilities. All of the collaborations described below allow for pre–employment transition services to be provided by either OFB or our partners.

OFB participates with the Department of Education, University of Kentucky Human Development Institute, and the Office of Vocational Rehabilitation in the Community Based Work Transition Program (CBWTP). The CBWTP is administered by individual school districts that hire employment specialists to provide students with community–based evaluation, work experience and job placement during the final two years of high school.

OFB provides an array of transition services to students who are blind or visually impaired across Kentucky. The Kentucky School for the Blind (KSB) serves students with visual disabilities from across the state.

Students can live and attend classes at the school’s Louisville location, or receive outreach services while attending their local elementary, middle and high schools. OFB actively participates in the vocational planning and academic progress of all of these students through collaboration and assistance with KSB’s Community Based Instruction Program, and services such as vocational assessments, and annual Individual Education Plans and Individual Learning Plans.

The coordinator attends monthly KSB outreach committee meetings, where services to students who are blind and visually impaired across the state are discussed. In addition, the Transition Coordinator and OFB VR Counselors meet monthly with KSB staff to discuss programming and further partnering to provide quality transition services to students, including those students who receive alternative diplomas. OFB distributes KSB’s “Parent to Parent” newsletter to its vocational rehabilitation counselors.

OFB collaborates on a variety of work–readiness and work–experience programs with KSB. One of these is the Summer Work Program. Up to 10 students are given the opportunity to work at the Louisville Zoo for two weeks during June. Participants are paid for the hours worked by the OFB. KSB provides job coaches to assist students on the job site. While job coaches are there, students are supervised by zoo employees. OFB and KSB are currently in talks to expand the program to more students for a longer period of time.

The World of Work Program is another program in which OFB and KSB collaborate to provide students a work–based learning experience in a competitive, integrated setting in the community. KSB finds placements for students in locally owned businesses, including the American Printing House for the Blind. Students work up to 10 hours per week during the school year, and are paid

through OFB. The OFB vocational rehabilitation counselor assigned to that student provides on–going career exploration and counseling services, and is provided a monthly written statement by each student about their job experience. Job readiness skills learned through these off–campus, real world experiences provide an invaluable service to students as they learn about themselves, work, and opportunities for the future.

OFB also participates with the Kentucky Deaf–Blind Project, which helps promote cooperative transition services for youth who are deaf–blind, and students at the KSB, the KSD, or any other school the student may be attending. OFB has a Deaf-Blind Coordinator who is responsible for helping to facilitate pre–employment transition services, including all the previously described work readiness and summer work experience programs, for this population of students.

OFB uses the Charles W. McDowell Rehabilitation Center to provide in–depth vocational assessments as well as career exploration activities for students statewide. One exceptional program offered at the Center is the Summer Youth Boot Camp Program, which focuses on job exploration, workplace readiness training, and self–advocacy. It is an intensive, four-week program based on the work of Dr. Karen Wolffe that introduces employability skills to transition–aged individuals with visual disabilities. The Center staff have adapted this program to ensure that other employability skills are integrated into the curriculum, such as orientation and mobility, keyboarding, basic computer use, social skills, independent living skills, and assistive technology.

Workforce Development Boards: OFB VR counselors actively participate on their local Workforce Development Board's Youth and One Stop committees to enhance and make accessible the programs and services for transition age consumers. Through Project CASE, a program developed from the use of Federal grant funding through the Rehabilitation Services Administration, the Office for the Blind will have stronger coordination and collaboration with the Youth Career Centers and other Kentucky Career Centers. Partnering with Eastern Kentucky Concentrated Employment Program (EKCEP) and KentuckianaWorks in the hiring of Career Pathway Coordinators, and in cross–agency training of staff on career pathways for students with disabilities, Project CASE will ensure sustained partnerships.

KY AHEAD is a professional organization whose purpose is to promote communication among professionals in post–secondary education in order to improve the development and implementation of services for persons with disabilities. Campus Disability Services Centers are an essential resource for students with disabilities attending post–secondary educational institutions. VR counselors maintain relationships with disability service center staff and strongly encourage college students to utilize the services available at the centers so that they can receive individualized accommodations for their coursework. Every effort is made to arrange for a student to meet with staff at the disability center prior to entry into a post–secondary program in assuring a smooth transition for the individuals.

The Kentucky Special Education Cooperative Network consists of nine special education cooperatives located across the state. These cooperatives were formed to better meet the needs of the multiple school systems across Kentucky's 120 counties. All 173 local school districts, and the Kentucky Schools for the Blind and Deaf are members of a special education cooperative.

Each cooperative has VI teachers and an AT specialist to assist students with visual needs. The school districts employ other specialty service providers such as Orientation and Mobility Specialists, Physical Therapists, and Speech Therapists. OFB works collaboratively with each cooperative network across the state in the provision of information and referral for students of all ages.

INSIGHT – Post–secondary Preparation Program for Students Who Are Blind or Significantly Visually Impaired is a collaborative project between the Kentucky Educational Development Corporation Special Education Cooperative, Kentucky School for the Blind, Kentucky School for the Blind Charitable Foundation and Kentucky Office for the Blind, MCP Orientation and Mobility Services, and Morehead State University. INSIGHT is a unique program designed to provide college bound students an opportunity to experience some of the challenges encountered when entering a university or community college. Participants gain an increased awareness of the educational, recreational, and social opportunities and challenges of the post–secondary environment.

The office's executive director, Director of Consumer Services and Transition Coordinator work directly when needed, with the Kentucky Interagency Transition Council. These involvements help facilitate the Department of Education's understanding of the unique transition needs of students with visual impairments and assists in understanding the educational process of Public Schools in the State.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The Agency in conjunction with OVR has agreements with all public institutions of higher learning in the state to meet the requirements of the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014, to develop agreements between the state vocational rehabilitation agencies and public institutions of higher education who serve mutual individuals with disabilities.

The Office participates with the Kentucky Department of Education (KDE) and 21 other state agencies on the Kentucky Interagency Transition Council. This Council's agreement, entitled The Kentucky Interagency Agreement on Transition Services" provides for a statewide system of coordination among agencies in the delivery of transition services.

The agency in conjunction with OVR has an agreement with the KDE for transition planning and services for secondary students with disabilities. This agreement is in the process of being rewritten to meet the requirements of WIOA.

These agreements are designed to facilitate the transition of students with disabilities from the receipt of educational services in school, to the receipt of vocational rehabilitation services.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Under IDEA, schools are responsible for initiating transition planning at the age of 16 for each student identified with a disability. In Kentucky, transition planning starts at age 14. Since school faculty and staff are academic specialists, it is very important for the VR counselor to have early influence on the student's vocational future helping to avoid weak or unrealistic vocational training. The VR counselor acts as a vocational specialist forging the educational and future vocational needs

of the child realistically together. The VR counselor is educated on the federal and state laws associated with transition and acts as an advocate for the student and parents. VR counselors attend transition related meetings as early as age 14 and act as a consultant in the student's IEP. Early contact and intervention not only saves the VR counselor considerable time and effort, it allows the student and parents the opportunity to plan a realistic vocational path that will lead them to the vocational goal of their choice.

OFB maintains agreements with other agencies and schools to provide for mutual collaboration in the development of an Individual Transition Plan (ITP) for each student. Transition planning begins in the IEP meetings in the school setting. Participants should include the student, parents or guardians of the student, appropriate school officials, an OFB VR counselor or designee, appropriate professionals from other agencies and other interested parties.

VR counselors shall attend student IEP meetings starting at age 14. Applications for OFB services can be taken as early as age 14 so that Pre–Employment Transition Services can be provided to these students. The school system will continue to have the primary responsibility for accommodations and student's educational needs. Once the student graduates OFB will become the primary agent. It is mandatory that the IPE be developed with the student 90 days after eligibility or prior to graduation, whichever comes first.

An IPE is developed for each student determined eligible and that meets the current order of selection for vocational rehabilitation services. The IPE should address the student's pre–employment transition services needs in the areas of job exploration counseling, work based learning experiences, counseling regarding post–secondary training opportunities, workplace readiness training to assist in the development of social and independent living skills, and instruction in self–advocacy.

OFB recognizes that it is the responsibility of Kentucky schools and OFB to coordinate and provide transition planning and services for students with disabilities. The VR counselor will provide consultation and technical assistance to assist the school as well as pre–employment transition services based on the student's needs. The Vocational Rehabilitation Counselor and AT staff determine the student's postsecondary needs upon graduation taking into consideration technology changes and the need for upgraded or more advanced technology.

Postsecondary transition is driven by the student's vocational goal. The student should go to work or attend advanced education to prepare to go to work. During high school transition the VR counselor should consider the post–secondary vocational goal and proactively encourage activities for the student that will promote a smooth transition to work. Such activities should be considered an investment in the student's future:

High school classes that directly or indirectly supports the student's vocational goal;

Work transition or summer employment related to the student's vocational goal;

Prep programs that help the student gain insight into work or the post–secondary educational environment.

OFB recognizes that transition planning is an ongoing process and that a student may choose to go in a different direction requiring a change in their vocational goal. Ongoing evaluations, work

exposure, and vocational counseling will be provided to assist students in the decision making process.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

OFB authorizes payment of services needed to determine eligibility and for any services provided that do not fall under the responsibility of the school district. OFB provides payment for pre–employment services such as career exploration, work experiences, advocacy, and peer mentoring.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

KSB provides an Outreach Consultant to each of the nine Special Education Cooperatives. These Outreach Consultants coordinate and provide training and professional collaboration for Teachers of the Visually Impaired and consult with Special Education Cooperative staff regarding the unique needs of students who are blind or visually impaired. The Office's Statewide Transition Coordinator stays actively involved in these regional initiatives. Outreach and Involvement of the VR Counselor begins as early as age 14.

OFB obtains a list of consumers per county that are accessing Educational Materials as an accommodation due to their disability in high school. The number for the 2015–2016 school years is 520. The list is distributed to VR Counseling staff so they can identify where students with visual disabilities are located in the counties they serve for outreach purposes. Staff is required to conduct outreach to school staff in order to strengthen partnerships and increasing awareness regarding services available defined as Pre–Employment Transition Services.

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.

OFB works collaboratively with the OVR in maintaining agreements with providers of private, non–profit vocational rehabilitation service providers to support achievement of successful competitive employment outcomes for individuals with disabilities. The office maintains agreements with providers of private, non–profit vocational rehabilitation service providers to support achievement of successful competitive employment outcomes for individuals with disabilities. The office works with community rehabilitation providers (CRPs) through a vendor application process to ensure quality services to agency consumers. The Office currently works with 65 CRPs providing services resulting in competitive employment outcomes and 85 CRPs providing services resulting in supported employment outcomes. The community rehabilitation provider (CRP) must submit a Vendor Application form. All vendor applications forms are submitted to the Office of Vocational Rehabilitation for review and approval of the agency as a provider.

The process for approval of a vendor as a supported employment provider is more involved and is outlined below:

- Vendor requests or obtains an application from OVR or OFB
- Upon completion of the application it is returned to the OVR branch
- OVR Branch staff review the application and obtain needed clarification if needed. Staff may meet with the provider for further technical assistance
- Application is approved and vendorship is established
- OVR Branch assists the provider with training and other information
- All vendors are required to participate in the Supported Employment training provided through the University of Kentucky Human Development Institute.
- Monitoring occurs for all vendors during the year by OVR Branch staff
- All vendorships are reviewed for continuation yearly

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.

OFB participates with other state agencies, including the Office of Vocational Rehabilitation, the Department for Behavioral Health, Developmental and Intellectual Disabilities Interagency Council, the Kentucky Interagency Transition Council, Commonwealth Council on Developmental Disabilities, and the University of Kentucky Human Development Institute with the purpose to collaborate in the provision of supported employment services. The Agency collaborates with the Community Based Work Transition Program in identifying and providing financial support for those high school students who qualify for supported employment services and who are eligible for OFB services.

The Community Rehabilitation Providers across the Commonwealth who are providing supported employment services are verified through written applications with the Office of Vocational Rehabilitation/Supported Employment Branch. As part of the application process is the written and verbal verification of the provider's funding for ongoing support services. The Supported Employment Branch conducts monitoring and technical assistance to assure the services are provided and funded appropriately.

OFB provides supported employment to individuals who are blind and visually impaired that have a secondary disability requiring long term supports in order for the individual to be successful in integrated competitive employment. The CRPs rely on various waivers within the state for the long–term support funding and currently eligibility for the waivers based solely on a visual impairment or blindness are non–existent. This creates a difficulty for the supported employment providers to commit to providing services to our population. The additional time for long–term support from the rehabilitation agency as outlined in WIOA assists with this obstacle but the reality is still present. Often times, if an individual has a cognitive, intellectual, or developmental disorder it is served by the general agency and if a visual impairment is present OFB is consulted on the case or a dual–case is opened for greater support of the individual with a disability.

OFB has collected information to pursue Establishment Grants for SE services/providers specific to the blind and visually impaired population. We hope to realize this project in FFY 2017.

OFB has a working relationship with the Kentucky Association of People Supporting Employmentfirst (APSE). This allows the inclusion of individuals who are blind or visually impaired as a training focus and also advocacy support. In addition the 874–K Coalition, which is a statewide Disability Advocacy Group, provides a unified voice to secure additional state dollars for supported employment extended services and other services specific to the disability population through a multitude of state agencies. The ARC of Kentucky provides education to families with regards to supported employment and is often seeking additional funding for the SE initiatives within the rehabilitation agencies.

OFB maintains a very close working relationship with the general rehabilitation agency, Office of Vocational Rehabilitation. Given the limitations on staff resources, it is not uncommon that the Office of Vocational Rehabilitation staff participates in workgroups on behalf of both the rehabilitation

agencies. This is true with the Medicaid Waiver work groups such as the Supports for Community Living Waiver and Michelle P Waiver both of which are focused on the developmental disabilities.

As required when approved to be a supported employment provider for the Office of Vocational Rehabilitation and Office for the Blind, an entity must complete the Supported Employment Training Project (SETP) through the collaborative efforts of the Department of Behavioral Health, Development and Intellectual Disabilities, the Commonwealth Council on Developmental Disabilities, Human Development Institute through University of Kentucky and the two rehabilitation agencies. Rehabilitation Counselors of OFB are encouraged to complete the SETP training as well to provide the fundamentals of supported employment and to maintain necessary knowledge and skills.

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

OFB recognizes that it has two customers the job seeker and the employer and works collaboratively with partner organizations in providing quality services on all levels. OFB is in a position to provide valuable services to 503 Federal Contractors with utilization goals of 7% of their workforce, employees with disabilities. OET shares with OVR and OFB the list of federal contractors it maintains and staff are assigned to contact those employers individually making them aware of vocational rehabilitation services available to them.

The Kentucky Skills Network (KSN) is a partnership of local and state workforce development organizations dedicated to providing proactive business services and industry skills development. Through local “Business Service Teams” the KSN has laid a foundation for coordinated employer services that will be leveraged in the coming four years.

The KSN offers a streamlined approach to assisting companies with recruiting talent, training new and existing employees, and developing tomorrow’s workforce. Consisting of four primary entities from the Kentucky Cabinet for Economic Development, Kentucky Education and Workforce Development Cabinet (i.e. OVR, OFB and OET), Kentucky Labor Cabinet, and the Kentucky Community and Technical College System, the KSN exists to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The mission of the KSN has four primary components:

1) Single point of contact approach

2) Streamlined workforce resources

3) Unified marketing and information

4) Talent/workforce development pipeline

Kentucky Skills Network local business service teams are designed to provide a primary point of contact for employer customers. The partner with the best/most established relationship with an employer should maintain responsibility and communication with the customer and engage other partners in order to provide streamlined solutions-based business services plans. The structure of the KSN business services teams is comprised of three levels, each of which may act as a point of entry for contact with companies. Level one consists of the State team. The State team includes one representative from each of the four core partners (inclusive of VR):

1) Kentucky Cabinet for Economic Development

2) KCTCS

3) Kentucky Education and Workforce Development Cabinet

4) Kentucky Labor Cabinet

These individuals work together to ensure that companies receive unified and coordinated information and services related to their workforce development needs. The KSN allows for the bringing together of the workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Through such options as reimbursable grants and tax credits for classroom training, on-the-job training, tuition and certification training, train-the-trainer travel, and entry level and skills upgrade training; Kentucky has resources that allow flexible and customizable training specific to company needs.

Early in 2016, KSN partners will gain access to a Customer Relationship Management system based on a SalesForce platform. Phase 1 will allow for shared access to employer contact and needs, and Phase 2 later in 2016-2017 will add the capacity for KSN partners to add and assess employer programs and resources via the SalesForce application.

In October 2015, the Kentucky Office for the Blind/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR-eligible individuals, including youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high-demand, high-quality occupations. Under this project employer engagement is a goal area. For all five years of the grant staff will conduct employer engagement activities such as regional employer conferences in the two project target areas on a variety of topics.

OFB will continue its involvement with the VR National Employment Team and utilize our expertise in working with the blind and visually impaired to assure that consumers participate fully in WIOA programs and services.

OFB will offer various topics for training and continue to provide services to employers such as assistive technology assessments, disability etiquette and is in the process of identifying other pertinent topics of interest to the business community.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

Kentucky's project is titled Creating Access to Successful Employment (Project CASE). Project CASE activities are consistent with section 101(d) of the Workforce Innovation and Opportunity Act (WIOA), with focus on improved alignment of Federal programs to strengthen the capacity of State workforce systems to meet emerging employers' needs with appropriately skilled and credentialed individuals. Project CASE provides a solid strategy for providing individuals with disabilities who face barriers to employment, with workforce investment activities, education, and supportive services to enter and retain employment.

Career Pathway initiatives in Kentucky over the past decade have created partnerships between industry and education at the secondary and postsecondary levels, and forged important links to strengthen local economies. Project CASE will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives, and can prepare for and obtain jobs in high–wage and high–demand occupations.

A variety of partnerships are needed in order to market the benefits of a variety of earn and learn opportunities, including registered apprenticeships to Kentucky business for individuals with disabilities including youth and students with disabilities. OFB will work with its existing partnerships among workforce, economic development, education and business entities in fostering work based learning opportunities.

We currently have in place five other innovative programs that provide high school students with a variety of work–based learning, financial literacy, self–advocacy training, job exploration, career counseling, and workplace readiness training opportunities that exist in the community with employers, in our rehabilitation center, and in post–secondary institutions.

The Summer Youth Boot Camp Program focuses on job exploration, workplace readiness training, and self–advocacy and is held at the Charles W. McDowell Center in Louisville. It is an intensive four week program based on the work of Dr. Karen Wolffe that introduces employability skills to transition aged individuals. The curriculum is specific to individuals that are blind or visually impaired.

The Summer Work Experience Program is in collaboration with Community Rehabilitation Providers. CRPs are paid to find work experiences in competitive integrated settings for transition aged individuals. The work experiences last six to eight weeks and the students are paid by the Office for the Blind for the time worked. The goals of the work experience are to provide community based career exploration and the opportunity to practice work readiness skills. It is also hoped that by participating in the work experience program, employers will be open to providing more opportunities for individuals who are blind or visually impaired in their communities.

The Summer Work Program is in collaboration with the Kentucky School for the Blind and the Louisville Zoo. Up to 10 students are given the opportunity to work at the zoo for two weeks during June. Participants are paid for the hours worked by the OFB. The Kentucky School for the Blind provides job coaches to assist students on the job site. While job coaches are there, students are supervised by zoo employees. OFB and the Kentucky School for the Blind are currently in talks to expand the program to more students for a longer period of time.

The World of Work Program is another program in which the OFB and KSB provide work based learning experiences to students. The program provides competitive integrated work experiences to students that attend the Kentucky School for the Blind. Students work in the Louisville community for up to 10 hours per week and are paid by the Office for the Blind. Students receive career exploration services and career counseling and are taught work readiness skills while participating in this program.

The INSIGHT Post–Secondary Preparation Program is held each summer at Morehead State University. The program is in its 10th year and focuses on getting students ready for post–secondary training opportunities as well as career ready. It is in collaboration with the Kentucky School for the Blind, Kentucky School for the Blind Charitable Foundation, Morehead State University, Kentucky Educational Development Corporation, and MCP Orientation and Mobility. Students are able to participate in college classes, live in the dorm, and participate in social activities both on and off campus during this eight day program. They are taught the self–advocacy skills necessary to succeed in a post–secondary environment along with workplace readiness skills.

The Kentucky Office for the Blind in conjunction with the Office of Vocational Rehabilitation and Office of Employment and Training hosted an Employer Summit in 2015 to highlight the benefits of hiring individuals with disabilities as well as the OFCCP regulation requirements. The event was well received with numerous employers seeking additional information on working with the two rehabilitation agencies. This outreach and education with Employers and Businesses across the commonwealth will continue with additional summits convened in regional locations to attract a more diverse employer customer base. The Workforce Partners recognize the regional differences as well as workforce needs and will hold Employer Summits focused specific to the regional sectors and incorporate the post–secondary education institutions as a conduit to meeting the talent pipeline demands.

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;

In Kentucky, The Cabinet for Health and Family Services (CHFS) is home to most of the state's human services and health care programs, including Medicaid, the Department for Community Based Services and the Department for Public Health. Medicaid Services purchases quality healthcare and related services that produce positive outcomes for persons eligible for programs administered by the department.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

The Department for Behavioral Health, Developmental and Intellectual Disabilities is the agency that provides quality information, services and support for individuals with needs related to mental illness, intellectual disability or other developmental disability and their families.

OFB is an active member of the Commonwealth Council for Developmental Disabilities participating in their strategic plan development and collaborating on projects to promote independence and employment for the specific population.

OFB will collaborate with CHFS on all levels regarding services that lead to competitive integrated employment for individuals who are blind and visually impaired. The majority of the targeted population that OFB serves does not qualify or meet the definition of an individual with a developmental disability so our collaboration with CHFS is not on the level that it is for the general agency that serves the majority of this population.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

Publicly–funded community services are provided for Kentuckians who have problems with mental health, developmental and intellectual disabilities, or substance abuse, through Kentucky's 14 regional Boards for Mental Health or Individuals With an Intellectual Disability (Regional MHID Boards). Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 which serve residents of a designated multi–county region.

The agency worked jointly with the Department of Community Based Services within the Cabinet for Health and Family Services in 2015 to develop a referral system and build a stronger partnership as it relates to youth in the Foster Care System. This collaboration was in conjunction with the Office of Vocational Rehabilitation and connects the rehabilitation transition services to students enrolled in high school that are also at high risks of drop–out in the schools due to their involvement in the foster care system. The intent is early intervention to address workforce needs and connection to resources and support within the local community.

CHFS employees coordinated efforts with both rehabilitation agencies for the second annual Youth Summit held in November 2015. The Summit focused on resources and support services available to youth with disabilities and out–of–school youth. The Summit provided valuable strategies for parents and youth as well as the professionals within the field of student and youth service providers.

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;

OFB maintains a system to collect and analyze on an annual basis data on qualified personnel needs and personnel development. Information is analyzed on an annual basis for the number of personnel employed in the provision of vocational rehabilitation services for the blind and visually impaired. The Executive Leadership Team (ELT) reviews this information as well as the State Rehabilitation Council. This ensures that the provision of quality services is consistent throughout the Commonwealth. In addition, the number of personnel, category, and qualifications of personnel needed by OFB, and a projection of the numbers of personnel that will be needed in five years are calculated. These calculations are based on projections of the number of individuals to be served. Personnel training files are maintained that contains records of each individual’s training activities. Assessments are conducted annually and utilized in the development and maintenance of their official career development plans as well as training, certification and educational activities. OFB has developed and maintains a system for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific need. OFB must work within the constraints of a state personnel cap. Currently the personnel cap is set at 95 full–time. The current total number of personnel is 89 with one vacancy (VR counselor). The following outlines the number of personnel employed, in relation to the number served (staff/consumer ratio) broken down by personnel category for 2015:

- Central Office Administrative = 11
- 1 Executive Director – ratio 1/2,461
- 1 program assistant director – ratio 1/2,461
- 1 internal policy analyst III – ratio 1/2,461
- 3 rehabilitation administrators – ratio 1/820
- 4 administrative assistants – ratio 1/615
- VR and IL/OIB Field Program Staff – 51
- 4 VR administrators – ratio 1/580
- 17 VR counselors–ratio 1/82
- *1 deaf/blind VR coordinator – N/A
- 2 O & M specialist – ratio 1/27
- 3 AT specialist – ratio 1/86

- 2 Bioptic driving instructors – ratio 1/27
- 13 administrative assistants – ratio 1/120

*Deaf/Blind VR Coordinator position was vacant from Oct. 2014 – Oct. 2015

- Business Enterprises = 5
- 1 assistant director – ratio 1/52
- 2 program administration – ratio 1/26
- 2 vending technicians – ratio 1/26
- McDowell Center Staff = 22
- 1 facility administrator – ratio 1/91
- 2 rehabilitation administrators – 1/46
- 5 administrative assistants – ratio 1/18
- 2 rehabilitation aides – ratio 1/46
- 2 orientation and mobility specialists – ratio 1/46
- 2 AT specialists – ratio 1/46
- 2 vocational evaluators – ratio 1/46
- 5 rehabilitation instructors – ratio 1/18
- 1 nurse – ratio 1/91

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

The only current vacancy is for the open position a VR counselor in our Prestonsburg office and OFB is in process of filling that position. Although OFB has only one vacancy at this time, it has additional personnel needs in the following areas: 1) business enterprises, 2) transition and 3) business services (employer engagement). Given budget constraints, hiring additional staff for these areas at this time is not possible.

The heightened focus on transition for students and youth under the implementation for WIOA requires additional staff administrative resources. Currently OFB has an administrator dedicated to this area as a part of their duties. In order to effectively meet the needs of this population and to develop and expand programs that facilitate transition additional staff are needed with an expertise in this area. Additional staff can assist with the development and implementation of transition strategies that will enhance the success of students who are blind and visually impaired.

The Kentucky Business Enterprises program is operating with a small staff of five. They are understaffed for meeting the needs of vendors in the Randolph Sheppard Program statewide.

For the area of employer engagement OFB has a need to develop activities that continue to strengthen business working relationships and the hiring of individuals who are blind and visually impaired. Existing staff resources are maximized covering current workload demands. As well existing staff do not have strong business backgrounds.

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.

Eight individuals or 9 percent of staff left the agency during FFY 2015 (a 10 percent decrease over the prior year) with two of the eight staff lost to retirements (25 percent). There were nine new hires or 10 percent during the 2015 federal year. Due to budget constraints only critical service positions were filled. The following table denotes the length of experience of existing staff current at the submission of this plan.

Years of Service with the Agency:

- 20 years or higher 21 percent
- 15–19 years – 8 percent
- 10–14 years – 17 percent
- 5–9 years – 24 percent
- 4 years or less – 30 percent

There are eighteen individuals that are included in the 21 percent of staff that have been with the agency 20 years or more. Of those seven or (39 percent) are VR assistants and three (16 percent) are program administrators. The other eight staff are orientation and mobility (1), assistive technology (1), VR Counselor, (1) IL/OIB Counselor, (1) Nurse (1), Vocational Evaluator (1), and two instructors (2). Another factor OFB must consider is those individuals that have lower years of service with the agency but have additional service years in state government making them eligible for retirement. Additionally there are staff that is close to retirement age without the qualifying years of service. This is approximately another 11 percent of the staff of which three of the eight staff are central office administrators.

Currently 44 percent of Vocational Rehabilitation Counseling staff has been in their position less than 10 years. Thirty–nine percent have been with the agency 10 years or more. Forty–four percent have been with the agency less than 5 years. In 2015, there was turnover in one of the 18 counseling positions (5 percent). One counselor took a position within the agency as the Deaf Blind State Coordinator. Currently there are two VR Counselor vacancies with the retirement of one effective the beginning of 2016. The Agency places an emphasis on the professional development, educational advancement and skills acquisition for all OFB staff.

Open positions for the VR Counselors is critical to services and will be filled with the most qualified candidates following all established procedures as soon as candidates can be recruited, hired and approved by the Education and Workforce Development Cabinet and State Office of Personnel. All attempts will be made to employ rehabilitation professionals certified in their areas of expertise.

Decisions on filling open positions are based on a thorough budget analysis, demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific needs. As positions became vacant the ELT discussed the needs of the program looking at the numbers served in correlation with the number of staff, workload and agency resources.

Central Office projections of needs in five years– 5 positions our of 11 currently. This includes the following positions:

- executive director
- program assistant director
- rehabilitation administrator

VR and IL/OIB Field Program staff projections of needs in five years–12 positions out of 51 currently. This includes the following positions:

- VR administrator
- VR counselor
- IL/OIB Counselor
- administrative assistants

Business Enterprises projections of staff needs in five years–2 positions out of 5 currently. This includes the following positions:

- program administration
- vending technicians
- McDowell Center Staff projections of needs in five years–ten positions our of 22 currently. This includes the following positions:
- facility administrator
- rehabilitation administrator
- administrative assistants
- rehabilitation aide
- orientation and mobility specialist
- AT specialist
- vocational evaluator
- rehabilitation instructor

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

The University of Kentucky is the only institution in the state that offers a Master's of Rehabilitation Counseling (MRC) program. This is a comprehensive accredited graduate program in rehabilitation counseling. The on line Accelerated Distance Learning Master's program can be completed in sixteen months without on–campus attendance and at in–state tuition rates. Participants in the program are eligible to test for rehabilitation counselor certification after completing 75 percent of their course work in their final semester. A compressed video site is located at the Kentucky School for the Blind in Louisville. OFB partners with this agency so that a large number of individuals throughout the state have direct access to rehabilitation courses. This provides the opportunity for staff to fulfill their Comprehensive System of Personnel Development (CSPD) requirements and move up in the Vocational Rehabilitation Counselor series. When individuals enroll in other masters level programs out of state, those programs are evaluated to ensure that they meet the eligibility criteria for the Certified Rehabilitation Counselor examination prior to being approved for tuition assistance. Two out of state distance learning programs OFB considers for staff are Auburn and Wisconsin Stout.

OFB staff participates on the University of Kentucky Advisory Council. Three OFB staff attended the annual Advisory council meeting held in January of 2015. Dr. Ralph Crystal PHD., CRC Program

Coordinator presided over the meeting. This included a review of the evaluation plan for reaccreditation and the strategies to address issues in need of remediation, an application for accreditation as a Rehabilitation Clinical Counseling program, and feedback was sought from the group on how UK can more efficiently work as partners in preparing students for professional practice.

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

The following information was provided from UK regarding their Master in Rehabilitation Council 2015 program statistics and includes both on–campus and distance learning students.

- Fall Enrollment 2014 was 114.
- Spring Enrollment in 2015 was 78.
- Summer Enrollment 2015 was 58.

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.

OFB obtains information from The University of Kentucky annually regarding the number of students enrolled and the number graduating from the program with certification or licensure and /or with credentials to qualify for certification or licensure. The following information was provided from UK regarding their MRC 2015 statistics and includes both on–campus and distance learning students:

University of Kentucky MRC program had a total of 253 enrolled for the 1014–15 Calendar year with 78 graduates. There were 55 graduates from the fall, 19 from the Spring and 4 from the Summer. All of them were eligible for licensure or certification. One OFB staff completed the UK MRC program in 2015 and that individual passed the CRC.

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.

OFB shall aggressively recruit, equip, train and work to retain qualified professionals through coordination with institutions of higher education, professional and paraprofessional associations including personnel from minority backgrounds and individuals with disabilities. OFB recognizes our staff as our greatest resource and is committed to the provision of training state personnel in assuring the provision of quality services to individuals resulting in competitive integrated employment. OFB will remain current on rehabilitation trends and best practices in the field for the purpose of developing and maintaining its internal training program and securing external training opportunities for its personnel.

OFB utilizes the state of Kentucky's Personnel Career Opportunities System (COS) an on–line recruitment system in recruitment efforts. OFB strives to achieve a more diverse workforce by recruiting and hiring individuals from protected classes. Recruitment of individuals with disabilities and those from minority backgrounds enables the agency to have highly competent individuals from all segments of society to accomplish its mission. The University of Kentucky's Graduate Program in Rehabilitation Counseling has partnered with Kentucky State University (a historically black liberal studies public institution) and the two state rehabilitation agencies to create an endorsement curriculum at Kentucky State to recruit students into the field of rehabilitation counseling. UK has a "University Scholars Program" with Kentucky State University (KSU). There were no students from KSU in 2015 that stated an interest in participating in an internship with OFB. Potential applicants are identified through recruitment, posting, and advertising according to the cultural diversity initiative and the agency's Affirmative Action goals.

When applicants are needed, OFB must request applications from Kentucky Department of Personnel registers. Individuals must be on the register identifying as qualifying for the position. OFB works to leverage its successful performance in recruiting individuals who are minorities or with disabilities in the following ways:

- Work closely with consumer groups, attending local chapter meetings, national meetings.
- Hires the most qualified individual realizing that as an agency OFB strives to promote cultural diversity in recruiting disabled or minority candidates inclusive of bilingual candidates.
- Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.
- Ensure that programs are accessible to minorities.
- Follow EEO guidelines and Affirmative Action Procedures.
- Utilize Division of Consumer Services demographic and population data to determine the number of minorities and individuals with disabilities in regions, and develop strategies to increase recruitment from these regions.
- Encourage minorities and individuals with disabilities to play an active role in the Office for the Blind's State Rehabilitation Council, participate in forums and provide input into policy and procedures.

OFB acknowledges the difficulty of recruiting and hiring individuals who are Certified Rehabilitation Counselors. In this narrow occupational field of qualified individuals who hold their certification there is a shortage and competitive salary expectations of graduates usually exceeds salary constraints of the OFB. Additionally, OFB has found it difficult to hire and maintain staff in the rural areas throughout the state because candidates from outside these areas are often unwilling or unable to acclimate to the cultural differences.

OFB has a personnel classification system in place that enables salary competitiveness with other states. States surrounding the northern and western borders of Kentucky offer higher entry–level salaries based on state demographics and wage studies. There are certain expectations for Masters Level, Masters with Certification, and a Masters Certification with Limited Managerial Responsibilities for existing staff. The system allows for higher entry–level wages for new hires based on their education, certification and experience levels. OFB works with the University of Kentucky in providing students of the MRC program opportunities to complete their practicum and internship hours with the agency. This is a benefit to the student giving them hands on field experience as well as a potential recruitment tool for OFB. In 2015, the agency had four UK/MRC practicum/internship students working toward fulfilling their required hours with the agency.

The Office of Diversity & Equality (ODE) in collaboration with Governmental Services Center (GSC) has a Minority Management Trainee Program (GMMTP). This is a recruitment and development tool to increase the representation of minority managers in state government. This program offers an experience that enables participants to cultivate the skills needed to serve Kentucky's citizens in an effective and responsive manner. Participants receive in–depth, practical training through classroom instruction, on–the–job experience and special projects. Individuals must meet the following criteria to be eligible for the program: 1) be an ethnic minority, 2) Have one (1) year of state government service, 3) Qualify for a grade 10 or higher job classification and 4) Aspire to be a manager and demonstrate exceptional management potential.

The Governor's Office of Minority Empowerment holds a statewide conference annually and OFB staff attend this conference.

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

OFB offers financial incentives to encourage staff retention and promote the achievement of CSPD requirements M.A. in Rehabilitation Counseling and or C.R.C. as well as other professional disciplines such as Orientation and Mobility and Assistive Technology. The office offers for all staff educational tuition assistance, payment of initial certification and maintenance fees, study time allowance per week for staff enrolled in school, alternate hours access to distance learning through state buildings, technology upgrades across the state to allow access to distance learning and training opportunities for maintaining certification requirements through training seminars and professional development conferences.

OFB is committed to improving the qualifications of its staff and achieving higher standards in the provision of vocational rehabilitation services. The office set a goal of achieving 100 percent qualified rehabilitation staff by 2016, taking into consideration vacancies created by turnover, retirements and upward mobility of staff. This goal was reached in federal fiscal year 2015 with 100 percent of VR Counselors meeting CSPD.

OFB has set standards that are consistent with the highest entry-level academic degree needed for any national or state approved or recognized certification, licensing or registration requirements. In the absence of these requirements, other comparable requirements (including state personnel requirements) that apply to the profession or discipline will be considered.

- Those certifications currently utilized are in the disciplines of:
- Certified Vocational Evaluation Specialist (CRCC/CVE)
- Certified Work Adjustment Specialist (CRCC/CWA)
- Certified Career Assessment Associate (CRCC/CCAA)

- Certified Rehabilitation Counseling (CRCC/CRC)
- Certified Vision Rehabilitation Therapist (ACVREP/CVRT)
- Certified Low Vision Therapist (ACVREP/CLVT),
- Certified Orientation and Mobility Specialist (ACVREP/COMS),
- Assistive Technology Professional (ATP/RESNA),
- Assistive Technology Applications Certificate Program (ATACP/CSUN)
- Certified Therapeutic Recreation Specialist (CTRS),
- Certified Driver Rehabilitation Specialist (ADED/CDRS)
- Certified in Literary Braille (NCLB/NBPCB)

The agency shall pay initial certification and ongoing maintenance fees for employees and will provide opportunities for continuing education courses in areas required for employees to maintain appropriate professional certification. OFB will take steps to re-train and hire personnel to ensure that such personnel meet appropriate professional standards in the state. Immediately following the passage of the 1992 Rehabilitation Act Amendments the state agency informally implemented hiring policies that provide a preference to individuals with a Master's Degree in Rehabilitation Counseling, or individuals who are eligible to hold a Certified Rehabilitation Counselor (CRC) Status. This procedure was formalized with the enactment of the federal standards for the Comprehensive System for Personnel Development in 1997.

Currently OFB has 18 rehabilitation counselor positions with one vacancy at this time. One Counselor accepted the position of Deaf Blind Statewide Coordinator and the other staff person retired. OFB tries to utilize best practices promoting retention among direct support professionals applied across an intergenerational workforce recognizing the differences in baby boomers and generation X's and Y's. In 2015, all the Vocational Rehabilitation Counseling staff met CSPD 100 percent. Eleven of 18 hold their MRC/CRC (11/18 or 61 percent). Thirteen of eighteen or 72 percent have their MRC. One counselor holds a master's degree in a qualifying area and qualifies to sit for the CRC exam. The remaining two VR Counselors hold Graduate Certificates in Rehabilitation Counseling.

There are seven administrators and five of seven hold their CRC or 71 percent. Six of seven or 86 percent hold a Master's degree (5 MRC) and one holds their bachelor's degree. Within the Office for the Blind, other employees hold a Doctorate, Master's Degrees, Bachelors, or are currently enrolled in a Master's Program or hold other certifications. There is diversity in the type and scope of educational levels and experience of the OFB personnel. Seventy-four percent hold a bachelor's degree; sixty percent hold a master's degree and thirty-four percent of the staff hold a certification in a specialized area (CRC, CVE, CDRS, LSW, COMS). 100 percent of Orientation and Mobility Staff hold Certification (4) and their Master's degree.

- 100 percent of Vocational Rehabilitation Counselors meet CSPD (one vacancy)
- 100 percent Deaf Blind Coordinator holds a MRC and CRC
- 100 percent of Bioptic Instructors also hold MRC and CRC, one or 50 percent CDRS
- 78 percent Vocational Rehabilitation Administrators hold MRC/CRC and 88 percent hold a Masters
- 50 percent of IL/OIB Counselors holds a Masters
- Two certified CVE on Staff & one holds CRC as well as a doctorate in Psychology (licensed)
- 100 percent of AT staff have a Masters Degree with three MRC
- 100 percent Rehabilitation Instructors have a Masters Degree
- 34 percent of staff in the agency hold their CRC/COMS/CDRS.

In all, 100 percent of AT staff hold a Masters; however, increasing the certification levels of AT staff remains a challenge for OFB. One of the AT Specialist holds the AT Applications Certificate through CSUN. OFB obtained information about the CATIS Certification that ACVREP is working on. This is a professional certification for assistive technology specialists working with individuals who are blind and visually impaired.

None of the IL/OIB or rehabilitation center staff are certified through ACVREP. This was not an area of concentration for staff although their discipline is certainly supported through the Association of Educators for the Rehabilitation of the Blind and Visually Impaired (AER) and the certifying body ACVREP. OFB is working with staff to make them aware of their options for continuing education giving them the option to secure additional coursework to prepare and qualify for certification through ACVREP.

In 2015, all five of the rehabilitation center instructional staff held a Master's degree. The Braille instructor holds a masters in Vision Therapy and is concentrating on gaining more field experience prior to retaking the exam for her discipline area. The HRD coordinator continue to work with the Rehabilitation Center staff to make them aware of their options for continuing education allowing them the coursework to prepare for certification through ACVREP as well. Staff already holding a master's degree in a related field may not have an interest in additional coursework or certification through ACVREP or see the value of it. Some staff in the instructional area also chooses the option to obtain masters in rehabilitation counseling through the University of Kentucky.

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.

To ensure that professionals providing services are appropriately and adequately trained and prepared in accordance with standards that are consistent with national certification standards that apply to the profession or discipline in which staff are employed, or standards sufficient to ensure the provision of quality vocational rehabilitation services, the OFB has established standards and objectives for each personnel classification and makes every attempt to provide activities to attain and maintain these standards. The OFB shall not discriminate on the basis of disability with regard to training and hiring. Based on the Rehabilitation Act Amendment of 1998 recommendations and the professionalism valued by the OFB, the agency has set the following standards for hiring Professional Vocational Rehabilitation Specialists and training current Professional Vocational Rehabilitation Specialists. These standards are in agreement with Kentucky's statutes and regulations. Hiring New Employees OFB will hire the best possible candidate based on the following priority list: Master's Degree in appropriate discipline (Rehabilitation Counseling, Orientation and Mobility, Education) with national certification from the appropriate Certification Commission. Currently enrolled in an accredited Master's Degree program in Rehabilitation Counseling, have successfully completed 40 graduate program hours, and will be eligible to hold CRC certification within two years of hire. Master's Degree from an accredited college or University in a related field and will be eligible to hold CRC certification within three years of the date of hire. Bachelor's Degree in a qualifying acceptable discipline that would allow acceptance into the graduate program and a commitment that they will enroll within one year of their initial probationary period. Preference in hiring and promotion will be given to those individuals who are the most qualified candidates meeting national certification standards from minority backgrounds or individuals with disabilities. There are cases in which the state agency is unable to recruit individuals who meet the national standard. In

those instances, the positions will be filled with an individual who has a Bachelor's Degree, and the new employee is expected to meet the national standard within three years of the date of hire. OFB financially assists with the provision of training for those individuals who are current employees working toward obtaining a master's degree in Rehabilitation Counseling and provides other benefits such as time to attend class or work on assignments. OFB offers opportunities for maintaining certification requirements through training seminars and professional development conferences. OFB promotes acceptable candidates who are current employees when they are the best-qualified applicants for the position. OFB has established a career ladder that is based on the achievement of a Master's Degree with certification as the highest level on the ladder. Current employees with a master's degree in Rehabilitation or appropriate area of discipline with certification supplemented by six years of experience in counseling, assessment, employer relations or rehabilitation technology. Current employees with a master's degree in appropriate area of discipline supplemented by two years of professional experience in rehabilitation counseling, assessment, employer relations or rehabilitation technology. Certification will be required within three years. Current employees with a bachelor's degree in appropriate area of discipline supplemented by two years' experience in a state vocational rehabilitation agency and the completion of a rehabilitation core curriculum met through in-service training or other strategies. Certification appropriate to the job will be required within six years. Employees will be required to obtain a master's degree in Rehabilitation or the appropriate discipline and obtain certification with the highest level of any national or State approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which they are providing vocational rehabilitation services.

The following professional personnel classifications are included in the above standards: vocational rehabilitation counselor independent living counselor rehabilitation instructor vocational evaluator assistive technology specialist orientation and mobility specialist

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

OFB shall ensure that personnel in all classes of positions are adequately trained and prepared through a system of individual Career Development Plans. Personnel are referred to available on–line approved training programs through Universities and other training sources. Rehabilitation technology and significant research and information from studies of consumer needs and satisfaction surveys shall be emphasized in individual plans and in training programs. All training for human resource development activities including tuition, books, in–service training programs and individual career development plans is supported through our regular basic support funds.

The HRD components of training, organizational development and career development form the basis of the Human Resource Development Plan. Staff career development is a combination of education, training and experience related to their specific professional disciples.In order to

adequately meet HRD needs of staff, OFB utilizes a variety of training resources and opportunities. OFB works closely with the general agency OVR in identifying available resources to meet the training needs of staff.

Through a system of Individual Human Resource Development (HRD) OFB has developed procedures and activities to ensure that all employed personnel are appropriately and adequately trained and prepared. This includes standards that are consistent with national or state approved or recognized certification, licensing, registration or other comparable requirements that apply to the area in which such personnel are providing vocational rehabilitation services.

OFB utilizes internal and external resources for training. Numerous specialized training seminars and programs are available throughout the state. When it is cost effective, the agency participates in national training opportunities. Employees participate in training, based on individual needs and career development plans. Employees then are asked to share the information with others as appropriate. OFB continues to provide training on the Rehabilitation Act Amendments of 1998 as well as training on the ADA, Workforce Innovation and Opportunity Act and the Ticket to Work and Work Incentives Improvement Act (TWWIIA).

Central office and other support staff as well as members of the State Rehabilitation Council will be included in all appropriate HRD activities. OFB is vested in using technology and is actively identifying potential web–based training programs that will allow staff the opportunity to utilize these alternative training methods for increased professional development. The agency is in the process of the implementation of on–line learning (see section below on eLearning). OFB staff access eLearning internally and externally through webinars and courses through outside educational and training sources.

Implementation, planning and coordination of HRD training activities are the responsibility of the HRD Unit. Currently, priority is given to staff in crucial CSPD positions that are eligible for scholarship opportunities enabling them to work toward their Masters in Rehabilitation Counseling or other specialty areas such as Orientation and Mobility and Assistive Technology. In addition, The University of Kentucky has available RSA–CSPD Training Scholarships to employed state rehabilitation counselors to pursue a masters' degree. The agency does give staff information and opportunities to utilize other university programs.

Career development allows employees the opportunity to develop and expand their career goals. Through new employee orientation, a training track on career development is conducted stressing that a career is a combination of education, training and experience related to a specific occupation. Staff is apprised that career development is the responsibility of each employee and his/her immediate supervisor and that career planning is managed and addressed in conjunction with the employee evaluation system. Individual career plans are developed for employees in conjunction with their initial performance plan that will provide opportunities for OFB personnel to upgrade their skills and qualifications and to advance within the agency to higher level paying positions. Career Plans are reviewed at the annual performance review in January and revised as needed.

OFB conducts an annual training needs assessment used to provide appropriate in–service training programs; as well as provide information to update individual career development plans to meet identified needs. Areas identified by staff in 2015 were the following: 1) Dealing with Difficult families and Negotiation Skills and professional development for the areas of Conflict Resolution and Decision Making. There were forty–eight respondents to the needs assessment.

OFB is supportive of staff in keeping current with up to date best practices and makes sure that staff receive current research and practices. This is done through shared information through workshops, conferences, presentations, publications (Braille Monitor, Council of the Blind, American Foundation for the Blind's Journal of Vision Impairment and Blindness, and National Federation of the Blind, Reflections) as well as internet site resources.

The Academy of Leadership Exploration and Preparedness program ALEAP is designed to provide staff with opportunities to learn about and develop foundational skills. This was a collaborative program with both OVR, the general agency and OFB. Staff first must participate in the prerequisite required courses (online and classroom setting of 50–60 hours of instruction) through the State Personnel Governmental Services Center. ALEAP II consists of three face to face sessions on a variety of leadership topics and the completion of a project. The enrollment from 2010 – 2015 was ten with eight of ten individuals or 80 percent successfully completed and the required coursework for ALEAP I and ALEAP II (three face to face sessions and completion of a project) graduating from the program.

Through a project with TACE in 2013 – 14 OFB introduced new concepts and processes to the agency for the area of succession planning. The central office administrator was identified as a critical need position for the project focus. For this area there was identification of key results areas and core competencies for the administrator position and for the field services manager position level to assure that this group is positioned to move to the next level and the development of training goals and objectives.

At the same time, the cabinet as a part of the State Workforce Board initiatives began a leadership project utilizing the same approach. The Project Director was a part of this workgroup and shared the work accomplished under this objective.

The curriculum is grounded in five essential leadership competencies identified and prioritized by Kentucky Workforce Leadership. The Leadership Academy combines virtual, physical, and online asynchronous classroom formats over a 5–month curriculum path that uses a team–based, experiential learning model that culminates with a "capstone" case study at the conclusion of the course. Implementation is set for FFY 2016. In addition to the Cabinet WIOA Leadership program, OVR and OFB training coordinators will ensure an additional training component for staff is included that encompasses crucial components specific to the field of leadership and rehabilitation.

OFB makes every effort to have representation at and participate in national and regional training events. In 2015 OFB staff attended the following National Conferences: National Braille Conference, National Council of State Agencies for the Blind, Council of State Administrators of Vocational Rehabilitation, Annual Summit VR Program Evaluation & Quality Assurance, National ADED, National AER and the National Randolph–Sheppard Forum.

All new hires attend new employee orientation and complete the required online coursework. Training occurred for the Rehabilitation Act, The ADA, Diversity, Career Development, Confidentiality, and The Role of the VR Counselor, the Introduction to the Eye and Low Vision and other pertinent topics.

In 2015, staff participated in several in house and other state trainings offered.

State Conferences attended were: the State Association of Persons Supporting Employment first Conference in February, Governors EEO Conference in November, Eye Opening Symposium in

October, Assistive Technology staff attended the University of Kentucky 12th Annual Institute in Assistive Technology in July (sponsored by the State programs under section 4 of the Assistive Technology Act of 1998 KATS) and Independent Living and Older Blind Counselors attended the University of Kentucky Annual Summer Series on Aging in June, Kentucky Association of Education and Rehabilitation of the Blind and Visually Impaired (KAER) in March, Kentucky AHEAD in May, the Kentucky Career Center Youth Summit, the Kentucky Career Center Employer Conference and Kentucky Rehabilitation Association Conference in Louisville in September.

Staff participated in teleconferences, webinars and online trainings on a variety of topics (American Foundation for the Blind E Learning, Supported Employment, Brain Injury, Assistive Technology, mental Illness). Staff participated in training through the KY Finance and Administration Cabinet on Financial Analysis. At the Charles W. McDowell Center monthly mini trainings were held for staff. VR field (counselors, assistants and other support staff) received in house training on the following: 1) Conflict Management 2) Case Management System/Coding, 3) Case Reviews, and 4) Pre Employment Transition Services, 5) Job Placement, and 6) Assessment. Several staff participated in training through the state government services including: 1) Hiring & Selection; 2) Overview of the Merit System; 3) Performance Matters; 4) Coping with Difficult Behaviors; 5) Leadership and Communication; 6) Diversity in the Workplace; and 7) Ethics.

CRC credits were awarded to certified counselors attending trainings for approved content area.

Staff is knowledgeable regarding work incentive resources that are available on line and at no cost. Staff are knowledgeable of the process to obtain Benefits Analysis services through a BIN Liaison or a certified a Community Work Incentives Coordinator (CWIC). One OFB VR Counselor is a CWIC.

Under the Quality In–Service Training Grant that just ended, OFB developed and implemented an online training program. A memorandum of understanding is in place covering 50 Angel seats, eLearning development, training, server streaming and instructional design support. Curriculum design and development is now complete for nine courses in the online program. Currently all 86/88 staff have accessed and completed at least three courses through eLearning in the system. Kentucky has recently launched a new Employee Learning Management System (KELMS). KELMS is a self–service training system and staff are seeing how it can be utilized to complement or link to KY virtual, our current e–learning system. Plans are to expand and build on the system.

The WorkSmart Kentucky Plan lays out the foundation to improve operational collaboration at both the state and local levels. Workforce Staff are involved in the committees and activities of the initiatives. The initiatives are focused on systems change. One initiative, Workforce Academy will provide training for all partners at every level of the system to be demand–driven and solutions based. Workforce Academy is a statewide training required for all Department of Workforce Staff. In 2015, Local Labor Market Training was provided to all workforce staff. Job Seeker Services Staff (case managers, interviewers, job developers and other job–seeker services personnel) attended The Power of LMI in Sector–Based Service Delivery to Job Seekers. The course presented basic understanding of how labor market information can be used to help job seekers understand their immediate job prospects and best, long–term career options and pathways based on stable and growing sectors in the region. Business Services Staff attended The Power of LMI in Sector Based Business Services. The course covered a basic understanding of how labor market information can best be used to support employer services staff in aligning business service strategies with labor market demand within a sector framework.

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.

Current information and research in the field of rehabilitation received by the Office for the Blind is distributed to staff statewide or if applicable posted on our website as a document or as a link to obtain pertinent information.

IRI journals, The Braille Monitor, The Braille Forum, Future Reflections, the Journal of Vision Impairments, and other journals and publications specific to the field are distributed to staff. Staff can make specific requests for information and research is done in the area for specific needed information to determine the need to subscribe to a publication or purchase books or materials for the staff. Information on Webinars through (i.e. EARN, JAN, EXPLORE VR, Workforce3One) are distributed to all staff via email on a weekly if not daily basis.

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.

OFB staff works to ensure that all materials are presented in the most accessible mode of communication that the consumer requires. All agency counselors are involved in an inter–agency project with OVR for Deaf–Blind intervention and receive extensive training in techniques for working with individuals who are Deaf–Blind. OFB has one individual designated to function as the Deaf–Blind Coordinator who has his MRC and is a CRC. On–going training opportunities ensure that skill levels are maintained or increased.

OFB utilizes a Williams Sound FM system for consumer and staff usage. The system will accommodate 10 individuals who are hard of hearing. The FM system is utilized for consumer meetings, trainings, conferences, counseling and other service activities. The FM system works for one speaker and several listeners. Counselors have access to Pocket Talkers utilized for conversing one on one with individuals who are hard of hearing. In order to accommodate consumers with different levels of hearing loss, OFB has a variety of headphones for use such as head earphones, mon/bi/ in the ear, and neck loops for hearing aids that work with the FM system and Pocket Talker.

ASL and Foreign Language Interpreters are contracted as necessary to ensure that individuals who are deaf or who are from diverse cultural backgrounds and need interpreters to access services will be able to communicate in their native languages. Certified interpreters shall provide interpreter services for the deaf. Voice Description is provided for any videos and classroom teaching techniques. All materials utilized and distributed by the OFB are available in an accessible format, including large print, cassette tape, CD ROM, disc, audio recordings, Spanish or Braille with respect to the individual’s informed choice. In an effort to assist staff with communication in a foreign language with consumers as needed Language Line is available as a resource.

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.

OFB shall coordinate its CSPD plans within the Kentucky Personnel System, to match the standards and qualifications of our personnel with personnel development under the Individuals With Disabilities Education Act, and the standards under the Rehabilitation Act, as amended.

The Kentucky Interagency Transition Council meets on a quarterly basis to address continued fulfillment of the Kentucky Interagency Agreement on Transition Services for Youth With Disabilities. The Office for the Blind, the Office of Vocational Rehabilitation and the Department of Education are three of the twelve state agencies that are parties to the agreement. One of the provisions of this agreement is cooperative training and staff development concerning transition issues. OFB staff attend Community Based Work Transition Program training offered by the University of Kentucky‘s Human Development Institute. In addition, staff attends the statewide annual Kentucky Association for Education and Rehabilitation of the Blind and Visually Impaired Conference and the Kentucky AHEAD Conference (professionals in post–secondary education providing services to persons with disabilities) each year receiving valuable training and resources.

Rehabilitation counselors work collaboratively with the special education cooperatives, high school education teachers, local directors of special education, and job coaches for students transitioning from high school into competitive integrated employment. OFB Vocational Rehabilitation Counselors attend IEP and ARC meetings working with the team in establishing a vocational goal. This assures the development of the students IPE in conjunction with the vocational rehabilitation IEP. OFB provides support to teaching instructors, school staff and job coaches regarding blindness issues and other areas of expertise such as Orientation and Mobility and Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore OFB staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

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 Kentucky Office for the Blind Comprehensive Statewide Needs Assessment (CSNA), July 2015, is available on the website. The purpose of this Comprehensive Statewide Needs Assessment (CSNA) is to assist in that effort, by providing a base of evidence on which priorities, goals and strategic planning can be developed. The Rehabilitation Act of 1973 was amended by the Workforce Innovation and Opportunity Act (WIOA), and signed into law on July 22, 2014. WIOA mandates that each state and its State Rehabilitation Council (SRC) conduct a comprehensive statewide assessment every three years. This study examines the rehabilitation needs of Kentucky residents who are blind, legally blind or visually impaired. In addition, we seek to clarify the needs of individuals with the most significant disabilities, minorities, individuals who have been unserved and underserved, individuals with disabilities served through other components of the statewide workforce development system, and youth and students with disabilities.

This project followed the guidelines established for a Comprehensive Statewide Needs Assessment and the Vocational Rehabilitation Needs Assessment Guide established by the Rehabilitation Services Administration and The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, signed into law on July 22, 2014. As specified by the guidelines, a number of data sources were used for this report. Primary data collected for this project includes:

- Interviews with stakeholder agencies;
- Survey of OFB consumers, parents, family members and the community at large;
- Focus groups with consumers, family members in Covington, London, Lexington and Louisville, and OFB program staff.
- Survey of Eye Physicians;
- Survey of Transition Students; Youth and Students;
- Survey of Teachers of the Visually Impaired;
- Survey of University and Technical College Disability Coordinators;
- Survey of Career Center Workforce System Partners;
- Survey of Community Rehabilitation Providers;
- Survey of State Rehabilitation Council Members;
- Survey of Office for the Blind Staff;
- Program data from the internal case management system; and
- State and National data trends.
- Labor Market Information

Several reports and publications created by the State of Kentucky and the Office for the Blind provided overall direction for the research and the development of this report. In particular, the documents and links compiled by the Kentucky State Rehabilitation Council Special Projects Committee in conjunction with Office for the Blind staff informed this report.

In order to provide some context to our analysis of the needs of blind and visually impaired Kentucky residents, this CSNA also examines a number of statistics and estimates provided at the state and national levels. All references are cited within the document.

Understanding the demographics of the overall population of the state of Kentucky gives a more complete context for the needs of the visually impaired and blind population within the state. Relative trends for blind and visually impaired Kentuckians, compared to national trends and the disparities among services and resources for subgroups of populations, become clearer when couched in this statewide context.

Understanding the prevalence and cost of eye disorders will help policy makers develop better policies and interventions for preventing and treating vision problems. If appropriate preventive steps are not taken, costs will burgeon as the population of Kentucky ages and life expectancy increases. The number of Kentucky residents with impaired vision, including blindness, could more than double over the next three decades.[3]

The direct costs of vision problems in Kentucky for all ages are an average of $951 million. Indirect costs are around $1,029 million totaling $1,900 million in overall costs. System change is very important in order to promote prevention of vision loss and preservation of eye health. This will improve the lives of citizens in the Commonwealth and offset some of the direct (medical costs) and indirect costs (reliance on federal and state programs) and loss of productivity in the workplace) in treating this population.

The latest 2009–2013 statistics from the U.S. Census Bureau, used in the 5–Year American Community Survey, indicate that 3.6% of Kentucky citizens reported a visual disability. Visual disability type is based on the question (asked of all ages): Is this person blind or does he/she have serious difficulty seeing even when wearing glasses? The estimates above are based on a sample of 3,035,296 persons who participated in the 2012 American Community Survey (ACS).

In the year 2012, an estimated 37.7 percent (plus or minus 0.70 percentage points) of non–institutionalized, male or female, with a visual disability, ages 21–64, all races, regardless of ethnicity, with all education levels in the United States were employed. In Kentucky, only 31.2 percentage of this same population were employed. This is 6.5 percent under the national average. In Kentucky, in 2012, 6.8 percent of individuals with a visual disability among non–institutionalized working–age people (ages 21 to 64) were not working but actively looking for work. Median annual earnings on an individual with a visual disability (including any working–age people ages 21 to 64 who work full–time/full year) in Kentucky in 2012 was $30,300.

The State Rehabilitation Council along with the Office for the Blind worked collaboratively to assess the needs of individuals with visual disabilities.

The mission of OFB is to provide opportunities for employment and independence for individuals who have visual impairments. For each of the last three years, 2012 – 2014, OFB has annually served an average of 1,500 consumers per month. Services to consumers are individualized, and include vocational assessment, bioptic driving, job placement, job development, career counseling, orientation and mobility training, assistive technology training and devices, independent living services, physical and mental restoration, and referral and coordination with other agencies. Over the past three years, on average, an individual maintains an open case with the agency for over two years, with an average of 326 individuals having a positive employment outcome per year. This employment outcome includes new jobs for individuals as well as individuals being able to maintain

a job as a result of receiving services from the agency. The median age of consumers is 40.31 years, and age–related eye diseases such as diabetic retinopathy, macular degeneration, cataract and glaucoma account for the majority of disabilities of Kentucky Office for the Blind consumers.

Staff members of OFB include vocational rehabilitation counselors, assistive technology specialists, orientation and mobility specialists, vocational evaluators, braille and computer instructors, independent living instructors, Bioptic driving instructors, and administrative support personnel.

Through survey responses, consumers and their family members as well as members of the State Rehabilitation Counsel (SRC) helped to identify challenges that they feel prevent or limit employment for individuals who are blind or visually impaired. Availability of jobs, availability of job placement services, and availability of transportation were perceived as top challenges to employment.

A service perceived to be very important to gaining employment as well as living independently was assistive technology. In addition, job search assistance (resume writing, interviewing skills, etc.), job placement, and on the job supports were rated high by respondents as a valuable services to gaining employment.

The benefits of working are many, including greater self–sufficiency and economic independence, and full integration into society. In Kentucky during the fiscal year 2014, consumers of OFB saw an average wage increase of $5.01/hr. and an average increase of over 12 working hours per week. Our needs survey revealed that although fear of losing SSI or SSDI benefits was seen as one of the top challenges or barriers to employment, it was not regarded as significant a challenge to work as were personal and home life issues. An individual managing both a disability and ongoing financial strain may experience issues in housing, medical expenses, and family relationships.

Transportation is always an important factor in employability, and one that remains an ongoing concern for individuals with disabilities, but particularly for individuals with visual impairments. Only about 32 percent of respondents had used public transportation in the last year, and 37.5 percent reported that no public transportation existed in their area, with an additional 22.5 percent stating that they didn't have access to any transportation resources such as friends, family, public, or paid private driver.

<u>Needs/Concerns</u>

- Increasing the types of available jobs through customized employment and job development
- Transportation options for underserved counties of Kentucky
- Vocational case management to address home, family and personal issues
- Availability of assistive technology that responds to the changing needs of today's information based workplace
- Assessment for the need for benefits counseling and/or personal finance management
- Increased need for work based learning or community based work experience

<u>Recommendations/Strategies</u>

- Increase agency capacity to provide job placement services through establishment grants for Community Rehabilitation Providers (CRPs) to offer customized employment services, job coaching, job development, and transition age work experiences.

- Increased use by counselors of the full resources of the Career Center for job leads and other job search services
- Continuation and expansion of McDowell Center for the Blind's "Boot Camp" and similar initiatives to provide comprehensive employability skills preparation for individuals who have struggled to find employment.
- Agency staff awareness and referral to community resources to assist with personal factors that impede independence and vocational success, including transportation issues. Updates of resource guides.
- Assistive technology instruction with a workforce–ready emphasis on training in the most common office setting software applications.
- Provision of benefits counseling to consumers

B. WHO ARE MINORITIES;

In looking at race and ethnicity in our state, 87.9 percent of the population is White, 7.8 percent Black or African American and 3.1 percent Hispanic or Latino. In the year 2012, an estimated 39.5 percent of Black/African American Kentuckians with a visual disability, (non-institutionalized, males or females, ages 21-64), were employed. In 2012, the prevalence of disability among persons of all ages of Hispanic or Latino origin in Kentucky was 8.6 percent. There are no statistics available regarding the prevalence of a visual disability for the Hispanic or Latino population.

Kentucky's predominate population is White as shown by the statistics in the above paragraph. Overall the rate of services in relation to the number of minorities in the population is consistent. However it is of note that a high incidence of Black/African American Kentuckians reported a visual disability.

The field of vocational rehabilitation has long recognized the need for ongoing awareness to the problem of un-served and underserved individuals with disabilities who come from different ethnic and racial minority groups. In fact, vocational rehabilitation counseling degree programs require cultural diversity and cultural counseling coursework devoted to working with individuals from different minority groups. Kentucky OFB works to maintain a culturally diverse staff, and is committed to embracing strategies that would improve outcomes for individuals from minority populations.

Needs/Concerns:

- Cultural competency in staff and counselors, and an agency that is welcoming to individuals from minority groups
- Recommendations/Strategies
- Remain vigilant to reviewing minority referral and application numbers, ensuring that they remain at least equivalent to that seen in the population of Kentucky.
- Provide active outreach to minority groups to ensure that individuals from all communities know and understand the services we are able to provide.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Survey data gathered from the SRC and OFB staff indicated that both staff and council members had concerns over how well we serve some sub populations of consumers: individuals from minority populations, individuals with criminal backgrounds, individuals with psychiatric and emotional

disabilities, and individuals with substance abuse problems. All these underserved populations face discrimination in our society, and certainly discrimination in hiring.

Individuals with a background of criminal convictions and/or incarceration face significant barriers to employment. Criminal history reports are used by employers and other groups to make decisions about whether or not to accept an individual's application for jobs, housing, and a myriad of other services. It isn't easy for the layperson to understand the complexity of a history that includes sentences served or charges dismissed, deferred or expunged. It isn't uncommon for the individual with the criminal background to be uncertain of where they currently stand legally, whether or not they were charged with a felony, and how to fill out applications. It is important that OFB staff understands the challenges faced by this population, and feels comfortable in providing the appropriate vocational counseling and services that lead to employment.

Blindness and visual disabilities create certain functional limitations to an individual's independence, and these limitations can be significantly compounded by the presence of mental illness. It is not surprising that our staff and council members feel that this population may require additional focus and attention. Understanding what components of our agency services are required, and how to combine these with ongoing community supports will be vital in providing quality case management.

Common estimates are that substance abuse (SA) exists in individuals with disabilities at 1.5 to 3 times the frequency of the nondisabled population. Within the sub population of individuals who are blind and visually disabled, the incidence of SA is estimated at between 30 and 50%. Adding to this already complex issue, the dual–diagnosis of mental illness and substance abuse is now recognized as existing in the majority of individuals in SA rehabilitation settings. An individual must have SA issues recognized and treated not only to participate effectively in their rehabilitation process, which may include training and skills acquisition, but to maintain employment.

Needs/Concerns:

- Better OFB counselor understanding of the criminal background check form, and the implications of an individual's legal history.
- Understanding the unique services and skills necessary to improve employment outcomes for these populations.
- Recommendations/Strategies
- Counselor training on reading criminal history reports and providing appropriate vocational counseling.
- Use of a screening tool to assess alcohol and drug use at application, standardized across counselors.
- Create joint training's with substance abuse treatment facilities, benefiting the agency by increasing knowledge about resources, and benefiting the facility by increasing awareness about the blind and visually impaired population and accessibility concerns.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

Employers who are aware of OFB services and have successfully hired blind or visually impaired consumers understand the ongoing support and assistive technology our agency provides. The challenge is to extend our reach to increasingly more employers and industries across the state. The role of each OFB rehabilitation counselor includes doing job development, and these counselors perform employer outreach continuously. OFB's assistive technology specialists are also points of

contact with employers and can help fill job openings with qualified consumers. They not only consult on accessibility issues and provide job site specific assistive devices and technology, but will give ongoing training and support to the consumer placed with an employee.

The use of Kentucky Career Center and Community Rehabilitation Providers (CRPs) are two additional means or resources by which we are able to provide services to employers. Career Centers offer employers job listing services and link them with job seekers. CRPs offer very individualized services which include consultation, job coaching and on–going support.

Survey data was gathered from Career Center Partner Staff, CRPs and Employers to get a full picture of the perceptions and needs of employers who hire OFB consumers. Naturally, it is important that employers feel comfortable working with an individual who is blind or visually impaired, and for that reason our agency provides consultation and even blindness etiquette and sensitivity trainings to companies. However, our survey results revealed that CRPs and Career Center staff also indicated that they themselves lacked experience and requested more training on working with OFB consumers. Additional survey data indicates that the services and rehabilitation process used by OFB is not completely understood by CRP staff. Until our workforce partners feel confident providing their services to this population, they may not be effective in job placement for our consumers. Our agency may be able to remove reluctance and hesitancy these partners have by better describing the supports and services we are able to provide the consumer in addition to and alongside their own services.

Based on survey results, OFB services that employers find highly desirable are the provision of assistive technology, consultation on reasonable accommodations, job analysis, and vision loss awareness training. Increasing these types of services to employers also ensures that OFB maintains human resource contacts and a presence with employers.

Needs/Concerns:

- More outreach to employers which results in job development and placement for consumers.
- Incomplete picture of the range and quality of services we provide to employers on a yearly basis, as it is not recorded in CMS
- Perceptions of the skills and abilities of Career Center and CRP staff in placing blind and visually impaired consumers.
- Recommendations/Strategies
- Increase “valuable services” to employers such as job analyses, consultation services on hiring, making accommodations, assistive devices for the workplace, disability awareness trainings, ADA trainings, etc. Capture employer services that OFB assistive technology, McDowell staff, and counselors provide in CMS
- OFB counselors to provide CRP staff necessary consumer background information (AT and O&M reports, etc), to increase comfort and confidence when working with individuals with blindness and visual impairments

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

In order to provide a more comprehensive picture of the needs of transition age students, surveys were administrated to consumers up to the age of 24, and again a year later, after the passage of

WIOA, two separate but similar surveys were administered to consumers identified as “youth” and “student.” In addition, survey data was also collected from secondary school Visually Impaired (VI) teachers, and higher education Disability Coordinators (DC).

Although it is difficult to know how many transition age individuals have a visual impairment in Kentucky, we do know that there are approximately 520 students who are using the services of the Kentucky Instructional Materials resource Center at the Kentucky School for the Blind for adapted and accessible text books and materials for school. At this time, our agency is actively serving over 450 individuals in the age range of 14 – 21. WIOA, the new workforce legislation, puts renewed emphasis on serving transition age consumers, and in reaching them with pre–employment transition services at even younger ages. These pre–employment transition services include career counseling, counseling about post–secondary training, workplace learning opportunities, self–advocacy training including peer mentoring and workplace readiness skills training. Partnerships exist between OFB, Kentucky School for the Blind, and Morehead State University in better serving students and youth with visual impairments in our state.

Employment during high school greatly enhances the chances of employment as an adult, and also increases they quality and wage of that future work.

The results of these surveys show that the involvement of OFB is welcomed and seen to provide valuable services for transition age consumers. Secondary level educators indicated that even earlier and more in–depth involvement in Individualized Education Plan (IEP) development is desired. Transition age consumers themselves placed high value on job seeking and job placement services (resume and interviewing, job placement, job shadowing and paid work experiences).

Disability coordinators in post–secondary education programs provided an important perspective for our transition age consumers who are actively pursuing post–secondary training. Disability coordinators ensure that students receive reasonable accommodations and supports during their enrollment. Our OFB counselors received positive ratings by this group, and are viewed as knowledgeable and able to connect students to needed resources. These coordinators saw a need for more orientation and mobility services, and more open and regular communication with a student’s vocational rehabilitation counselor. Services related to assistive technology and job preparation skills were identified as very useful by post–secondary students themselves, with high interest in job shadowing and paid work experiences.

<u>Needs/Concerns Reaching all students who could benefit from OFB services</u>:

- Greater counselor involvement in career counseling and development of the Individualized Education Plan (IEP) to avoid unrealistic vocational goals
- More consistent service provision between counselors
- Earlier counselor involvement with students and their families
- Enhanced student awareness of enrollment in transition programs that take place during the summer
- Career counseling about community college and vocational and certificate options for post–secondary education
- More opportunities for workplace learning including paid work experiences and job shadowing
- More Orientation and Mobility services
- Recommendations/Strategies

- Create strategies for OFB counselors to meet the needs of younger secondary school transition students and their families, and enhance their effectiveness at ARC and IEP meetings
- Provide OFB marketing materials to eye physicians" offices about who to refer and how
- Ensure consistent and high quality transition services from OFB counselors through training and case reviews.
- Marketing and outreach to high school educators and counselors, including state wide coordinators and VI instructors, to promote summer transition program enrollment opportunities
- Continue to enhance summer transition programs to include more opportunities for paid work experiences

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Eighteen members of community rehabilitation provider organizations answered survey questions. The first question asked, "Does your organization provide community employment services for individuals who are blind and visually impaired?" Fourteen respondents affirmed this statement, whereas only two said no. The next question asked, "Does your organization provide Supported Employment services?" Fourteen respondents answered yes and 4 respondents said no.

Next, community rehabilitation providers (CRPs) were asked, "How would you rate your organization's skills and knowledge in assisting individuals who are blind and visually impaired in obtaining employment?" The most common response was "good" or 41.2 percent. The next question asked, "What could Office for the Blind do to support CRP vendors more effectively in providing services to the blind and visually impaired?" Six services were listed: "Improved Communication with Vocational Rehabilitation Counselors," "Streamlined Paperwork, Training," "More knowledge of OFB services," "More Referrals, and Realistic Expectations (vocational goals)." "Training," "More Knowledge of OFB services," and "More Referrals" were marked by 50 percent or more of respondents.

Currently in Kentucky, the Office for the Blind works with a limited number of Community Rehabilitation Providers (CRPs) to find job experiences and job placements for our consumers. While most CRP"s have typically worked with individuals with developmental and intellectual disabilities, they are gaining familiarity in working with individuals with visual disabilities. Our survey uncovered interesting findings about the beliefs of different provider staff. When asked to rate their organization's skills and knowledge in assisting blind consumers, most chose only a "good" rating as opposed to "very good" or "excellent." It follows then that over 50 percent felt that more training in working with this population, and better knowledge of the services offered by Office for the Blind would be welcomed supports. A strong partnership with CRPs across the state would greatly enhance services OFB could offer consumers. However only half of those surveyed requested more referrals. Based on this survey, CRP survey participants feel strongly that employers have concerns that there are risks in hiring individuals who are blind and visually impaired, and also that employers are concerned about making accommodations for this population.

It is possible that more CRPs would feel comfortable working with blind and visually impaired consumers if they had a greater understanding of the population itself and the types of jobs blind individuals hold across the country. By having a strong understanding of how OFB can support placement efforts through assistive technology, and other services, CRPs may come to understand the opportunities they are able to provide in their own communities. Increasing referrals to CRPs

must go hand–in–hand with ensuring CRP staff feel comfortable and competent working with consumers who are blind. OFB must enhance communication and understanding about the role it can play in partnership with CRP staff (orientation and mobility services, assistive devices, etc.). Staff who lack experience working with consumers with visual disabilities would benefit from training that would include how to effectively work with our staff to meet technology or mobility needs for a consumer, and understanding how assistive technologies are used in different job settings. Importantly, CRP staff who have no reservations themselves about the abilities of blind and visually impaired consumers to work will be more effective in alleviating the concerns employers have about hiring individuals from this population. OFB has collected information to pursue Establishment Grants for CRP service providers specific to the blind and visually impaired population. We hope to realize this project in FFY 2017.

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 .

Fifteen Teachers of the Visually Impaired (VI) were asked questions. We asked VI teachers what triggers a referral to OFB. The choice “Grade Level” was chosen more often than Age, Law Requirements, Family Request, etc. With new WIOA emphasis on “Pre–Employment Transition Services,” VR counselors will communicate the need for earlier involvement with students and their families. Ideally, students and families should understand the role of the VR counselor in planning for future employment, and the services and programs we make available to students during their secondary school years.

VI teachers indicated that their expectations in working with a counselor are mainly to provide resources for the student/family, and to include the counselor as part of the student’s IEP team. The survey indicated that the VI teachers have low expectations for meeting regularly with the VR counselor and student, or to have open and regular communication. Inconsistent service provision, or limited or sporadic involvement, was identified as a current barrier to accessing OFB services. These beliefs may indicate a need to not only affirm our own commitment to early involvement in planning, but to find new ways to stay involved and easily accessible. The survey also indicated there is a need for a greater understanding of the array of services, family buy–in in the process and increased participation in work experience programs.

VI teachers gave positive ratings to OFB”s counseling staff in areas such as knowledge, rapport building ability, and ability to connect to needed vocational services such as training, job search and placement, including post–secondary education. Some VI teachers did not agree with the statement that counselors assist with the development of strong appropriate vocational goals. Participants indicated the need for setting realistic and appropriate vocational goals based on an individual’s skills, abilities, and interests.

The results indicated that of the eighteen disability coordinators who participated in this survey, over 60 percent work at four year universities, and 28 percent work at technical colleges. Both public and private, urban and rural institutions were equally represented. Overwhelmingly, the respondents affirmed that when students are not already OFB consumers, they do link students with OFB when they enroll for classes.

We were interested in learning about the types of services offered by disability coordinators in post–secondary institutions. All respondents indicated that they offer testing accommodations. Less than half offer career or vocational assessment and counseling, and between 30 – 40 percent offer assistive technology evaluations or disability specific assessments. Of those surveyed, only 2 individuals indicated that they offer job placement services. These results indicate that while academic services such as testing accommodations are well supported, more emphasis on career related counseling and direct placement services would be very useful for this population.

All the Disability Coordinators in this survey have an expectation that OVR counselors will provide needed assistive technology for post–secondary students. Percentages were high among responses that goals and expectations of working with an OVR counselor included provision of orientation and mobility services, resources for the student/family, vocational/career counseling, open and regular communication, assistance with training/college funding, and assistance with employment upon graduation. While we may help provide financial assistance for tuition and assistive devices, the true strength of our agency is in the vocational counseling services we provide on an individual basis. We must work to remain active counselors, ensuring that students are getting opportunities for work experiences, internships, and apprenticeships through the Career Pathways program.

The new Workforce Innovation and Opportunity Act, signed into law in July of 2014, places renewed emphasis on ensuring that students with disabilities receive pre–employment transition services. These services focus on high–school age students, and include job exploration counseling, work–based learning experiences, work readiness, and instruction in self–advocacy. Recognizing that early exposure to work, as well as the development of values and interests that support a future career greatly improves the chances that a student will be employed in the future, Office for the Blind will increase resources to support innovative programs for this population.

In response to this change, our agency reached out to consumers who met the new WIOA age/school enrollment criteria in a survey that could begin to explore the degree of work exposure, workplace readiness, technology needs, and other service needs this agency can provide. Additionally, in order to capture the needs of the population that meet the criteria for the definition of Youth under WIOA, we developed a separate survey to capture their input.

Almost 70 percent of youth, as opposed to 55 percent of students, indicated that services related to assistive technology would be personally useful to them. Notably, most of the youth surveyed here are in four year university or college programs, and therefore may place greater value on assistive technology training than teens/students, as more challenging school work on a post-secondary level makes greater demands on using the internet and creating original documents using computer software programs.

Computer literacy has become a necessity for jobs of the 21st century. Training in technology for students and youth should remain an area of great emphasis for our agency, as research has shown that receiving this training is predictive of employment in higher positions (Shaw and Gold, 2010). Well over half the respondents of these two surveys prefer to use the computer (rather than print or braille) to read, are users of tablets and smart phones, and use assistive technologies like JAWS, screen readers, CCTVs, BrailleNote, etc. Young consumers of OFB are already using different electronic technologies, but will require more training to enhance their skills for the workplace.

As might be expected, more youth respondents have had work experiences, interviewed for jobs, and received a paycheck than student respondents. Less than half the student participants had ever had work place learning experiences, including job shadowing. As reflected by this survey, our

agency has not seen visually impaired students or youth participate in internships, although this is a new area of emphasis in WIOA.

The majority of students and youth surveyed reported that they had received counseling on how to apply to universities, but far fewer between 15–20 percent had discussed community colleges, and fewer still from both groups had discussed trade or vocational schools with a teacher or counselor 7–22 percent. Only about half of all youth surveyed indicated that they understood the difference between a vocational/trade school and a community college. Two year degree and/or certificate programs offer attractive alternatives with their emphasis on Career Pathways and additional student supports, and should be part of the counseling discussion.

Our surveys of these two groups revealed interesting information about their opinions of agency services that would be useful now or in the near future. Youth participants rated almost all the services with a 50 percent or higher endorsement as personally useful. Value was particularly found by both student and youth respondents in job seeking and job finding services like resume and interviewing skills, job placement, and job shadowing, and paid work experiences. At the time of the survey, none of the youth respondents were working, and only 30 percent were actively seeking employment.

Transportation, mobility issues, and orienting to new educational or work environments pose a significant barrier to individuals who are blind or visually impaired. The majority of youth respondents rated themselves as only average or needing improvement in the area of orientation and mobility. About 40 percent of youth respondents indicated that they could not plan a route or arrange transportation for themselves. Only half of student respondents reported that they could plan a route.

About half of youth respondents indicated that they would find independent living skills services useful. About 40 percent are not able to make meals for themselves, and 30 percent are not able to do their own laundry. Caring for personal needs, being organized, and realizing the importance of being punctual and reliable are all important pre–employment skills.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

Based on the 2010 Demographic Profile Data of General Population and Housing Characteristics, Kentucky's population is 4,339,367. In the year 2012, an estimated 2.2 percent (plus or minus 0.02 percentage points) of non–institutionalized, male or female, all ages, all races, regardless of ethnicity, with all education levels in the United States reported a visual disability. In Kentucky, 43,325 or 3 percent reported having a visual disability, a little higher than the national average.

In the year 2012, an estimated 37.7 percent (plus or minus 0.70 percentage points) of non–institutionalized, male or female, with a visual disability, ages 21–64, all races, regardless of ethnicity, with all education levels in the United States were employed. In Kentucky, only 31.2 percent of this same population was employed. This is 6.5 percent under the national average. In Kentucky, in 2012, 6.8 percent of individuals with a visual disability among non–institutionalized working–age people (ages 21 to 64) were not working but actively looking for work.

Projections are reflective of rising cost in tuition (2.9 percent – 3.1 percent across the state) and medical care. According to an April 17, 2015 press release from the Council on Postsecondary Education the Council on Postsecondary Education set tuition and mandatory fee rate increases at the lowest in more than a decade.

Kentucky ranks above the nationwide average for adults that have the following: arthritis; heart attack; stroke; high cholesterol; depressive disorder; high blood pressure, smokers and COPD, emphysema, or chronic bronchitis. In 2013, 80.8 – 83.3 percent of individuals reported having access to health care coverage. Adults age18–64 reporting having health care coverage was 76.5 – 79.5 percent. According to Kynect, Kentucky's healthcare connection, as of June of 2015 there are 1,032,087 total eligible members.

Kentucky's workforce is one of the nation's least healthy, and the state has a disproportionate number of working–age people who are not in the workforce because of health problems. The state ranks first in the nation for the highest smoking rate (28.3 percent), cancer deaths and preventable hospitalizations; second in heart disease and poor physical–health days; third in heart attacks and poor mental–health days; and in the top 10 in diabetes, cholesterol and sedentary lifestyles.

Kentucky's annual unemployment rate fell to 5.4 percent in 2015 from 6.5 percent in 2014, while nonfarm employment gained 27,700 jobs, according to the Office of Employment and Training (OET), an agency of the Kentucky Education and Workforce Development Cabinet. It was the lowest annual jobless rate for the state since 2007 when it was also 5.4 percent.

For 2016 the Kentucky Office for the Blind will have one category out of four open under Order of Selection.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The following data that represents estimated performance for FY 2016 under this State Plan based on historical data from prior years. The estimated service and category numbers are reflective of the average number of new applicants that we expect to receive in 2016 and it is inclusive of the carryover of consumers from the prior year.

The following information reflects the estimated numbers taking into consideration that in FFY 2016 Category One is the only category open.

Estimated number to be served is 1,260 with 282 positive employment outcomes. The number for FY 2016 year take into account that Categories Two and Three were closed effective October 1, 2015. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post–employment services.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Projected performance for FY 2016 under Title VI, Part B

OFB estimates that it will serve around 60 individuals with a total estimated associated costs fo around $62,000. This is an average estimated costs per person of around $1,033 with 8 employee outcomes. Expenditures exceeding the Title VI–B 2016 allotment will be covered with funds from the 110 program.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

OFB is under an order of selection with only Category One open.The numbers take into account that Categories Two and Three were closed effective October 1, 2015. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post-employment services.

The estimated number to serve under Category One is 1,100 with 219 successful employment outcomes.

The estimated number to serve under Category Two is 143 with 55 successful employment outcomes.

The estimated number to serve under Category Thee is 17 with 8 successful employment outcomes.

The estimated number to serve under Category Four is zero.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Year to date in FFY 2016 there are 65 individuals on a waiting list for services (PC2–30, PC3–10 and PC4–25). There were ten closed in out of selection.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

The costs are reflective of the actual direct service cost to consumers for the current year to date 2016.

Category One

Estimated to be served – 1,100

Total Estimated Associated Costs – $1,400,000

Average Estimated Costs per person – $1,272

Estimated Employment Outcomes – 291

Category Two

Estimated to be served – 143

Total Estimated Associated Costs – $200,000

Average Estimated Costs per person – $1,526

Estimated Employment Outcomes – 55

Category Three

Estimated to be served – 17

Total Estimated Associated Costs – $11,500

Average Estimated Costs per person – $1,916

Estimated Employment Outcomes – 8

Category Four None

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The following goals and priorities were developed collaboratively with the State Rehabilitation Council (SRC) based on the identified needs through the FFY 2015 Comprehensive Statewide Needs Assessment (CSNA). Several reports and publications created by the State of Kentucky and the Office for the Blind provided overall direction for the research and the development of this report. In particular, documents and links compiled by the Kentucky State Rehabilitation Council Program Planning Committee in conjunction with Office for the Blind staff informed this report.

The SRC planning committee set draft goals and objectives and designed a CSNA draft methodology plan in late 2013. The following methods were agreed upon by the committee and recommended to the full council for approval.

Literature Review – Internal Case Management Data and External Data Focus Groups/Open Forums Surveys of different groups Interviews with SRC members and advocacy organizations Data analysis and preliminary results reports Final Report and Presentation to the SRC Formulation of state plan goals and priorities

The Planning Committee reviewed the input received for the 2016 State Plan in relation to the goals, strategies and innovation and expansion activities existing in the plan. At the October 23, 2015 meeting, a presentation was made to the full SRC and the committee made a recommendation to the SRC to accept the following proposed goals for the FFY 2016 State Plan. Discussion was held with a suggestion made for an expansion of one of the strategies. A motion was made to send it back to the Committee for re–wording and that the vote be tabled till the January 22, 2016 meeting.

Due to inclement weather the meeting was rescheduled to February 19, 2016. Based on the input received, there were six concise and measurable goal areas set. These goals were based on the Statewide Comprehensive Needs Assessment, Monitoring Reports, the federal Standards and Performance Indicators, real time data through the Case Management System, strategic planning and other sources of information.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

The SRC Planning Committee and the Kentucky Office for the Blind have recommended and approved the following Goals at the February 2016 meeting.

Goal 1: To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain or regain integrated competitive employment.

Develop new relationships with employers, community organizations & government agencies to promote employment opportunities.

Provide resources for consumers that lead to successful outcomes.

Goal 2: Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth. Maximize federal match dollars for the Vocational Rehabilitation Program.

Monitor ongoing fiscal and staff resources in order to maximize service dollars

Maximize services in expending required percentages for PETS and SE services for youth and students.

Goal 3: KBE will provide full–time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business.

Maximize training opportunities for vendors and KBE staff.

Provide new vending opportunities.

Improve existing vending locations.

Goal 4: Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Increase the skills and competency levels of all rehabilitation staff statewide.

Improve services to underserved populations within the blind and visually impaired community, including substance abuse, mental health, and criminal background.

Goal 5: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Develop a marketing approach and plan to guide OFB's partnership efforts with eye physicians

Increase available resources and seek to leverage funding, staff resources, in–kind and programmatic support and other forms of assistance from partners.

Goal 6: To engage, youth, parents, high schools, and other transition specialists in exploring and planning career choices that connect to a full range of postsecondary options for training, career development, and employment.

To improve the number, quality, and rate of employment outcomes for youth and students participating in Transition services.

Develop and implement a plan for PETS services

Enhance student awareness of enrollment in transition programs

The Kentucky Office for the Blind set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities

Develop and release an RFP for establishment grants for CRPs to address integrated competitive employment for adults, students, and youth who are blind or visually impaired.

Develop, award and implement establishment grants.

Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired, including youth with the most significant disabilities.

Goal 2: OFB will identify and utilize internal and external resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

OFB will utilize the expertise of the Human Development Institutes' Supported Employment Training Project at the University of Kentucky.

OFB will attend training through the HDI project as well as in house training on policy updates and changes.

OFB will work closely with APSE, Community Mental Health Centers, the Department of Behavioral Health, Developmental and Intellectual Disabilities to identify strategies to expand services to youth.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

The Kentucky Office for the Blind Comprehensive Statewide Needs Assessment (CSNA), July 2015, is available at http://blind.ky.gov. The purpose of this Comprehensive Statewide Needs Assessment (CSNA) is to assist in that effort, by providing a base of evidence on which priorities, goals and strategic planning can be developed. The Rehabilitation Act of 1973 was amended by the Workforce Innovation and Opportunity Act (WIOA), and signed into law on July 22, 2014. WIOA mandates that each state and its State Rehabilitation Council (SRC) conduct a comprehensive statewide assessment every three years. This study examines the rehabilitation needs of Kentucky residents who are blind, legally blind or visually impaired. In addition, we seek to clarify the needs of individuals with the most significant disabilities, minorities, individuals who have been unserved and underserved, individuals with disabilities served through other components of the statewide workforce development system, and youth and students with disabilities.

For the purposes of this project we addressed the following:

What are the vocational rehabilitation needs of individuals who are blind and visually impaired across our state? How can the Kentucky Office for the Blind increase opportunities for blind and visually impaired job seekers to prepare for work, find employment, and be provided with the necessary supports, services, and assistive technologies to sustain employment?

What are the needs of transition age youth and students in our state? How can we increase awareness among all students, parents and secondary school teachers about the transition programs and services we provide. How can we enhance pre–employability skills in the transition population?

What are the needs of employers in Kentucky? What services can we offer employers that would increase job opportunities for individuals who are blind or visually impaired?

How can the Office for the Blind better address the needs of underserved populations, particularly individuals with criminal backgrounds, individuals with psychiatric and emotional needs, and individuals with substance abuse issues? How can OFB improve counseling and VR services to these populations as well as to racial and ethnic minority populations?

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

This 2015 Comprehensive Statewide Needs Assessment informs Office for the Blind's (OFB) strategic and state plans; meets the Federal regulatory requirements of 34 CFR §361.29; and provides vital information on the State OFB program which is used by both public and private disability advocacy agencies. The State Rehabilitation Council along with the Office for the Blind worked collaboratively to assess the needs of individuals with visual disabilities. The Kentucky Office for the Blind Comprehensive Statewide Needs Assessment (CSNA), July 2015, is available at http://blind.ky.gov.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

Kentucky is currently establishing baselines and developing strategies regarding the State's performance under the performance accountability measures of section 116 of WIOA. The current Kentucky OFB/VR Case Management System (CMS); a web–based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology – a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation.

In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports for common measures reporting.

Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

OFB and the State Rehabilitation Council examined a number of statistics, estimates and internal program data from our Case Management System as well as other documents and publications. These included:

2012 Comprehensive Statewide Needs Assessment 2015 State Plan 2015 Annual Report 2015–2017 Strategic Plan 2015 Satisfaction Survey of Closed Cases (successful and unsuccessful) Caseload Statistics Prior performance on the standards and indicators

OFB was last monitored in 2009 and all findings and recommendations from those monitored activities under section 107 have been addressed or resolved.

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.

The Rehabilitation Act of 1973, as amended, requires an Order of Selection of individuals to be served, ensuring that individuals who have the most significant disabilities will be given first priority whenever all eligible individuals who apply cannot be served. The initial date for implementation of Order of Selection was January 1, 1995. There were Five Priority Categories with only eligible individuals in Priority Categories One through Four being served. The effective date was May 4, 2007 for additional changes to Order of Selection. During the 2003 site monitoring with RSA, OFB staff consulted with RSA representatives on the Order of Selection and the need for regulatory changes. Category Five was removed and definition changes were made to Categories One through Four refining the criteria to be closely aligned with the federal policy.

The order of selection gives first priority to those individuals with the most significant disabilities as defined by OFB. The criterion to determine individuals with the most significant disabilities and the subsequent order of categories to be followed in selection of individuals to be provided services, is based on a refinement of the criteria set forth in the definition of individual with a significant disability, specifically, the degree by which an individual's impairment seriously limits his or her functional capacities and the number of rehabilitation services needed by an individual.

Currently the agency has four priority service categories with Priority Category One open and Two, Three and Four Closed. They are as follows:

A. Priority Category One – Eligible individuals with the most significant disability whose severe impairment seriously limits three (3) or more functional capacity in terms of employment outcome; and whose rehabilitation requires two (2) or more services over an extended period of time. (Open)

B. Priority Category Two – Eligible individuals with a significant disability whose severe impairment limits two (2) functional capacities in terms of an employment outcome and whose rehabilitation requires two (2) or more services over an extended period of time. (This category is closed)

C. Priority Category Three – Eligible individuals with a non– significant disability whose impairment seriously limits one (1) functional capacities in terms of an employment outcome and whose rehabilitation requires two (2) or more services over a period of time. (This category is closed)

D. Priority Category Four – All other individuals. (This category is closed).

B. THE JUSTIFICATION FOR THE ORDER.

FFY 2015 Review

In FFY 2015, agency staff and the SRC reviewed on a quarterly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories. During FFY 2015 budgets and fiscal resources were reviewed monthly by the agency Executive Leadership Team (ELT). Information was presented to the State Rehabilitation Council at each quarterly meeting.

During FFY 2015, OFB continued its efforts in maintaining administrative costs to a minimum and implementing additional cost–saving measures. On June 6, the Executive Leadership met and reviewed the Expenditure/Budget report history. Upon review, OFB identified resources to serve some individuals but not all individuals in a priority category. The date of application will be utilized as a criterion for ranking individuals within a priority category. The State Rehabilitation Council was consulted and informed of this and was in full agreement with the decision. The Executive Director issued an implementing memorandum to staff, with instructions that appropriate services delayed under the order of selection may be provided for those individuals on the waiting list in Category Two by date of application effective July 1, 2014.

The decision was based on the following:

Lower caseload sizes and referral flow Projected carryover of funds into 2015 VR counselor caseload expenditures are under budget

Priority Category 2 remained closed. OFB continued to monitor the funds as we approached the end of our federal fiscal year in order to determine if Category 2 could be opened in FFY 2015. Based on expenditures in caseload funds, individuals on the waiting list, and average costs per case the decision was made to open Categories two and three effective September 1, 2014. For the remainder of the FFY 2015, The Executive Leadership Team along with the State Rehabilitation Council carefully monitored and reviewed all fiscal information.

As the year progressed, OFB fiscal deficits continued. While our efforts in reducing expenses created some savings, it was not enough to offset the deficit. It was anticipated that the next federal fiscal year would yield a larger deficit based on our current reduced revenue. The agency was unable to match federal funds due to past state general fund cuts and we relinquished $1.1 million. OFB did not have enough general funds allocated in the existing year to cover the total dollars needed to draw down its federal allotment and found itself in a position of having to borrow funds from the upcoming fiscal year. Carry forward of dollars into 2016 was only going to be a little over $300,000. Due to these reasons, the Office for the Blind again closed Categories two and three effective October 1, 2015. Priority Category Four remains closed as well. Priority Category 1 is the only open category for services. Eligible individuals who fall in one of the closed categories are placed on a waiting list unless they request to be removed from the waiting list. Year to date in FFY 2016 there are 65 individuals on the waiting list. Current average caseloads in FFY 2016 four months into the year is 63 and it is anticipated to increase. Average caseloads for FFY 2015 was 86.

C. THE SERVICE AND OUTCOME GOALS.

The numbers below outline the current service population numbers and costs. Actual numbers served and the costs associated with them are listed for 2015. Service Numbers and costs for 2016 and are estimated based on current numbers year to date from queries run in the Case Management System (CMS). Categories Two and Three were closed effective October 1, 2014 . Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection,

irrespective of the severity of the eligible individual's disability; and individuals requiring post-employment services. The actual total costs of services and administration for 2015 was: $ 8,254, 246. The actual year end actual outcomes and costs for 2015 for October 1, 2014 through September 20, 2015 are as follows:

Category One

Active Cases - 1,192

Number of Employment Outcomes - 218

Actual Associated Costs per Category Per Successful Employment Closure - $265,869

Actual Associated Costs Per Category - $1,295,885

Category Two

Active Cases - 254

Number of Employment Outcomes - 59

Actual Associated Costs per Category Per Successful Employment Closure - $114,117

Actual Associated Costs Per Category - $303,119

Category Three

Active Cases - 38

Number of Employment Outcomes - 5

Actual Associated Costs per Category Per Successful Employment Closure - $9,796.39

Actual Associated Costs Per Category - $28,958

Category Four

None

FY 2016

Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post-employment services. The estimated year end actual outcomes and costs for 2016 for October 1, 2015 through September 20, 2016 are as follows:

Category One

Active Cases - 1,143

Number of Employment Outcomes - 221

Actual Associated Costs per Category Per Person - $1,093.60

Actual Associated Costs Per Category - $1,250,000

Category Two

Active Cases - 154

Number of Employment Outcomes - 35

Actual Associated Costs per Category Per Person - $1,785.71

Actual Associated Costs Per Category - $275,000.

Category Three

Active Cases - 22

Number of Employment Outcomes - 7

Actual Associated Costs per Category Per Person - $1,590.90

Actual Associated Costs Per Category - $35,000

Category Four

None

Year to date for FFY 2016 there are a total of 65 consumers determined eligible for services in Priority Category 2, 3 and 4 placed on a waiting list. All consumers were given information and referral to meet their individual needs.

Individuals entering services in 2016 with individualized plans for employment=960 Estimated Total Costs: $6,750,000

Estimated determined eligible entering services in 2016=225 Estimated Total Costs: $1,750,000

Total Projected Services and Administrative Costs inclusive of facilities, salaries, benefits, outreach activities, and required statewide studies: $8,500,000 Revenues are projected at a minimal growth and the number of personnel will not increase with a state imposed cap. This will allow OFB adequate revenue and personnel (89) to cover the costs identified and to ensure the provision of the full range of services to individuals selected for services under the order of selection for the 2016 calendar year.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

2015 YEAR END ACTUAL OUTCOMES AND COSTS 10/1/14 THROUGH 9/30/15

2016 YEAR END ACTUAL OUTCOMES AND COSTS 10/1/15 THROUGH 9/30/16

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

ORDER OF SELECTION SERVICE DETERMINATION AND ADMINISTRATION

DEFINITIONS

1. Applicant means an individual who has submitted an application for vocational rehabilitation services. An individual is considered to have submitted an application when the individual, or the individual's representative, as appropriate, has filled out and signed an agency application form or has otherwise submitted a signed written request for services, and the individual is available for an assessment to determine eligibility and priority for services.

2. Legally Blind, as defined in Kentucky Revised Statutes 163.460 (2), means a visual acuity of 20/200 or less in the better eye with correction or a visual field of 20 degrees or less.

3. Visually Impaired, as defined in Kentucky Revised Statutes 163.460 (3), means a condition of the eye with correction, which constitutes or progressively results for the individual in a substantial disability to employment.

4. Eligible Individual means an individual with a primary impairment of blindness or another visual impairment, who the OFB has determined is an individual with a disability who requires vocational rehabilitation services to prepare for, enter, engage in, retain or advance in employment.

5. Functional Capacities means the following:

Orientation and Mobility: The ability to travel independently to and from destinations in the community;

Self-Care: means the ability to engage in activities of daily living including: personal grooming; home management; health and safety needs;

Communication: The ability to comprehend, respond, and exchange information through: spoken words; written words, sign language, Braille, concepts, gestures or another means;

Work Skills: The ability to do specific tasks required for a particular job;

Work Tolerance: The ability to sustain required levels of functioning in work related activities with or without accommodations;

Interpersonal Skills: The ability to make and maintain personal, family and community relationships; and

Self–Direction: The ability to independently plan, initiate, problem solve, organize and carry out goal–directed activities.

6. Individual With a Significant Disability, as defined in Section 7 (21) of the Rehabilitation Act, as amended in 1998, means:

An individual with a disability as defined under Section 7 (20) of the Rehabilitation Act, as amended in 1998;

Who has a significant physical or mental impairment, which for such individual constitutes or results in a substantial impediment to employment; and seriously limits one or more functional capacities (such as mobility, communication, self–care, self–direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;

Whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and

Who has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculo skeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia, and other spinal cord conditions, sickle cell anemia, specific learning disabilities, end stage renal disease, or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitations.

Individual With The Most Significant Disability means an eligible individual with a significant disability whose severe impairment seriously limits three or more functional capacities in terms of employment outcome; and whose rehabilitation requires two or more services over an extended period of time.

8. Presumption of Eligibility for Social Security Recipients and Beneficiaries means that an individual who has been determined eligible under Title I or Title XVI of the Social Security Act is:

Considered to be an individual with a significant disability; and

Presumed to be eligible for vocational rehabilitation services under Title I (provided the individual intends to achieve an employment outcome consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual) unless the office can demonstrate by clear and convincing evidence that such individual is incapable of benefiting from vocational rehabilitation services in terms of employment outcome due to the severity of the disability of the individual.

9. Order Of Selection means the order to be followed in determining which priority categories of eligible individuals shall be provided vocational rehabilitation services when the Office for the Blind does not have funds to provide such services to all eligible individuals ensuring that first priority for services is given to those individuals who have the most significant disabilities.

OOS Administration

If the Executive Director and State Rehabilitation Council determine that the agency lacks available funds to serve all consumers, the office shall follow an order of selection to give priority for services according to a ranking of categories of consumers based on the severity of the disability. The Executive Director of the Office for the Blind shall direct the order of selection by designating in written memorandum, the priority categories to be served.

Order of Selection will not use any of the following factors in determining eligible individuals Residency duration, type of disability; age, gender, race, color, or national origin, source of referral, type of expected employment outcome, need for specific services or anticipated cost of services, or the income level of the individual or its family.

The order of selection shall be implemented on a statewide basis.

The order of selection shall be implemented to assure that eligible individuals with the most significant disabilities are provided services before other eligible individuals.

The order of selection shall not affect: The acceptance of referrals and applicants;

The provision of assessment services to determine whether an individual is eligible for vocational rehabilitation services, and the individual's priority under the order of selection;

Services needed by any eligible individual who has begun to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and

Individuals requiring post–employment services. The office will ensure that all funding arrangements for providing services under the State plan, including third–party arrangements and awards under the establishment authority, are consistent with the order of selection.

An eligible individual shall be immediately reclassified into a higher priority category whenever appropriate justification exists in the case record of the individual.

The office shall conduct an assessment to determine whether an individual is eligible for vocational rehabilitation services and the individual's priority under the order of selection. The VR Counselor determines the eligibility of the individual and their priority category based on a review of the data from the assessment which may include but is not inclusive of:

Ophthalmologist and Optometrist vision reports Functional Limitations Checklist Medical and Psychological Reports Educational Background Work History Other pertinent information

In the order of selection each eligible individual within a closed priority category shall be placed on a waiting list until such time as the priority category is opened. The process for the waiting list is as follows:

Once an individual has been determined eligible within a closed priority category by the Vocational Rehabilitation Counselor the individual will receive notification through the counselor in writing of:

Their assignment to a particular category;

The priority categories currently being served;

Their right to appeal their category assignment and the availability of the Client Assistance Program (CAP); Information and referral services; and

They are given the option to be placed on a waiting list by date of application until such a time the priority category can be opened and the individual employment plan can be developed and initiated.

The waiting list will be maintained by the Director of Consumer Services.

The waiting list will be reviewed quarterly by the Director of Consumer Services and Regional Managers.

Consumers will be contacted annually to inform them the status of Order of Selection and their specific priority category. Additional information (I & R) will be given. The consumer will be asked regarding their preference for remaining on the waiting list.

At the time when funds become adequate and a priority category will be opened the following sequence of action will occur for those individuals in a closed category:

Priority Category Two (2) will be opened and individuals on the waiting list will be served by date of application. The office will assure that eligible individuals, who do not meet the order of selection criteria for the priority categories, shall have access to services provided through the information and referral system in accordance to the 1973 Rehabilitation Act. These services will include referral to other Federal and State programs including the statewide workforce investment programs. The process for this is as follows: The agency will provide the individual with a notice of referral; The notice will contain a point of contact for the program or service an individual is being referred to and; any relevant information regarding services for the individual relating to the preparation, securing, obtaining or retaining of employment; and documentation of the nature and scope of information and referral services provided will be included in the individual service record and entered in the Case Management System (CMS).

Individuals who are presumed to be significantly disabled because they receive SSA benefits will be further assessed to determine if they meet the agency's criteria for "individual with a most significant disability."

Consumers making the decision not to be placed on a waiting list after they receive notification of their priority category will be closed. They will receive notification from their VR Counselor that their case will close and of their right to appeal the agency's decision, including information on how to contact CAP. The notification will include information on how they may reapply for services in the future if their circumstances change or if the agency makes changes to order of selection.

When a request for services by an eligible individual is affected by the order of selection, the individual shall be immediately notified of such in writing, and provided with information on procedures for individual rights for appeal, and how the Client Assistance Program may provide help in the process.

Quarterly, the Executive Director, State Rehabilitation Council and Management Staff will reevaluate the agency circumstances to determine whether or not the agency's resources are sufficient in serving all individuals or there is a need to implement, establish or make changes in order of Selection. At such time that the agency finds that it is able to serve those individuals in any closed priority category, that category will be re–opened. If the Agency finds that they have the resources to serve some individuals but not all individuals in a priority category the date of application will be utilized as a criterion for ranking individuals within a priority category. The timeline for this would be a year, unless the agency's financial situation should change drastically. Circumstances that would allow this to occur include a decrease in the number of referrals or other sources that would result in additional funds, which could be utilized to serve these individuals.

When a priority category is to be opened for services, the Executive Director shall issue an implementing memorandum to staff, with instructions that appropriate services delayed under the order of selection may be provided.

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.

OFB has not elected the option of serving individuals regardless of any established order of selection.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

The Office for the Blind is committed to the principle that individuals with the most significant disabilities (MSD), including those who have not traditionally experienced competitive work, are capable of engaging in employment in integrated settings. The agency and State Rehabilitation Council have agreed upon the goals and priorities in this section for Supported Employment. The goals and priorities in this section reflect the commitment of OFB to increase competitive integrated employment outcomes for individuals who are blind through supported employment.

Based on the information gathered and analyzed from the comprehensive statewide needs assessment conducted in FFY 2015, the Agency's performance, the 107 monitoring report, real time data from the case management system, the Strategic Planning process and other sources of information the following goals for the distribution of Title VI, Part B Funds were set. A review of the set goals and priorities will occur annually for any needed revisions for the State Plan.

The Kentucky Office for the Blind set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities

Develop and release an RFP for establishment grants for CRPs to address integrated competitive employment for adults, students, and youth who are blind or visually impaired.

Award and implement establishment grants.

Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired, including youth with the most significant disabilities.

Goal 2: OFB will identify and utilize internal and external resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

OFB will utilize the expertise of the Human Development Institutes' Supported Employment Training Project at the University of Kentucky.

OFB will attend training through the HDI project as well as in house training on policy updates and changes.

OFB will work closely with APSE, Community Mental Health Centers, the Department of Behavioral Health, Developmental and Intellectual Disabilities to identify strategies to expand services to youth.

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

During FY 2015 the amount of Title VI, Part B funds spent was $27,879. There were $0 carry–forward dollars from 2014 expended in FFY 2015. The amount of Fiscal Year 2015 Title VI, Part B Allotment carried over to FY 2016 was $11,817. The anticipated FY 2016 allotment is $39,696. OFB will allocate funding from Title VI, Part B to ensure that individuals with the most significant disabilities have access to the provision of supported employment services on a statewide basis. These funds are only a supplement to the funds provided under Title I of the Act. Title VI, Part B funds will only be used in the provision of Supported Employment services to those individuals determined eligible through comprehensive assessments determining that it is an appropriate objective. These monies allocated will be fully expended with no more than five percent for administrative costs. Expenditures exceeding the Title VI–B allotment will be covered with funds from the 110 program. OFB served 61 consumers through supported employment in 2015 with 8 successful closures (20 of them were Youth with one successful closure/11 Youth with no closures) Year to date in FFY 2016 we have served 50 individuals with 2 successful closures. Twenty of these are youth and 12 students (one closed successful).

Supported Employment is competitive work (for the maximum hours possible) in an integrated work setting for individuals with the most significant disabilities for whom competitive employment has not traditionally occurred. Services will be outlined for consumers with the most significant disabilities in the individualized plan for employment based on his/her informed choice, individual strengths, resources, capabilities, needs, abilities and preferences. Job skills' training when needed is provided on–site through job coaches and the development of natural supports. All services provided under the individualized plan for employment will be coordinated with other Federal or State program plans.

OFB will reserve and expend half of the allotment for the provision of supported employment services, including extended services to youth with the most significant disabilities. Extended services will be available for a period not to exceed four years.

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.

OFB works closely with the general agency OVR through an established network of Supported Employment Providers. OVR's Supported Employment Branch develops yearly agreements with each provider. Fee–for–service and outcome fees, along with policies and procedures are developed and followed by each provider.

The main issue in Kentucky for Supported Employment is the lack of consistent available funding for ongoing supports as well as a limited number of service providers statewide. Area providers are not experienced or well trained in the provision of supported employment services and placement best practices for the blind and visually impaired population. This is an area of expertise that many providers do not have. Due to the relatively small population of individuals who are blind or visually

impaired, providers do not have an incentive to expend time, monies and resources to train staff in this area. Additionally, OFB consumers typically do not fit the set criteria set by the Department of Behavioral Health, Developmental and Intellectual Disabilities making them eligible for the provision of ongoing supports through Medicaid waivers. OFB will continue to provide technical assistance and training to provides and identify new strategies for this area.

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 strategies included in this section were developed for the established goals and priorities. Goals are assigned to an OFB staff person or work group to assure that each strategy action step is carried out and goals are met. The designated staff person or work group will report quarterly on a grid for each goal strategy. A quarterly report will be compiled of the results of the steps taken in meeting the set goals and reviewed by the OFB Executive Leadership Team and State Rehabilitation Council. The Council through its committees and the Executive Leadership Team will quarterly review the summarized reports monitoring the agencies performance in meeting the State Plan Goals and Priorities.

Additionally, through quality assurance processes OFB provides internal and external methods and examinations to identify areas where improvement and training are needed. Internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

Real time data is pulled and evaluated from the Web Intelligence system (WEBI) and Crystal Reports monthly or as needed (daily, weekly). The data is reviewed for positive or negative issues and trends in services, data integrity. Any issues that arise are addressed with staff as soon as possible.

OFB utilizes a case review process titled Group Review to Improve Professional Skills (G.R.I.P.S). This system evaluates counselors and assistants case review results as a team. Regional managers review one case per VR counselor during designated months (seven out of twelve months). Specialized topics will be selected to identify specific trends or policy needs such as deaf/blind, closures, post–secondary training, transition and secondary impairment of brain injury or stroke. Annually, a group case review is conducted with all of the counselors reviewing the same case. This provides the opportunity for discussion of strengths and weaknesses related to case management, documentation, service provision, and data input. Case Review Form will be reviewed annually in December for any additions which will allow for consistency of the same review form throughout the calendar year. A database will be maintained in central office to collect information.

Satisfaction Survey Process

Consumer satisfaction is considered an important component of service quality. OFB seeks to determine the satisfaction level of people who have received services as an ongoing tool to improve performance. At the request of the State Rehabilitation Council to the Kentucky Office for the Blind, the Human Development Institute at the University of Kentucky coordinates a telephone survey with the Survey Research Center. The purpose of the study is to assess customer satisfaction of all consumers who receive services from OFB and whose cases are closed successful and unsuccessful during the federal fiscal year.

Comprehensive Needs Assessment

Every three years, OFB jointly with the state rehabilitation council conducts a statewide comprehensive needs assessment in order to satisfy requirements in the Rehabilitation Act of 1973, as amended. The assessment identifies additional VR service needs, such as an emerging disability groups, or needs resulting from changes in the state populations.

Under this project the Office works with the state rehabilitation council in the development of goals for the assessment, develops a plan for the assessment, conducts the assessment, gathers information, analyzes the results, develops findings, develop conclusions and potential action strategies to form state plan goals, priorities, and strategies.

Strategic Planning

These are the specific activities that each State must undertake to ensure its effectively implementing rehabilitation programs and services. These strategies promote expansion and improvement. Through the strategic planning process OFB sets goals in order to accomplish its mission and address major issues facing the organization. Every three years the Office sets realistic goals and objectives developed from a SWOT analysis. This process allows us to build on identified strengths; shore up your weaknesses; capitalize on opportunities; and recognize any threats the Office is facing. Input for strategic planning is gathered from staff, consumers, the public at large and the State Rehabilitation Council. That information is summarized and used along with satisfaction survey results, the comprehensive statewide needs assessment and other internal data through CMS and used to formulate a three year–strategic plan.

Monitoring Reports

OFB takes into account all the findings and recommendations of the monitoring report in its planning, identifying service trends and making needed improvements to program operations.

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.

OFB provides a wide range of assistive technology devices and subsequent support for individuals who are blind or visually impaired statewide for the vocational rehabilitation and the independent living/older blind programs. First for individuals who are working or are pursuing a career OFB's trained assistive technology specialist conduct a comprehensive evaluation to ensure that the correct products are selected so that they meet the individual's needs. AT staff members fully train consumers to use the devices and work with employers to ensure that proper ongoing support is in place.

Assistive technology specialist also provides service to consumers enrolled in OFB's Independent Living and Older Blind program. Similar to the services above, products are demonstrated that may enhance a person's quality of life. If the consumer chooses to purchase a device, training and support will be provided if necessary.

OFB's Assistive Technology services are provided on a state–wide basis. Each regional office has one AT Specialist so that residents of each county have a relatively close service provider. The agency also operates a residential training facility, the Charles McDowell Center that consumers can benefit from when more long term training and support is necessary. There are two assistive technology specialist staff housed at the center.

At application, through the assessment process the vocational rehabilitation counselor identifies issues surrounding employment specifically related to job tasks. Once an individual is determined eligible a referral is made to assistive technology services. The VR Counselor provides information through the referral inclusive of but not limited to: vision reports and a description of work related job

tasks specifically any the individual is experiencing difficulty performing. Assistive technology staff reviews the referral information from the counselor and perform an initial assessment of the individual in their applicable environment (employment, home or academic). The process is individualized for each consumer based on their needs.

At any point while the case is open or when post-employment services are appropriate the vocational rehabilitation counselor will refer the individual for assistive technology services. This may be due as a result of increased job duties for the individual or perhaps there is the need for current or updated technology on the job.

For transition students, the vocational rehabilitation counselor provides information in the referral sheet to the assistive technologist regarding any technology that the student used while in high school and home environment, post–secondary information and the vocational goal.

If an individual needs in depth training, then the assistive technology specialist makes a recommendation to the vocational rehabilitation counselor for a referral for training at the Charles W. McDowell Rehabilitation Center. The vocational rehabilitation counselor coordinates services with the consumer regarding more comprehensive long term training at the residential center. Once the individual completes their training and returns home, the assistive technology specialist will follow–up by phone or a home visit.

OFB provides consultation services to business partners related to job accommodations with a goal developing, establishing and maintaining employer relationships. This allows OFB to determine if a particular job is an overall good match for our consumer base (blind and visually impaired). Recommendations are then made to the employer regarding reasonable accommodations. Additionally, accessibility testing is provided based upon need. An example, would be consulting with a company that was upgrading to a soft phone environment. OFB assistive technology staff role in the process is to be a bridge between the employer interests and the consumer's opportunity for competitive integrated employment. This gives the employer security that an agency is behind them increasing their interest in the working partnership. This consultation service also gives the employer a place to return to in the future to meet their ongoing needs. Employers may contact OFB in instances when an existing employee is interested in applying for promotional opportunities within the company.

OFB will make referral and access additional resources through the Kentucky Assistive Technology Services (KATS) Network and the Kentucky Assistive Technology Loan Corporation (KATLC) for individuals. The KATS Network, the Kentucky Assistive Technology Act Program, serves Kentucky residents of all ages with disabilities of all types, their families, employers and employment service providers, educators, health care and social service providers, and others seeking information about assistive technology (AT) and accessible information technology. KATLC is a program funded by both private and public money to help Kentuckians with disabilities obtain assistive technology to improve their independence or quality of life.

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.

Individuals who are minorities have equal access to vocational rehabilitation services. OFB is committed in its effort to build the capacity to effectively serve individuals with most significant

disabilities who are minorities. OFB will provide vocational rehabilitation services to all individuals who have visual disabilities who are eligible for services regardless of gender, race, national origin, religion, color, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities to the same extent as it provides services to other significant populations or individuals.

Management and staff shall focus on the agency mission, which is competitive integrated employment, in assignment of tasks, planning and utilization of work time, initiation of self–directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non–minority and individuals with disabilities receive.

OFB works to develop outreach activities to minorities to facilitate increased consumer referrals to the Agency. OFB encourages staff to get to know key community leaders and minority organizations to facilitate outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures. The Office encourages existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

The Office provides cultural diversity training to staff in order to develop a better understanding of different cultures and value systems. Staff participates in the Governor's Equal Employment Opportunity Conference and Minority Empowerment Conferences.

Service demographic and population data is utilized to determine the number of minorities in regions and develop strategies to increase percentages. OFB will utilize different methods and channels of communication in targeting minority populations. This will include usage of the "Language Line" that will enable our staff to communicate with non–English speaking applicants in their native language.

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).

OFB will use a variety of methods to improve and expand VR services for students. As stated in this section internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

OFB will use the strategic planning process as one of its methods to ensure it's effectively implementing rehabilitation programs and services to this target population. Through quality assurance processes OFB provides internal and external methods and examinations to identify areas where improvement and training are needed. OFB will utilize the case review process, Group Review to Improve Professional Skills (G.R.I.P.S) to review transition cases.

As stated earlier in this section the OFB conducts a statewide comprehensive needs assessment in order to satisfy requirements in the Rehabilitation Act of 1973, as amended. The assessment has a component that identifies additional VR service needs of both students and youth. A part of the

assessment is tailored to this population to identify emerging needs. Information gained through this process is then analyzed to develop conclusions and potential action strategies in serving this population

In order to assure the coordination of services to facilitate the transition students from school to postsecondary life (including the receipt of VR services, postsecondary education, competitive integrated employment, and pre–employment transition services) OFB utilizes the following process. The VR Counselor is responsible for the schools located in their assigned county areas. Counselors work with school staff to identify potentially eligible students assuring that they are given the opportunity to apply for services starting at age 14. While the student is enrolled in school, the VR Counselor works with school staff to ensure the student receives the needed services to aid in the transition to post–secondary life. Services include but are not limited to pre–employment transition services, other VR services and programming offered by OFB, and other services specific to transition aged students by school districts and other entities. VR Counselors provide individualized services and where gaps in services are identified staff work to developed new and innovative services in the students' home area to better serve this population. One project that aligns with this area in serving students is Project CASE (Creating Access to Successful Employment). In October 2015, the Kentucky Office for the Blind/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR–eligible individuals, including students and youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high–demand, high–quality occupations. Creating Access to Successful Employment (CASE) will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives, and can prepare for and obtain jobs in high–wage and high–demand occupations.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

In 2015, OFB along with the State Rehabilitation Council conducted the Comprehensive Statewide Needs Assessment. The CSNA assessed the need to develop, establish and improve community rehabilitation programs. OFB surveyed staff, consumers and partners on the use of establishment grants to develop innovative programming. Through the needs assessment it was identified that this was an area for OFB to focus on. Community rehabilitation providers indicated the need for training and expansion in this area. Consumers as well as advocacy organization leaders indicated community rehabilitation providers were lacking in the knowledge and skills to serve individuals that are blind and visually impaired. OFB will ask RSA for technical assistance in this area during its scheduled fiscal technical assistance visit May 9 –11.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

Kentucky is committed to acquiring a system that gathers the collective data required under section 116 of WIOA for all the core partners. Currently, Kentucky is determining what gaps currently exist and identifying a plan for collecting, tracking, measuring and reporting data from the workforce partners. It is anticipated that this will require substantial work on several levels prior to the development and implementation of uniform system to capture the data. Changes under WIOA require significant modifications in the current manner that data is collected. Additionally the

workforce partners use different systems and tracking mechanisms. The current Kentucky OFB/VR Case Management System (CMS); a web–based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology – a goal that none of the “off the shelf” options for case management systems for vocational rehabilitation agencies could meet at the time.

With recent improvements in technology, several systems could meet the programmatic and accessibility needs of the agency. The current CMS system is approaching its useful life expectancy and upgrades to the current system as well as the purchase or licensing of other systems that would meet both the needs of the two vocational rehabilitation agencies and those of common measure reporting are being considered.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation.

Early in 2016 Kentucky Skills Network partners will gain access to a Customer Relationship Management system based on a SalesForce platform. Phase 1 will allow for shared access to employer contact and needs, and Phase 2 later in 2016–2017 will add the capacity for KSN partners to add and assess employer programs and resources via the SalesForce application.

Regardless of the system that the Agencies choose to implement, innovations that are anticipated include: paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity.

In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting.

Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

In October 2015, the Kentucky Office for the Blind, Office of Vocational Rehabilitation/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR–eligible individuals, including youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high–demand, high–quality occupations.

The goals and strategies of this five year project and the evaluation plan for it strongly aligns with the performance accountability measures under section 116 of WIOA.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

Over the past six years the Kentucky Workforce Investment Board in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations has engaged in an aggressive effort to implement the strategic initiatives outlined in the WORKSmart Kentucky plan adopted in 2010 and updated in 2013.

The plan has served as a blueprint for transforming Kentucky's workforce services focused on adapting to the changing needs of employers to create a demand–driven, business–led, solutions–based publicly funded talent development system for the Commonwealth. Over the next four years, the new Administration will work with the new Kentucky Workforce Innovation Board on a new strategic plan and new goals. The new plan and goals will inform subsequent modifications of this State Plan and of course the continuing transformation of Kentucky's workforce system through innovative practices which enhance sustainable economic and job growth to improve the lives of Kentuckians. Kentucky strategies have and will continue to support WIOA's focus on low income adults and youth who have limited skills, lack work experience, and face other barriers to economic success. Vocational Rehabilitation is a full and actively engaged partner in Kentucky in the workforce system. OFB and OVR are actively engaged in the planning process, on committees and staff serves as project directors on some of the KWIB initiatives. They are advocates in the workforce system for individuals with disabilities. Please refer to the Vocational Rehabilitation section of this combined plan for a comprehensive listing of goals and strategies. In October 2015, the OFB and OVR/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR–eligible individuals, including youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high–demand, high–quality occupations.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

OFB followed the guidelines established for a Comprehensive Statewide Needs Assessment and the Vocational Rehabilitation Needs Assessment Guide established by the Rehabilitation Services Administration and The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, signed into law on July 22, 2014. As specified by the guidelines, a number of data sources were used for this report. In order to provide some context to our analysis of the needs of blind and visually impaired Kentucky residents, this CSNA also examines a number of statistics and estimates provided at the state and national levels.

1. To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain or regain competitive employment.

Objective 1.1: Develop new relationships with employers, community organizations & government agencies to promote employment opportunities.

Strategies

Cultivate relationships with area employers. Increase “valuable services” to employers such as job analyses, consultation services on hiring, making accommodations, assistive devices, disability awareness trainings, ADA trainings, etc.

Collaborate with key partners (SRC, CRPs and Workforce Development Partners) to enhance connections with the employer community.

Collaborate with the Career Center Business Services Team to expand relationships, avoid duplication of contacts with employers, and maximize employment opportunities for people with disabilities.

Objective 1.2: Provide resources for consumers that lead to successful outcomes.

Strategies

Coordinate benefits planning that supports individuals to set goals for increasing self–sufficiency

Provide referrals to appropriate resources that address barriers to gaps in services.

Provide assistive technology instruction with a workforce–ready emphasis on training in common office setting applications.

Partner with advocacy organizations to address personal and family adjustment to blindness issues through counseling and peer mentoring

Objective 1.3: Develop and implement strategies to improve OFB’s performance on the required accountability measures under section 116 of WIOA.

Utilize agreements with the Office of Employment and Training (OET) to access wage data in order to capture 2nd and 4th quarter employment data for consumers.

Identify new partners and enhance existing partnerships to improve performance outcomes

Set baselines, identify successful outcomes and acceptable measureable progress

Develop strategies to improve performance outcomes

Work collaboratively with partners in the development, design and implementation of a system that captures the required data elements

Goal 2: Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth. Objective 2.1: Maximize federal match dollars for the Vocational Rehabilitation Program.

Strategies

Research and explore all available options and opportunities.

Research allowable use of funds through the Establishment Grants for Match

Objective 2.2: Monitor ongoing fiscal and staff resources in order to maximize service dollars

Strategies

The Executive Leadership Team will review at a minimum on a quarterly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories.

Ongoing review of data from the case management system (i.e. application, referral and caseload trends).

Consultation with the State Rehabilitation Council regarding the administration of Order of Selection consistent with 34 CFR 361.36.

Objective 2.3: Maximize services in expending required percentages for PETS and SE services for the transition population.

Strategies

Monitor service provision and the drawdown of funding.

Goal 3: KBE will provide full–time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business.

Objective 3.1: Maximize training opportunities for vendors and KBE staff.

Strategies

Offer and conduct annual vendor training for potential licensees.

Offer and conduct annual upward mobility training for current vendors.

Offer and conduct training for KBE staff.

Objective 3.2: Provide new vending opportunities.

Strategies

Communicate with federal and state agencies to acquire new locations.

Work with the State Blind Vendor committee to seek out possible opportunities.

Survey at least one potential location each month as opportunities permit, with a minimum of 4 per year.

Objective 3.3: Improve existing vending locations.

Strategies

Actively seek potential satellite locations for assisting vendors and to enhance vendor income.

Utilize management resources to improve profit percentages.

Offer training and services to improve business practices

Goal 4: Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective 4.1: Increase the skills and competency levels of all rehabilitation staff statewide.

Strategies

Maximize training funds to support staff in professional training and development activities.

Provide quality training statewide that is job specific and targeted to address any deficiencies identified in quality assurance reviews or training needs assessments.

Provide job–driven training that promotes skill enhance and employer engagement.

Objective 4.2: Improve services to underserved populations within the blind and visually impaired community, including substance abuse, mental health, and criminal background.

Strategies

Participate in cross trainings with agencies who provide services to treat mental illness, substance abuse to provide all professionals a better understanding of the unique services necessary to improve outcomes for consumers.

Collaborate with criminal justice agencies to promote better understanding of issues that impact employment for consumers with backgrounds.

Goal 5: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Objective 5.1: Develop a marketing approach and plan to guide OFB’s partnership efforts with eye physicians.

Strategies

Identify through WEBI existing eye physicians that serve as a regular referral source to each caseload.

Identify caseloads that do not have a regular referral flow from an eye physician.

Update marketing materials to clarify how to make appropriate referrals.

Objective 5.2: Increase available resources & seek to leverage funding, staff resources, in–kind and programmatic support & other forms of assistance from partners.

OFB will collaborate with other statewide partners increasing their capacity to serve individuals with disabilities, and will refer eligible individuals who can benefit from the resources and services available at no cost.

OFB staff will provide training for Career Center Partner Staff to increase knowledge and confidence in working with individuals who are blind and visually impaired.

Goal 6: To engage youth, parents, high schools, and other transition specialists in exploring and planning career choices that connect to a full range of post–secondary options for training, career development, and competitive integrated employment.

Objective 6.1: To improve the number, quality, and rate of employment outcomes for youth and students participating in Transition services.

Strategies

VR Counseling Staff, school counseling and teaching staff, and VI teachers statewide will collaborate to achieve earlier involvement of OFB counselors in IEP development of vocational goals. OFB transition policies and practices used to guide the implementation and continuous improvement of services leading to employment will be based on the gathering and tracking data through the case management system.

Objective 6.2: Develop and implement a plan for PETS services

Development and implementation of a plan for service delivery. Expansion of the Student “Employability Skills Boot Camp” (i.e. workplace readiness and independent living, counseling on training and education opportunities, self–advocacy, job exploration counseling). Development of more opportunities for workplace learning including paid work experiences and job shadowing.

Plan and conduct regional transition conferences.

Objective 6.3: Enhance student awareness of enrollment in transition programs

Promote summer transition programs through innovative marketing strategies in order to increase referrals. Implementation of marketing strategies to VI teachers, students and their families

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Title I funds for innovation and expansion activities will be used for employer engagement and support of the Statewide Rehabilitation Council. The areas of focus for Innovation and Expansion Activities are as follows:

1) Annual Support for the Statewide Rehabilitation Council 2) Develop and implement a statewide plan for employer engagement Statewide Rehabilitation Council

OFB will continue to provide annual support for the Statewide Rehabilitation Council through administrative support and direct expenses necessary to operate the State Rehabilitation Council. There is a projected budget of $43,300 for FFY 2016. Fiscal tracking mechanisms are in place in order to capture annual support for the Statewide Rehabilitation Council. In FFY 2016 the Office will spend $43,300 Innovation and Expansion funding in the support of the SRC for reimbursement of expenses and personnel costs for the agency designated liaison for the SRC. This includes: SRC Annual Report Publication,

SRC Consumer Satisfaction Survey of all closed cases contracted through the University of Kentucky.

Reimbursement of expenses in accordance with Section 105 (g) of the Act.

Employer Engagement

OFB in conjunction with the Office of Vocational Rehabilitation and Office of Employment and Training hosted an Employer Summit in 2015 to highlight the benefits of hiring individuals with disabilities as well as the OFCCP regulation requirements. The event was well received with numerous employers (75) seeking additional information on working with the two rehabilitation agencies. This outreach and education with Employers and Businesses across the commonwealth will continue with additional summits convened in regional locations to attract a more diverse employer customer base.

Employer Engagement Goal: Develop and implement a statewide plan for employer engagement.

Objective: Increase employer engagement statewide resulting in increased employment outcomes.

Strategies

Develop strong partnerships with employer associations (i.e. Chamber, LSRM)

Strengthen the vocational rehabilitation role/relationship on the business services teams through the Kentucky Skills Network.

Build Career Pathways for individuals with disabilities

Identify needed resources and training of employers

Develop a plan for outreach and education

Hold regional Employer Summits

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.

OFB has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age. The agency takes into consideration the needs of staff in correlation to the service needs of individuals with disabilities in Kentucky specifically for: Individuals with the most significant disabilities, including the need for supported employment services; and individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program. We will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101–336, and applicable federal regulations relating to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the US Department of Labor Final Rule on Federal Executive Order 11246.

Office for the Blind is committed to a policy of equal opportunity to all qualified applicants without regard to race, color, national origin, gender, age or disability. OFB encourages applications for employment from persons who are members of groups that have been traditionally underrepresented in the workplace such as members of racial or ethnic minority groups, women, and those with disabilities.

There is an explicit commitment to assuring equal access for all communications through outreach, media contact of any form inclusive of social media, websites, online learning or flyers, and other announcements or correspondence under the project.

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.

This section will contain a reporting of the strategies under the FFY 2015 State Plan that contributed to the achievement of the goals.

Goal 1: OFB will exceed or meet the federal Standards and Indicators annually. OFB met all the standards and indicators above goal but one.

Objective 1.1 Increase in the number of positive employment outcomes. (RSA Performance Indicator 1.1)

Strategies:

Vocational Rehabilitation Services staff will develop relationships with employers and their professional organizations in order to educate them about hiring individuals who are blind and visually impaired.

Recruit and retain quality rehabilitation services staff assuring the provision of quality services that will result in positive employment outcomes for consumers.

Provide training for all new and existing staff that will increase their skills and abilities in providing quality services and supports that move consumers into successful employment

Goal One Outcomes Reporting: Although, tracking and reporting on the Standards and Indicators was removed from WIOA requirements OFB had this as a goal for the prior year and will report it's performance as required under the previous plan. The number of employment outcomes for FY 2014 was 274. The number of employment outcomes for FFY2015 was 282. This is a 3% increase over the prior year.

Objective 1.2: OFB will meet or exceed the RSA standard for the percentage of cases with employment outcomes (RSA Performance Indicator 1.2).

Strategies:

OFB VR Counselors will provide benefit planning and referral information to consumers OFB will utilize its' case review process "Group Review to Improve Professional Skills (GRIPS)". The GRIPS will provide an opportunity for advanced skill development and improved quality assurance through

group review of case files to strengthen its quality assurance processes in order to maximize the efficiency and effectiveness of services.

Vocational Rehabilitation Services staff will work with the business services teams in the Kentucky Career Centers in making linkages, avoiding duplication in making contacts with employers, and maximizing employment opportunities for consumers.

Performance Indicator 1.2: The percentage of cases with employment outcomes; RSA Standard: 68.9%

The percentage of cases with employment outcomes for FY 2015 of the total number of cases was 80.47 percent. This performance indicator was met.

Objective 1.3: OFB will meet or exceed the RSA standard for the percentage of all individuals determined to have achieved an employment outcome who exited the OFB program into competitive, self, or KBE employment with earnings equivalent to at least the minimum wage. (RSA Performance Indicator 1.3) Strategies: Ensure proper coding of consumers employment wages through case reviews.

Increase collaboration and partnerships with other agencies in order to maximize opportunities and resources for consumers.

Increase follow up and on site contacts and/or meetings between VR field staff and employers in order to discuss issues, concerns, provide technical assistance, training, and to ensure job retention and upward movement for consumers

Primary Indicator One (Performance Indicator 1.3): Percentage of all individuals determined to have achieved an employment outcome who exited the OFB program into competitive, self, or KBE employment with earnings equivalent to at least the minimum wage. RSA Standard: 35.4 percent

For FY 2015 this indicator was met with a percentage of 100 percent

Objective 1.4: OFB will continue to meet or exceed the RSA standard for the percentage of individuals with significant disabilities of all individuals who exit the VR program into competitive, self, or KBE employment with earnings equivalent to at least the minimum wage. (RSA Performance Indicator 1.4)

Strategies: Continued development of relationships with community rehabilitation providers in order to assist individuals that are underserved with the most significant disabilities through supported employment.

Review unsuccessful closures across the life of the case identifying trends, issues needing addressed and areas of improvement to in order to increase the number of individual with significant disabilities entering employment. Develop and maintain close working relationships with state and local partners (e.g. ILC’s, Medicaid Waiver, CRP’s, etc.) to maximize resources and develop appropriate support systems.

Primary Indicator Two (Performance Indicator 1.4): Percentage of individuals with significant disabilities as a percentage of all individuals who exit the VR program into competitive, self, or KBE employment with earnings equivalent to at least the minimum wage. RSA Standard: 89 percent

For FY 2015 this indicator was met with the percentage at 100%

Objective 1.5 OFB will continue to meet or exceed the RSA standard for the average hourly earnings of all individuals who exit the OFB program in competitive, self, or KBE employment with earning levels equivalent to at least the minimum wage as a ratio to Kentucky's average hourly earnings for all individuals in the state who are employed. (RSA Performance Indicator 1.5)

Strategies: Increase employer relationships so that there will be opportunities for upward movement and higher salaries for consumers.

Work collaboratively with the Kentucky Business Enterprises program to increase the number of licensed blind vendors.

Implement Quality Assurance procedures to assure proper coding of consumers' employment wages in the case management system. Primary Indicator Three (Performance Indicator 1.5): The average hourly earnings of all individuals who exit the OFB program in competitive, self, or KBE employment with earning levels equivalent to at least the minimum wage as a ratio to Kentucky's average hourly earnings for all individuals in the state who are employed. RSA Standard: .59

For FY 2015 this indicator was met with the ratio to the average Kentucky hourly wage for all categories at 70.46 percent.

Objective 1.6: OFB will meet or exceed the RSA standard for self–sufficiency resulting from employment based on the percentage of change between application and closure. (RSA Standard 1.6).

Strategies:

OFB will place a greater emphasis on jobs with higher wages through job clubs and career exploration.

Vocational counseling and guidance will have a focus on self–sufficiency. Determine the need for further services and make appropriate referral to other state and federal programs to assure the needs of consumers are met.

Referral to benefits planning services and supports necessary for consumers to obtain and utilize those public benefits and work incentives needed to achieve their desired employment outcomes

Performance Indicator 1.6: Self–sufficiency resulting from employment; RSA Standard: 30.4 mathematical difference

For FY 2015 this indicator was met with the percentage change between application and closure at 34.73 percent.

Objective 1.7: OFB will meet or exceed the RSA Standard for service rates for all individuals with disabilities from minority backgrounds as a ratio to the service rate for all non–minority individuals with disabilities

Strategies:

OFB will continue its recruitment efforts among minority students, including students with disabilities through the provision of internships with Kentucky State and the University of Kentucky. OFB will continue to explore innovative approaches to increase and expand program services to Kentucky's minority populations, including Hispanic/Latino, Asian, Native American, and African American persons.

Collaborate with community leader contacts through religious and civic organizations and non–profit organizations that are close to the pulse of the minority community.

Evaluation Standard Two: Minority Access

Performance Indicator 2.1: Service rates for all individuals with disabilities from minority backgrounds as a ratio to the service rate for all non–minority individuals with disabilities for FY 2015 was 101.84 percent. RSA Standard: 80.00 ratio

Outcomes Reporting Evaluation Standard 2: This performance indicator was met. The agency has a plan in place for minority outreach. Individuals who are minorities have equal access to vocational rehabilitation services. OFB is committed in its effort to build the capacity to effectively service individuals with most significant disabilities who are minorities. OFB will provide vocational rehabilitation services to all individuals who have visual disabilities who are eligible for services regardless of gender, race, national origin, religion, color, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities to the same extent as it provides services to other significant populations or individuals. Goal 2: To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain, or regain competitive employment.

Objective 2.1: Increase the number of individuals with successful employment and/or independent living outcomes.

Strategies

Cultivate relationships with area employers (includes the Employment Initiative) Indicator: Employment Initiative Reports, Performance S & I 2012–57 employer contacts 2013–179 employer contacts 2014– 301 employer contacts 2015–296 employer contacts *The expectation is still that each counselor would make and keep 2 appointments per month, which would come to 432 appointments per year.

Provide quality training statewide that is job specific and targeted to address any deficiencies identified in quality assurance reviews, federal performance indicators results or training needs assessments. Indicator: and scope of trainings April 2015 VR Counselor and field staff training

Benefits planning occurs that supports individuals to set goals for increasing self–sufficiency Indicator: served identified through CMS 2012 – 0 2013–5 2014–14 2015–31

Goal Two Outcomes Reporting: There is a full reporting of the Performance Indicator 1.1: The number of employment outcomes under Goal 1. A one day training was held in April of 2015. There was 36 field staff in attendance. The training covered WIOA, Pre–Employment Transition Services, time allocation, the 90 day IPE Requirement, Individuals Plans and policies and procedures. OFB committed one counseling staff to participate in the WIPA CWIC training and through the VCU Work Incentive Planning and Assistance National Training Center. This individual obtained their certification in June of 2014. Staff received training in FY 2015 on Benefits Planning and an emphasis was strongly placed on making sure staff take advantage of this service for consumers.

Goal 3: Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth.

Objective 3.1: Diminish internal administrative costs in an effort to maximize consumer service funds.

Strategies:

Reduce administrative overhead costs while preserving quality service Delivery

Indicator: % of administrative cost reductions from prior year 16 percent reduction from 2012 – 2013 12 percent reduction from 2013 – 2014 3 percent reduction from 2014 – 2015

Objective 3.2: Assure an efficient and effective service delivery system within an available budget.

Strategies:

Office leadership will analyze counselor caseloads and staff allocations and reallocate positions Indicator: Analysis of caseloads and position reallocation Conduct cases reviews and provide technical assistance to improve efficiency and effectiveness in order to maximize services and employment outcomes within the available budget. Indicator: % reduction of errors

OFB went to a data recording system through the case review process this year that looks at each counselors performance overall through the question on the case review form. In review of recent cases, data entry accuracy has increased. A focus for FFY 2016 is conducting reviews in a timely manner and training for the area of guidance and counseling for counselors.

Objective 3.3: Improve the efficient and effective processing and payment of authorizations and invoices for services so that the system will provide the support needed for the field staff.

Strategies:

Office leadership will continue to work to improve the management information systems by identifying and correcting coding issues. Indicator: of trainings A one day training was held in April of 2015. Identify high service costs areas and evaluate the need to implement policy changes Indicator: Analysis of expenditures completed annually

OFB has made several adjustments in processes and in the case management system over the past two years. As a result there have been increased efficiencies for this area. Objective 3.4: Maximize federal match dollars for the Vocational Rehabilitation program.

Strategies:

Research and explore all available options and opportunities. Indicator: Reporting of Federal money drawn down Goal 3 Outcomes Reporting: In the CSPD attachment of this plan a full reporting of the analysis of position vacancies, filling of positions and reallocation is reported. Only critical staff vacancies were filled in FFY 2015. OFB uses a Group Review to Improve Professional Skills (G.R.I.P.S), Case reviews are conducted by the two regional managers and annually a peer review is conducted with the VR counseling staff. The primary verification process covers10% of the cases sent for payment. Staff are required to provide supporting documentation for the payment process (i.e. bills, reports, invoices) for the randomly selected cases. Over the past three years, OFB has made every effort in to reduce expenses and this has created some savings and made an impact on the bottom line of the budget. Every effort was made to cut administrative costs instead of service costs associated with consumers. OFB made changes to the policy and procedures manual to align with WIOA (i.e. IPEs are developed within 90 days of eligibility, applications as early as age 14, Pre–Employment Transition Services provided to students with disabilities and new or amended definitions for supported employment, competitive integrated work, student with a disability, and youth with a disability).

Goal 4: KBE will provide full–time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business. Objective 4.1: Maximize training opportunities for vendors and KBE staff

Strategies:

Offer and conduct annual vendor training for potential licensees Indicator: of trainings 2012–4 2013–0 2014–2 2015–4

Offer and conduct annual upward mobility training for current vendors Indicator: of trainings 2012–1 2013–1 2014–4 2015–5

Offer and conduct training for KBE staff Indicator: of trainings 2012– 8 staff 2013–6 staff 2014–5 staff 2015–6 staff Objective 4.2: Provide New Vending Opportunities

Strategies:

Communicate with federal and state agencies to acquire new locations Indicator: of new locations identified and evaluated 2012–15 locations surveyed and 6 accepted 2013–14 locations surveyed and 7 accepted 2014–12 locations surveyed and 6 accepted 2015–8 locations surveyed and 8 accepted

Work with the State Blind Vendor committee to seek out possible opportunities Indicator: of quarterly meetings 2012–4/4 2013–4/4 2014–4/4 2015–5/5

Survey at least one potential location each month Indicator: new locations secured 2012–6 2013–7 2014–6 2015–8

Objective 4.3: Improve existing vending locations Strategies:

Actively seek potential satellite locations Indicator: of potential satellite locations identified 2012–6 identified and opened 2013–7 identified and opened 2014–6 identified and opened 2015–8 identified and opened

Offer training and services to improve business practices Indicator: of trainings occurring 2012–9 vendors trained 2013–10 vendors trained 2014– 27 vendors trained 2015– 25 vendors trained

Goal Four Outcomes Reporting: Due to budget constraints the KY Business Enterprises Program (KBE) has a small staff of 6. The program continues to operate with a small staff for the program operations of 52 vendors (FFY 2015). A new assistant director was hired in April of 2015. Currently the program is in process of the review and revision of the KBE state regulations for changes.

Goal 5: To develop, design and implement a professional development leadership program for the agency rehabilitation staff for effective succession planning. Objective 5.1: Provide critical leadership skills training to increase competency of executive leadership maximizing the effective management of the VR program.

Strategies: Develop and deliver training on management (processes) and leadership (behaviors) skills both of which are essential to the agency.

Indicator: of trainings completed

Supervisory Series through Kentucky Association of Rehabilitation Leadership occurred. (3 sessions lasting two – three days).

Develop and deliver training on building effective teams, managing unsatisfactory performance and progressive discipline, consistency and fairness, productivity, effective hiring practices, personnel regulations, and employee performance reviews. Indicator: of trainings completed Supervisory Series through Kentucky Association of Rehabilitation Leadership occurred. (3 sessions lasting two – three days).

Objective 5.2: Develop and implement a leadership preparation program for staff identified as potential future leadership.

Strategies

Develop the framework for curriculum development through an assessment and evaluation of needs. Indicator: Assessment of needs completed

Develop training that will increase the knowledge, skills, and abilities of identified staff preparing them or advancement or promotion into more challenging roles. Indicator: Full implementation of leadership development program

Objective 5.3: Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff.

Strategies:

Maximize training funds to support staff in professional training and development activities. Indicator: 100% draw down of training funds annually Training grant funds were drawn down in full for 2011, 2012; however they were not fully expended in 2013.

Host a two–day AT Expo and Conference event designed to increase knowledge and promote skills acquisition by providing current information and training on assistive technology. Indicator: of staff participating in AT Expo 93 staff in attendance Development and implementation of in house online learning modules. Indicator: Online modules development and implementation Moderate Progress

Goal Five Outcomes Reporting: The Academy of Leadership Exploration and Preparedness program ALEAP provides staff with opportunities to learn about and develop foundational skills. This was a collaborative program with both OVR and OFB. Staff first must participate in the prerequisite required courses (online and classroom setting of 50–60 hours of instruction). ALEAP II consists of three face to face sessions on a variety of leadership topics and the completion of a project. Eight OFB successfully completed the required coursework for ALEAP I and ALEAP II.

Office for the Blind was a part of a succession planning project with TACE with consultant Doug Wilson. OFB identified the central office administrator as a critical need position for the project focus. Identification of key results areas and core competencies for the administrator position and for the field services manager position (to assure that this group is positioned to move to the next level) occurred.

The Cabinet as a part of the State Workforce Board initiatives began a leadership project utilizing the methodology. The curriculum is grounded in five essential leadership competencies identified by Kentucky Workforce Leadership. Implementation is set for FFY 2016.

OFB developed and implemented an online training program. Curriculum design and development is now complete for nine courses in the online program. All staff have accessed and completed at least three courses through eLearning in the system. Kentucky has recently launched a new Employee Learning Management System (KELMS). KELMS is a self–service training system and staff are seeing how it can be utilized to complement or link to KY virtual, our current e–learning system. Plans are to expand and build on the system.

Goal 6: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Objective 6.1: Develop new collaborative relationships with employers, community organizations & government agencies to promote employment opportunities.

Strategies:

Collaborate with key partners (SRC, CRP’s and Workforce Development Partners) to enhance connections with the employer community. Indicator: Performance of S & I 2012– 100 percent S & I met 2013–89 percent S & I met 2014–89 percent S & I met 2015–89 percent S & I met

Collaborate with the Career Center Business Services Team to expand relationships, avoid duplication of contacts with employers, and maximize employment opportunities for people with disabilities. Indicator: Level of involvement in Business Services Team See Outcomes Narrative Below

Expand relationships with the State and Local Workforce Investment Boards and Workforce Development Partner agencies in order to accomplish the initiatives described under the KWIB strategic plan Indicator: of committees and initiatives staff attend Initiatives: Workforce Academy, Partner for Success, Core Certification, Case Management and the Business Services Teams.

Objective 6.3: Increase available resources & seek to leverage funding, staff resources, in–kind and programmatic support & other forms of assistance from partners

Strategies:

OFB collaborates with other statewide partners increasing their capacity to serve individuals with disabilities, and refers eligible individuals who can benefit from the resources and services available at no cost. Indicator: of referrals to other sources, scope and type increases over the prior year (I & R) 39 individuals placed on the waiting list in FY 2015 received referrals to other sources.

Complete an assessment to identify existing resources and identify where gaps exists. Indicator: Assessment of needs and available resources

Develop electronic tools to assist staff, partners, and consumer's access information about available services and benefits Indicator: Development and implementation of tools

Objective 6.4: Enhance working relationships with consumer advocacy organizations.

Strategies:

Advocacy organizations will present at new employee orientation. Indicator: of presentations 2012 – 1/1 2013– 0/0 2014– 1/1 2015–0/0

Advocacy organizations members will present at the McDowell Center Classes. Indicator: presentations 2012– 4/4 quarterly presentations 2013– 4/4 quarterly presentations 2014–4/4 2015– 4/4 Quarterly meetings will be held with advocacy organization leadership Indicator: of meetings 2012– 4/4 2013–4/4 2014–3/4 2015–4/4

Objective 6.5: Increase effective communication with consumers & staff regarding mission, goals, priorities & program outcomes.

Strategies: Develop methods of effective communication to directly engage, inform and update partners, staff, consumers, stakeholders and other entities (newsletter, presentations, training, exhibits). Indicator: of newsletter 2012– 4/4 quarterly 2013– 0/4 *Discontinued the formal publication of the newsletter.

Make formal and informal presentations, at functions and activities of other groups and organizations. Indicator: of marketing events and of state/national conferences 2012 –2/2 National Conventions attended 2/2 State Conventions attended 2013 1/2 National Conventions attended 2/2 State Conventions attended 2014– 1/2 National Conventions attended 2/2 State Conventions attended 2015– 1/2 National Conventions attended 2/2 State Conventions attended 2013– Established baseline for Marketing and Outreach Events –205 2014– 207 2015– 125 Goal Six Outcomes Reporting: There is a full reporting of OFB's activities in this section on Cooperation and Coordination with Other Agencies and Other Entities: Cooperation with Agencies That Are Not in the

Statewide Workforce Investment System and with Other Entities that details our activities on the KWIB initiatives and other partnering organizations. OFB made a concentrated effort in strengthening its ongoing relationships with the advocacy organizations. Quarterly meetings occurred with the advocacy organization presidents of the Kentucky chapters for the National Federation of the Blind, the American Council of the Blind and the Blue Grass Council of the Blind occurred regularly. As well chapter representatives presented at staff trainings and the consumer classes at the rehabilitation center. OFB staff attended state conventions and presentations were given on agency program services as well as fiscal updates. OFB along with the State Rehabilitation Council developed a resource guide for the Blind and Visually Impaired as well as a Comparable Benefits guide for Staff. Staff participate in a variety of events including job, transition and health fairs as well as the Optometric Association Congress each annually.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

This is a reporting of the factors that impeded the achievement of goals for OFB for the VR program.

Goal 1: OFB will exceed or meet the federal Standards and Indicators annually. OFB met all the standards and indicators above goal but one.

Objective 1.1 Increase in the number of positive employment outcomes. (RSA Performance Indicator 1.1)

Goal One Outcomes Reporting: Although there was improvement overall this has been an area that was impeded by the closing of service categories under order of selection. Given the decrease for 2013, when the PEO's dropped from 368 (FFY 2012) to 336 the two year average was a negative number total at –18. In 2014 the number of PEO's decreased to 274 (two year average –94). This year was a gain at 282 PEO's (two year average –54). Overall the agency was still able to place a number of individuals into SGA that are receiving SSI or SSDI. There are several factors that affected the agency's performance in this area (i.e. staff, turnover, administration changes). However, the main one was the closing of categories under Order of Selection. The numbers served for 2015 (1,192) increased from 2014 (1,143) for Priority Category One. For Priority Category Two, there were 254 in 2015 served compared to only 210 served in 2014. For Priority Category Three there was an increase in the number served from 30 (2014) to 38 (2015). Beginning in FFY2016 OFB closed categories two and three leaving only one priority category open due to fiscal constraints. Again, this will have an overall effect on the number of positive employment outcomes.

Goal 2: To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain, or regain competitive employment.

Objective 2.1: Increase the number of individuals with successful employment and/or independent living outcomes. Strategies:

Identify new and strengthen current relationships with potential referral sources of persons needing independent living services, especially in geographic areas or among populations identified as underserved. Indicator: served IL/OIB programs 2012–898 individuals received services 2013–780 individuals received services 2014–717 individuals received services 2015–753 individuals received services

Goal Two Outcomes Reporting: As previously reported, staff in the IL/OIB program were reduced from ten to eight in FFY 2012 due to budget constraints. Existing staff have absorbed the service needs of those counties. As a result there were reduced numbers for this program as staff adjusted to new service areas and built referral sources. Numbers served steadily decreased through 2012 – 2014 with a 5% increase in 2015 in the numbers served.

Goal 6: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Objective 6.1: Develop new collaborative relationships with employers, community organizations & government agencies to promote employment opportunities.

Objective 6.2: Develop a marketing approach and plan to guide OFB's partnership efforts with eye physicians.

Strategies:

Identify through WEBI existing eye physicians that serve as a regular referral source to each caseload. Indicator: WEBI report No progress in 2015

Identify caseloads that do not have a regular referral flow from an eye physician. Indicator: List of caseloads low on referrals from eye physicians No progress in 2015

Develop and implement a marketing plan to address the identified gaps in referrals and caseloads. Indicator: Development and implementation of a plan addressing gaps No progress in 2015

Goal 6 Outcomes Reporting: There was no progress for this goal area. Given the workload of staff and existing resources this area was not a focus under this state plan.

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.

Reporting of Supported Employment Program Goals

This is a reporting of the strategies that contributed to the achievement of Goal 2.

Goal 2: Develop and implement a statewide model for more effectively serving the transition population

Strategy : The Office for the Blind State Transition Coordinator will collaborate with special education and other public and private, non–profit partners to enhance VR transition Services.

Measure: of individuals participating in the Community Based Work Transition Program. of Transition presentations Target: Increase in the number of students participating in the Community Based work transition program. Baseline 2013 – 1 student There were no students participating in the CBWTP

Strategy: Statewide Transition Coordinator will facilitate the development and establishment of collaborative partnerships with VR Counseling Staff and VI teachers statewide. Measure: of positive employment outcomes Target: Increase in the number of successful rehabilitations for transition students from the prior year. 2014 – 36 2015 – 42 15 percent increase Outcomes Goal Two Reporting: The OFB State Transition Coordinator has worked to forge new partnerships and strengthen existing ones to enhance transition services over the last year.

OFB has monthly meetings with staff at the Kentucky School for the Blind to discuss ways the two entities could further partner to make a more smooth transition from secondary to post–secondary life for students that attend the school.

The meetings also give the opportunity for the Office and KY School for the Blind to be proactive in transition planning. OFB partners with the KY School for the Blind to provide work experience opportunities to students during the school year and in the summer. The State Transition Coordinator attends meeting of the Outreach Committee at the KY School for the Blind to give input on outreach efforts to students that are blind or visually impaired across the state.

This committee benefits OFB as it provides an opportunity to learn more about events across the state and provides an opportunity for OFB to obtain more information about unserved and underserved areas across the state. The meetings also give the State Transition Coordinator the opportunity to strengthen relationships with the KY School for the Blind Outreach Consultants.

The Outreach Consultants are located throughout the state and cover regions that are aligned with the 9 special education cooperatives throughout the state. They serve as a link between the KY School for the Blind and local teachers of the visually impaired, students, and families in their assigned areas. Each Outreach Consultant holds Professional Learning Collaboratives in their assigned areas for teachers of the visually impaired and orientation and mobility instructors.

The State Transition Coordinator has been invited to speak to each of the regional Professional Learning Collaboratives about WIOA and the focus on transition. These meetings have also been used to generate ideas about how to spend Pre–ETS money locally on services that students in the area need to successfully transition to post–secondary life. The meetings have also allowed the State Transition Coordinator to clarify information for the teachers of the visually impaired and orientation and mobility specialists regarding when to refer students and when to invite OFB to school based meetings.

OFB is very involved in the planning of the yearly INSIGHT Post–Secondary Preparation Program. The program is in its 10th year and offers a unique opportunity to partner with other public, private, and non–profit entities to provide a way to expose students to college life. The State Transition Coordinator serves as a member of the Kentucky Interagency Transition Council. The council provides a forum to learn information about new and existing resources for transition aged individuals. The council is comprised of public and private agencies that all have an interest in the successful transition of students. Through the council, new relationships are being formed and the relationship with personnel from the State Educational Agency is being strengthened. New relationships are being formed with existing CRPs and new community based providers to have

them to assist in providing Pre–ETS to students who are blind or visually impaired in the student's home area.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Below is an explanation of the factors that impeded the achievement of Goal 1.

Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities.

Strategy: Develop a work plan for the recruitment and training of CRP's Measure: Development of a work plan and trainings held Target: Implementation of training plan No progress

Strategy: VR Counseling Staff will collaborate with Community Rehabilitation Providers (CRP's) to maximize resources and ensure quality services. Measure: CRP Expenditures and of referrals Target: Increase in CRP expenditures from the prior year 2014–$29,600 2015– $38,125 33 percent increase in expenditures

Increase the of consumers referred from the prior year 2014 – 52 2015 – 74 30 percent increase

Strategy: Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired including the most significant disabilities.

Measure: of Supported Employment PEO's Target: Increase in the of consumers placed from the prior year. 2012–1 2013–4 2014–6 2015–8 25 percent increase from the prior year.

Outcomes Goal One Reporting: OFB made limited progress in this area. There was an increase in the number of positive employment outcomes of 75% over the prior year; however of note is the total number is at four. There was also an increase in the amount of expenditures as reported above which correlates with the higher number of PEO's. There was no progress in the development of a work and training plan. Staff resources to dedicate to this area were limited given the current workload. OFB is looking at the potential of establishment grants in order to support the establishment, development, or improvement of a public or other non–profit Community Rehabilitation Program (CRP). This is an area of focus in the current conducting of the triennial statewide comprehensive needs assessment. This would be for the purpose of providing services that promote competitive employment in integrated settings, particularly for individuals who are blind and visually impaired (MSD). Based on current feedback form the statewide needs assessment CRP's feel this is an area of weakness for them in serving this target population. Office for the Blind recognizes the need in working with CRP's to make needed improvements.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

The current Kentucky OFB/VR Case Management System (CMS); a web–based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen

reading technology – a goal that none of the “off the shelf” options for case management systems for vocational rehabilitation agencies could meet at the time.

With recent improvements in technology, several systems could meet the programmatic and accessibility needs of the agency. The current CMS system is approaching its useful life expectancy and upgrades to the current system as well as the purchase or licensing of other systems that would meet both the needs of the two vocational rehabilitation agencies and those of common measure reporting are being considered.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation.

Early in 2016 Kentucky Skills Network partners will gain access to a Customer Relationship Management system based on a SalesForce platform. Phase 1 will allow for shared access to employer contact and needs, and Phase 2 later in 2016–2017 will add the capacity for KSN partners to add and assess employer programs and resources via the SalesForce application.

Regardless of the system that the Agencies choose to implement, innovations that are anticipated include: paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity.

In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting.

Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

During FY 2015, the State Rehabilitation Council had a budget of $82,100. The projected budget for FFY 2016 is $43,300. These dollars came from Title I funds.

For the FFY 2015 State Plan Title I funds for innovation and expansion activities were used to increase and enhance employment opportunities for individuals who have the most significant disabilities and support of the Statewide Rehabilitation Council. The areas of focus for Innovation and Expansion Activities are as follows:

Annual Support for the Statewide Rehabilitation Council

Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities.

Develop and implement a statewide model for more effectively serving the transition population

Title I funds for innovation and expansion activities will be used to increase and enhance employment opportunities for individuals who have the most significant disabilities. The Areas of focus for Innovation and Expansion Activities are as follows: Annual Support for the Statewide Rehabilitation Council

OFB will continue to provide annual support for the Statewide Rehabilitation Council through administrative support and direct expenses necessary to operate the State Rehabilitation Council. Funding will be provided for payment for contractual services to complete the annual client satisfaction survey, reimbursement of expenses and personnel costs and all costs associated with the publishing of the SRC Annual Report. These funding arrangements are consistent with 34 CFR 361.35.

Progress:

Fiscal Tracking mechanisms were put in place in order to capture FFY 2015 annual support for the Statewide Rehabilitation Council. IN FY 2015, the agency spent $34,364.52 in Innovation and Expansion for this area.

Funding in the support of the SRC for reimbursement of expenses and personnel costs for the agency designated liaison for the SRC. This includes:

SRC Annual Report Publication,

SRC Consumer Satisfaction Survey of all closed cased contracted through the University of Kentucky.

Reimbursement of expenses in accordance with Section 105 (g) of the Act.

A copy of the 2014 Satisfaction Survey Executive Summary, as well as the Survey Highlights, were distributed to SRC members, via email, prior to the October 23, 2015 SRC meeting, where a representative, from the University of Kentucky Human Development Institute, delivered a presentation for the Council on the Survey results. It was reported that a total of 194 participants responded which was an 86.6% response rate. Overall, the results of the study indicated that consumers expressed high degrees of satisfaction with their experiences. Nearly 85% of all participating consumers rated services they received through OFB as a 1 or 2, on a five point scale where 1 = “excellent” and 5 = “poor”.

The SRC Planning Committee gave input in 2015 on the OFB State Rehabilitation Council’s Annual Report. The theme for the Annual Report “An Untapped Labor Pool” was approved by the full Council. The 2015 Annual Report contained facts that informed the public about the Office for the Blind and the Council, such as OFB 2015 program statistics, the 2015 Satisfaction Survey results, consumer success stories and contact information for the agency. The Annual Report publication is available to the public on the OFB website at http://blind.ky.gov.

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.

Organizational systems, which help to assure the quality and effectiveness of supported employment, are in place. The Office for Vocational Rehabilitation has an established program, which provides technical assistance and training to service providers and monitors quality assurance. OFB assists these same providers through staff training and consultation to ensure that the unique needs of individuals who are blind are met.

Supported Employment services are supplemented with unique services, which may be necessary for individuals who are blind. These services include rehabilitation engineering, assistive technology, orientation and mobility, Braille, daily living skills, communication skills, advocacy and independent living skills.

Consumer waiting lists in the Commonwealth are lengthy. This is due to the low number of supported employment providers and the lack of adequate funding and the set criteria for accessing that funding for ongoing support services. Most providers rely on funding from Medicaid Waiver Programs to fund ongoing support services. However, many individuals in Kentucky who are blind or visually impaired do not qualify for these waiver programs.

This is further complicated by the lack of knowledge of area providers regarding the blind and visually impaired. Counselors offer to partner with provider staff assisting them with job placement in order to address specific needs issues surrounding blindness that present a major challenge. OFB follows the rates of payment process and agreements; however, efforts are made to work individually with all providers advocating for our consumer base. Principles

Supported Employment is paid competitive work that offers ongoing support services in integrated settings for individuals with the most significant disabilities. Supported employment is intended for individuals for whom competitive employment has not traditionally occurred or has been interrupted or intermittent as a result of a most significant disability, and who need ongoing supports to maintain their employment.

This includes transitional employment for individuals with the most severe disabilities due to mental illness. This employment outcome is obtained by providing intensive service and is maintained through the provision of extended service. The level of employment participation may be full–or part–time based on the interests and abilities of the individual. Individuals will be compensated at or above minimum wage, but not less than the customary or usual wage paid by the employer for the same or similar work performed by individuals who are not disabled.

OFB is committed to the principle that individuals with the most significant disabilities, including those who have not traditionally experienced competitive work, are capable of engaging in employment in integrated settings. Supported Employment services provide for a system of intensive, life–long work and community and natural supports, allowing individuals needing these

services the tools to perform competitive work in an integrated setting. OFB is committed to the principle that there is no disability too significant, which would impede an individual's ability to work.

Procedures

OFB established written procedures in the OFB Counselor Manual whereby all rehabilitation counselors may provide supported employment services to those individuals who have the most significant disabilities and who qualify for services under the definition of supported employment. These procedures contained in the Counselor Manual include competitive work, integrated work setting, on–going support services, transition services, transitional employment, eligibility requirements, funding, vendors, referral, individual plan for employment, outreach, application, assessment, job development, job placement, on the job skills training with job coaches or employment specialists, community supports, post–employment services and extended services for the duration of the individual's current employment or future employment.

OFB uses the same process as our sister agency OVR in establishing vendors and payment schedules. The Agency coordinates with OVR supported employment efforts, which include developing agreements with supported employment vendors. The Agency partners with the Office of Vocational Rehabilitation, consulting with vocational rehabilitation counselors and supported employment vendors concerning program issues, tracking supported employment cases, and advising necessary staff concerning training activities and program changes.

TRANSITION FROM SCHOOL TO EMPLOYMENT

OFB may also provide supported employment services for youth in transition from school to employment. These services are a coordinated set of activities for a student designed within an outcome–oriented process that promotes movement from school to post–school activities. They must promote or facilitate the achievement of the employment outcome identified in the student's IEP and IPE. OFB participates with twenty other state agencies in the Kentucky Interagency Transition Council. The purpose of this organization is to provide a system of collaboration among agencies and schools in a shared responsibility for the education and employment of youth with disabilities. Through an Individualized Transition Plan (ITP) for each individual, the IPE is coordinated with the Individualized Education Plan (IEP).

OFB staff serves in a consultative and technical assistance role to educational agencies in transition planning for students until age 14. The agency provides information and referrals to needed services to schools for all age levels as a proactive preventive measure in offsetting challenges or issues for this population before they occur.

Supported employment services provided by the agency are time limited. During the initial phase of SE, a comprehensive assessment is imperative. There is collaboration between OFB and provider staffs in the development of the IPE in order to further define services with the consumer. A fee schedule is set for reimbursement of these initial services. Job Placement and Retention payment points are outcomes based.

Ongoing support services can be provided for a time not to exceed 24 months unless special circumstances are noted in the Individualized Plan for Employment (IPE) and the vocational rehabilitation counselor, the consumer, and the supported employment provider are in agreement that further time is needed to reach the vocational goals of the consumer. For youth, ongoing supports can be provided for a time not to exceed four years. The employment goal of the individual

shall be consistent with these criteria: the maximum numbers of hours per week in employment possible in an integrated setting, based on the strengths, resources, priorities, concerns, abilities, interests, and informed choice of the individual.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

The time limited supports must be identified as to OFB involvement and the service provider must be in agreement that they will provide these supports or identify another agency or program in agreement to provide extended services of support to the individual for the duration of employment. On–going support services identified by the agency will be specified in an Individualized Plan for Employment.

At a minimum, these extended services shall include twice monthly monitoring at the work site. If the IPE provides for off–site monitoring, it must, at a minimum consist of two face–to–face meetings with the Supported Employment consumer and at least one contact with the employer each month.

OFB will continue to provide short–term blindness specific skills, such as Orientation and Mobility in the case when there are substantial changes involving the consumer's level of vision, employment or status of their job. This option for supportive services alleviates some of the fears of providers in accepting referrals from OFB.

Extended Services

Extended Services are ongoing support, follow–up services, and other appropriate services that are needed to support and maintain a consumer in supported employment after the consumer is no longer being funded and/or supported by the agency. In order to be approved to be a supported employment vendor for the agency, the supported employment agency must make extended services available using a funding source other than the agency.

This will typically begin after the 24–month period in which the consumer has been receiving services funded by the agency and after the consumer has successfully transitioned into work. Examples of follow–up services include facilitation of natural supports on the work site and regular contact with the employer, the consumer, family members or advocates of the consumer, and/or other suitable informed advisors.

This follow–up is intended to reinforce and stabilize successful employment. Systems of natural supports, including agreements with community service organizations and employers, may be initiated to provide extended supports for the duration of the employment of the individual. Office for the Blind staff is called upon to consult as needed.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Department of Workforce Investment**

Name of designated State agency **Kentucky Office for the Blind**

Full Name of Authorized Representative: **Allison Flanagan**

Title of Authorized Representative: **Executive Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 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 **Kentucky Office for the Blind**

Full Name of Authorized Representative: **Allison Flanagan**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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 **Kentucky Office for the Blind**

Full Name of Authorized Representative: **Allison Flanagan**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **Yes**

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: **Yes**

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

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,

I. 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
II. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

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:

I. THE COMPREHENSIVE ASSESSMENT OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES CONDUCTED UNDER SECTION 102(B)(1) OF THE REHABILITATION ACT AND FUNDED UNDER TITLE I OF THE REHABILITATION ACT INCLUDES CONSIDERATION OF SUPPORTED EMPLOYMENT AS AN APPROPRIATE EMPLOYMENT OUTCOME, IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 606(B)(7)(B) OF THE REHABILITATION ACT

II. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

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* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

JOBS FOR VETERANS' STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(A) HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

Veterans and eligible persons will receive employment, training and job placement services at a local KCC office in a similar fashion to other customers. However, veterans and eligible persons will be provided priority of service over non–veterans for all employment, training and job placement services in accordance with 38 U.S. Code (USC), Chapter 42.

Initial contact at a KCC visited by a veteran and other eligible person will be by an intake/assessment customer service staff member. This person will provide the veteran with a self–assessment form that determines if the individual is qualified as having Significant Barriers to Employment (SBE), and is to be referred to a DVOP specialist. OET will continue to emphasize and train KCC staff to identify those who are already in the system seeking services, those entering the KCC and those found by the DVOP conducting outreach that are consistent with these target populations. These targeted populations include: • special disabled or disabled veterans, as defined in 38 USC §4211(1) and (3); • homeless veterans and those veterans who are at–risk of becoming homeless (any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing); • recently–separated service member, as defined in 38 USC §4211(6); • ex–offenders, as defined by WIOA Section 101(38); • veterans lacking a high school diploma or equivalent; • low–income veterans, as defined by WIOA Section 101(36); • 18 to 24 year–old veterans, as directed by the assistant director for Veterans Employment and Training (ASVET) in Veterans Program Letter (VPL) 04–14; • transitioning service members assessed as not meeting the Career Readiness Standards, as documented on DD2958 and active duty services members being involuntarily separated through a service reduction in force as described in (VPL) 07–14; and • wounded, ill or injured service members receiving treatment at a military treatment facility or a warrior transition unit and the spouses and family caregivers of such wounded, ill or injured service members as described in (VPL) 08–14.

(B) THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

DVOP specialists provide intensive services to veterans with SBEs, other eligible veterans, and other eligible persons as specified by 38 USC §4103A, and at the direction of the ASVET through guidance contained in VPL 03–14, VPL 03–14 Change 1, VPL 03–14 Change 2, VPL 04–14, VPL 07–14 and VPL 08–14. DVOP specialists will provide a full array of employment, training and placement services to those veterans with one or more SBEs. DVOP specialists will also facilitate services through an effective case management strategy. DVOP specialists conduct an assessment, and provide services to veterans and eligible persons to include: • evaluation of skill levels and needs; • development of an Individual Employment Plan (IEP) to identify employment goals, appropriate objectives, and appropriate combination of services for the participant to achieve the employment goals; • coordination of supportive services with applicable providers; • assistance to KCC partners in providing services to veterans on a priority basis; and • conducting outreach to identify those veterans and other eligible persons, ensuring they receive appropriate intensive services, case management and other workforce services necessary to re– turn to meaningful, sustainable employment. LVER staff perform only those duties specified in 38 USC §4104(b), in accordance with guidance promulgated at VPL 03–14. These are related to direct outreach with businesses, and facilitation within the state's employment service delivery system. LVER staff is assigned duties that promote veterans to businesses, business associations, and business groups. When business outreach is primarily conducted by a Business Services Team, the LVER will be included as an active member. Additional LVER activities and services include, but are not limited to the following: • planning and participating in job and career fairs; • coordinating with unions, apprenticeship programs, businesses and business organizations to promote employment and training programs for veterans; • informing federal contractors of the process to recruit qualified veterans; • promoting credentialing and licensing opportunities for veterans; and • conducting veterans' programs training for all KCC staff.

The Intensive Services Coordinator will:

• Upon a veteran's being determined by local VR&E staff as "job ready" and suitable for services, or having completed education, vocational or other VR&E designated rehabilitation program, The ISC will notify the servicing KCC and DVOP of the individual's enrollment into the program and the employment and/or rehabilitation services plan, as outlined and provided by the VR&E.

• Once initial contact with the program participant is confirmed, the ISC will send a personal communication to VETS and the VR&E staff to confirm initial enrollment into the program through the local Career Center.

• Provide continuous monitoring and assessment of services by utilizing the Employ Kentucky Operating System (EKOS).

• Monitor and assess services provided by the DVOPs and KCC staff to Chapter 31 veterans to ensure services are appropriate and being provided on a timely basis.

• Act as a liaison between the KCC staff and VR&E staff to resolve conflicts and ensure smooth delivery of needed services.

• Report VR&E procedural problems to the appropriate VR&E , KCC and VETS staff including the Veteran program Coordinator.

• Coordinate, reconcile and distribute the Chapter 31 VETS 201 Report on a quarterly basis.

• Inform the VR&E employment counselor when any participant fails to respond to communications form the DVOP or ISC. Recommend case closure if no contact has been established after 90 days.

(C) THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR ONE-STOP DELIVERY SYSTEM PARTNER NETWORK;

Service delivery is conducted through an integrated delivery system within the KCC structure. Crosstrained, responsive customer service teams throughout the Commonwealth provide effective services. Upon arrival to a KCC, veterans with SBEs will be identified using a self–assessment form and if eligible they will be referred to the DVOP specialist for further assessment, services and intensive case management as required. LVER staff work with the Business Services Team to promote the hiring of veterans to employers. LVERs are key members of the Business Services Teams, providing information on current employer job openings, assisting employers seeking to hire qualified veterans, and actively promoting job–ready veterans to employers.

(D) THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Kentucky does not participate in the Incentive Award program.

The governor suspended indefinitely the Employee Recognition Awards Program, vehicle used to pay incentive awards, in September 2010. It has not been reinstated by the current governor.

(E) THE POPULATIONS OF VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

Kentucky possesses the capacity and capability to serve all veterans. DVOP Specialists, however, only serve those veterans with SBEs, and other targeted populations as directed by the Secretary. These include: • special disabled or disabled veterans, as defined in 38 USC §4211(1) and (3); • homeless veterans and those veterans who are at–risk of becoming homeless; • recently–separated service member, as defined in 38 USC §4211(6); • ex–offenders, as defined by WIOA Section 101(38); • veterans lacking a high school diploma or equivalent; • low Income veterans, as defined by WIOA Section 101(36); • 18– to 24–year–old veterans, as directed by the assistant director for Veterans Employment and Training (ASVET) in Veterans Program Letter (VPL) 04–14. • Transitioning service member assessed as not meeting the Career Readiness Standards, as documented on DD2958 and active duty services members being involuntarily separated through a service reduction in force as described in (VPL) 07–14; • Wounded, ill or injured service members receiving treatment at a military treatment facility or a warrior transition unit and the spouses and family caregivers of such wounded, ill or injured service members as described in (VPL) 08–14 ;• Chapter 31 VR&E veterans .

LVER staff indirectly serve veterans through direct business outreach to promote the hiring of qualified veterans and obtain job orders for review of potential cross–match with veterans seeking employment.

Although Kentucky does not have federal or state recognized Native American tribes, there are sever– al Native American organizations and groups. State workforce reports through Sept. 30, 2015, show that 1,248, or 0.6 percent of all participants registered with the Kentucky workforce system are Native Americans, of which 219 are veterans (1.2 percent of all veterans registered). Kentucky intends to coordinate activities and resources with Native American organizations as appropriate. This includes invitations to job fairs and hiring events, providing marketing materials, and providing information on employment and training services, emphasizing veteran’s priority of service.

(F) HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

The U.S. Department of Labor (DOL) has issued regulations implementing priority of service for veterans and other eligible persons required by the Jobs for Veterans Act (JVA). The JVA mandates that priority of service shall be implemented by all “qualified job training programs,” further defined as “any workforce preparation, development or delivery program or service that directly funded, in whole or in part, by the Department of Labor.” Subsequent regulations implemented under policy guidance issued by the Employment and Training Administration provides further guidance on how priority of service is to be applied across all new and existing qualified job training programs.

Veterans and other eligible persons identified at the point of entry into the service delivery system will be notified of programs and services for which they may receive priority of service. “Point of Entry” includes both KCC locations as well as web–based and other virtual service delivery systems.

All Workforce Investment Boards (WIB) and KCCs will ensure their plans provide strategies and policies for providing veterans and other eligible persons with priority of service. Policies implemented will ensure that veterans and other eligible persons are aware of their entitlement to priority of service, the array of programs and services available to them, and any eligibility requirements for those programs and/or services.

Monitoring the administration of priority of service within the service delivery system consists of re–views of individual records to ensure eligibility, notification, and referrals as required are documented accurately. Additionally, reviews of the Commonwealth’s static and ad–hoc reports are conducted to measure priority of service indicators in activities, services, and referrals. Further, annual assessments and state–initiated KCC office validation visits include screening for signage notification of priority of service, as well as reviews of documentation and staff interviews to ensure priority of service is understood and administered appropriately.

The State Veterans’ Program Coordinator (SVPC) will continue to conduct training workshops on priority of service provisioning to all KCC office staff and WIB staff as appropriate.

(G) HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND ONE-STOP DELIVERY SYSTEM PARTNER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

All KCC DVOP specialists and partner staff provide job and job training individualized career services in addition to job–driven training and placement services through direct services and referrals to KCC partners. The DVOP specialist and/or the partner staff member, working with the participant, mutually agree on the individualized services the participant requires and will receive.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Employment placement services may be provided in two ways. The participant may receive direct services from a KCC DVOP specialist and/or partner staff, both as an initial visit and follow–up meetings and case management sessions. Alternatively, the participant may conduct self–directed assistance in resume writing, job searches, and career exploration options for education and employment goal attainment through the Commonwealth's Focus Career function via the Kentucky Career Center website.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

All veterans and eligible persons will be provided local labor market information along with current training programs tailored to the economic sectors for that region by either the DVOP, KCC staff or partner agency staff. Upon completion of the training program, veterans will be registered into the Focus Career system for job matching and placement. Additionally, DVOP and KCC staff will provide referrals as required for all veterans completing training.

Success will be measured by the number of veterans and eligible persons training enrollments, completion of training and employment outcomes.

(H) THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

Please see attached spreadsheet for DVOP and LVER staff information here: kwib.ky.gov/VetStaff.xlsx Kentucky JOBS FOR VETERANS STATE GRANT (NVTI Required Training Completion Date)

As of 8/5/2014

Grant Funded Staff Name (Last Name, First Name) Date Appointed to Current Position

NVTI Required Training Completion Date

Central Office 275 East Main St

Frankfort, KY 40621

Kuhn, David 10/16/2006

4/18/2007

White, Ernest 10/16/2006

10/31/1997

Kentucky Career Center

1844 Carter Ave Ashland, KY 41105

Richard, Steven 8/16/2011

6/15/2012 White, Greta 10/16/2011

1/27/2012

Kentucky Career Center

803 Chestnut St Bowling Green, KY 42102

Walbert, Donald 5/16/2014

10/24/2014

McGlothlin, Donald 7/16/2012

1/27/2012

Kentucky Career Center

310 Roy Kidd St Corbin, KY 40701

Victor, Jordon 5/16/2014

8/23/2014

Kentucky Career Center

1324 Madison Ave Covington, KY 40701

Schweinzger, Thomas 3/1/2001

2/14/2006

Kentucky Career Center

8020 Veteran Memorial Dr Florence, KY 41042

Wocher, Kenneth 12/17/2002

1/24/2006

Kentucky Career Center

233 Ring Road Suite 100

Elizabethtown, KY 42702

Cruz, Hector 6/1/2003

1/24/2006

Shorter, Robert 6/16/2014

2/25/2011

Kentucky Career Center

1121 Louisville Road Ste 6

Frankfort, KY 40601

Quire, Bruce 5/2/2011

3/9/2012

Kentucky Career Center

100 Technology Court, Suite B Georgetown, KY 40324

Bell, Charles 10/1/2003

2/14/2006

Kentucky Career Center

1055 Industry Road Lexington, KY 40505

Church, Nathan 4/18/2011

8/5/2011

Jones, Brian 8/1/2014

2/1/2016

Kentucky Career Center

600 West Cedar St Louisville, KY 40202

Tedford, Frank 12/1/2014 .

6/17/2015

Hinkle, Cathy 5/1/2014

11/6/2015

Kentucky Career Center

6201 Preston Hwy Louisville, KY 40219

Potts, William 1/16/2013

6/21/2013

Mattingly, Irv 9/1/2005

2/14/2006

Kentucky Career Center

56 Federal St Madisonville, KY 42431

Eaves, Charles 12/16/2014

2/5/2016

Kentucky Career Center

3108 Fairview Drive

Owensboro, KY 42351

DVOP Vacant

Kentucky Career Center

416 S. 6th St. Paducah, KY 42002

Tinsley, Randall 5/16/2014

8/22/2014

Kentucky Career Center

686 North Lake Dr. Prestonsburg, KY 41653

McBrayer, Jerry 3/1/2005 1

1/29/2005

Lanning, Larry 11/16/2011

3/1/2013

Kentucky Career Center

2028 Merrick Drive Richmond, KY 40475

Jones, Denise 1/16/2013

6/7/2013

(I) SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

UNEMPLOYMENT INSURANCE (UI)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 21-14 for the FY 2015 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

(A) CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. TRANSMITTAL LETTER

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

Mr. Les Range Regional Administrator Employment and Training Administration U. S. Department of Labor 61 Forsyth Street SW Atlanta, Georgia 30303

August 18, 2016

Dear Mr. Range,

Enclosed is the Kentucky Office of Employment and Training, Unemployment Insurance State Quality Service Plan for Federal Fiscal years 2017 and 2018. All pages required from Kentucky are included in this plan.

We appreciate the support we have always received from the Atlanta Regional Office. If you have any questions regarding the plan or need any additional information, please contact Todd Peyton, Acting Unemployment Insurance Quality Control Manager at (502) 782-3196.

Sincerely,

Jason Dunn Unemployment Insurance Executive Director Kentucky Office of Employment and Training

The signed copy of the Transmittal Letter is maintained with the State Agency and the Regional Office.

2. BUDGET WORKSHEETS/FORMS

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

The title: Application for Federal Assistance SF-424. Description: Unemployment Insurance Administration. Funding total: $26,675,105. Project start: 10/10/2016. Project end date: 9/30/2017. Name of authorizing representative; Jason Dunn. The signed copy of the SF 424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office.

3. THE STATE PLAN NARRATIVE

The State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to

the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

STATE PLAN NARRATIVE KENTUCKY FY 2017 and 2018 A. Overview 1. State Priorities and the strategic direction the state has adopted to ensure continuous improvement. The Commonwealth will transform the workforce development system through innovative practices which enhance sustainable economic and job growth to improve the lives of Kentuckians. Through the following, Kentucky will ensure collaboration with key partners and continuous improvement statewide workforce investment system; Branding/Identity, One-Stop Certification, National Career Readiness Certification (NCRC), Work Ready Communities, High Performing Workforce Boards, and Partner for Success. A comprehensive rebranding of our workforce system offices to the Kentucky Career Center name and logo will address the architecture of the entire system including One Stops, online services, and other public interfaces. This will transform the identity of the “unemployment office;” increase the awareness and use of online job matching and training services by unifying promotional efforts; increase the use of our job portal Focus Career and Focus Talent by employers and job seekers with increased promotional activity; reduce confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach; and increase communication among all service delivery points by unifying them under one brand. The Commonwealth also has implemented Focus Suites that features a job seeker portal called Focus/Career, an employer portal called Focus/Talent and a staff portal called Focus/Assist. This system allows job seekers/employers to enter their information into a system regardless of the program they are seeking. For example, within the Focus/Career portal, job seekers can create and/or update their resume. Much of this information is transferred back to EKOS for reporting purposes. Focus/Talent is utilized by employers who prefer to enter their company information and job posts, which are automatically processed into the EKOS database and viewable to job seekers in the EKOS Self Service Module on America’s Job Exchange (AJE) and Job Central (JC). These enhancements have streamlined the process and are assisting job seekers in maintaining and updating resumes as additional training is received. The State of Kentucky is updating the Worker profiling model to better identify and help claimants who are unlikely to return to their previous job and are likely to exhaust their UI claim. Kentucky’s Unemployment Insurance Department is working with the Commonwealth Office of Technology (COT) to create a new model. The current model was last updated in 1997 and has never been revised. The current model is completed by a staff member weekly and is a combination of manual and computer based selection of claimants. The new model will be completely automated and allow coefficients to be updated on a yearly basis without having to rebuild the entire model. To monitor this plan the statewide system will use EKOS data and Unemployment Insurance Wage Records to evaluate the effectiveness of the services to customers and employers, as well as the level of interaction among partners. Through a series of reports designed specifically to utilize this data, the Commonwealth can identify statewide and regional trends to make changes and improve the service delivery system. 2. Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications. The state of Kentucky’s First Payment Promptness for FY 2015 (4/01/2015 to 3/31/2016) was 67.05% (thru 3/31/16) below the Acceptable Level of Performance (ALP) of =>87%. The State of Kentucky expects First Payment Promptness: % of all 1st payments within 14/21 days after the compensable week to be => ALP of 87% by 9/30/2018. First Payment Promptness Intrastate 14/21 Days for FY 2015 was 66.43% (thru 3/31/16) below the ALP of =>87%. The State of Kentucky expects its First Payment Promptness Intrastate 14/21 Days to be => ALP of 87% by 9/30/2018. First Payment Promptness Interstate 14/21 Days for FY 2015 was 65.63% (thru 3/31/16) below the ALP of =>70%. Kentucky expects First Payment Promptness Interstate 14/21 Days to be => ALP of 70% by 3/31/2018. Nonmonetary Determination Time Lapse of 71.96% (thru 3/31/16) was below the ALP of >=80%. The State of Kentucky expects that its

Nonmonetary Determination Time Lapse to be => ALP of 80% by 3/31/2018. Benefit Year Earnings (BYE) for the State of Kentucky for the period of January 2015 to December 2015 was 2.711% which is .742 over the Target Rate for CY 2015 of 1.969%. The State of Kentucky expects its BYE to be =< ALP of 1.969% by 9/30/2018. Improper Payments Measure of 12.16% (7/01/2014 to 06/30/2015) was over the ALP of 61.4% ALP by 3/31/2017. 3. Coordination with other plans. Central office staff will produce and share quarterly data on the local offices, regions and system-wide statistics. Kentucky will also provide staff support to assist any customer who asks to be contacted and will share any details of those customer interactions on a real-time basis with the appropriate local office and regional staff. Employers and individual customers are encouraged to go to the website and take the survey. Notices have been made available to post on bulletin boards, present to customers on a card/piece of paper and use in other ways appropriate to each local business area. This customer-focused initiative will continue to build brand recognition. B. Federal Emphasis on the Government Performance and Results Act

1. State Performance compared to the GPRA goals. For FY 2015 the Percent of Intrastate Payments Made Timely increased 4% from 79.7% to 83.7% (below the FY 2015 goal of 87.5%). Detection of Recoverable Overpayments decreased 6.6% from 61.2% to 55.3% (below the FY 2015 goal of 67.9%). Reemployment Rate for Unemployment Insurance Claimants increased by 1.9% from 65.8% to 67.7%. The Percent of Employer Tax Liability Determinations Made Timely decreased 0.9% from 88.2% to 87.3% (below the FY goal of 88%). Establish Tax Accounts Promptly the state of Kentucky's score of 86.4% was below the Acceptable Level of Performance (ALP) of 88% for FY 2015. 2. Actions planned to achieve GPRA goals and targets. To improve the Percent of Intrastate Payments Made Timely the State of Kentucky recently implemented a new upgrade that allows adjudicator's the option of choosing that the automated system print and mail the determinations in batches. The system will also place the determinations in the imaging system making the information immediately available to all staff. Training existing staff is continuing quarterly. Staff realignment occurred to merge functions, improve collaboration and efficiencies. Cross departmental utilization is occurring by utilizing of one lower authority appeal (referee) and six higher authority appeals staff (commission writers) to assist with adjudicating cases. The State of Kentucky is requesting a regulation change that will adjust the employers 15 day protest period to respond to a notice of initial claim and notice of potential benefit charges. This would reduce claimants having to wait to request first payment until the 16th day after filing an initial claim is filed. Implementation of a new pilot program began on August 2, 2016. The new program will utilize a split chargeability issue system. To improve the Detection of Recoverable Overpayments our ultimate goal is to be able to audit 100% of all cross-matches each quarter. We are now staffed with 3 adjudicators. In order to meet this goal our staff would need to increase by at least 3 to 6 adjudicators. They would be auditing and rendering decisions on overpayments from New Hire and cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted. We recently created a form that will be universal for all UI staff to use. We recently hired a new fraud investigator and have rearranged the county assignments. This will help with the case load and each investigator will carry a smaller area. Report UI Fraud added to the Kcc.ky.gov website which includes an email address to report fraud and an electronic form to report UI Fraud. The Integrity Branch is working with Tax Branch to add verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically. To increase the Reemployment Rate for Unemployment Insurance Claimants the Commonwealth will ensure collaboration with key partners and continuous improvement statewide workforce investment system; Branding/Identity, One-Stop Certification, National Career Readiness Certification (NCRC), Work Ready Communities, High Performing Workforce Boards, and Partner for Success. A comprehensive rebranding of our workforce system offices to the Kentucky Career Center name and logo will address the architecture of the entire system including One Stops, online services, and other public interfaces. This will transform the identity of the "unemployment

office;" increase the awareness and use of online job matching and training services by unifying promotional efforts; increase the use of our job portal Focus Career and Focus Talent by employers and job seekers with increased promotional activity; reduce confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach; and increase communication among all service delivery points by unifying them under one brand. The Commonwealth also has implemented Focus Suites that features a job seeker portal called Focus/Career, an employer portal called Focus/Talent and a staff portal called Focus/Assist. This system allows job seekers/employers to enter their information into a system regardless of the program they are seeking. Enhancements to the system have streamlined the process and are assisting job seekers in maintaining and updating resumes as additional training is received. The State of Kentucky is updating the Worker profiling model to better identify and help claimants who are unlikely to return to their previous job and are likely to exhaust their UI claim. Kentucky's Unemployment Insurance Department is working with the Commonwealth Office of Technology (COT) to create a new model. The new model will be completely automated and allow coefficients to be updated on a yearly basis without having to rebuild the entire model. To monitor this plan the statewide system will use EKOS data and Unemployment Insurance Wage Records to evaluate the effectiveness of the services to customers and employers, as well as the level of interaction among partners. Through a series of reports designed specifically to utilize this data, the Commonwealth can identify statewide and regional trends to make changes and improve the service delivery system. In order to improve the Percent of Employer Tax Liability Determinations Made Timely the Division has been working with other state agencies to create a one stop business registration system known as KYBOS. Currently the Secretary of State and the Department of Revenue have begun operating with KYBOS and the Division is still in the developing stages to come onboard with KYBOS. This system will send reminders to registered businesses in Kentucky, that an unemployment account is needed and will also help monitor successorship by obtaining information from predecessor employers by prompting them to answer a series of questions when a business requests to be closed. At the time of closure, a more automated detection can be made on successorship and the successor can be notified to respond to the potential successorship. In the short term, the Division will develop a quarterly review to monitor timeliness of creating tax accounts and monitoring successorship timeliness within 180-days. The Division plans on utilizing data in the Tax Population 3 file to help with these measurements. We hope by reviewing this data, we can find common identifiers in which we can focus in on to help improve our processes. Also, as we work through more and more of our payroll shifts from our SUTA dumping investigations, we hope to help curb some of these late successorship determinations. C. Program Review Deficiencies

1. Causes for failure to conduct required reviews/activities, e.g., Benefit Payment Control, Internal Security, Benefit Accuracy Measure, and Tax Performance System. No failures to conduct required reviews/activities have occurred. 2. Plans to conduct the reviews required. No failures to conduct required reviews/activities have occurred. D. Program Deficiencies

1. Plans to correct deficiencies identified through required program reviews, e.g., deficiencies identified during an internal security review. No deficiencies have been identified through required program reviews. E. Reporting Deficiencies Kentucky has identified no Reporting Deficiencies. F. Customer Service Surveys G. Other (e.g., approach to maintaining solvency, request for technical assistance) H. Assurances By signing the SQSP signature page, the state administrator certifies the following assurances, and that the state will institute plans or measures to comply with the following requirements: A. Assurance of Equal Opportunity (EO). B. Assurance of Administrative Requirements and Allowable Cost Standards. C. Assurance of Management Systems, Reporting, and Recordkeeping. D. Assurance of Program Quality. E. Assurance on Use of Unobligated Funds. F. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93). G. Drug-Free Workplace (29 CFR

Part 98). H. Assurance of Contingency Planning. Provide the most recent dates for the following: • Information Technology (IT) Contingency Plan Implemented: The Mainframe Disaster Recovery Plan was first implemented on October 31, 2013. The UI IT Contingency Plan covering the Central Office was first implemented on July 13, 2012. This past year, an expansion of the UI Contingency Plan was made to cover the Regions and it is expected to be fully completed and implemented as of October 1, 2016. • IT Contingency Plan Reviewed/Updated2: The Mainframe Disaster Recovery Plan was updated as of 5/11/2016. The UI IT Contingency Plan covering the Central Office is expected to be fully completed and updated as of October 1, 2016. • IT Contingency Plan Tested3: The Mainframe Disaster Recovery Plan was tested in October, 2015, with findings resulting from the test included in the update published 5/11/2016 The UI IT Contingency Plan covering the Central Office and the Regions have been undergoing testing on a Region by Region basis beginning in August, 2016, and expected to complete by October 1, 2016. i. Assurance of Conformity and Compliance. j. Assurance of Automated Information Systems Security. Provide the most recent dates for the following: • Risk Assessment Conducted4: Completed by SDGblue and approved for release 5/6/2016 • System Security Plan Reviewed/Updated5: Completed by SDGblue and approved for release 1/14/2016. k. Assurance of Confidentiality

Narrative

State: Kentucky Federal Fiscal Year: 2017-2018 SQSP Corrective Action Plan & Progress Report

Performance Narrative Requirement 1: Make Timely Benefit Payments. During the core measure period of 4/1/2015 to 3/31/2016, the state of Kentucky first payment promptness was 67.1% below the ALP of 87%, the intrastate first payment promptness of 66.4% was below the ALP of 87%, and the Interstate first payment promptness of 65.6% was below the 70% ALP. Kentucky law provides employers with a 15 day protest period to respond to a notice of initial claim and notice of potential benefits charges. Claimants cannot request first payment until the 16th day after filing an initial claim and the payment system will accept the payment request up to 26th day after the initial claim is filed. In addition, all requests for out of state wages on combined wage claims for claimants filing interstate claims must be completed manually by staff causing further delay in initial claim processing and initial payment release. The adjudicator creates the determination in the same system that stores the claimants and employers statement of separation. The adjudicator will have the option of choosing that the automated system print and mail the determinations in batches. This will alleviate the necessity of investigators processing the determinations for distribution. The system will also place the determinations in the imaging system making the information immediately available to all staff. Adjudicators were utilized to develop, implement, and test the new system. These adjudicators are now utilizing the new system and continually involved in process improvement of the system. Training existing staff is continuing quarterly. Recent quarterly training has emphasized BTQ standards . Annual training will occur August 22 – 24, 2016. Staff realignment occurred to merge functions, improve collaboration and efficiencies. Kentucky is utilizing one lower authority appeal (referee) and six higher authority appeals staff (commission writers) to assist with adjudicating cases. Kentucky plans to Request a regulation change that will adjust the employers 15 day protest period to respond to a notice of initial claim and notice of potential benefit charges. This will reduce claimants having to wait to request first payment until the 16th day after filing an initial claim is filed. Monitoring and assessment will be accomplished through daily, weekly and monthly reports reflecting issues received, issues worked and remaining issues. These reports will include a comparison of the pilot program data with the non-pilot program data. Monthly Interstate Section team meetings will be held to assess existing efforts and results and discuss improvements that can be made. Tickets will be created to system developers to correct system issues. Completion Date

9/30/2017

Quarter 1 status report:

Quarter 2 status report:

Quarter 3 status report:

Quarter 4 status report:

Quarter 5 status report:

Quarter 6 status report:

Quarter 7 status report:

Quarter 8 status report:

Performance Narrative Requirement 2: Detect Benefit Overpayments. Kentucky failed to meet the 61.4% or better performance level on detection of overpayments for SQSP performance period ending March 31, 2016. Kentucky's current performance level is 58.79%. The goal of 75 to 100 cases investigated per month by the investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Training existing Staff is ongoing. Our ultimate goal is to be able to audit 100% of all cross-matches each quarter. We are now staffed with 3 adjudicators. In order to meet this goal our staff would need to increase by at least 3 to 6 adjudicators. The new adjudicators would be working in the same capacity as our current adjudicators. They would be auditing and rendering decisions on overpayments from New Hire and cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted. Currently fraud tips are sent to the Integrity Branch via email. We recently created a form that will be universal for all UI staff to use. It will contain pertinent information that is required to pursue an investigation. Kentucky has 120 counties which are divided amongst the six current Fraud Investigators. Each investigator has a large area to cover which includes working fraud tips and prosecuting claimants with Fraudulent overpayments in our Court system. We recently hired a new fraud investigator and have rearranged the county assignments. This will help with the case load and each investigator will carry a smaller area. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted. Completion Date

9/30/2017

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Performance Narrative Requirement 3: Establish tax Accounts Promptly. Kentucky does fall below the national aggregate at establishing new employer accounts within the 90-days (86.4% vs 87.3%) and 180-days (90.1% vs 92.7%) marks. Also, the successorship determinations made within the 180-day mark (50.6% vs 75.2%) does fall substantially below the national aggregate. The main reason for these deficiencies is employers must meet a certain quarterly payroll requirement of $1,500 in a calendar quarter or employ one worker for 20 weeks in a calendar year. Because of these requirements, employers cannot register for an unemployment account at the same time they are applying for their other tax accounts. This leads to the employers and tax preparers forgetting to apply for an unemployment account when this liability actually occurs and not registering for an account with the Division until quarterly reports are due. Also, regarding successorship timeliness, most employers are not aware of successorship laws, regulations and forms and may have purchased an existing business, when they already have an unemployment account. This Division relies heavily on their SUTA Dumping system (SDDS) to monitor payroll shifts from one company to another and investigates successorship. For the past 3 years, Kentucky has led the Nation with the total number of mandatory transfers processed for SUTA Dumping identification. In an effort to improve establishing employer tax accounts more promptly, the Division has been working with other state agencies to create a one stop business registration system known as KYBOS. Currently the Secretary of State and the Department of Revenue have begun operating with KYBOS and the Division is still in the developing stages to come onboard with KYBOS. This system will send reminders to registered businesses in Kentucky, that an unemployment account is needed and will also help monitor successorship by obtaining information from predecessor employers by prompting them to answer a series of questions when a business requests to be closed. At the time of closure, a more automated detection can be made on successorship and the successor can be notified to respond to the potential successorship. In the short term, the Division will develop a quarterly review to monitor timeliness of creating tax accounts and monitoring successorship timeliness within 180-days. The Division plans on utilizing data in the Tax Population 3 file to help with these measurements. We hope by reviewing this data, we can find common identifiers in which we can focus in on to help improve our processes. Also, as we work through more and more of our payroll shifts from our SUTA dumping investigations, we hope to help curb some of these late successorship determinations. Completion Date

9/30/2017

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"Performance Narrative Requirement 4: Employment Rate as Second Quarter after Exit. The state of Kentucky Reemployment CY 2015 of 66.7% was 0.3% below the ALP of 67%. The Commonwealth will transform the workforce development system through innovative practices which enhance sustainable economic and job growth to improve the lives of Kentuckians. Through the following, Kentucky will ensure collaboration with key partners and continuous improvement statewide workforce investment system; Branding/Identity, One-Stop Certification, National Career Readiness Certification (NCRC), Work Ready Communities, High Performing Workforce Boards, and Partner for Success. A comprehensive rebranding of our workforce system offices to the Kentucky Career Center name and logo will address the architecture of the entire system including One Stops, online services, and other public interfaces. This will transform the identity of the “unemployment office;” increase the awareness and use of online job matching and training services by unifying promotional efforts; increase the use of our job portal Focus Career and Focus Talent by employers and job seekers with increased promotional activity; reduce confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach; and increase communication among all service delivery points by unifying them under one brand. The Commonwealth also has implemented Focus Suites that features a job seeker portal called Focus/Career, an employer portal called Focus/Talent and a staff portal called Focus/Assist. This system allows job seekers/employers to enter their information into a system regardless of the program they are seeking. For example, within the Focus/Career portal, job seekers can create and/or update their resume. Much of this information is transferred back to EKOS for reporting purposes. Focus/Talent is utilized by employers who prefer to enter their company information and job posts, which are automatically processed into the EKOS database and viewable to job seekers in the EKOS Self Service Module on America’s Job Exchange (AJE) and Job Central (JC). These enhancements have streamlined the process and are assisting job seekers in maintaining and updating resumes as additional training is received.

The State of Kentucky is updating the Worker profiling model to better identify and help claimants who are unlikely to return to their previous job and are likely to exhaust their UI claim. Kentucky’s Unemployment Insurance Department is working with the Commonwealth Office of Technology (COT) to create a new model. The current model was last updated in 1997 and has never been revised. The current model is completed by a staff member weekly and is a combination of manual and computer based selection of claimants. The new model will be completely automated and allow coefficients to be updated on a yearly basis without having to rebuild the entire model. To monitor this plan the statewide system will use EKOS data and Unemployment Insurance Wage Records to evaluate the effectiveness of the services to customers and employers, as well as the level of interaction among partners. Through a series of reports designed specifically to utilize this data, the Commonwealth can identify statewide and regional trends to make changes and improve the service delivery system." Completion Date

9/30/2017

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Quarter 5 status report:

Quarter 6 status report:

Quarter 7 status report:

Quarter 8 status report:

"Performance Narrative Requirement 5: Issue Detection Date (IDD) Nonseparation. The state of Kentucky had a 67.29% Correct Detection Date for Non-separations for the Nonmonetary Determination Issue Detection and Determination Date Accuracy for the period of April 2015 – March 2016. This issue was found during yearly BTQ review of Non-separations. The cause of this deficiency appears to be human error either on the part of DCI and/or BTQ.

We have reviewed all BTQ cases over the last two years with an incorrect Issue Detection Date. We have developed consensus on the cause of each incorrect detection date. These cases will be used as examples during training and communication with staff on the importance of identifying the correct detection date. We will monitor the detection date of cases during the state's weekly BTQ review and during quarterly BTQ reviews to measure how effective the training and communication is and analyze whether the training and communication can be improved in any way. " Completion Date

9/30/2017

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Performance Narrative Requirement 6: Determination Date (DD) Separations & Nonseparations. The State of Kentucky had a 23.08% Correct Determination Date for Separations, 28.04% Correct Determination Date for Non-separations, and 25.45% Correct Determination Date for the total of all separations and non-separations for the Issue Detection and Determination Date Accuracy April 2015 – March 2016. In 2015, the State of Kentucky implemented an option to batch print all

determinations. This process change occurred to reduce the time spent by Disputed Claims Investigator (DCI) manually printing, folding, and mailing all determinations. This process also allowed the automatic scanning and imaging of over 150,000 multipage documents a year. However, the batch printing system had an effect on creating a difference between the mail date and the report date. We have been aware of this issue and have a help desk ticket with the Commonwealth Office of Technology (COT) to correct this issue. Plans for this issue solution remain viable for future implementation. Budgetary constraints for UI IT development as well as prioritization of IT projects, has delayed final development and implementation of a solution. Ongoing analysis and movement toward mainframe independence are factors in considering the order in which projects are completed and resources, both financial and staffing, are allocated. Completion Date

9/30/2017

Quarter 1 status report:

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Quarter 3 status report:

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Quarter 6 status report:

Quarter 7 status report:

Quarter 8 status report:

Performance Narrative Requirement 7 Completion Date

Quarter 1 status report:

Quarter 2 status report:

Quarter 3 status report:

Quarter 4 status report:

Quarter 5 status report:

Quarter 6 status report:

Quarter 7 status report:

Quarter 8 status report:

4. CORRECTIVE ACTION PLANS (CAPS)

Corrective Action Plans (CAPs): CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 -2018 MEASURE/PROGRAM AREA: First Payment Promptness: % of all 1st payments within 14/21 days after the compensable week. Current Performance Level: First Payment Promptness: % of all 1st payments within 14/21 days after the compensable week. 67.1% vs. ALP >=87% First Payment Promptness, 14/21 days Intrastate UI full weeks. 66.4% vs. ALP >= 87% First Payment Promptness, 14/21 days interstate UI full weeks. 65.6% vs. ALP >= 70% Projected Performance Levels:

69% 72% 75% 77% 80% 83% 85% 87%

68% 71% 74% 77% 80% 83% 85% 87%

66% 67% 68% 69% 70% 71% 71% 71%

(12/31/16)(3/31/17)(6/30/17)(9/31/17)(12/31/17)(3/31/18)(6/30/18)(9/30/18)

SUMMARY: During the core measure period of 4/1/2015 to 3/31/2016, the state of Kentucky first payment promptness was 67.1% below the ALP of 87%, the intrastate first payment promptness of 66.4% was below the ALP of 87%, and the Interstate first payment promptness of 65.6% was below the 70% ALP. Kentucky law provides employers with a 15 day protest period to respond to a notice of initial claim and notice of potential benefits charges. Claimants cannot request first payment until the 16th day after filing an initial claim and the payment system will accept the payment request up to 26th day after the initial claim is filed. In addition, all requests for out of state wages on combined wage claims for claimants filing interstate claims must be completed manually by staff causing further delay in initial claim processing and initial payment release. The agency was affected by a high staff turnover rate due to retirement and other employment has left the unit with fewer numbers of experienced staff. There were many technical issues related to the completion of automated non-monetary determination system mostly related to tasks taking longer to complete activities than expected. Adjudicators were spending too much time manually printing determinations. The new completed updates allow adjudicators to create determinations in the same system that stores the claimants and employers statement of separation, this will fix the problem of spending time manually printing determinations. The adjudicator will have the option of choosing that the automated system print and mail the determinations in batches. This will alleviate the necessity of investigators processing the determinations for distribution. This process improvement will increase efficiency of adjudicators in resolving issues, which will lead to prompt payments. The system will also place the determinations in the imaging system making the information immediately available to all staff. Adjudicators were utilized to develop, implement, and test the new system. These adjudicators are now utilizing the new system and continually involved in process improvement of the system. This system has 12 outstanding requests for technical issues with the Commonwealth Office of Technology (COT). Technical issues with upgrade of system have been resolved. Current technical issues are not related to the completion of the new automated batch printing, but are process

improvements that will further improve the system. No current plan to hire additional staff, instead focusing on training of current staff and cross utilization of staff from other departments. Training existing staff is continuing quarterly. Recent quarterly training has emphasized BTQ standards . Annual training was completed August 22 – 24, 2016, which included all staff and cross utilized staff. Staff realignment occurred to merge functions, improve collaboration and efficiencies. Cross departmental utilization is occurring by utilizing of one lower authority appeal (referee) and six higher authority appeals staff (commission writers) to assist with adjudicating cases. The realignment allowed the branch to move staff into positions that better fit their skill sets. The cross utilization of staff allows the branch extra staff to utilize during times of seasonal increases in the volume of issues. The training will increase staff performance on resolving issues, provided clearly defined expectations of performance, and increase the inefficiency of the staff in resolving issues which will lead to more timely first payments. Unemployment Insurance is requesting a regulation change that will adjust the employers 15 day protest period to respond to a notice of initial claim and notice of potential benefit charges. This will remove the barrier of employers waiting 15 days to respond to adjudicators. These more timely employer responses will result in less time needed to resolve issues and quicker first payment promptness. This will reduce claimants having to wait to request first payment until the 16th day after filing an initial claim is filed. In addition to all of the changes, the branch has also implemented of a new pilot program which began on August 2, 2016. The new program utilizes a split chargeability issue system. The performance of the staff participating in the pilot program will be measured against the performance of staff not involved in the pilot program to determine if the program is effective in reducing the promptness of first payments. Budgetary constraints for UI IT development as well as prioritization of IT projects, delayed final development and implementation. Ongoing analysis and movement toward mainframe independence are factors in considering the order in which projects are completed and resources, both financial and staffing, are allocated. The new enhancements to the functionality to the internal claim intake system were not completed until early 2016. Since implementation fourteen help desk tickets have been created to improve the newly implemented system. Monitoring and assessment will be accomplished through daily, weekly and monthly reports reflecting issues received, issues worked and remaining issues. These reports will include a comparison of the pilot program data with the non-pilot program data. Monthly Interstate Section team meetings will be held to assess existing efforts and results and discuss improvements that can be made. Tickets will be created to system developers to correct system issues.

MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Monitoring of new pilot program through weekly and monthly reports. X

Complete testing of new pilot system within the adjudication unit and then initiate training in new system and branch wide implementation. X Effects of monthly meeting/training increase in efficiency. Ensure consistence in decisions within adjudication branch and lower and high authority. X

Requesting a regulation change that will adjust the employers 15 day protest period (changed to 10 day protest period) to respond to a notice of initial claim and notice of potential benefit charges. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017-2018 MEASURE/PROGRAM AREA: Nonmonetary Determination Timeliness Current Performance Level: Nonmonetary Determination Timeliness. 72% vs. ALP >= 80% Projected Performance Levels:

77% 78% 78% 79% 79% 80% 80% 81%
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: During the core measure period of 4/1/2015 to 3/31/2016, the state of Kentucky first payment promptness was 67.1% below the ALP of 87%, the intrastate first payment promptness of 66.4% was below the ALP of 87%, and the Interstate first payment promptness of 65.6% was below the 70% ALP. Kentucky law provides employers with a 15 day protest period to respond to a notice of initial claim and notice of potential benefits charges. Claimants cannot request first payment until the 16th day after filing an initial claim and the payment system will accept the payment request up to 26th day after the initial claim is filed. In addition, all requests for out of state wages on combined wage claims for claimants filing interstate claims must be completed manually by staff causing further delay in initial claim processing and initial payment release. The agency was affected by a high staff turnover rate due to retirement and other employment has left the unit with fewer numbers of experienced staff. There were many technical issues related to the completion of automated non-monetary determination system mostly related to task taking longer to complete than expected. Adjudicators were spending too much time manually printing determinations. The new completed updates allow adjudicators to create determinations in the same system that stores the claimants and employers statement of separation, this will fix the problem of spending time manually printing determinations. The adjudicator will have the option of choosing that the automated system print and mail the determinations in batches. This will alleviate the necessity of investigators processing the determinations for distribution. This process improvement will increase efficiency of adjudicators in resolving issues, which will lead to prompt payments. The system will also place the determinations in the imaging system making the information immediately available to all staff. Adjudicators were utilized to develop, implement, and test the new system. These adjudicators are now utilizing the new system and continually involved in process improvement of the system. This system has 12 outstanding requests for technical issues with the Commonwealth Office of Technology (COT). Technical issues with upgrade of system have been resolved. These technical issues are not related to the completion of the new automated batch printing, but are process improvements that will further improve the system. No current plan to hire additional staff, instead focusing on training of current staff and cross utilization of staff from other departments. Training existing staff is continuing quarterly. Recent quarterly training has emphasized BTQ standards . Annual training was completed August 22 – 24, 2016, which included all staff and cross utilized staff. Staff realignment occurred to merge functions, improve collaboration and efficiencies. Cross departmental utilization is occurring by utilizing of one lower authority appeal (referee) and six higher authority appeals staff (commission writers) to assist with adjudicating cases. The realignment allowed the branch to move staff into positions that better fit their skill sets. The cross utilization of staff allows the branch extra staff to utilize during times of seasonal increases in the volume of issues. The training will increase staff performance on resolving issues, provided clearly defined expectations of performance, and increase the inefficiency of the staff in resolving issues which will lead to more timely first payments. Unemployment Insurance is requesting a regulation change that will adjust the employers 15 day protest period to respond to a notice of initial claim and notice of potential benefit charges. This will remove the barrier of employers waiting 15 days to respond to adjudicators. These more timely employer responses will result in less time needed to resolve issues and quicker first payment promptness. This will reduce claimants having to wait to request first payment until the 16th day after filing an initial claim is filed. In addition to all of the changes, the branch has also implemented of a new pilot program which began on August 2, 2016. The new program utilizes a split chargeability issue system. The performance of the staff participating in the pilot program will be measured against the performance of staff not involved in the pilot program to determine if the program is effective in reducing the promptness of first payments. Budgetary constraints for UI IT development as well as prioritization of IT projects, delayed final development and implementation. Ongoing analysis and movement toward mainframe independence are factors in considering the order in

which projects are completed and resources, both financial and staffing, are allocated. The new enhancements to the functionality to the internal claim intake system were not completed until early 2016. Since implementation fourteen help desk tickets have been created to improve the newly implemented system. Monitoring and assessment will be accomplished through daily, weekly and monthly reports reflecting issues received, issues worked and remaining issues. These reports will include a comparison of the pilot program data with the non-pilot program data. Monthly Interstate Section team meetings will be held to assess existing efforts and results and discuss improvements that can be made. Tickets will be created to system developers to correct system issues.

MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Monitoring of new pilot program through weekly and monthly reports. X

Complete testing of new pilot system within the adjudication unit and then initiate training in new system and branch wide implementation. X Effects of monthly meeting/training increase in efficiency. Ensure consistence in decisions within adjudication branch and lower and high authority. X

Requesting a regulation change that will adjust the employers 15 day protest period (changed to 10 day period) to respond to a notice of initial claim and notice of potential benefit changes. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 -2018 MEASURE/PROGRAM AREA: Benefit Year Earnings BYE Current Performance Level: Benefit Year Earnings (BYE) ALP = 25% reduction. Failed Projected Performance Levels:

3% 6% 9% 12% 15% 18% 21% 25%
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: The Target rate for CY 2015 was 1.969% however Kentucky's actual BYE Rate was 2.711% a difference of .742. The goal of 75 to 100 cases investigated per month by the investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Our ultimate goal is to be able to audit 100% of all cross-matches each quarter. We are now staffed with 3 adjudicators. In order to meet this goal our staff would need to increase by at least 3 to 6 adjudicators. The new adjudicators would be working in the same capacity as our current adjudicators. They would be auditing and rendering decisions on overpayments from New Hire and cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted. Currently fraud tips are sent to the Integrity Branch via email. We recently created a form that will be universal for all UI staff to use. It will contain pertinent information that is required to pursue an investigation. Kentucky has 120 counties which are divided amongst the six current Fraud Investigators. Each investigator has a large area to cover which includes working fraud tips and prosecuting claimants with Fraudulent overpayments in our Court system. We recently hired a new fraud investigator and have rearranged the county assignments. This will help with the case load and each investigator will carry a smaller area. Report UI Fraud added to the Kcc.ky.gov website which includes an emial address to report fraud and an electronic form to report UI Fraud. Working with tax branch to add verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically. The goal of 75 to 100 cases investigated per month by the investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS)

cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted.

MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Put verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically.

X

Hiring additional adjudicators for BARTS. X Promote usage of electronic responses to wage notices from employers.

X

Kentucky will add a note on all monetary determinations reminding claimants of the requirement to register with Focus Career Job Search. All “A” claimants setting up a valid claim will be mailed a letter reminding them of the requirement to register with Focus Career Job Search.

X Recently hired additional fraud investigators to increase the total number of NDNH cross match hits investigated. X Recent upgrade completed that automatically sends letter to claimant as well as employer during BARTS overpayment investigations. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 - 2018 MEASURE/PROGRAM AREA: Improper Payments Measure Current Performance Level: Improper Payments Measure. 12.16% vs. ALP

12% 11.5% 11.25% 11.00% 10.75% 10.5% 10.25% 9.99%
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: Kentucky failed to meet the 10% or better performance level on detection of overpayments for SQSP performance period ending March 31, 2016. The current performance level by the state of Kentucky is 12.16%. The goal of 75 to 100 cases investigated per month by the Integrity Branch Investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Training existing Staff in the Integrity Branch is ongoing. The Adjudication Branch has 10 less staff members then it did two years ago. Technical issues related to the completion of automated non-monetary determination system prevented the previous plan from starting in a timely manner. Monetary Details Comparison Accuracy for 2015 was -23.69%. The state of Kentucky found that the BAM program that is creating the population was not being run at the right time on the right day. The ultimate goal of the Integrity Branch is to be able to audit 100% of all cross-matches each quarter. The Integrity Branch is now staffed with 3 adjudicators. In order to meet this goal the Integrity Branch would need to increase by at least 3 to 6 adjudicators. The new Integrity Branch adjudicators would be working in the same capacity as our current adjudicators. They would be auditing and rendering decisions on overpayments from New Hire and cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each Integrity Branch adjudicator. Monthly progress meetings will be conducted in the Integrity Branch. Currently fraud tips are sent to the Integrity Branch via email. We recently created a form that will be universal for all UI staff to use. It will contain pertinent information that is required to pursue an investigation. Kentucky has 120

counties which are divided amongst the six current Fraud Investigators. Each Fraud Investigator has a large area to cover which includes working fraud tips and prosecuting claimants with Fraudulent overpayments in our Court system. We recently hired a new Fraud Investigator and have rearranged the county assignments. This will help with the case load and each Fraud Investigator will carry a smaller area. Report UI Fraud was added to the Kcc.ky.gov website which includes an email address to report fraud and an electronic form to report UI Fraud. The Integrity Branch is working with the Tax Branch to add verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically. The adjudicator creates the determination in the same system that stores the claimants and employers statement of separation. The adjudicator will have the option of choosing that the automated system print and mail the determinations in batches. This will alleviate the necessity of Adjudication Investigators processing the determinations for distribution. The system will also place the determinations in the imaging system making the information immediately available to all staff. Adjudicators were utilized to develop, implement, and test the new system. These Adjudicators are now utilizing the new system and continually involved in process improvement of the system. This system has outstanding requests for technical issues with the Commonwealth of Kentucky's Technical department. In the Adjudication Branch Training existing staff is continuing quarterly. Recent quarterly training has emphasized BTQ standards . Annual training will occur August 22 – 24, 2016. In the Adjudication Branch staff realignment occurred to merge functions, improve collaboration and efficiencies. Cross departmental utilization is occurring by utilizing of one lower authority appeal (referee) and six higher authority appeals staff (commission writers) to assist with adjudicating cases. Requesting a regulation change that will adjust the employers 15 day protest period to respond to a notice of initial claim and notice of potential benefit charges. This would reduce claimants having to wait to request first payment until the 16th day after filing an initial claim is filed. Implementation of a new pilot program began on August 2, 2016. The new program will utilize a split chargeability issue system. The BAM program run date and time was fixed in the end of May of 2016. BAM is also watching the creation of the population on a weekly basis to ensure that it is being run correctly. We expect to see improvement in the Denied Claims Accuracy for the 3rd quarter of 2016. The goal of 75 to 100 cases investigated per month by the Integrity Branch Investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Budgetary constraints for UI IT development as well as prioritization of IT projects, delayed final development and implementation. Ongoing analysis and movement toward mainframe independence are factors in considering the order in which projects are completed and resources, both financial and staffing, are allocated. The new enhancements to the functionality to the internal claim intake system were not completed until early 2016. Since implementation twelve help desk tickets with the Commonwealth of Kentucky Technical Branch (COT) have been created to improve the newly implemented system. The Integrity Branch will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly Integrity Branch progress meetings will be conducted. In the Adjudication Branch monitoring and assessment will be accomplished through daily, weekly and monthly reports reflecting issues received, issues worked and remaining issues. These reports will include a comparison of the pilot program data with the non-pilot program data. Monthly Interstate Section team meetings will be held to assess existing efforts and results and discuss improvements that can be made. Tickets will be created to system developers to correct system issues. MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Monitoring of new pilot program through weekly and monthly reports. X

Complete testing of new pilot system within the adjudication unit and then initiate training in new system and branch wide implementation. X Effects of monthly meeting/training increase in efficiency. Ensure consistence in decisions within adjudication branch and lower and high authority. X

Requesting a regulation change that will adjust the employers 15 day protest period to respond to notice of initial claim

X

Put verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically. X Hiring additional adjudicators for BARTS. X Promote usage of electronic responses to wage notices from employers. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 - 2018 MEASURE/PROGRAM AREA: Detection of Overpayments Current Performance Level: Detection of Overpayments – Core Measure - >=50% & <=95% of detectable/recoverable ops are established for recovery. Failed. Projected Performance Levels:

60% 62% 64% 66% 68% 70% 72% 75%
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: Kentucky failed to meet the 61.4% or better performance level on detection of overpayments for SQSP performance period ending March 31, 2016. Kentucky's current performance level is 58.79%. The goal of 75 to 100 cases investigated per month by the investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Our ultimate goal is to be able to audit 100% of all cross-matches each quarter. We are now staffed with 3 adjudicators. In order to meet this goal our staff would need to increase by at least 3 to 6 adjudicators. The new adjudicators would be working in the same capacity as our current adjudicators. They would be auditing and rendering decisions on overpayments from New Hire and cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted. Currently fraud tips are sent to the Integrity Branch via email. We recently created a form that will be universal for all UI staff to use. It will contain pertinent information that is required to pursue an investigation. Kentucky has 120 counties which are divided amongst the six current Fraud Investigators. Each investigator has a large area to cover which includes working fraud tips and prosecuting claimants with Fraudulent overpayments in our Court system. We recently hired a new fraud investigator and have rearranged the county assignments. This will help with the case load and each investigator will carry a smaller area. Report UI Fraud added to the Kcc.ky.gov website which includes an email address to report fraud and an electronic form to report UI Fraud. The Integrity Branch is working with Tax Branch to add verbiage on the UI Tax form (UI3) letting employers know about reporting Fraud electronically. In November of 2015, the state completed an upgrade of its BARTS Overpayment Detection System. This upgrade allowed the system to automatically generate letters to the employers and claimants at the same time. Previously the system only generated automatic letter to the employer. This improvement also integrated National Directory of New Hire Crosshatching. This automation will allow adjudicators to save time mailing letters, increase their efficiency, and increase the number of cases that they can investigate. The state of Kentucky is working on creating a link between our UI claim staking data system and Workforce Career the State's job registration system. This link will allow SWA to stop payments if claimants are not registered within 14 days of the intial claim. The state will continue to utilize the State Information Data Exchange System, and Systematic Alien Verification for Entitlement and Social Security Administration cross matching. In August of 2016, the state

completed training of staff in proper adjudication and issue training. This training will help staff to prevent overpayments from occurring in the future. The State will develop a UI Integrity Task force to help monitor and review progress of this plan on a monthly basis. The goal of 75 to 100 cases investigated per month by the investigators was not met due in part to staff turnover and training new Federally Funded Time Limited staff (FFTL) to support the increased Benefit Asset Reporting and Tracking System (BARTS) cross match audits. Kentucky will continue to monitor the detection of overpayments by having a set quota of 75 to 100 cases investigated and closed per month by each adjudicator. Monthly progress meetings will be conducted.

MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Put verbiage on the UI Tax Form (UI3) letting employers know about reporting Fraud electronically. X

Hiring additional adjudicators for BARTS. X Promote usage of electronic responses to wage notices from employers.

X

Kentucky will add a note on all monetary determinations reminding claimants of the requirement to register with Focus Career Job Search. All “A” claimants setting up a valid claim will be mailed a letter reminding them of the requirement with Focus Career Job Search.

X

Creation of UI Integrity Task Force X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017-2018 MEASURE/PROGRAM AREA: Data Validation Benefits All Submitted and Passing Current Performance Level: Population 3 = Not Submitted.

Module 4 Nonseps = Failed. Projected Performance Levels:

NS Fail Fail Fail Pass Pass Pass Pass

Fail Pass Pass Pass Pass Pass Pass Pass

(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: DV Benefits Population 3; We have been unsuccessful in creating a passing extract file. Current issues are 5159 Filed from Agent Total (7.07%), 5159 Transitional Total (3.75%), 586 New CWC Total (24.78%), 586 New CWC BY Established Total (45.45%), 218 Benefit Year Established Total (6.96%), and 218 Total BY Established (6.96%). DV Benefits Module 4 BTQ2 Nonmonetary Determinations-Non-separations; 32 nonseparation issue numbers were excluded from the BTQ population. Through trial and error this will correct this population. The data validation team will meet on a monthly basis to review the current data validation priority plan, monitor the plans effectiveness, assess accomplishments of planned actions, and for controlling quality after achieving performance goals. Data validation efforts are dependent on the state’s information technology staff and resources. The Commonwealth Office of Technology has committed to working for 8 hours each week on data validation. For DV Benefits Module 4 BTQ2 Nonmonetary Determinations-Non-

separations we will review all 32 nonseparation issue numbers that are excluded from the BTQ population and attempt to identify all of the issue numbers that should be included in the BTQ population. DV Benefits Populations 3; the previous plan involved attempting to solve issues related to four benefits populations. This plan will allow specific narrow focus of having to pass two populations. DV Module 4 BTQ2 Nonmonetary Determinations-Non-separations; will be more successful because we have already identified the issue numbers that are not included in the population. The data validation team will meet on a monthly basis to review the current data validation priority plan, monitor the plans effectiveness, assess accomplishments of planned actions, and for controlling quality after achieving performance goals. MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 DV Benefits Population 3 load extract file each and every quarter until population passes validation.

X

DV Benefits Population 3; solve errors for each and every extract file that is loaded into the SUN system until the population passes validation. X DV Benefits Population 3; investigate the variance for each and every issue between the extract file and the reported data until the population passes validation prior to 12/31/2017.

X DV Module 4 BTQ2 Nonmonetary Determinations – NonSeparations identify all of issue numbers currently excluded which need to be included in the BTQ population. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 - 2018 MEASURE/PROGRAM AREA: Data Validation Tax Current Performance Level: Data Validation Tax – All Submitted and Passing. Failed. Projected Performance Levels:

Fail Fail Fail Pass Pass Pass Pass Pass
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: We have not been able to get an extract file to import onto the SUN system until very recently. Most recent sample failed due to errors with transaction date, established date, employer report quarter, due date, and End of Report Quarter. The data validation team will meet on a monthly basis to review the current data validation priority plan, monitor the plans effectiveness, assess accomplishments of planned actions, and for controlling quality after achieving performance goals. Data validation efforts are dependent on the state's information technology staff and resources. The Commonwealth Office of Technology has committed to working for 8 hours each week on data validation. DV Tax Population 4; the previous plan involved attempting to solve issues related to five tax populations. This plan will allow specific narrow focus of having to pass just one population. We have recently got an extract file to pass import onto the SUN system. DV Tax Population 4 will be attempted to be validated each and every quarter until the population passes. After each validation file is created, we will resolve all errors. We will attempt to identify any and all variances to attempt to determine a solution to the variance.

MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 DV Tax Population 4: Solve errors for each and every extract file that is loaded into the SUN system until the population passes validation.

X DV Tax Population 4; Investigate the variance for each and every issue between the extract file and the reported data until the population passes validation. Pass validation prior to 9/30/2017. X

CORRECTIVE ACTION PLAN

State: Kentucky Federal Fiscal Years: 2017 - 2018 MEASURE/PROGRAM AREA: BAM Operations Complaint Current Performance Level: BAM Operations Complaint ALP = pass all M&P. Failed. Projected Performance Levels:

Pass Pass Pass Pass Pass Pass Pass Pass
(12/31/14)(3/31/15)(6/30/15)(9/31/15)(12/31/15)(3/31/16)(6/30/16)(9/30/16)

SUMMARY: For the first quarter of 2016, on the Denied Claims Accuracy Comparison Report the Monetary Percent Difference was -22.28% and the Nonseparation Percent Difference was -47.17% which is at least 15% but below 50%. The reason for the deficiency is related to the Denied Claims Accuracy Comparison Report for Monetary and for Non-separations. The state of Kentucky recently identified 32 issue numbers that were being excluded from the Benefit Accuracy Measurement population for Non-separations. The state of Kentucky found two date issues that may be the reason for deficiency for the BAM Monetary population. The state of Kentucky worked with the Commonwealth Office of Technology (COT) to correct the non-separation and monetary populations. In June 2016 the COT team added the previously 32 excluded issues into the BAM population. In June 2016, the COT team corrected both date issues affecting the monetary population that may have been the cause of the variance in the population. The plan was successful, however it was not timely and took until early 2016 to find the 32 excluded issue numbers for the non-separations and to find the date issue with the BAM Monetary population. The actions will now be more successful because we have identified how to find excluded issues from the non-separations and because we identified the two date issues with the monetary population. In June 2016, the programing change was made and we should start to see the results in the BAM Accuracy Comparison Report for the 3rd Quarter of 2016. To monitor and assess accomplishment of planned actions and for controlling quality after achieving performance goals, BAM Unit will request comparison reports from DOL quarterly to monitor BAM Accuracy Comparison Report. BAM Unit will also on a weekly basis review the sample selected by COT and sent to BAM for investigation. MILESTONES: Completion Date* 12/31 03/31 06/30 09/30 12/31 03/31 06/30 09/30 Request comparison reports from DOL quarterly to monitor progress. X

Monitor on a weekly basis the sample selected by COT and sent to BAM for investigation. X Continue to review COT sampling process to verify 2 week lag period for military claims. X

Review BAM error report weekly. X

BAM investigators and supervisors will attend DOL trainings to help identify issues. X

5. UI PROGRAM INTEGRITY ACTION PLAN (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

UI Integrity Action Plan (IAP) State Federal Fiscal Year Accountable Agency Official(s): Kentucky 2017 Shelley Ponds Top Three Root Causes (IPIA 2015) IPIA Year 2014 IPIA Year 2015 https://www.dol.gov/general/maps/data (% of $ Overpaid) (% of $ Overpaid) Root Cause 1: BYE 2.28% 20.01% Root Cause 2: Work Search 2.82% 24.76% Root Cause 3: Separation Issues 2.59% 22.73% State Federal Fiscal Year Accountable Agency Official(s): Kentucky 2018 (Enter the name and title of the staff person who is accountable for reducing UI improper payments.) Top Three Root

Causes (IPIA 2016) IPIA Year 2015 IPIA Year 2016 https://www.dol.gov/general/maps/data (% of $ Overpaid) (% of $ Overpaid) Root Cause Alternate Year 1: Root Cause Alternate Year 2: Root Cause Alternate Year 3: Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.) "The improper payment rate from July 1, 2014 to June 30, 2015, for the State of Kentucky was 12.16%, 2.16% above the ALP of 10%. For prevention of improper UI payments the State Information Data Exchange System (SIDES) has been implemented. For detection of improper UI payments the State of Kentucky has implemented the use of the National Directory of New Hires (NDNH) which allows for improved access to wage data and data from other states regarding new hires and wages. Kentucky recently enhanced its programing relating to the National Directory of New Hire (NDNH) investigations that will now allow the state to have the ability to detect additional overpayments not currently detectable due to lack of an employer response. Kentucky added to the process an automatic letter that is sent to the claimant as well as the employer. This improvement was completed in November of 2015. Kentucky has increased cross match audits each quarter and will continue to expand the audit size each quarter. Currently, BARTS is utilized for all fraud tip processing. The result is more timely and efficient fraud investigations. Kentucky has further expanded the BARTS system by incorporating an Internet Response Module for Employers (IRME). IRME provides employers the opportunity to receive and respond to the numerous quarterly Wage Audit Notices (WAN) they receive in the mail electronically via Internet. Non-compliant (bi-weekly, monthly, etc.) wages can be automatically prorated into compliant (Saturday week end date) format for review and validation by the employer. From July 1, 2015 to June 30, 2016, $11,082,983 in benefit overpayments was recovered. The methods of overpayment recovery used are: Recover program, monthly partial payment agreements with claimants, offset of benefits, state and federal revenue intercept, liens, civil suits and wage garnishment, and court recovered funds resulting from fraud prosecution. For recovery of improper UI payments the State of Kentucky has implemented Treasury Offset Program (TOP) — Implementation of the U.S. Department of the Treasury's TOP to recover certain unemployment debts from Federal income tax refunds. Kentucky actively promotes the integrity efforts of the Division by hosting employer training seminars. An important topic covered is the recent legislation that imposes penalties on claimants and employers for failing to respond timely. Efforts are ongoing to promote the utilization of our online work refusal and fraud tip forms. The messaging efforts planned by the state to inform all UI and workforce staff of the state's integrity plan is focus messaging through emails, placing the plan on the state of Kentucky's UI website career side for claimants, using social media to include; Facebook, Twitter, and YouTube, and press releases of the integrity plan. The outreach efforts to employers to inform them of the integrity initiative include placing the plan on the state of Kentucky's UI website in the employer section, using social media to include; Facebook, Twitter, and YouTube, press release of integrity plan, and including plan in quarterly bills to employers. Kentucky will implement an Integrity Task force to assist in the implementation, monitoring, and review of this plan on a monthly basis. The BAM sample will be monitored for correctness. In June of 2016, changes were made to the monetary denied population (date and time of running population), and nonseparation population (add issues that were previously excluded from program). We should begin to see results in the 3rd quarter of 2016. These corrections to the BAM populations will help the BAM data show more accurate overpayment detection measure and Benefit Year Earnings (BYE). Work Search is the 2nd root cause of the Integrity Action Plan. The problem is that claimants are creating claims without being registered with State Job Registration Focus Career. The state of Kentucky is working on creating a link between our UI claim staking data system and Workforce Career the State's job registration system. " Instructions for the following section: In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause. Root Cause 1: BYE Strategies Actions Targets & Milestones

Resources 1 Automate NDNH letter to claimant and employer Recently completed automation of NDNH letter automatically mailed to claimants in addition to the employer during an investigation. 12/31/2016 ETA 227 2 Review of BAM fields Perform a detailed review of BAM fields used to calculate the BYE rate. Work with National Office to ensure correctness of data. Quarterly review SUN System, PuTTy 3 BAM Comparison Report Quarterly review of BAM Accuracy Comparison Report Quarterly review SUN System, PuTTy 4 Additional Notice on all monetary determinations. Kentucky will add a note on all monetary determinations reminding claimants of the requirement to register with Focus Career Job Search. All “A” claimants setting up a valid claim will be mailed a letter reminding them of the requirement to register with Focus Career Job Search. Quarterly review SUN System, PuTTy 5 New BARTS fraud investigator Recently hired additional fraud investigator to increase the total number of NDNH cross match hits investigated. Quarterly review BARTS case load data 6 Upgrade of NDNH system Recent upgrade completed that automatically sends NDNH letter to claimant as well as employer during BARTS overpayment investigations. Quarterly review SUN System, PuTTy Root Cause 2: Work Search Strategies Actions Targets & Milestones Resources 1 Claimant reminder during 1st Eligibility review Claimant’s will be given a written reminder of State of Kentucky’s Work Search requirements during their 1st eligibility review meeting. The letter will explain all requirements with notice that failure to comply will result in disqualification from receiving benefits. 6/30/2017 Focus Career, KEWES, BAM reports 2 Claimant Messaging; Additional Notice of Work Search Requirements Kentucky’s Unemployment Insurance Division will email all "A" claimants reminding them of Kentucky’s Work Search requirements during with notice that failure to comply will result in disqualification from receiving benefits. 3/31/2017 KEWES 3 Claimant Messaging; Additional Notice of Work Search Requirements Kentucky will add a note on all monetary determinations reminding "A" claimants of Kentucky’s Work Search requirements with notice that failure to comply will result in disqualification from receiving benefits. 6/30/2017 Focus Career, KEWES, BAM reports Additional: UI Integrity Task Force will review progress and implementation monthly. 12/31/2016 Focus Career, KEWES, BAM reports Root Cause 3: Separation Issues Strategies Actions Targets and Milestones Resources 1 Training Train existing staff quarterly emphasizing BTQ standards. Annual Training 8/24/16, Quarterly Training SUN System, Adjudication Manual, 300 Handbook 2 Implement Pilot program Implementation of new pilot program to utilize split chargeability issue system. Began 8/2/16, Quarterly review, weekly and monthly report monitoring SUN System, Adjudication Manual, 300 Handbook 3 Regulation change Requesting a regulation change that will adjust the employers 15 day protest period (change to 10 day protest period) to respond to a notice of initial claim and notice of potential benefit charges. 9/30/2017 Estimated completion date SIDES Additional: The change in the 15 day protest period will hopefully increase the timeliness of responsiveness of employers, reduce timeliness of nonmonetary determinations by allowing adjudicators to have information for timely, and reduce timeliness of first payments. UI Integrity Task Force will review progress and implementation monthly. Root Cause Alternate Year 1: Strategies Actions Targets & Milestones Resources 1 2 3 Additional: Root Cause Alternate Year 2: Strategies Actions Targets & Milestones Resources 1 2 3 Additional: Root Cause Alternate Year 3: Strategies Actions Targets and Milestones Resources 1 2 3 Additional:

6. ORGANIZATIONAL CHART

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

Office of Employment and Training Organizational Chart Executive Director Jason Dunn Communications Director Holly Neal Staff Assistant Pat Dudgeon Unemployment Insurance Division Director Vacant Benefits & Adjudication Assistant Director Katie Houghlin Benefits Branch Becky Akin, Manager Adjudication Branch Karen Pursiful, Manager Tax and Audit Acting Assistant Director Andy Hudgins UI Tax Enforcement Branch Andy Hudgins, Manager UI Tax Audit Branch Gary Upchurch, Manager UI Appeal Hearing Branch Jeff Paige, Manager UI Appeals Support Branch Don Schierer, Acting Manager Quality Control Branch Todd Peyton, Acting Manager UI Integrity Branch Shelley Ponds, Acting Manager Economist Manoj Shanker Research & Statistics, Vacant Workforce & Employment Services Division Director Vacant Assistant Director Vacant Quality Assurance Branch Jim Beyea, Manager Systems Management Vacant, Manager Individual Customer Services Branch Vacant, Manager Employer Customer Services Branch Michelle DeJohn, Manager Workforce Intelligence Ashley Jones, Acting Manager Assistant Director Roger Phillips Regional Managers OET Local Offices (By Region) Grant Management & Support Division Vacant, Director Grant Management & Support Assistant Director Vacant Grant Management Branch Donna Stratton, Manager Operations Branch Susan Wilkerson, Manager Program Support Branch Ron Winfield, Manager Kentucky Unemployment Insurance Commission Buddy Hoskinson, Chair Kentucky Unemployment Insurance Commission Greg Higgins, Manager

7. SQSP SIGNATURE PAGE

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

U.S. Department of Labor SQSP SIGNATURE PAGE

OMB Approval No. 1205-0132 Expires 12/31/2019

U.S. DEPARTMENT OF LABOR Employment and Training Administration FEDERAL FISCAL YEAR 2017 STATE

KY

UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

_____Kentucky_____ (STATE'S NAME)

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE SIGNATURE DATE

STATE ADMINISTRATOR

Jason Dunn, UI Director

DOL APPROVING OFFICIAL

DOL APPROVING OFFICIAL

The signed copy of the Signature Page is maintained with the State Agency and the Regional Office.

(B) REQUIREMENTS FOR STATES ELECTING TO INCLUDE UI IN THE COMBINED STATE PLAN

States that elect to include UI in the Combined State Plan must:

1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:

(A) IF A STATE IS IN THE FIRST YEAR OF THEIR 2-YEAR CYCLE, A COMPLETE SQSP PACKAGE MUST BE SUBMITTED. A COMPLETE SQSP PACKAGE WILL INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, STATE PLAN NARRATIVE, CAPS (INCLUDING THE MILESTONES AND THE COMPLETION DATE FOR EACH MILESTONE), THE UI IAP, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. ONE OF THE KEY GOALS FOR THE UI PROGRAM IS TO ENSURE THAT CLAIMANTS ARE ABLE TO SUCCESSFULLY RETURN TO WORK. AS SUCH, THE SQSP STATE PLAN NARRATIVE MUST PROVIDE A DISCUSSION OF THE PLAN COORDINATION WITH OTHER WIOA COMBINED PLAN PROGRAMS TO ENSURE A COORDINATED EFFORT AND INTEGRATED SERVICE DELIVERY.

A signed copy the Transmittal letter is maintained with the State Agency and the Regional Office. The title: Application for Federal Assistance SF-424. Description: Unemployment Insurance Administration. Funding total: $26,675,105. Project start: 10/10/2016. Project end date: 9/30/2017. Name of authorizing representative; Jason Dunn. The signed copy of the SF 424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office. The Organization Chart is maintained with the State Agency and the Regional Office. The signed copy of the SQSP Signature Page is maintained with the State Agency and the Regional Office.

(B) IF A STATE IS IN THE SECOND YEAR OF THE 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE WITH A MODIFICATION THAT MUST INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. THE MODIFICATION MAY ALSO INCLUDE CAPS FOR NEW IDENTIFIED PERFORMANCE DEFICIENCIES, AND ANY REQUIRED MODIFICATIONS TO EXISTING CAPS. THE CAP MUST LIST BOTH SPECIFIC MILESTONES FOR KEY CORRECTIVE ACTIONS OR IMPROVEMENT ACTIVITIES, AND THE COMPLETION DATE FOR EACH MILESTONE.

Kentucky is in the second year of the two-year cycle and has submitted the off-year SQSP components. The SQSP package can be found: kwib.ky.gov/UISQSP.pdf

2. SUBMIT THE REQUIRED OFF-YEAR SQSP COMPONENTS AS A MODIFICATION TO THE COMBINED STATE PLAN ON THE SAME CYCLE AS THE REGULAR SQSP PROCESS WHICH MUST BE APPROVED BY SEPTEMBER 30TH EACH YEAR.

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Include the State's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

Instructions: 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 first two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the first two years of the plan.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	60.00	64.00	65.00	67.00
Dislocated Workers	60.00	72.00	65.00	75.00
Youth	60.00	66.00	65.00	71.00
Adult Education	0.00	Baseline	0.00	Baseline
Wagner-Peyser	60.00	64.00	65.00	67.00
Vocational Rehabilitation</	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	55.00	68.90	60.00	71.50
Dislocated Workers	55.00	74.00	60.00	77.00
Youth	55.00	69.00	60.00	72.00
Adult Education	0.00	Baseline	0.00	Baseline
Wagner-Peyser	55.00	68.90	60.00	71.50
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	5,200.00	Baseline	5,700.00
Dislocated Workers	Baseline	6,600.00	Baseline	7,100.00
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	0.00	Baseline	0.00	Baseline
Wagner-Peyser	Baseline	5,200.00	Baseline	5,700.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	50.00	50.00	55.00	55.00
Dislocated Workers	50.00	55.90	55.00	58.90
Youth	50.00	68.00	55.00	71.00
Adult Education	0.00	Baseline	0.00	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	0.00	Baseline	0.00	Baseline
Dislocated Workers	0.00	Baseline	0.00	Baseline
Youth	0.00	Baseline	0.00	Baseline
Adult Education	53.00	53.00	54.00	54.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

KYAE completed 8-25-2016 Blank areas = Baseline

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	0.00	Baseline	0.00	Baseline
Dislocated Workers	0.00	Baseline	0.00	Baseline
Youth	0.00	Baseline	0.00	Baseline
Adult Education	0.00	Baseline	0.00	Baseline
Wagner-Peyser	0.00	Baseline	0.00	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

TABLE 7. COMBINED FEDERAL PARTNER MEASURES

Measure	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)