WIOA STATE PLAN FOR THE COMMONWEALTH OF MASSACHUSETTS

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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))

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* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
    - State Strategy Implementation,
    - State Operating Systems and Policies,
    - Assurances, and
    - Program-Specific Requirements for the Core Programs, and
    - Program-Specific Requirements for the Combined State Plan partner programs.

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.) Yes

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

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

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

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

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

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

Employment and training activities carried out by the Department of Housing and Urban Development No

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

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

Massachusetts Employment and Job Trends

Massachusetts is a key contributor to the national economy. In 2014, the six state New England region added $852.6 billion to the total value of goods and services produced by the nation (i.e., Gross Domestic Product or GDP), with Massachusetts supplying 49.8 percent of the region's share, making the Commonwealth the largest regional economy, and fifteenth largest nationally. If we consider economic value produced given population size, the Commonwealth ranks seventh highest in the country.

As of December 2015, there were 3.5 million jobs in the Massachusetts economy as measured by the Current Employment Statistics program. Over the year, jobs are up 41,100 an increase of 1.1 percent. Jobs were 120,300 higher than the previous high of February in 2001 and the Commonwealth has added 183,900 jobs since the April 2008 pre–recession high.

Chart 1 – Massachusetts Job Trends 2010–2015

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Statewide, the Education and Health Services, Professional, Scientific and Business Services and Leisure and Hospitality sectors have provided the most jobs. These engines of job growth reflect the diversity of services and jobs in the Massachusetts economy.

Share of GDP

While the Professional, Scientific and Business Services sector doesn't contain the same number of jobs as some of the other sectors, when we account for its impact on gross domestic product it is the primary economic driver in the Commonwealth. In 2014, this sector contributed 19.2 percent of the Gross Domestic Product in Massachusetts, followed by Real Estate, Education and Health Services, and Manufacturing.

Employment Share

When looking strictly at employment share by sector, Education and Health Services provides the largest number of jobs, At 769,200 private sector jobs, this sector accounts for 22 percent of all jobs in the state. Trade, Transportation and Utilities represents 16 percent of all jobs, with Retail Trade jobs accounting for nearly two–thirds of the 564,600 jobs in this sector. At 15 percent of all jobs, Professional and Business Services is the third largest sector with 538,400 jobs and generated the fastest annual job growth in 2014.

The next largest private employment sector is Leisure and Hospitality. With 349,200 jobs, this sector comprises 10 percent of all Commonwealth jobs. The Manufacturing sector which provides 7 percent of jobs in the State has a lower concentration of jobs and less growth. However, nine of the sixteen local Workforce Development Areas, including North Central, Merrimack Valley and Greater Lowell, have larger proportions of manufacturing employment than the state as a whole.

Chart 2 – Massachusetts Jobs by Industry Super Sector Seasonally Adjusted

Job Growth

As Chart 3 highlights, Education and Health Services has consistently added more jobs than any other sector from the 2001 prior peak in jobs through the end of 2015. Within the sector, the largest job growth has been in Health Care and Social Assistance industries.

Chart 3 – Long Term Job Gain/Loss by Sector Seasonally Adjusted

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The Leisure and Hospitality sector is the next largest contributor to long–term job growth due mostly to gains in Accommodation and Food Services.

Steadily increasing in momentum, the Professional and Business Services sector has become a pivotal segment of the economy. The professional, scientific and technical industries in this sector provide some of the highest skilled jobs in the Commonwealth. As Chart 4 illustrates, the Professional, Scientific and Technical Services sector is the largest sector employing Computer and Mathematical STEM Occupations. Nearly 40 percent of all the state's Computer and Mathematical occupations are employed within the Commonwealth's Professional, Scientific, and Technical

Services sector. Further, roughly 75 percent of this occupational group is employed within four industry sectors, each of which is among the highest contributors to the state's Gross Domestic Product. Initiatives to fill Computer and IT occupational pipelines directly contribute to the growth of GDP.

Chart 4 – Change since 2008 for All Computer and Mathematical Jobs by Industry Sector \

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Regional Differences in Jobs across the Commonwealth

For sub–state analysis, the Massachusetts landscape is divided into seven regions: Berkshires, Cape Cod & the Islands, Pioneer Valley, Central, Northeast, Southeast and Greater Boston Metropolitan. These regions encapsulate the 16 workforce investment areas in the Commonwealth as listed below:

Region	Workforce Area
Berkshire	Berkshire
Cape and the Islands	Cape Cod and Islands
Pioneer Valley	Franklin / Hampshire
_	Hampden
Central	Central
_	North Central
Northeast	Greater Lowell
_	Merrimack Valley
_	North Shore
Southeast	Bristol
_	Brockton
_	Greater New Bedford
_	South Shore
Greater Boston Metropolitan	Boston
_	Metro North
_	Metro South/West

Looking at industry composition regionally across Massachusetts, the seven regions mirror the high concentration of Health Care and Social Assistance jobs the state as a whole demonstrates. The Cape and Islands have the highest proportion of jobs in the Accommodation and Food Services sector but Health Care jobs follow just slightly behind.

As noted previously, Manufacturing jobs play a larger role than depicted in the state average in some regions, particularly in the Northeast where these jobs make up the second highest concentration of jobs. We also see the heavy concentration of Professional Scientific and Technical Services jobs in Greater Boston which at 12.9 percent are more than double the concentration of the next closest region, the Northeast, at 6.2 percent.

Chart 5 –Employment Share and Growth by NAICS Sectors

–	Berkshire		Pioneer Valley		Cape and Islands		Central Mass		North East		South East	
Utilities	0.5%	–4%	0.7%	7%	0.4%	–8%	0.6%	27%	0.3%	–5%	0.6%	2%
Construction	5.0%	9%	4.0%	13%	6.7%	23%	4.6%	25%	4.6%	21%	6.0%	37
Manufacturing	7.6%	0.1%	8.6%	–6%	2.2%	23%	10.5%	–4%	13.5%	4%	7.6%	–3
Wholesale Trade	1.6%	0.3%	2.8%	2%	1.6%	18%	3.7%	4%	3.2%	–3%	4.2%	–1
Retail Trade	14.0%	0.4%	10.9%	0%	15.8%	8%	11.5%	3%	10.8%	4%	14.2%	3%
Transportation & Warehousing	1.8%	4%	3.6%	8%	2.7%	43%	3.7%	14%	2.3%	0%	3.1%	14
Information	1.4%	–17%	1.4%	–9%	1.7%	–5%	1.4%	–6%	2.3%	–8%	1.6%	–6
Finance and Insurance	2.9%	–11%	3.4%	–6%	2.3%	9%	4.0%	5%	2.6%	–6%	4.4%	0%
Real Estate, Rental & Leasing	0.9%	–4%	1.1%	5%	1.4%	13%	0.7%	–2%	1.0%	10%	1.2%	4%
Professional & Tech Services	4.2%	1%	2.8%	13%	4.2%	3%	4.4%	12%	6.2%	–5%	3.7%	10
Mgmt of Companies & Enterprises	0.4%	7%	1.3%	0%	0.4%	12%	1.4%	9%	1.5%	30%	1.9%	12
Admin and Waste Services	3.5%	–1%	3.7%	20%	5.0%	53%	4.0%	–12%	5.1%	13%	4.9%	21
Educational Services	13.0%	5%	15.3%	7%	8.1%	–5%	12.3%	5%	9.8%	10%	9.2%	7%
Health Care and Social Assistance	20.4%	8%	22.1%	29%	16.0%	10%	20.2%	20%	18.9%	25%	18.4%	17
Arts, Entertainment, & Recreation	3.0%	11%	2.0%	2%	3.9%	40%	1.5%	7%	1.9%	9%	1.7%	17
Accommodation and Food Services	11.6%	8%	8.0%	5%	17.3%	70%	8.1%	12%	8.8%	15%	9.4%	12
Other Services (ex Public Admin)	3.5%	–30%	3.2%	–44%	4.1%	–1%	3.0%	–12%	3.5%	–11%	3.8%	–22
Public Administration	4.1%	–7%	4.7%	–2%	5.7%	–7%	4.1%	–4%	3.4%	–3%	3.6%	2%
_	SHARE	GROWTH										

Source: DUA Quarterly Census of Employment &Wages 2010 Q2 to 2015 Q2

It should be noted that the QCEW program moved approximately 34,000 Personal Care Attendant jobs in 2013 from the Other Services sector into Health Care and Social Assistance as required by the federal Office of Management and Budget. Due to this coding change, at the industry level a large number of jobs were added to the Health Care and Social Assistance sector, inflating growth in this area across the regions.

Demand for Jobs

As the number jobs has risen in Massachusetts, so too has the demand for workers. Statewide, and in varying degrees among local workforce areas, the Commonwealth's labor markets are exhibiting significant tightness between employer demands for labor, as measured by the Conference Board's Help Wanted On–Line (HWOL) analytics and the supplies of jobseekers which include unemployed residents and those currently employed job changers.

Over the last four years, the Commonwealth's workforce system has enhanced its use of analytic tools, including the use of real–time job posting data to understand the demand for hiring compared to available unemployed residents. By looking at the BLS estimated number of unemployed residents as a proxy for supply we begin to see signs that as of May 2015, the Massachusetts demand for labor and supply of unemployed individuals seeking work were virtually at the same levels. With this apparent trend, the demand for skilled labor and matching the unemployed to jobs are more important than ever.

Chart 6 – Online Job Posting vs. Unemployed Labor Supply – Seasonally Adjusted

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Long Term Employment Hiring Trends Through 2022

The Massachusetts 2012 to 2022 Long–Term Employment Projections by Industry and Occupation provide model based estimates for annual job openings by occupation. This data source and other sources indicate that by industry Health Care and Social Assistance and Professional, Scientific and Technical Services are projected to have the most job openings. By 2022, these two industries will account for over 40 percent of the Commonwealth's job growth, in addition to large number of workers needed to replace current workers who may have retired or taken other jobs. The projections further indicate that Health Care and Science, Technology, Engineering, and Mathematical (STEM) occupations represent 70 percent of the top 50 most in demand occupations.

Chart 7 – Projected Employment Demand by Industry 2022

Title	Employment 2012	Employment 2022	Change Level	Change Percent
Health Care and Social Assistance	524,751	636,863	112,112	21.40%

Title	Employment 2012	Employment 2022	Change Level	Change Percent
Professional, Scientific, and Technical Services	266,077	321,181	55,104	20.70%
Accommodation and Food Services	275,407	323,039	47,632	17.30%
Ambulatory Health Care Services	164,387	205,673	41,286	25.10%
Food Services and Drinking Places	242,175	283,252	41,077	17.00%
Hospitals	183,505	216,177	32,672	17.80%
Construction	115,743	147,667	31,924	27.60%
Educational Services	331,495	359,815	28,320	8.50%
Retail Trade	345,812	371,183	25,371	7.30%
Specialty Trade Contractors	79,535	101,186	21,651	27.20%

Source: DUA Long Term Industry and Occupation Projections 2012 to 2022

Statewide, the most in demand occupations will be in Health Care, Food Services and Computer Related occupations like Software Developers of System Software, and Software Developers of Applications.

Massachusetts' single most in–demand occupation — now and projected — is Registered Nurses with Personal Care Aides, Home Health Aides and Nursing Assistants also figuring strongly.

Chart 8 – Top 10 Projected Demand Occupations

	Employment 2012	Employment 2022	Change Level	Change Percent	Annual Average Openings Total	Annual Average Openings Growth	Annual Average Openings Replacements	Education Level	2014 Mean Annual OES Wage
Registered Nurses	78,750	93,307	14,557	18.50%	2,983	1,456	1,527	Information Not Available	$85,770
Combined Food Preparation and Serving Workers, Including Fast Food	58,254	70,746	12,492	21.40%	3,473	1,249	2,224	Less than high school	$20,810
Retail Salespersons	109,827	119,163	9,336	8.50%	4,690	934	3,756	Less than high school	$26,240
Waiters and Waitresses	58,572	66,836	8,264	14.10%	3,644	826	2,818	Less than high school	$26,860
Personal Care Aides	21,688	29,943	8,255	38.10%	981	826	155	Less than high school	$26,120
Home Health Aides	19,759	27,738	7,979	40.40%	1,174	798	376	Less than high school	$26,800
Nursing Assistants	39,174	45,942	6,768	17.30%	1,422	677	745	Information Not Available	$30,160
General and Operations Managers	55,959	62,608	6,649	11.90%	1,712	665	1,047	Associate's degree	$133,040
Software Developers, Systems Software	30,032	36,293	6,261	20.80%	1,011	626	385	Bachelor's degree	$114,350

	Employment 2012	Employment 2022	Change Level	Change Percent	Annual Average Openings Total	Annual Average Openings Growth	Annual Average Openings Replacements	Education Level	2014 Mean Annual OES Wage
Management Analysts	27,103	33,070	5,967	22.00%	1,017	597	420	Bachelor's degree	$101,090
Cooks, Restaurant	23,385	29,044	5,659	24.20%	1,027	566	461	Less than high school	$28,010
Customer Service Representatives	50,089	55,743	5,654	11.30%	1,928	565	1,363	High school diploma or equivalent	$40,340
Software Developers, Applications	27,353	32,937	5,584	20.40%	909	558	351	Bachelor's degree	$109,670
Medical Secretaries	19,033	24,188	5,155	27.10%	745	516	229	High school diploma or equivalent	$39,730
Market Research Analysts and Marketing Specialists	15,071	19,850	4,779	31.70%	685	478	207	Bachelor's degree	$72,980
Bookkeeping, Accounting, and Auditing Clerks	41,191	45,731	4,540	11.00%	832	454	378	High school diploma or equivalent	$43,460
Hairdressers, Hairstylists, and Cosmetologists	18,463	22,927	4,464	24.20%	878	446	432	Postsecondary non–degree award	$32,360
Accountants and Auditors	37,131	41,587	4,456	12.00%	1,545	446	1,099	Bachelor's degree	$80,030

	Employment 2012	Employment 2022	Change Level	Change Percent	Annual Average Openings Total	Annual Average Openings Growth	Annual Average Openings Replacements	Education Level	2014 Mean Annual OES Wage
Carpenters	22,231	26,620	4,389	19.70%	713	439	274	High school diploma or equivalent	$56,450
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	46118	50453	4335	0.094	989	434	555	High school diploma or equivalent	$42,700

Source: DUA Long Term Occupational Projections 2012 to 2022

Three of the top ten consist of occupations with high average wages and in demand skills while three others have lower than the state average wage and may require less than a high school education. Additionally these occupations consistently exhibit a high number of job openings, typically stemming from employee turnover due in large part to the number of projected openings that stem from replacements versus growth.

Potential STEM Shortages

Over 85,000 job openings in STEM related occupations are projected by 2022, accounting for 22 percent of job growth. The most in demand openings are for Registered Nurses, Software Developers, Systems Software, Applications, Computer Systems Analysts and Licensed Practical and Licensed Vocational Nurses. According to the Georgetown Center on Education and the Workforce, by 2020 nearly 80 percent of STEM jobs in Massachusetts will require a Bachelor's degree or higher. Specifically, within STEM fields, Computer Science and Technology related occupations are most at risk of going unfilled.

Massachusetts's population projections and educational attainment rates portend critical shortfalls in the supply of labor needed to sustain the state's leading industries.

Regional Differences in Demand Across the Commonwealth

Not surprisingly, Registered Nurses are projected to be in demand across Massachusetts, but to a lesser extent in the Cape and Islands region where the most demand is projected to come from Food Services professions and Retail Sales. The Greater Boston region which encompasses 46 percent of the jobs in Massachusetts is unique in that it is the only region that indicates long term demand for IT jobs within the top five projected occupational openings. In fact, no other region outside of Greater Boston has any IT professions that factor in to the highest twenty in demand occupations.

Chart 9 –Regional Comparison of the Top Five Projected Occupations Ranked by Net Change 2012 to 2022

Region	1st		2nd		3rd		4th		5th	
Berkshire	Registered Nurses	_	Food Preparation & Serving Workers, & Fast Food	_	Home Health Aides	_	Retail Salespersons	_	Waiters & Waitresses	_
_	307	19%	301	23%	296	39%	241	9%	237	17%
Cape & the Islands	Waiters & Waitresses	_	Cooks, Restaurant	_	Retail Salespersons	_	Registered Nurses	_	Home Health Aides	_
_	549	16%	533	26%	464	8%	424	19%	377	49%
Pioneer Valley	Food Preparation & Serving Workers, & Fast Food	_	Registered Nurses	_	Personal Care Aides	_	Retail Salespersons	_	Nursing Assistants	_
1,476	22%	1,459	23%	1,051	39%	922	9%	816	19%	
Central MA	Personal Care Aides	_	Registered Nurses	_	Food Preparation & Serving Workers, & Fast Food	_	Retail Salespersons	_	Electricians	_
_	305	9%	207	2%	168	3%	154	1%	147	8%
Northeast	Registered Nurses	_	Food Preparation & Serving Workers, & Fast Food	_	Personal Care Aides	_	Retail Salespersons	_	Waiters & Waitresses	_
_	1,847	19%	1,684	20%	1,208	41%	1,201	9%	1,162	14%

Region	1st		2nd		3rd		4th		5th	
Southeast	Food Preparation & Serving Workers, & Fast Food	_	Registered Nurses	_	Retail Salespersons	_	Personal Care Aides	_	Nursing Assistants	_
_	3,348	23%	2,513	22%	2,347	10%	1,370	42%	1,185	15%
Greater Boston	Registered Nurses	_	Management Analysts	_	Software Developers, Systems Software	_	Food Preparation & Serving Workers, & Fast Food	_	Software Developers, Applications	_
_	6,363	17%	4,317	23%	4,181	20%	4,076	20%	3,815	20%
_	Net Change	Percentage Change								

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'.

Unemployment and Labor Force

Unemployment in Massachusetts has declined steadily from a high of 8.8 percent at the end of 2009. As of December 2015, the Massachusetts unemployment rate stood at 4.9 percent with an estimated 174,600 residents unemployed and actively seeking work.

Chart 10– Massachusetts Unemployment Rate 2010 through 2015

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The estimates for the numbers of residents unemployed have declined while the estimates for employed residents were increasing. At the same time the shares of the working age population participating in the labor force, the sum of employed and unemployed, were gradually increasing. However, since July 2015 estimates indicate participation in the labor force has been declining, with some increases in the number of residents who are not seeking a job, but would like a job. The share of employed residents also includes some "hidden unemployment" that is, residents who are involuntarily employed part–time but want full–time work. Those who are not in the labor force but want a job along with those unemployed and actively seeking work represent just over 300,000 residents, many of whom may have barriers to employment for current jobs. In December 2015, the labor force participation rate was at 64.5, the lowest level in the data series that goes back to 1976.

View of the working Age Population

The estimated number of Massachusetts residents employed reached an all–time high of 3.47 million in May of 2015. By November the number had dropped to 3.39 million. However, a percentage of this population includes individuals who are working part–time but are seeking full time work. In looking at BLS's alternative measures of unemployment, the U–6 measure captures the estimates for total number of unemployed, all marginally attached workers and individuals employed part–time for economic reasons. These roughly 175,000 involuntary part time workers may have a gap in skills, be missing a credential or have some other barrier preventing them from gaining full–time employment. Also from the chart below we see that while the labor force has grown, there remains a sizable amount of the working age population who are not currently looking for work. The BLS indicates that on a national level the primary reasons people report for leaving the labor force, aside from those who have simply stopped working, are attendance in school, illness or disability and retirement.

Chart 11: Estimates of Residents Labor Force Status

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Regional Differences in the Workforce & Labor Force across the Commonwealth

The Greater Boston region is a major factor in the state's overall unemployment rate. Chart 12 indicates that this region not only has the lowest unemployment rate but also the largest labor force, almost double that of the next largest region in terms of labor force, the Southeast Region.

The Cape and Islands region exhibits a higher unemployment rate than other regions due to the seasonal variations in employment. Immigration and increases in seasonal jobs to the region in summer months result in lower unemployment than indicated by the annual average unemployment rate.

Chart 12: Workforce Area Regions: 2015 Annual Average

Workforce Area Region	LaborForce	Employment	Unemployment	Rate

Workforce Area Region	LaborForce	Employment	Unemployment	Rate
Berkshire	65,608	61,950	3,658	5.6
Cape and the Islands	127,607	119,574	8,034	6.3
Central MA	438,793	415,758	23,035	5.2
Greater Boston Metropolitan	1,308,895	1,255,748	53,147	4.1
Northeast Region	555,353	526,681	28,672	5.2
Pioneer Valley	355,229	334,144	21,085	5.9
Southeast Region	718,469	678,254	40,215	5.6

Source: DCS/BLS Local Area Unemployment Statistics

Education Levels

Massachusetts benefits from being the most well educated state in the nation. The twelve month average labor force education attainment by residents age 25 plus from 2012 to 2014 demonstrates that both the majority of the working age population and the labor force possess a bachelor's degree or higher (i.e., 43% and 50%, respectively). This education segment grew by 45,800 residents since 2012, more than any other educational group. High school graduates are the second most prevalent education level among the Commonwealth's working age population, but the segment's population growth has remained relatively flat. This group is the only educational segment to decline in labor force members over the two–year period.

Chart 13– Educational Attainment Level of the Massachusetts Age 25+ Labor Force

Employment Status Pop. 25+ Years by Education Attainment

2012 vs 2015 Change & Growth_	Less than High School	High School Graduate	Some College or Associate's	Bachelor or Higher
Labor Force	157,700	683,100	627,200	1,635,900
Change in Labor Force	22,200	–42,500	–12,200	127,500
% Growth Rate LF	16.40%	–5.90%	–1.90%	8.50%
Share of Labor Force	5.10%	22.00%	20.20%	52.70%
Underlying Data				
2012 Annual Average	135,500	725,600	639,400	1,508,400
2015 Annual Average	157,700	683,100	627,200	1,635,900

Source: BLS Current Population Statistics

MassINC & The UMass Donahue Institute predict that for the first time since data have been collected, "Massachusetts will end a decade with fewer prime working age college–educated residents than it [started] with." With projections indicating a diminishing population of bachelor's

level educated individuals seen in Chart 14, addressing labor demand for all industries could be impacted, not just those associated with STEM–related occupations.

Chart 14 Massachusetts Projected Rate of Change in Population with Bachelor's Degree 1990 – 2030

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Individuals with Barriers to Employment

Certain groups of job seekers continue to see higher than average annual unemployment rates, between 7 and 12 percent, despite a December 2015 unemployment rate of 4.9 percent. The Baker Administration created a task force on Economic Opportunity for Populations Facing Chronically High Rates of Unemployment to lay out a strategic plan that addresses chronic unemployment among specific target populations including African Americans, Hispanic or Latino Americans, certain groups of veterans, and persons with disabilities and Native Americans. The Task Force summarized a list of barriers that individuals often face in the employment process which can be found in attachment B at the end of this document.

Chart 15: Unemployment rates by Massachusetts Target Populations

Massachusetts 2014 Target Populations Unemployment Rates

Gulf–era II Veterans 9.0%

Black African American 10.7%

Hispanic / Latino 11.0%

Person with a Disability 15.1%

Native American 19.7%

Source: Governor Baker's Task Force on Persons Facing Chronically High Rates of Unemployment, BLS

Individuals with Disabilities

The most recent information specific to individuals with disabilities from the American Community Survey shows that for Massachusetts in 2014 the number of working–age people with disabilities was 399,206. Of those, 35.5 percent were employed and 19.4 percent were employed full time. At the same time, the number of those who were not working but actively looking for work was 7.3 percent. An estimated 57.2 percent were not in the labor force.

As can be seen in Chart 16 individuals with cognitive disabilities make up the majority of all three groups. It is even more predominant for those actively looking for work, with over 1/3 of this group is estimated to have a cognitive disability. The term Cognitive Disability is a broad category that encompasses intellectual and development disabilities, and can include diagnoses such as Downs Syndrome, Dyslexia and Traumatic Brian Injury.

Chart 16 – Disability Category by Labor Force Cohort

_	Employed	Unemployed	Not in the Laborforce
With a hearing difficulty	40,879	5,401	32,498
With a vision difficulty	26,972	4,362	35,302
With a cognitive difficulty	51,295	15,751	126,885
With an ambulatory difficulty	45,787	8,836	122,462
With a self–care difficulty	13,107	3,375	57,100
With an independent living difficulty	26,577	7,885	109,501
_	204,617	45,610	483,748

Source: U.S. Census American Community Survey 2014

Age Demographics of the Labor force

When viewed by age cohorts, the working age population and labor force exhibit distinct patterns. As indicated in Chart 17, looking at labor force participation rates by age groups, the rates are highest among 25 to 54 year–olds. This age group which represents the largest share of the labor force also has the strongest attachment to the labor market with labor force participation rates above 80 percent. Looking back to 2005, those aged 25 to 34 had a participation rate of 82.2 percent and now have a rate of 85.2 percent in 2015. This age group has the largest number of residents in the labor force. Those 35 to 44 years old also have a slightly higher labor force participation rate in 2015, 83.9 percent compared to 83.1 percent in 2005. At the same time, the rates for those ages 45 to 54, middle age workers, who make up one of the larger labor pools of the working age population, have declined across the board in all labor market measures since 2005. The group is much smaller in both population and labor force than in 2005.

Teens, young adults and seniors all exhibit lower labor force participation rates compared to other cohorts, most likely to due to educational pursuits or retirement. Both the teen population and the labor force participation have been declining since 2005. At the same time the population for 20 to 24 year olds has increased with a slight drop in participation by 2015.

Older workers (55–64) make up the third largest population share. This population's labor force participation rate is comparatively high amongst the other cohorts percentages suggesting older workers are delaying retirement. However since this category makes up such a large part of the overall population, when this group does transition out of the labor force, it may exacerbate the current tightness in the Massachusetts labor market.

Chart 17: Working Age Population and Labor Force by Age Group, December 2015

Age Group	Population	Labor Force	LFPR	Out of LF
Age 16–19	329,100	118,200	35.9%	210,900

Age Group	Population	Labor Force	LFPR	Out of LF
Age 20–24	526,200	364,000	69.2%	162,200
Age 25–34	979,700	834,500	85.2%	145,200
Age 35–44	779,200	653,700	83.9%	125,500
Age 45–54	909,500	739,500	81.3%	170,000
Age 55–64	922,300	644,600	69.9%	277,700
Age 65+	1,046,700	231,700	22.1%	815,000
Total: Age 16+	5,492,700	3,586,200	65.3%	1,906,500

Skills Gap

With a tightening labor market, the importance of addressing skill gaps in our workforce becomes greater. A month into his term, Governor Baker created the Workforce Skills Cabinet, composed of the secretaries for Labor and Workforce Development, Education, and Housing and Economic Development, to gather ideas to strengthen the pipeline to employment. This cabinet is charged with finding a way to help people who are looking for work get the skills they need to fill the jobs that exist in the Commonwealth, and to help employers find qualified workers. Since early March 2015, the Workforce Skills Cabinet has met with business leaders and educators around the state to find ways to create partnerships between the employer community, the state workforce system and education.

To provide some indicators of which occupations may be experiencing a potential skill gap, Massachusetts conducted an analysis of demand for jobs versus the potential supply of workers with the skills needed to meet that demand.

Methodology

Using a six month period from February to July 2015, data from the Massachusetts Department of Unemployment Assistance's monthly survey of Unemployment Insurance (UI) claimants were compared to The Conference Board Help Wanted Online Data Series® real–time job vacancies by occupation. The six digit Standard Occupational Code (SOC) title associated with the UI Claimant's last occupation of employment was compared to advertised job openings with the same SOC.

Wage levels from the most recent Occupational Employment Statistics (OES) are included. To gauge the level of experience and training required for each occupation, the SOC was matched to O*NET Job Zones. These zones are clusters of similar occupations based on the education, related experience and on–the–job training typically needed to perform the job. They are categorized as follows:

Job Zone 5: Occupations that need extensive preparation Examples: Lawyers, Industrial Engineers and Physical Therapists

Job Zone 4: Occupations that need considerable preparation Examples: Computer System Analysts, Teachers and Accountants

Job Zone 3: Occupations that need medium preparation Examples: Medical Assistants, Registered Nurses and Computer Support Specialists

Job Zone 2: Occupations that need some preparation Example: Truck Driver, Receptionists and Retail Salespersons

Job Zone 1: Occupations that little to no preparation Examples: Waiters/Waitresses, Cashiers and Short Order Cooks

More information on O*NET Job Zones: https://www.onetonline.org/help/online/zones

Occupations that did not have a threshold of at least 50 posted vacancies from February to July 2015 had median wages below $25,000 annually and were in Job Zones 1 or 2 were excluded from the analysis.

For Job Zones 3, 4 and 5, the top 20 occupations in terms of posted vacancies were listed. Each occupation listed has a ratio calculated of the number of UI Claimants for every 100 job vacancies posted. This ratio serves as an approximation of a potential skills gap, with a lower figure indicating a higher gap.

A second metric used compares the volume of posted job vacancies to the count of current employment in an occupation from OES data in an attempt to gauge the urgency of relative demand. By adding these two figures, we estimate what a possible "full employment" number would be for an occupation if all the posted vacancies were actually filled. The number of posted job vacancies was divided by the "full employment" figure to generate a percentage that illustrates possible demand relative to current employment levels.

These two indices, job demand relative to current employment levels and the ratio of available claimants to job vacancies, serve as indicators of possible occupationally associated skill gaps and their level of demand.

Chart 18 –Potential Skill Gaps in Extensive Preparation Occupations

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimant per 100 posting	Entry Wage	Median Wage
Medical Scientists, Except Epidemiologists	309	5,327	10,000	35%	6	$47,900	$87,000
Medical and Health Services Managers	831	4,001	10,600	27%	21	$67,250	$96,950
Physical Therapists	47	2,429	7,300	25%	2	$64,860	$82,540

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimant per 100 posting	Entry Wage	Median Wage
Speech–Language Pathologists	44	1,875	3,660	34%	2	$56,270	$76,910
Mental Health and Substance Abuse Social Workers	188	1,783	5,170	26%	11	$27,030	$42,730
Occupational Therapists	34	1,314	4,490	23%	3	$57,840	$80,420
Lawyers	401	1,592	17,180	8%	25	$69,420	$124,780
Educational, Guidance, School, and Vocational Counselors	204	1,168	6,910	14%	17	$38,230	$60,920
Education Administrators, Elementary and Secondary School	139	1,080	6,810	14%	13	$72,240	$98,450
Education Administrators, Postsecondary	234	1,044	9,950	9%	22	$58,790	$85,060
Operations Research Analysts	113	784	3,180	20%	14	$45,650	$78,000
Community and Social Service Specialists, All Other	141	738	1,710	30%	19	$24,800	$34,560
Architectural and Engineering Managers	227	777	6,440	11%	29	$95,260	$135,940
Physician Assistants	35	536	2,610	17%	7	$72,810	$101,040
Computer and Information Research Scientists	26	518	820	39%	5	$67,420	$100,020
Mental Health Counselors	251	697	7,900	8%	36	$27,520	$36,640
Nurse Practitioners	55	500	5,080	9%	11	$80,470	$103,070
Natural Sciences Managers	113	522	3,050	15%	22	$107,030	$163,810

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimant per 100 posting	Entry Wage	Median Wage
Healthcare Social Workers	94	466	11,090	4%	20	$39,820	$58,000
Health Specialties Teachers, Postsecondary	41	370	5,000	7%	11	$57,440	$102,230

Source: DUA Unemployment Insurance Claimant Data, Conference Board Help Wanted Online Data Series® real–time job vacancies

Specialized healthcare professions make up the most difficult to find and highest relative demand occupations in Job Zone Five, and as expected, pay a higher than average wage. Speech Language Pathologists, Physical Therapists and Occupational Therapists in particular only have 2–3 available claimants for every 100 posted vacancies and OES data indicates slightly higher than average median annual wages at $76,910, $82,540 and $80,420 respectively. Computer and Information Research Scientists have the highest relative demand and a current employment count is lower than other occupations, which may indicate difficulty finding individuals skilled in this type of work.

Chart 19 Potential Skill Gaps in Considerable Preparation Occupations

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimants per 100 postings	Entry Wage	Median Wage
Software Developers, Applications	734	13,169	26,900	33%	6	$71,770	$104,460
Marketing Managers	1,330	9,505	9,470	50%	14	$81,060	$127,940
Network and Computer Systems Administrators	393	6,781	9,730	41%	6	$58,950	$81,390
Social and Human Service Assistants	678	6,856	17,790	28%	10	$23,350	$31,110
Computer Systems Analysts	453	6,597	15,850	29%	7	$59,550	$85,180
Management Analysts	273	5,757	21,000	22%	5	$57,840	$88,500
Industrial Engineers	117	4,951	7,150	41%	2	$64,310	$90,160

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimants per 100 postings	Entry Wage	Median Wage
Market Research Analysts and Marketing Specialists	333	4,311	17,220	20%	8	$41,120	$66,070
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	1,173	4,708	26,680	15%	25	$41,420	$66,920
Human Resources Specialists	403	3,534	13,140	21%	11	$41,560	$61,810
Managers, All Other	1,190	4,160	5,600	43%	29	$65,920	$110,320
Public Relations Specialists	133	3,097	7,000	31%	4	$38,380	$57,170
Sales Representatives, Services, All Other	905	3,501	19,990	15%	26	$37,270	$68,090
First–Line Supervisors of Non–Retail Sales Workers	112	2,620	5,740	31%	4	$51,900	$86,240
Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products	562	3,034	14,680	17%	19	$53,970	$84,180
Financial Analysts	312	2,740	16,640	14%	11	$54,950	$84,220
Computer Programmers	194	2,575	8,440	23%	8	$57,490	$85,870
Elementary School Teachers, Except Special Education	392	2,371	26,770	8%	17	$49,140	$69,810
Secondary School Teachers, Except Special and Career/Technical Education	502	2,413	24,000	9%	21	$50,640	$70,290

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimants per 100 postings	Entry Wage	Median Wage
Human Resources Managers	497	2,301	4,220	35%	22	$70,660	$110,100

Source: DUA Unemployment Insurance Claimant Data, Conference Board Help Wanted Online Data Series® real–time job vacancies

In Job Zone Four we again see stem–related occupations constituting the majority of the Higher Demand and Higher Gap quadrant. Included are Industrial Engineers, Network Administrators, Software Developers and Computer Systems Analysts on the cusp, providing a range of median wages from $81,390 to $104,460. Management and Supervisory occupations also figure prominently in this particular zone, signaling a possible need for managerial and leadership skills.

Chart 20 Potential Skill Gaps in Medium Preparation Occupations February to July 2015

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimants per 100	Entry Wage	Median Wage
Web Developers	164	7,133	3,960	64%	2	$48,210	$74,080
Merchandise Displayers and Window Trimmers	144	1,798	1,470	55%	8	$19,260	$27,210
Real Estate Sales Agents	27	1,533	2,600	37%	2	$33,370	$55,680
Computer User Support Specialists	787	6,854	16,490	29%	11	$39,230	$58,430
Executive Secretaries and Executive Administrative Assistants	1,583	10,328	26,670	28%	15	$39,810	$54,800
First–Line Supervisors of Construction Trades and Extraction Workers	1,517	3,285	8,860	27%	46	$50,280	$72,400
Bus and Truck Mechanics and Diesel Engine Specialists	111	1,179	3,210	27%	9	$38,510	$50,020

Occupation	Feb–July 2015 Claims	Feb–July 2015 Job Postings	Job Count	Job Count as % of full employment	Claimants per 100	Entry Wage	Median Wage
First–Line Supervisors of Mechanics, Installers, and Repairers	367	2,246	9,120	20%	16	$48,220	$69,860
Dental Assistants	309	1,534	7,200	18%	20	$31,260	$41,480
Preschool Teachers, Except Special Education	1,056	2,819	13,400	17%	37	$24,410	$32,430
Maintenance and Repair Workers, General	1,246	4,617	22,430	17%	27	$29,430	$42,530
First–Line Supervisors of Office and Administrative Support Workers	821	7,304	35,820	17%	11	$39,470	$57,020
Registered Nurses	1,065	14,322	79,910	15%	7	$59,080	$81,380
Hairdressers, Hairstylists, and Cosmetologists	196	1,752	10,750	14%	11	$18,850	$28,490
Medical Secretaries	737	3,195	20,880	13%	23	$30,840	$38,290
Licensed Practical and Licensed Vocational Nurses	467	2,258	16,100	12%	21	$43,150	$53,640
Bookkeeping, Accounting, and Auditing Clerks	1,127	5,341	38,870	12%	21	$29,590	$42,190
Medical Assistants	714	1,795	16,100	10%	40	$29,260	$36,000
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	1,061	3,565	45,310	7%	30	$29,980	$41,920
Teacher Assistants	788	2,228	35,070	6%	35	$20,040	$28,350

Source: DUA Unemployment Insurance Claimant Data, Conference Board Help Wanted Online Data Series® real–time job vacancies

While there are few occupations in the Higher Demand, Higher Gap quadrant overall, Web Developers are clearly a critical area. This occupation has highest demand in relation to current employment of any occupation included in the analysis and indicates only two available claimants for every 100 posted vacancies. At $74,080 annually web developer pays well above other occupations in this job zone.

Merchandise Displayer is an interesting and likely under–considered occupation that requires a unique combination of skills that includes the use of crafting tools, digital literacy and management skills. However, median wages for this are below average at $27,210 annually and probably reflect this more as part time work.

Nursing occupations along with other health professions figure prominently in the Lower Demand, Higher Gap quadrant and should continue to be areas of focus for training, despite the higher percentages of current employment.

When considering occupations that may have potential skill gaps overall without excluding professions by job zones or wages, we do see several Job Zone 2 occupations in the chart below. While there may be limited supply of UI claimants in these occupations, again it is probably due to the fact they offer lower wages or that these are more likely to be part time opportunities.

Chart 21 Occupations with Overall Higher Demand and Higher skill gaps Occupation

Occupation	Feb to July 2015 Claims	Feb to July 2015 Job Postings	Employment Count	Demand as % of full employment	Claimants per 100 Postings	Entry Wage	Median Wage	Job Zone
Software Developers, Applications	734	13,169	26,900	33%	5.6	$71,770	$104,460	4
Web Developers	164	7,133	3,960	64%	2.3	$48,210	$74,080	3
Network and Computer Systems Administrators	393	6,781	9,730	41%	5.8	$58,950	$81,390	4
Social and Human Service Assistants	678	6,856	17,790	28%	9.9	$23,350	$31,110	4
Computer Systems Analysts	453	6,597	15,850	29%	6.9	$59,550	$85,180	4

Occupation	Feb to July 2015 Claims	Feb to July 2015 Job Postings	Employment Count	Demand as % of full employment	Claimants per 100 Postings	Entry Wage	Median Wage	Job Zone
Medical Scientists, Except Epidemiologists	309	5,327	10,000	35%	5.8	$47,900	$87,000	5
Industrial Engineers	117	4,951	7,150	41%	2.4	$64,310	$90,160	4
Public Relations Specialists	133	3,097	7,000	31%	4.3	$38,380	$57,170	4
Demonstrators and Product Promoters	51	2,710	1,480	65%	1.9	$20,900	$32,870	2
First–Line Supervisors of Non–Retail Sales Workers	112	2,620	5,740	31%	4.3	$51,900	$86,240	4
Physical Therapists	47	2,429	7,300	25%	1.9	$64,860	$82,540	5
Computer Programmers	194	2,575	8,440	23%	7.5	$57,490	$85,870	4
Speech–Language Pathologists	44	1,875	3,660	34%	2.3	$56,270	$76,910	5
Merchandise Displayers and Window Trimmers	144	1,798	1,470	55%	8.0	$19,260	$27,210	3
Information Security Analysts	37	1,684	2,630	39%	2.2	$50,790	$84,800	4
Telemarketers	127	1,718	3,690	32%	7.4	$20,820	$27,710	2
Real Estate Sales Agents	27	1,533	2,600	37%	1.8	$33,370	$55,680	3
Database Administrators	119	1,550	3,730	29%	7.7	$53,520	$79,560	4
Occupational Therapists	34	1,314	4,490	23%	2.6	$57,840	$80,420	5

Occupation	Feb to July 2015 Claims	Feb to July 2015 Job Postings	Employment Count	Demand as % of full employment	Claimants per 100 Postings	Entry Wage	Median Wage	Job Zone
Bus and Truck Mechanics and Diesel Engine Specialists	111	1,179	3,210	27%	9.4	$38,510	$50,020	3

Source: DUA Unemployment Insurance Claimant Data, Conference Board Help Wanted Online Data Series® real–time job vacancies

Regional Differences

There are some minor variations across the Commonwealth in skill gap indicators. The Greater Boston Region demonstrates a higher demand and higher gap for Social and Human Service Assistants in Job Zone 4. Approximate annual median wages in the Boston area for this occupation are $30,070. A relative low annual wage and high level of experience required combined with high level of preparation may contribute to a gap between supply and demand in this occupation. Outside of Web Developers, this region does not display the higher demand and higher skill gap for IT professions compared to the state as a whole, possibly due to the high concentration of the Professional and Technical Services industry in Greater Boston.

There are indicators of a potential skill gaps needed in education professions in the Cape and Islands region, where Elementary and Secondary Teachers are showing the highest concentration of relative demand with a lack of available claimants that are not seen elsewhere in the Commonwealth.

The Metro South West region has some of the same critical IT occupational skill gaps seen statewide and additionally has the highest relative demand for IT Security Analysts, a newly emerging occupation in demand, with little in the way of potential talent available.

Overall the cursory indications are that IT and health care occupation clusters, and to a lesser extent management, are areas of concern in regard to a potential skills gap in the Commonwealth. Across the three higher preparation job zones, these occupational areas concentrate heavily in STEM–related fields, more so than other occupations in Massachusetts.

Overall Labor Market and Workforce Indications

Statewide, and in varying degrees among local workforce areas, the Commonwealth's labor markets are exhibiting unprecedented tightness between employer demands for labor and the supplies of unemployed jobseekers and employed potential job changers.

Massachusetts's population projections and educational attainment rates portend a potential shortfall in the supply of labor needed to sustain the state's leading industries, in particular Health

Care and Education, and Professional, Scientific, & Technical Services industries which are critical to the statewide economy. Regional differentiation in employment, demographic and job growth trends call out additional priority industries/occupations for specific regions. At the same time, while not concentrated in any specific industry, anticipated Computer and IT labor shortfalls will have a wide impact on the economy given their distribution across industries.

The existing and projected demographic patterns for the Massachusetts workforce will not solve the workforce gaps emerging in the post–recession economy. The Massachusetts workforce currently has the highest concentration of 4–year degreed workers in the nation, but that trend is predicted to change based on the expected outflow of the labor force (baby boomers) and the size of college graduation cohorts. The Massachusetts population is only growing due to the inflow of immigrants, which may not be able to replace the skill loss of the baby boomers. Instead, it presents a significant need to build capacity in ESOL and "credentialing" focused on high–demand career pathways.

These trends signal the need to focus on three major challenges:

1) Talent retention of the existing workforce, especially individuals with STEM related credentials

2) Creating career pathways for those individuals who are not currently in the workforce for a number of reasons, from difficulty accessing adequate childcare, barriers to employment, or lack of education and skill related to the job market.

3) Maximizing the existing labor force by accurately matching talent, training dollars, and new education and training options aligned with business demands. Workforce strategies need to align with demand in order to bolster talent pipelines, especially in STEM related areas.

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.

The Baker Administration has launched several initiatives to better align the broadly defined workforce system with the needs of business as well as focus on expanding the impact on job outcomes for individuals with barriers to employment. One initiative is the Workforce Skills Cabinet, which was created to align the resources of the Executive Office of Labor and Workforce Development, the Executive Office of Education and the Executive Office of Housing and Development. In the Commonwealth, the major federal and state programs for job seekers are employers are administered by multiple state agencies and field organizations.

This section will provide an <u>overview</u> of the resources and services for different customers:

- All job seekers and business (Workforce Boards and One-Stop Career Centers)
- Individuals receiving TAFDC (Department of Transitional Assistance)
- Adult Education and Basic Skills (Department of Elementary and Secondary Education)
- Multi-Agency Career-Readiness Initiative
- Individuals with Disabilities (Vocational Rehabilitation through Massachusetts Rehabilitation Commission and the Massachusetts Commission for the Blind) and Community Based Organizations (CBO's) funded by the Department of Mental Health and Department of Developmental Disabilities
- Youth (WIOA Youth and YouthWorks)
- Talent Pipeline Initiatives for Business (Workforce Competitiveness Trust Fund and Workforce Training Fund)

RESOURCES AND SERVICES FOR ALL JOB SEEKERS AND BUSINESS

Workforce Development Boards and One-Stop Career Centers

A large portion of the workforce activities occurs though the Massachusetts One-Stop Career Centers (OSCC). There are 27 comprehensive and 5 affiliated centers located throughout the Commonwealth. These centers make up the backbone of the state's delivery system for employment and training services for job seekers, businesses, and workers.

The graphic above shows a map of the 16 workforce areas in Massachusetts and the location of the 32 One-Stop Career Centers.[SEE GRAPHIC ON THE MA STATE PLAN POSTED AT WWW.MASS.GOV/MASSWORKFORCE/STATE-PLAN]

The Massachusetts One-Stop Career Center (OSCC) system categorizes its services to job seekers and workers across a continuum of basic, individualized, and follow up services. Self-service activities and group services such as workshops are also available. Training is provided through the Individual Training Account (ITA) system, On-the-job training customized training and class-sized training, as appropriate. OSCCs serve as the point of access to a system of training providers with programs and services tailored to individual needs and career objectives. Services are provided in accordance with individual career plans, which are collaboratively developed by case managers and jobseekers, and local planning and implementation decisions.

Each comprehensive One-Stop Career Center offers an extensive array of services, which include:

- Determination of eligibility to receive assistance under WIOA;
- Outreach and intake, including career center seminars that provide orientation to the information and other services available through the One-Stop delivery system;
- Initial assessment of skills, aptitudes, interests and abilities, and supportive service needs;
- Career counseling, job search and placement assistance;
- Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, such as job vacancy listings in such labor market areas, information on job skills necessary to obtain the jobs available, and information relating to local occupations in demand and the earnings and skill requirements for those occupations;
- Provision of performance information and program cost information on eligible providers of training services;
- Provision of information regarding local area performance as relates to local performance measures and any additional performance information, as available;
- Provision of information relating to the availability of supportive services, including but not limited to childcare and transportation.

Massachusetts One-Stop Career Centers offer a full menu of comprehensive services for businesses as well that include:

- Timely screening and referral of competitive applicants;
- Active employer outreach and solicitation of job openings;

- Provision of information regarding the full array of OSCC services, including OJT and customized training;
- Customer assistance with online listing of job orders and access to the state's talent bank;
- Basic labor market information, and listings of education and training programs and resources;
- Referral services for employers to sources of funding for worker training;
- Community service organizations, and if available, tax credit programs;
- Assistance with significant employer downsizing or layoffs, including layoff aversion strategies;
- Job fairs and recruitment events are held either on site at the One-Stop Career Centers or at other venues that will attract an increased number of businesses;
- Coordination with economic development as well as various programs that can assist business;
- Information sessions for businesses on tax incentive programs and the Workforce Training Fund programs- training for incumbent workers and layoff aversion programs and services;

One-Stop Career Center - Customers and Services

In fiscal year 2015, the Massachusetts workforce system served 160,550 jobseekers, 23% of whom were determined to have or self-reported a significant barrier to reemployment. Individuals connect to the system through the Unemployment Insurance System (RESEA), referrals from partners (TANF, SNAP, Voc. Rehab, etc.) and on a walk-in basis.

[SEE CHART ON OSCC CUSTOMERS SERVED -- RESEA, TANF/SNAP, VETERANS AND PEOPLE WITH DISABILITIES ON THE MA STATE PLAN POSTED AT WWW.MASS.GOV/MASSWORKFORCE/STATE-PLAN]

Overall, One-Stop Career Center Customers reflect the data trend that individuals with less education experienced higher levels of unemployment and were more likely to be in need of services. In FY15, the following breakdown by education demonstrates that 43% of the customer base only had a high school diploma or less.[SEE CHART ON OSCC CUSTOMERS SERVED BY EDUCATION LEVEL FOR FY 2015 ON THE MA STATE PLAN POSTED AT WWW.MASS.GOV/MASSWORKFORCE/STATE-PLAN]

In FY15, 160,550 individuals worked with the Career Centers but only 1.9% were determined eligible for and received ITAs (3,113). In FY 2015, the Workforce Investment Act funded training placements in the following top ten occupational categories.

A chart with a summary of the FY 2015 WIA enrollments by occupational categories can be on the MA State Plan posted at www.mass.gov/massworkforce/state-plan

With close to half of OSCC customers having a high school diploma or less, there is ample opportunity to provide workforce services that will enable individuals in this category to gain entry into the labor force. However, in FY 2015, less than 10% of training enrollments were in computer/ mathematical-related programs. As noted previously, with the high demand for IT-related occupations, workforce services, training in particular, need to align with this talent pipeline.

The lower numbers overall of OSCC customers who also work with partner agencies such as TANF/ SNAP and the Massachusetts Rehabilitation Commission signal an opportunity for the Massachusetts Workforce System to reverse this trend. Beyond the One-Stop Career Centers, our system continues to be engaged in various programs and partnerships that incorporate additional workforce activities and supportive services. Leveraging programs that multiple agencies and workforce partners share in utilizing is key in to this effort under WIOA.

RESOURCES AND SERVICES FOR INDIVIDUALS RECEIVING TAFDCESP provides HiSET Vouchers for TAFDC clients to take the HiSET exams through Educational Testing Service (ETS) to obtain their High School Equivalency certificate. ETS contracts with testing centers certified by the Massachusetts Department of Elementary and Secondary Education (DESE).

Transportation Reimbursement

The Department provides transportation reimbursement, subject to funding, for TAFDC clients participating in qualified ESP activities of up to $80 per month.

Child Care Services

TAFDC clients and certain former TAFDC clients are eligible for referrals to their local Child Care Resource and Referral (CCRandR) agency. The CCR&R will explain the types of available child care and provide a list of child care providers with openings, or arrange for child care at home or with a relative. After the child care provider has been contacted and arrangements are finalized, the CCR&R will provide a voucher for the child care.

RESOURCES AND SERVICES FOR ADULT EDUCATION Through both federal and state grants, ACLS funds a broad network of education providers, including local school systems, community-based agencies, community colleges, libraries, volunteer organizations, correctional facilities, and others. ACLS also funds family literacy, distance learning, transition to college, and workplace education programs.The Massachusetts Executive Office of Labor and Workforce Development, its Department of Career Services, the Executive Office of Education, its Departments of Elementary and Secondary Education and Higher Education, and the consortium of 15 community colleges represented under the Transformation Agenda have jointly developed the Career Readiness Initiative (CRI) to improve the education and career readiness services provided within the state to help individuals obtain and retain gainful employment. Three main components below make up the CRI:

- Skill assessment: ACT's Career Ready 101. Licenses have been made available to 99 programs across careers centers, adult education programs and community colleges throughout Massachusetts. *ACT Career Ready 101* is a self-paced, online career exploration and academic remediation system available to an unlimited number of users.
- Skill Certification: The National Career Readiness Certificate (NRC)is the Skill Certification component of CRI. The *NCRC* is a portable credential that demonstrates achievement and a level of workplace employability skills that include Reading for Information, Locating Information and Applied Mathematics. Many workforce partners, including ACLS-funded ABE programs that currently have *ACT Career Ready 101* licenses have incorporated its use into their program designs.

- Business Needs: Job Analysis and Profiling. Through this employer engagement opportunity, designated business services staff will analyze a specific job (at an employer place of business) and identify target scores for an occupation as well gather job tasks and skill information from incumbent workers and supervisors. This data is used to place the individuals with the requisite level of talent, as certified by the NRC, into these occupations.

SERVICES FOR INDIVIDUALS WITH DISABILITIES

The major resources and support services for individuals with disabilities are administered through the Massachusetts Rehabilitation Commission and the Massachusetts Commission for the Blind.

Massachusetts Rehabilitation Commission -Vocational Rehabilitation for the Disabled provides services to adults, students, and youth over the age of 16 with disabilities so they can gain and maintain employment. This program is administered by the state, but is bound by federal rules tied to the Federal Vocational Rehabilitation Program. Funding primarily comes from federal sources with this line item accounting for state matching and maintenance of effort funds. The main goal of this program is to assist people with disabilities choose, obtain, and maintain competitive employment. Services offered include:

- Job-driven competitive employment and training services, including direct job placement service, partnerships with employers, on-the-job trainings (OJT), work-based learning experiences, paid internships, with a focus on high-growth industries and employment opportunities.
- Pre-employment transition services to students with disabilities.
- Vocational counseling, guidance, and career development.
- Vocational assessments and testing, job matching services, and support to identify job goals and opportunities.
- Provision of assistive technology to assist in obtaining and maintaining competitive employment.
- Assistance, support, and guidance for post-secondary educational opportunities.
- Medical and therapeutic services to assist with obtaining and maintain employment.
- Consult with employers about the Americans with Disabilities Act, employment tax credits, and accommodations to assist individuals with disabilities to go to work.
- Ongoing employment support services to individuals with disabilities to maintain and advance in employment, including job coaching and counseling support Massachusetts Commission for the Blind (MCB) -

MCB provides employment-related services to eligible participants of the Vocational Rehabilitation (VR) Program beginning at the age of 14. Vocational Rehabilitation Services offered include:

- Evaluation and counseling to identify job goals
- Assessment of work sites and the need for assistive technology
- Assistive technology, orientation and mobility instruction, and rehabilitation teaching to enable blind persons to be independent at work
- Providing funds for college or vocational training
- Job counseling

- Pre-employment transition services
- Supported Employment Services
- Short and long-term internships
- Mentorship RESOURCES AND SERVICES FOR YOUTH RESOURCES AND SERVICES FOR OLDER WORKERS Workforce Competiveness Trust Fund: An initiative created in 2006 and administered by Commonwealth Corporation on behalf of the Executive Office of Labor and Workforce Development, the Trust Fund supports industry sector partnerships to develop training pipelines to meet the skill needs of businesses in high demand occupations. Each partnership includes businesses with common skill needs, educational institutions, workforce board/s, and other related partners. The partnerships provide training and education services for a two- to three-year period for industries including health care, manufacturing, clean energy, life science, trades, financials services and hospitality.

The Fund has leveraged $18 million in private sector and foundation investments and builds a program infrastructure that allows workforce boards to add capacity through WIOA, TAA and other programs.

Forty-six partnerships have been supported through the WCTF since 2007; many of the partnerships continued beyond the grant period creating a platform for working strategically with critical industries to address their ongoing and changing workforce needs.

Workforce Training Fund: The Workforce Training Fund Program helps address business productivity and competitiveness by providing resources to Massachusetts businesses to fund training for current and newly hired employees through competitive grants. Companies must pay into the WTF in order to be eligible to apply for grant funds.

The workforce development boards and the career centers work closely with local employers to access the Workforce Training Fund for their incumbent worker training needs. Grant programs include:

- General Programs Grants up to $250,000 that are awarded competitively to employers, employer organizations, labor organizations, training providers, and consortia of such entities to train current and newly hired workers. Applicants may use a training provider of their choice.
- Technical Assistance Grants: Technical assistance grants of $5,000 to $25,000 help employers or groups of employers or employees determine a set of training needs. Eligible applicants include employers, industry associations, labor organizations, community colleges, administrative entities for local workforce areas, and other entities with expertise in providing technical assistance for training, and consortia of such entities.
- Express Program Grants assists companies with 100 or fewer employees to address their employee training needs through a list of pre-registered courses. Eligible employers complete a short, online application to request grant funds for pre-registered training courses.

The Workforce Training Fund is supported through business contributions, raising approximately $21 million each year. In FY 2015 the Workforce Training Fund, through its General Program, awarded $16.4 million through 170 grants to support 270 businesses in training 13,608 incumbent workers.

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	OPPORTUNITIES

	STRENGTHS	OPPORTUNITIES
One–Stop Career Centers	· USDOL resources integrated under one roof for "One–Stop" for customers · Supportive services referrals · Strong partnerships with social service entities, local service providers and non–profit organizations that have been developed on regional levels · One common data system (the Massachusetts One–Stop Employment System (MOSES)) — coordinate, schedule, monitor and report on virtually all service activities · JobQuest — allows job seekers and business to conduct activities such as create and modify their customer profiles, develop job postings, or search for eligible training providers. JobQuest enables customers to access a host of self–service activities that augment the spectrum of staff supported services offered at local One–Stop Career Centers · Strong Veterans Services – Local DVOPs have direct contact and coordination with homeless Veteran shelters, the VA and local area community organizations that provide direct services and training program opportunities leading to gainful employment and self–sufficiency · Programs in "demand" careers such as "bio–medical" and advanced manufacturing are being designed and run specifically for Veterans. · Out–stationed community college staff acting as "community college navigators" for One Stop Career Center customers. · Availability of multiple labor market tools to help inform job seekers decisions related to careers or business needs. These include: · The Massachusetts Career Information System (MassCIS),	· Need for consistent branding of One–Stop Career Centers · Improve data quality and data entry in MOSES · Lack of employer awareness. It's estimated that only 8% of businesses utilize some component of the public workforce system. · Lack of subsidized training vouchers for customers compared to need · Potential misalignment of ITA training enrollments with demand and is an opportunity · Underutilized Registered Apprenticeship as a career pathway · Lack of systemic alignment with workforce development, education and training partners to serve "shared customers", particularly with serving those with barriers to employment (low–skilled, limited English proficient, etc.) · Limited Career Center access during evenings and weekends; creates challenges for customers who cannot visit the career center during traditional business hours (e.g., incumbent workers, those engaged in programming with partners, etc.) · Opportunity for integrated education and training models for partner customers (e.g. ABE students)

	STRENGTHS	OPPORTUNITIES
Career Readiness Initiative	· Provides a resource to quantify and catalogue talent in the labor supply · Create a shared language amongst Business, Jobseekers and Workforce Practitioners · Creates a linkage from ABE programming to community colleges	· Certification testing is time intensive for participants and staff · Recognition from business community needs to grow
Workforce Competitive–ness Trust Fund	· Directly supports training for jobs that are in demand · Leverages private sector investments (there is a 30% required match) · Creates critical infrastructure in regions to engage with businesses to understand their needs as the industry goes through changes and can adjust strategy real–time	· No recurring revenue stream so fund is dependent on episodic funding that does not allow for predictability and scale · Opportunity to leverage WIOA, youth funding, TAA and other federal funding streams to provide training for jobs in demand
Workforce Training Fund	· Training tied to a business need that is related to competitive position and growth · Business–friendly and allows for the strengthening of employer relationships · Supports small businesses through the General Program and the Express program	· Application process can be slow for businesses without human resources capacity · Application is currently done in a flat file so analysis is difficult to do of trends

	STRENGTHS	OPPORTUNITIES
Youth–works	· The program operates at a large scale (4500–5000 youth on average each year) · The program provides work readiness training through a formal curriculum · Staff in the field participate in professional development on the use of the curriculum · 20% of the slots are targeted toward youth who are court–involved, in DCF custody or homeless · Creates an early "entry point" into a talent pipeline	· The summer program is short and could be connected to WIOA youth programs · More private–sector employers could be engaged and provide subsidized, partially subsidized or unsubsidized employment opportunities for teens · The quality of the job placement or learning opportunity could be improved with more private sector engagement · Make connections to out–of–school youth population enrolled in the ABE system.
Senior Community Service Employment Program	· Program participants provide invaluable community service in public and private non–profit agencies (host agencies) by increasing the capacity of host agencies to address community needs · Provides career pathways and skill upgrading through the community service assignment for otherwise chronically unemployed individuals with multiple barriers to employment · Fosters individual economic self–sufficiency, and social and emotional well–being	· Most SCSEP projects rely heavily on participant staff members and the maximum durational time is 48 month, thus there is a lot of staff turn–over in the program

	STRENGTHS	OPPORTUNITIES
DTA Employment Services Programs	· Improved performance with regard to labor participation rates as 62% clients obtained or retained employment in fiscal year 2014 · There is a strong relationship with TAFDA and local providers. Theses provider maintain a regular presence at Transitional Assistance Offices (TAO) in order to keep TAFDC clients engaged and to more effectively coordinate services with DTA case managers	· A limited number of entry points for TAFDC customers. · Resources for training or career pathways in Massachusetts through the state is limited. Resources do not match demand · Limited number of providers in rural areas creates barriers to those with transportation issues

	STRENGTHS	OPPORTUNITIES
Adult Education	· The ABE system (federal and state funds) serves approximately 20,000 adults who are low skilled, basic skills deficient, lack English proficiency, lack a high school diploma or its equivalent and it helps them close the educational gap and qualify for further opportunities. · The ABE system engages a wide range of program providers (including employer partnerships for workplace education) to meet the needs of various communities with specific barriers. · ABE supports postsecondary success through the Transition to College programs. · ACP programs provide an opportunity for the LWDB, OSCC to collaborate regionally on creating career pathways for ABE students. · ACLS has convened the ACP task force consisting of representatives from LWDBs, OSCCs, ABE programs, and higher ed. who are involved in guiding policies to help ABE learners to advance along career pathways. · ACLS has been involved inthe US DOE sponsored Moving Pathways Forward (MPF) Supporting Career Pathways Integration project, that focuses on 1) identifying industry sector(s) and engaging employers, 2) strengthening education and training, and 3) measuring system change and evaluating system performance. · Out–stationing (an ABE staff person onsite at OSCC) has been institutionalized over the years and connects OSCC with the ABE system. · Adult learners get exposed to level appropriate workforce preparation activities that help them plan for next steps after ABE services.	· Because of significant barriers and low educational levels many ABE and ESOL students require years of ABE/ESOL before they can benefit from the opportunities of the workforce system. · Support the out–stationing model with a system to track referrals and cross agency collaborations. · Increase ACP focus on career pathways with employer driven demand. · Mature partnerships between the ABE and workforce systems connect ACP participants to relevant training, apprenticeships, and jobs. · Develop regional integrated education and training (adult career pathways) models that leverage training resources for ABE students. · The workforce system provides ABE staff with a better understanding of regional labor market needs. · Connect ABE out–of–school youth population with YouthWorks programs. · Increased career advising and case management might be needed in adult education programs to successfully implement the vision and requirements of WIOA. Additional funding or coordinated partner services could address this. · Demand for ABE services surpasses available resources (long wait lists). WIOA places additional demands and requirements on the ABE system without additional funding.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

The "capacity" of the state to provide the workforce development activities identified in (A) above is represented in the chart showing the "strengths and opportunities" for each program. The strengths identified for each workforce activity show areas with strong capacity. The opportunities identified for each workforce activity show where we need to build capacity.

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.

Context for Vision and Goals

Governor Charles D. Baker took office in January 2015 and quickly tasked the Executive Office of Labor and Workforce Development's (EOLWD) Secretary, Ronald L. Walker, II, with the charge of building upon our successes in creating jobs and assisting residents in finding employment opportunities in every community within the Commonwealth. Working with EOLWD, the Governor signed an Executive Order early on in his administration establishing a Workforce Skills Cabinet (WSC) to create a formal structure within the Administration to set up guiding principles and policies to align economic, workforce, and education systems in order to better address the workforce skills gap in Massachusetts. The Workforce Skills Cabinet is chaired by the Secretary of Labor and Workforce Development and comprised of the Secretaries of Education, Housing and Economic Development and others as required. The cabinet is charged with creating and implementing a strategy to align systems and develop workforce skills to meet the varying needs of employers in the Commonwealth's regions, now and in the future. The WSC provided a direction to organize various state and federal processes impacting these systems. The research and stakeholder processes were developed to provide context for three major planning products for the Commonwealth:

- Statewide Economic Development Plan (State Required, State Driven)
- Statewide Workforce Development Plan (WIOA Required, State Driven)
- Statewide Strategic Plan for Higher Education Campuses (State Driven)

The amendment of the Workforce Investment Act (WIA) by the Workforce Innovation and Opportunity Act (WIOA) serves as a vehicle for ensuring Governor Baker's vision that all Massachusetts residents benefit from a seamless system of education and workforce services that leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy.

Organizing Lens: Workforce Skills Cabinet (WSC)

The WSC Secretaries agreed to analyze the landscape and key economic conditions that would affect alignment of systems and the ultimate outcomes for business and individuals. Ultimately the work of the WSC would impact the development of the required plans listed above. The WSC used the framework of looking at the economy (the macro view), the systems (state services), and the customers (businesses, workers, students) to brief the Secretaries on major assets and challenges.

See the MA State Plan posted at www.mass.gov/massworkforce/state–plan GRAPHIC: CHART 19, WORKFORCE SKILLS CABINET, depicting this WSC framework.

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/ The analysis includes a series of research briefings, interviews and meetings with stakeholders, internal briefings by staff on operations of

the three major systems and input from external stakeholders on how to align systems and reduce skill gaps in the economy. The key findings are represented in the charts below. This information set an agenda for the WSC agencies that will influence the development of policies, operations and funding priorities and guide the work of the Administration.

The list below shows the high–level insights from the "macro" level briefings on the labor market and the potential for new workforce supply to meet skill need in Massachusetts. Coupled with the specific labor market analysis in Section I, it supports the focus on developing middle–to high–skilled talent pipelines in technical occupations (often called "middle" skills) within vocational/technical education, on–the–job training efforts or sector initiatives and community college credentials along with a strong demand for STEM credentials across the post–secondary spectrum.

GRAPHIC: CHART 20, INSIGHTS FROM BRIEFINGS – The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/ Insights from the WSC briefings:

Economy (Macro)

- Business Needs:Growing need for "Middle Skills" Workers with Certificates/Two–Year degrees
- Lack of credentialed workers in high growth areas (Healthcare, Education, Professional Tech, Advanced Manufacturing, STEM)

Workforce Demographics

- Highest concentration of 4–year degreed workers in nation
- Outflow of middle– to high–skilled labor (Baby Boomers retiring)
- Inflow of immigrants accounts for 100% of population growth (*ESOL, credentialing needed*)
- 50% of UI claimants have a HS diploma or less

New Workforce Pipeline

- High high school graduation rates
- Persistent achievement gaps in low–income communities
- Low on–time completion rates for 2 and 4–yr degrees at public higher education institutions
- Shortage of middle skill credentials in high growth areas
- Strong pipeline from private sector universities (4 year+ degrees)

In addition, the WSC **reviewed the "system" level of state and regional government structures** and the roles each Secretariat is asked to play in the overall design and support for economic, education and workforce development.

System (State Services)

Executive Office of Education (EOE)

Developing supply of new workforce through coordination of:

- 4 State Governance Boards (Board of Early Education & Care, Board of Elementary and Secondary Education, Board of Higher Education, UMass)
- 3 State education agencies (Early Education & Care, Elementary and Secondary Education, Department of Higher Education)
- 15 Community Colleges
- 9 State Universities
- 5 UMass Campuses
- 26 Vocational Technical Schools
- 408 School Districts
- 10,000 Early Education Providers
- 125 Adult Education Programs

Executive Office of Housing and Economic Development

Setting conditions for business growth through:

- Housing
- Mass. Office of Business Development
- MassDevelopment
- Mass Life Sciences Center
- MA Tech Collaborative
- MOITI
- Clean Energy Center
- NA Growth Capital Corp.

Executive Office of Labor and Workforce Development

- Connecting/reconnecting workers to jobs through:
- DUA (Unemployment Insurance)
- DCS (Career Centers)
- Commonwealth Corporation
- 16 Workforce Development Boards
- 32 One–Stop Career Centers
- Job seeker services
- Job seeker access to education and training programs
- Business support (talent recruitment, retention, training and labor market info)

Customers (Business, Workers, Students)

Finally, while the organization of agencies can be sorted and mapped at a state level by agency or program, the "user" or customer – individuals and business – have a different perspective on alignment or lack thereof. There are excellent examples where economic, education, human service, and workforce operators connect and align within a region, yet many times individuals and

businesses feel like they are required to talk to several disconnected systems to package a set of services to meet their needs.

Federal and State Planning Processes

The Workforce Skills Cabinet developed an agenda to influence the creation of the specific, state required planning processes to align the policies, operations and resources governed by these efforts through a customer perspective. The goal is to build out an integrated, customer–facing system that connects and coordinates across education, workforce and economic development to achieve the best outcomes for individuals and business. The full agenda is in Attachment A. Through the Workforce Investment and Opportunity Act, the "workforce" system is expanded to include the other key federal partners captured under WIOA and housed under the Executive Office of Health and Human Services (EOHHS). The funding and services captured under these partners will therefore be aligned and includes in Step 2 (Chart 20) through the development of the State Workforce Development Plan.

Below is the overview of the intention and design of aligning our federal and state planning processes. Each step informs the next, bringing in the information and analysis acquired from the prior Plans. Ultimately, statewide planning across the three Secretariats will inform the design of regional planning for our key regional partners.

The following sections describe each of the steps below in terms of expected process and initial context points.

STEP 1: Business Lens / Economic Development Planning Process

The Administration will utilize the state required economic development planning process to set the stage for our Statewide Workforce Development WIOA Plan to ensure the vision and goals for the workforce system are aligned with the economic development strategies identified.

The Governor and the Secretary of Housing and Economic Development (EOHED), with the assistance of an Economic Development Planning Council, must develop and implement (1) a written comprehensive economic development policy for the Commonwealth and (2) a strategic plan for implementing the policy.

In addition to gathering input and information through the Workforce Skills Cabinet, the Executive Office of Housing and Economic Development created a formal process to shepherd the development of the Economic Development Plan based on internal and external research and input from a wider audience of stakeholders that took place during the summer and fall of 2015. The research included:

Internal Research

- **Baker–Polito platform**, transition documents, current program, and funding streams, along with a review of national best practices from the National Governors Association and National Conference of State Legislatures

- **Academics** (Michael Porter (Harvard), Barry Bluestone (Northeastern), Alicia Sasser Modestino (Northeastern), Michael Goodman (UMass), Elisabeth Reynolds (MIT), Rappaport Center)
- **Key industry groups** (AIM, Mass. High Tech Council, Mass. Taxpayers Foundation, NAIOP, CNU, Mass. Competitive Partnership, Jobs for Massachusetts)
- **Regional Listening Sessions:** Six teams, led by EOHED senior staff, conducted deep dives on the secretariat's economic development policy areas, identifying opportunities, policy goals, resources, key partners, key questions, and success metrics

Legislative and Municipal Engagement

- EOHED met with 62 lawmakers individually since January
- The Secretary of EOHED visited 85 cities and towns since January, including 24 of 26 Gateway Cities
- EOHED altogether visited 105 unique communities, with a collective population of nearly 4.3 million residents (64% of the state's population), from Great Barrington and Williamstown, to Chatham and Salisbury
- Focus of discussions is on local opportunities, priorities and concerns, EOHED perspectives on local opportunities, and resources to help advance the local agenda

Public Engagement

- Six statewide public listening sessions were held in June
- Eight more were added in response to popular demand to participate
- Sessions provided EOHED staff with direct engagement with over 1,000 stakeholders – residents, elected and municipal officials, business owners, regional agencies, and trade groups
- Feedback from listening sessions has helped shape key priorities and strategy decisions

Themes from the fourteen economic development listening sessions included the following areas, which span across all areas of federal, state, and local government.

DRAFT	STRENGTHS	INHIBITORS FOR GROWTH
INNOVATION	Nationally leading research and development base – per capita and as a share of GDP, more R&D expenditures, and federal funding for R&D, than any other state 2nd in tech patents per capita	Slower–than–average rate of new business formation • Need for systems that bring companies to scale • Need for business mentorship, and small business technical assistance

DRAFT	STRENGTHS	INHIBITORS FOR GROWTH
INNOVATION	Diverse cluster base of employment/ business growth–education, financial services, biopharma, health care delivery, medical devices, technology, insurance, and marketing	
INFRA–STRUCTURE	Site readiness and infrastructure concerns	
INFRA–STRUCTURE	A lack of capacity in local governments and municipal boards	
BUSINESS ENVIRONMENT	Political and fiscal stabilityHigh and growing prosperity statewide – • 5th highest GDP per capita, fifth highest rate of growth in the US	High levels of regional inequality • All regions outside the Boston metro lag US averages in measures of prosperity, private employment, and wages • Berkshire, Bristol, Hampden, Franklin and Worcester Counties have each seen negative job growth since 1998
BUSINESS ENVIRONMENT	Business and land use regulations – volume, complexity, lack of predictability	
CAPITAL AND COSTS	National leader in venture capital investment as a share of GDP Second in VC under management	Businesses struggling to accessearly–stage capital
BUSINESS ENVIRONMENT	Competitive overall tax position – 27th in state and local taxes as a share of GDP	Reputation as high cost state
HOUSING	• Housing affordability: Around Boston, there's limited housing workers can afford, and outside Boston, incomes aren't high enough • A slow and dysfunctional housing production market	
WORKFORCE	The nation's best–educated workforce	Demographic challenges: • An older–than–average workforce, and aging more quickly than the US affecting job creation and municipal financial health • Regional demographic trends – in particular in the western counties and on the Cape • Talent retention is a struggle for communities outside Boston

DRAFT	STRENGTHS	INHIBITORS FOR GROWTH
WORKFORCE	An unmatched knowledge economy—40% of workers employed in the innovation sector	Skill Mismatch • Employers struggling to find skilled workers, in middle–skills positions and in the STEM fields • Demographic churn will exacerbate middle skills mismatch
WORKFORCE	3rd highest average wages statewide in the US, with greater–than–average wage growth	High levels of overall economic inequality – 7th highest Gini coefficient in the US
WORKFORCE	High and growing labor force productivity – 5th highest GDP per	

The analysis and strategies of the Task Force align with WIOA's principal mission to engage and support individual job seekers with barriers by coordinating services across WIOA funding streams. The recommendations include implications for all of the WIOA Core Program Partners and are therefore integrated into the vision, goals and strategies of the statewide Workforce Development Plan.

The Massachusetts Combined WIOA State Plan will impact the overall systems for the partners included in the Plan. The Commonwealth developed the Combined State Plan to include the following partners:

- **The Adult Program (Title I of WIOA),** as part of the Department of Career Services (DCS), Executive Office of Labor and Workforce Development (EOLWD);
- **The Dislocated Worker Program (Title I),** as part of the Department of Career Services (DCS), EOLWD;
- **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.)), as part of DCS, EOLWD;
- **Jobs for Veterans State Grants Program** (Programs authorized under 38, U.S.C. 4100 et. seq.) as part of DCS, EOLWD;
- **The Wagner–Peyser Act Program** (Wagner–Peyser Act, as amended by Title III), as part of DCS, EOLWD; and
- **The Youth Program (Title I),** as part of the Department of Career Services (DCS), EOLWD;
- **The Adult Education and Family Literacy Act Program** (Title II), as part of Adult Community Learning Services (ACLS), Department of Elementary and Secondary Education (DESE) Executive Office of Education (EOE);
- **The Vocational Rehabilitation Program** (Title I of the Rehabilitation Act of 1973, as amended by Title IV), as part of the Massachusetts Rehabilitation Commission (MRC) and Massachusetts Commission for the Blind (MCB), Executive Office of Health and Human Services (EOHHS).
- **Federal–state unemployment compensation program**, as part of the Department of Unemployment Assistance (DUA), EOLWD;

- **Temporary Assistance for Needy Families Program** (42 U.S.C. 601 et seq.) as part of Department of Transitional Assistance (DTA), EOHHS;
- **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))), as part of DTA, EOHHS and
- **Senior Community Service Employment Program** (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)), as part of the Executive Office of Elder Affairs (EOEA).

Step 3: Executive Office of Education (EOE) Higher Education Strategic Planning

The Executive Office of Education, in partnership with the Board of Higher Education, will kick off a new strategic planning process for the 15 community colleges, state universities and UMass system in 2016. The Executive Office intends to build the strategic planning requirements to include key priorities developed through the Workforce Skills Cabinet. Institutions will be expected to utilize the information developed in the State Economic Development Plan and Statewide Workforce Development Plan (required by WIOA) on key industries and high–demand career pathways as a building block for developing curriculum, programming, and capital planning. In addition, EOE will set an expectation to be part of regional planning efforts designed under the Workforce Skills Cabinet (leveraging the WIOA planning requirements).

Step 4: Create and Launch an Integrated Regional Planning Process

The Administration will utilize the required WIOA Regional Planning process to create a new, Integrated Regional Planning Process across the economic, education and workforce Secretariats.

On a regional basis, this process will seek out and scale up regional workforce development models that provide workers with the skills employers demand. The process will ensure that regional employers, educators, and workforce training officials are coordinated in a way that creates strong talent pipelines, for both middle–skilled and highly skilled jobs. Additional detail is described in further sections.

Workforce Development Plan Vision

Vision: All Massachusetts residents will benefit from a seamless system of education and workforce services that supports *career pathways* for individuals and leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy.

To achieve this vision, Massachusetts will engage businesses to understand their needs and develop an integrated education and workforce system that supports career pathways to prepare residents with foundation, technical, professional skills and information and connections to postsecondary education and training. *WIOA partners will work to:*

- **Design career pathways** across partners aligned with business demand
- Improve foundation skills *and* transition to postsecondary education and training for individuals with barriers to employment

- **Assist low–income individuals and families** to achieve economic self–sufficiency through support services, labor–market driven credentialing, and employment
- **Meet the needs of job seekers and businesses** who engage in the public workforce system (including partner programs)

The concept for the Vision is a departure over prior workforce development planning frameworks for federal programs in Massachusetts. Over the span of the Workforce Investment Act (WIA), the Commonwealth continued to oversee and operate federal programs separately within the agency most directly tied to the federal funding partner. The WIOA partners are embarking on a new concept to organize resources (staff, supports etc.) around key job seeker populations and business development using a "pathways" models that will encourage separate agencies to wrap resources, staff and supports around the customer base.

The term "pathway" is utilized in many policy debates and program operations. Through the WIOA Planning Process, stakeholders worked through the idea of creating pathways to organize services (not just sector initiatives) similar to the generalized model in Chart 25 developed by CLASP. The Steering Committee has worked with stakeholders to create "service flow charts" for specific populations (including but NOT limited to youth, low–skilled (including Title II), low–income (including TANF and SNAP), individuals with disabilities (including Vocational Rehabilitation), older workers (including SCSEP), homeless, veterans, etc.). As described under further sections and in the draft statewide Memorandum of Understanding (MOU), state partners will work with representatives in local areas to define and build out similar pathways appropriate to regions.

See the MA State Plan posted at www.mass.gov/massworkforce/state–plan for CLASP graphic depicting the "Three Core Features of a Career Pathway"

The concept of organizing public services along a pathway continuum requires a new level of communication, referrals, staff cross–training, information technology tools to improve coordination, and overall focus on using data and information to track an individual's progress into other programs not administered by the organization that was the first point of contact for a participant (student, consumer, job seeker, client etc.). In addition, the ability to ensure that an individual moves into a next step implies that while individuals are engaged more strategically to produce stronger education/job/wage outcomes, less individuals will be served collectively.

Aligning services for individuals to ensure access to career pathway supports limits the concept of "universal access" or open enrollment to ensure that resources are prioritized or reserved for individuals referred in from other support services. For example, students who achieve a high school equivalency credential through Title II and need to transition to skill training and certification to achieve employment may be prioritized for an ITA through a Career Center thus limiting the pool of ITAs for the general OSCC population. Or, job seekers working with the OSCC who are focused on employment and develop a Career Action Plan that identifies a need for Title II adult basic education's ESOL support may be prioritized for enrollment in programs (currently faced with existing wait lists) based on the agreement between programs to prioritize career pathway development and employment in their region.

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.

State partners will work with regional partners to implement the following strategies in pursuit of the goals to achieve our vision for the workforce system. In addition, the WIOA Steering Committee developed a statewide Memorandum of Understanding (MOU) (Attachment C-1) that outlines all of the partners' commitments to implementing the strategies to achieve the goals.

Goal I: Align economic, workforce, and education systems to coordinate systems based on skill needs in regions.

Strategy: Create a new, integrated Regional Planning process (to be named) across the economic, education, and workforce Secretariats.

New regional planning structure based on an aligned regional map between workforce areas, economic development, and education regions

The 16 Workforce Investment Areas remain under WIOA, however the new regional planning process will reorganize higher-level activities (*e.g. data analysis, strategic planning, service mapping etc.*) into the newly designated structure.

Required coordinated teams led by Workforce Boards, Community Colleges and Vocational Technical Schools, Economic Development with partners etc.

The Governor has designated a new set of regional boundaries that "roll up" existing workforce development areas into a smaller set of regions. The new configuration organizes the 16 Workforce Investment Areas into 7 regions.

[See the MA State Plan posted at www.mass.gov/massworkforce/state-plan to view the regional designation].

The purpose of the regional planning under the Workforce Skills Cabinet and WIOA is to use the same regional boundaries between economic development, workforce, education and key partners. Each region will be asked to identify business demand for skills, create regional strategies, and align existing resources to this process. The goal is to ensure that regional employers, educators, and workforce training officials are coordinated in a way that creates strong talent pipelines, for both middle-skilled and highly skilled jobs. Integrated Regional Planning will support the development of cross-secretariat partnerships formed to support sector initiatives/career pathway initiatives that includes education and training, credential attainment, work-based learning (OJTs or apprenticeship), etc. A Workforce Development Board(s) will convene regional leaders in partnership with education and economic development partners to coordinate strategic activities and performance metrics. Greater detail and guidance for regional planning will be developed in the Spring of 2016 based upon the Governor's input, stakeholders and the Workforce Skills Cabinet leadership.

Goal II: Increase talent recruitment and hiring for business partners through business outreach, candidate referrals, and education and training activities that match business need.

Strategies:

1. *Re-design of business services model* at One-Stop Career Centers (Demand-driven 2.0 Model)

EOLWD to create better branding/promotion of the services afforded by One-Stop Career Centers and to identify existing online portals that can be leveraged by employers and job seekers to facilitate matching.

EOLWD to develop a consistent and reliable INTERNAL employer-engagement process model(across all OSCCs) to be executed by all career centers and to be used to develop meaningful partnerships with hiring managers/human resources personnel of local area employers to be responsive to short- and long-term workforce needs (Attachment C-8). The Commonwealth will review and utilize the change in staffing models and best practices used in states like Ohio. Demand Driven 2.0 will build upon the existing business strategies developed in One-Stop Career Centers and through Workforce Development Board strategies such as industry recruitment and hiring, industry briefings, sector partnerships, and other models.

EOLWD to create and implement regular professional development opportunities for career center staff to ensure that their knowledge and expertise is current and consistent with the specific opportunities and needs within the industries of their region.

Develop and implement statewide performance measures for business customers and include in statewide "dashboard" for state and regional partners. EOLWD will work with the WIOA

Partners to continue to refine and implement performance metrics for business customers. (The WIOA Performance Sub-Group and Business Services Sub-Group will continue to refine the Dashboard, including a balance of measures that focus on quantity, relationship development, and hire rates. Initial state-designed measures are described in Assessment and Performance section below, including template developed by the Performance Sub-Group.)

2. C*oordinate business outreach* and recruitment across economic development, workforce and education partners (Workforce Skills Cabinet MOU).

The Workforce Skills Cabinet created a signed Memorandum of Understanding (MOU) across the three Secretariats. In addition, the statewide MOU for the WIOA Core Program Partners will ensure that state and regional partners work on the following:

Building stronger communications/collaborations among all Secretariat and agency staff that offer business services.

Establishing a Secretariat liaison or point of contact as a member of the Workforce Skills Cabinet Governor's BizWorks 2.0 Team to meet with businesses and assess talent needs at the STATE level. EOLWD will coordinate and ensure follow up on business leads.

Encouraging regional business services staff to participate in statewide cross-training developed by MassBizWorks on all available business services, resources and partners. This training will allow for a more inclusive connecting of business services across all partners as business services staff are cross trained on all services.

Establish a statewide coordinated strategic marketing plan for businesses located and doing business in Massachusetts (BizWorks has a plan)

Create regional "maps" or service flows for business customers. Utilize the required local WIOA MOU between local area partners, convened by Workforce Development Boards, to align and address business customers. Local area MOUs must contain the following items developed by all of the partners and to be reviewed annually and revised as needed:

- **Utilize "regional" LMI analysis** to develop a local business talent assessment, utilizing regional labor market data, regional economic development agencies, and business intelligence gathered from interactions with core partners.
- **Develop a coordinated, streamlined regional strategy** for business partner outreach and follow up.
- **Utilize MassBizWorks as a starting place** to develop a regional consultation process to coordinate partners, access statewide training for regional business services staff and share information.
- Share feedback directly from businesses that utilize public services (e.g. hiring results.)

Evaluating and utilizing a statewide "tracking" system (e.g. Saleforce or appropriate software) to allow regional staff across Secretariats to:

- Share employer leads, coordinate outreach, reduce the duplication of services, and shorten the follow up response time by an agency.
- Track business outreach and results (hiring), and eliminate the existing confusion to our business customers.
- Promote cross-agency data sharing to track business outcomes and use of business tools (e.g. services offered through WDBs, career centers, DTA, MRC, etc.)

3. Develop new education and training models aligned to business need (WIOA Formula money for sector initiatives, Pay-for-Success Model, Workforce Competitiveness Trust Fund, etc.).

The Massachusetts Workforce Development Board, EOLWD and the Department of Career Services will **encourage Workforce Areas to utilize federal WIOA funding to support sector or career pathway initiatives**, including On-the-Job Training, Apprenticeship, Pay-for-Success models, and other tools on the pathway to postsecondary credentials. These pathway initiatives will leverage business feedback about the skills and credentials required to access opportunities and identify innovative entry points for job seekers with varying degrees of preparation.

Utilize state resources to support sector or career pathway initiatives, including on-ramps to adult education, community colleges, career and technical education, On the Job Training, Apprenticeship and other tools to expand the capacity of regional partnerships to deliver talent to business. Currently, the Workforce Competitiveness Trust Fund is the vehicle for state resources. In addition, this is a recommended strategy to assist individuals with barriers to enter the labor market (see goal below).

Utilize federal and state resources to support job-driven, integrated education and training adult basic education participants including leveraging workforce resources to create these models (e.g. the use of ITAs for Title II participants).

Leverage the Workforce Training Fund for new hires and incumbent worker training.

Goal III: Increase credentialing and job placement outcomes for individuals, including individuals with barriers to employment.

Strategy: Develop and utilize an *integrated jobseeker customer flow* between WIOA Core Program Partners

Build statewide integrated, technology-based intake and case management information system as the main entry portal into the expanded Massachusetts Workforce Development System for all staff and common customers (both job seekers and employers) (Attachment D). Designing and implementing the technological infrastructure to execute a common intake/registration application with real-time triage processes that feature strong skills and transferability assessments, job matching and job referral, common case management and reporting systems across all partners is imperative to our ability to strengthen the consistency and quality of services provided by the system to job seekers and businesses. Massachusetts applied for Workforce Innovation Funding but did not win the award. We will continue to seek additional funding. The goal of working on this with all of the core partners is included in the statewide MOU.

Create regional "career pathways" or customer flows for each customer base across systems (UI Claimants, long-term unemployed, adult education student, TANF/SNAP, vocational rehabilitation clients, veterans, older workers and individuals with additional barriers to employment including CORI, homeless etc.) to align programs and resources that lead to employment outcomes, particularly for those with barriers to employment. The statewide MOU for all of the WIOA Core Program Partners and additional stakeholders outlines models for organizing pathways and opportunities to share systems, staff and resources to build out the model. (Examples of the customer pathway chart are available in Attachments C-3 to C-8 included in the Statewide MOU.)

The 16 regions will develop specific local Memorandum of Understandings that with speak to the implementation of joint service design for priority populations. Service design must include:

- Partners working together on development of One-Stop Career Center operational components such as design of workspace, customer service flow, menu of services, marketing and outreach materials, etc.
- Clear procedures for mutual referrals between partners.
- Maximizing the capacity to share data and information across systems for both sharing of information on individual customers, and tracking the use of partner services by common customers.

WIOA sets very high expectations for all WIOA partners to improve outcomes for business and individuals with barrier to employment within the same levels of resources, or in some cases, less funding and staffing. Workforce Development Boards are centered in the middle of bringing together the diverse interest groups representing the multitude of populations who face barriers to employment to organize new service pathway for each priority population. The first year of the local MOU process will develop baseline models and work to forge relationships across WIOA and non-WIOA partners.

Goal IV: Increase credentialing and job placement outcomes for youth, including youth with barriers to employment.

Strategy: Implement integrated pathways for youth across WIOA Core Program Partners

Create regional "youth pathways" for youth that leads to postsecondary education and/or employment outcomes. The statewide MOU for all of the WIOA Core Program Partners and additional stakeholders outlines models for organizing pathways and opportunities to share systems, staff and resources to build out the model. A model youth employment pathway is in AttachmentC-2. The MOU is in Attachment C-1.

An example of integrated pathways for youth includes working across WIOA Core Program Partners to provide in-school and out-of-school youth with disabilities access to activities that support them as they transition into postsecondary education, training, and integrated employment opportunities. Local Workforce Boards competitively select youth program vendors to provide the required 14 WIOA program service elements. One of the required service elements, "Activities that Help Youth Transition to Postsecondary Education and Training" must be made available based on a youth's individual assessment of service needs. Through the youth program vendors and One-

Stop Career Centers, in-school and out-of-school youth with disabilities who are transitioning into the world of work have access to a wide array of training and education programs offered in an integrated setting. The training and education programs offered include career exploration, counseling on enrollment in comprehensive transition or post-secondary educational program, work readiness training, work-based learning opportunities, and occupational skills training which are designed to lead to increased credentialing and job placement outcomes.

To support Local Workforce Boards in leveraging resources for youth with disabilities who are transitioning into postsecondary education, training, and integrated employment opportunities, the Department of Career Services will work collaboratively with the Massachusetts Rehabilitation Commission (MRC) and the Massachusetts Commission for the Blind (MCB) to:

• Ensure a mutual awareness of available vocational rehabilitation and youth program services.

• Share information about best practices in assisting youth with disabilities, as well as provide access to accommodations and supports available through vocational rehabilitation to assist youth with disabilities.

• Develop a new referral process between the Title I Youth Program and the Title IV Vocational Rehabilitation.

• Identify appropriate roles of One-Stop Career Center staff, youth services provider staff, and vocational rehabilitation staff to support career pathways for youth with disabilities that lead to integrated competitive education.

Through the Department of Elementary and Secondary Education's Connecting Activities initiative, administered by the 16 Workforce Development Boards, in-school youth have access to structured work-based learning experiences that support both academic and employability skill attainment. The Massachusetts Work-Based Learning Plan is an assessment tool designed to facilitate and evaluate work-based learning experiences for in-school youth who participate in Connecting Activities, as well as a number of additional youth programs, such as YouthWorks.

Local Workforce Boards are encouraged to leverage all of the elements of the Connecting Activities initiative in effect locally, including policies and programmatic supports for the full range of career development education (career awareness, exploration and immersion), as well as the Massachusetts Work-Based Learning plan, to support work-based learning for in-school and out-of-school youth with disabilities enrolled in youth program vendors who are transitioning to postsecondary education, training, and integrated employment opportunities.

The Commonwealth also intends to explore the use of Pay-for-Performance contract models that have the potential to improve long term outcomes for disconnected youth as a strategy for increasing credentialing and job placement outcomes.

Goal V: To develop a state of the art Labor Market and Workforce Information (LMWI) system by which EOLWD can deliver timely and accurate information to consumers, and from which a customer service focus ensures that workforce partners, economists, researchers, businesses and

job seekers have the support they require in accessing labor market and workforce data, not just within Massachusetts but nationwide.

Strategies:

Conduct a redesign of the EOLWD Labor Market Information website to provide greater access to both comprehensive and easily applicable information for LMWI stakeholders.

- Conduct a detailed assessment and site map of data assets available on the current website
- Employ data visualization software that will enable EOLWD to make previously complex and underutilized data sets easier and quicker to access.
- Engage state LMWI operators and providers to ensure any implemented changes meet the needs of users.

Support and educate workforce development boards and other workforce partners in their ability to provide labor market and workforce information (LMWI) to their customers

- Establish and deliver training curriculum surrounding the access and practical application of LMWI.
- Expand the scope of training to include webinar and video conferencing to deliver content on a regional basis.
- Develop a process whereby users with ad hoc data LMWI requests that can't be addressed through currently existing tools can have their needs addressed quickly.

Establish a reliable LMWI product line of data resources that addresses stakeholder needs.

- Develop LMWI reports and briefings that illustrate the updates, changes and trends regarding the Labor Force, Jobs and Unemployment Insurance Claimant numbers and demographic both regionally and statewide.
- Establish and publish a set schedule of release dates of LMWI products.

Expand access to and develop additional sources of informative LMWI and economic data.

- Introduce and provide assistance with current LMWI tools produced by the U.S. Census as part of the Local Employment Dynamics Partnership as well as new tools as they become available.
- Develop aggregate skills data of the Massachusetts labor force through the WorkKeys® assessment as part of EOLWD's Career Readiness Initiative.

Engage LMWI partners in forward thinking discussions and innovative project collaborations

- Convene a stakeholder group comprised of economists, researchers and business leaders as well as workforce development professionals that would meet on a regular basis to address the more intrinsic LMWI issues. These issues could include but not be limited to, the increasing effect of automation on certain occupations, the growing instances of micro-job and the "Gig Economy" and strategies to address the labor force shortage in IT related occupations in the Commonwealth.

- Produce policy recommendations, potential LMWI research topics and presentation material.

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.)

See Appendix I.

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 Baker–Polito Administration supports enterprise–wide performance management as a tool for both process and outcome improvement. As such the Administration embraced the new federal Indicators of Performance, as well as the latitude afforded states to create their own distinct indicators stemming from WIOA. A Performance Measurements Workgroup was established as part of the MWIB WIOA Steering Committee structure. The group consisted of internal and external members of the workforce development system and core partners under WIOA.

The Performance Measurements workgroup is currently exploring:

- Data each measure is meant to capture and what it would communicate;
- Available data sources / agency capacity to capture the data;
- Balance between exhaustive list and meaningful list;
- Whether the performance measures will apply to all core WIOA partners
- How the measures would be compared (i.e. by area, statewide, etc.);
- Developing baseline data on program performance;
- Future targets for performance measures.

Federally Required WIOA Measures

The federal indicators of performance focus on employment outcomes in the second and fourth quarter after exit, median earnings in the second quarter after exit, credential attainment, and measurable skill gains for job seekers and adult education participants. For the first time, all partners and their federally funded programs will be measured in the same way for these same outcomes. While they are only a slight departure from the indicators captured and reported on by Workforce Investment Boards and One–Stop Career Centers, they represent a wholesale change for the other core partners. Moreover, a penalty could be applied to WIOA discretionary funds for repeated missed performance targets, which may create a new sense of shared accountability for shared customers and their outcomes. There is also a new federal indicator focused on "effectiveness in service to employers" that all partners would be measured on and required to report. As of the writing of this draft, this indicator is still under development with our federal regulators.

REQUIRED FEDERAL MEASURES (WIOA Legislation)

Included in the Measures:

All measures applied to participants in each WIOA funding stream (reports separate by agency)

- All One–Stop Career Center Customers (Specific One–Stop Career Center report or statewide rollup)

- Title II participants (*adult education*)
- Title IV vocational rehabilitation participants (*MRC and MCB*)

Targets:

- Federal Government sets target for federal measures
- First report period begins July 1, 2016
- The first year will serve as the baseline period as it is the first time any partner will be collecting this information in this format

Federal Measures:

- Employed 2nd Quarter after Exit (federal measure)
- Employed 4th Quarter after Exit (federal measure)
- Median Earnings 2nd Quarter After Exit (federal measure)
- Credential Attainment Rate (federal measure)
- Measureable Skill Gains (based on training/education gains) – (federal measure)
- Effectiveness in Serving Employers – (federal measure to be defined)

Given the significant change to performance measurement for several of the WIOA partners, there were efforts internal to each system (adult education, vocational rehabilitation, etc.) to better understand the impact of the required WIOA measures for each unique system as well. For example, in addition to the cross–agency WIOA Workgroup on Performance Measurement, the Adult and Community Learning Services (ACLS) department in Massachusetts created a stakeholder engagement process for providers in the field to better understand the implications and impact of the federal measures on adult education.

The WIOA performance measures provide one strategy for assessing the quality of the adult literacy services provided. In FY16, ACLS convened a WIOA Performance Measures Task Force comprised of five Massachusetts adult education directors and ACLS staff to:

- Review the WIOA performance measures and program performance data;
- Decide whether the federal measures should be part of a new state performance accountability system for awarding past performance points to local programs;
- Decide whether additional measures should be added;
- Weight and rank the measures;
- Address implications; and
- Create a plan for rolling out the new system including a performance measures pilot for FY17.

ACLS continues to integrate the feedback and work with the adult education field into the cross–agency Performance Workgroup and the WIOA Steering Committee.

State–Designed Performance Measures

Although these federal indicators represent a significant step toward systems alignment and shared accountability, the various workgroups and the Steering Committee felt it was important to

consider additional indicators that would specifically speak to our achievement of the goals previously outlined.

As such, the Steering Committee and Performance Measurements Workgroup developed measurement concepts that reflect the vision, goals and strategies outlined in prior sections. In particular, the Performance Measurements Workgroup identified gaps in the federal measures related to the results for specific job seeker populations, business customers and the long–term impact of education, training and supports on an individual's career pathway toward self–sustaining wages.

Currently, the Performance Measurements Workgroup is reviewing the following types of state–designed measures.

RESULTS FOR KEY POPULATIONS

A significant focus for WIOA and for the Baker Administration is to ensure that individuals who face barriers to employment benefit from public education, training and workforce programs in order to shift patterns of chronic unemployment for specific demographic populations and job seekers. While the WIOA federal measures look at job placement, states are not required to further review job placement data by population type. Massachusetts is considering state–designed measures that track job placement and results for specific populations WITHIN the required, federal data sets for each funding stream. Currently, the group is reviewing the proposed measures as shown in the table below.

Evaluation Question: Are programs achieving results for program participants?

Results for Key Populations State Designed Job Seeker Performance Measures

Vocational Rehabilitation Participants(WIOA Title IV)

	All Career Center Participants(WIOA Title I, III, Vets, TRADE, etc.)	Adult Education Participants(WIOA Title II)	
Number and Percent of customers enrolled in training and employed in a training related job 2nd Quarter After Exit	Only Career Center Customers enrolled in a training program.	Only Title II individuals enrolled in a training program.	Only Title IV individuals enrolled in a training program.
Number and Percent of Veterans Employed 2nd Quarter After Exit	Only Career Center Customers who self–declare Veterans status included in measure.	Only Title II individuals who self–declare Veterans status included in measure.	Only Title IV individuals who self–declare Veterans status included in measure.

	All Career Center Participants(WIOA Title I, III, Vets, TRADE, etc.)	Adult Education Participants(WIOA Title II)	
Number and Percent of Individuals with Language Barriers at Registration Employed 2nd Quarter After Exit	Only Career Center Customers who self–declare ESOL status included in measure.	Title II individuals with ESOL status included in measure.	Only Title IV individuals who self–declare ESOL status included in measure.
Number and Percent of Individuals without High School Equivalency at enrollment that obtained a HS equivalency and who are Employed at 2nd Quarter After Exit	All Career Center Participants without HS Equivalency at intake (WIOA Title I, III, Vets, TRADE, etc.)	All Adult Education Participants (WIOA Title II)	All Vocational Rehabilitation Participants without HS Equivalency at intake (WIOA Title IV)
Number and Percent of Individuals with a Disability Employed 2nd Quarter After Exit	Only Career Center Customers who self–declare included in measure.	Only Title II individuals who self–declare included in measure.	Only Title IV individuals who self–declare included in measure.
Number and Percent of Individuals receiving TANF or SNAP Employed at 2nd Quarter After Exit	All Career Center Participants receiving TANF or SNAP required to enroll in job assistance services (WIOA Title I, III, Vets, TRADE, etc.)	All Adult Education Participants receiving TANF or SNAP (WIOA Title II)	All Vocational Rehabilitation Participants receiving TANF or SNAP (WIOA Title IV)

CAREER PATHWAY RESULTS FOR INDIVIDUALS

The individual completion or job placement results for individuals by funding stream stop short of providing information on how a person progresses across systems or resources as they (hopefully) make progress along a career pathway. As the Commonwealth builds new IT systems to track cross–agency referrals and to match individuals to wage record data from different systems, the state will move toward more in–depth analysis of the impact of education, training and support systems on an individual's long–term success.

A handful of leading states have developed longitudinal data systems and practices of answering important questions about public services and investments. These states work with the Workforce Data Quality Campaign. The Campaign has identified a group of 10 states working together as "The Alliance for Quality Career Pathways" (Arkansas, California, Illinois, Kentucky, Massachusetts, Minnesota, Oregon, Virginia, Washington and Wisconsin) that is developing shared metrics for career pathway systems. Career pathways reorient existing education and workforce services into a structure that focuses on the workforce needs of employers and on the education and training

needs of individuals as they pursue their career paths. The effort is led by the ten states and facilitated by the Center for Law and Social Policy (CLASP), a WDQC national partner. States are currently testing a set of metrics that include educational outcomes (e.g. credit accumulation, certificate attainment) and labor market outcomes (e.g. employment placement rates, initial earnings). These metrics would give multiple programs shared outcome measures and similar definitions, such as measuring "initial earnings" as the median earnings in the second and third quarters after career pathway exit. Several of the states are integrating the metrics testing into state data system development projects.

Massachusetts leadership across the Administration, the State Workforce Development Board, WIOA Partners, the WIOA Steering Committee, and stakeholders hopes to learn from how these states have developed IT systems across existing infrastructure and the key drivers to building this capacity.

The Steering Committee has discussed ideas to follow individuals (not funding streams) across programs/services to look at longer term impact. The concepts and vision to develop career pathways measures in Massachusetts are captured below.

Evaluation Question: Are programs assisting individuals to move along a career pathway toward self–sustaining wages?

Included in the Measures:

- Cohort–based, longitudinal report.
- Build cohort based upon individuals found across data systems with from agency referrals.

Targets:

- Target goals to be determined.
- These measures will entail additional IT system development and costs to collect data for the measures.

Career Pathway Results Measures (State Designed):

- Track an <u>individual</u> across programs over multiple years:
- Report on pattern of "bundled" services or service use across Career Centers, adult education, vocational rehab, higher education etc. service
- Number and percentage of individuals who complete a Career Action Plan (CAP) with assessments (education, TORQ, CRI, inventory)

BUSINESS CUSTOMER RESULTS

The required WIOA measure to look at the "effectiveness in service to employers" needs additional definition and refinement. The Steering Committee, Performance Workforce and Business Strategies Workgroups also identified a need to greatly improve the data collection and ability to report out on results for business customers, in particular those business customers working with One–Stop Career Centers. The WIOA partners outside of the One–Stop Career Center system do not

serve the same volume of business customers and therefore need to continue to identify ways in which these types of measures would be meaningful and doable.

Evaluation Question: Are programs meeting the needs of Massachusetts' businesses?

Included in Measures:

- Business customers of One–Stop Career Centers (OSCC)

Target:

- Create a Business Engagement/OSCC Dashboard; these measures will entail additional IT systems development and costs to collect data for the measures.

Business Service Measures – State Designed(Measures reported by Career Centers)
Number of businesses served
Number of new businesses served
Number of repeat businesses served
Number of businesses served by industry type
Number of Business Visits Weekly by OSCC Business Service Representatives
Number (and percent) of businesses registered with OSCC (JobQuest) who hire customers
Number of hires per industry
Retention rate for individuals hired by businesses registered with OSCC (JobQuest) who hire customers

WAGE RECORD DATA

All of the federal and proposed state–designed measures require broad access to wage record data. One critical step to implementing WIOA performance measurements is the ability to share individual–level information on the employment status and earnings of participants in our newly expanded workforce system. The Administration has filed legislation to facilitate sharing of information in the new ways that WIOA requires with expected passaged prior to July 1, 2016.

- Individual wage record data (collected by DUA) is needed by all partner agencies (DCS, ACLS, MRC and MCB) for the required federal reports on the new federal measures.
- This type of information will also be needed for the state–designed measures outlined in the State Plan, which will focus on longitudinal, individual achievement over time.

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 response to this section is included in the response to the "Goals" section (number 2) above.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2).

The Commonwealth expands on the response provided in the Goals section, as follows: Alignment with Career and Technical Education and Apprenticeship opportunities as well as other education programs and activities occurs at the local level in each region. The sixteen workforce boards, through their required Strategic Plans, develop strategies and actions to promote the alignment of all programs with WIOA-funded programs. Additionally, sector strategies and youth initiatives promote integration of services across programs.

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 Baker–Polito administration utilized WIOA implementation as an opportunity to reconstruct and reinvigorate the state workforce board. In July 2015, Governor Baker filed legislation to transform the previous Massachusetts Workforce Investment Board (MWIB) from a 65–member board, to a leaner 33–member Massachusetts Workforce Development Board (MWDB) to serve as the primary vehicle to provide the policy and operational framework for the state workforce development system.

The state statute establishing the new MWDB (Chapter 142 of the Acts of 2015) was enacted on December 2, 2015 and imbued the Board with carrying out the responsibilities required of WIOA; providing assessments and recommendations to the governor, the Workforce Skills Cabinet, local workforce boards, and other entities as needed regarding the effectiveness of the public workforce development system in the Commonwealth; and promoting innovative and performance–driven models for workforce development.

The MWDB first met on February 25, 2016 and will meet quarterly. In that first meeting, the MWDB established by–laws and discussed a committee structure to address the primary functions of the Board and bring forth policy and programmatic issues for full–Board consideration and voting. The Board will meet again in May 2016 to vote and finalize its committees for FY 2017.

Additionally, during the Board's first meeting the Board also voted to authorize the Department of Career Services (DCS), the designated State Workforce Agency, to promulgate and carryout workforce policies that are operational in nature ensuring there is policy guidance to inform the Massachusetts Workforce Development System's programmatic operations. This allows the Board to focus on high–level strategic priorities that foster continuous improvement, align programs and activities, and martial key stakeholders and partners to implement those strategies.

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.

The state strategies in the Combined Plan flow from the five key goals identified for the Commonwealth. State partners will work with regional partners to implement the following goals and strategies in pursuit to achieve the established vision for the workforce system. The WIOA Steering Committee developed a statewide Memorandum of Understanding (MOU) (Attachment C–1) to outline the partners' commitment to implement the goals and strategies in Section II. Many of the specific details on partnerships with business, integrated serviced delivery, and evaluation of results across the Core Program Activities are including in Section III, Implementing State Strategies and Alignment with Activities outside the Plan, which were combined in a unified response as follows.

The state strategies in the Combined Plan flow from the five key goals identified for the Commonwealth. State partners will work with regional partners to implement the following goals and strategies in pursuit to achieve the established vision for the workforce system. The WIOA Steering Committee developed a statewide Memorandum of Understanding (MOU) (Attachment C–1) to outline the partners' commitment to implement the goals and strategies in Section II. Many of the specific details on partnerships with business, integrated serviced delivery, and evaluation of results across the Core Program Activities are including in Section III, Implementing State Strategies and Alignment with Activities outside the Plan, which were combined in a unified response as follows.

Implementation of State Strategies – Core Program Activities and Alignment across WIOA activities
The Steering Committee worked to develop the vision, goals and strategies included in Section II. Through the Governor, State Workforce Board and Steering Committee, we will implement major state strategies using the state's oversight, policy and performance roles embedded in the lead state agencies for Core Program Activities. Our goal is to use the following processes to drive change across systems:

– A state–level Memorandum of Understanding (MOU)

– 16 Local MOUs – Regional Planning

– Workforce Board Certification

– One–Stop Standards and Competitive Selection

– Performance analysis (federal WIOA measures and state–designed measures)

In addition to executing a state–level MOU and 16 local MOUs as required by WIOA, the Commonwealth will utilize the state's authority to develop Workforce Board Certification standards, statewide One–Stop Career Center standards, competitive selection process for OSCC operators and the use of federal and state–designed performance measures to push forward the vision for the system and implement the state strategies described in Section II (c) above. These processes will include the participation of all the WIOA Core Program Partners in review and design in order to align WIOA activities across programs and with activities outside of the Plan.

State Level Memorandum of Understanding Massachusetts intends to fully implement the key tenants of WIOA to develop robust partnerships across programs and services. Key changes from WIA to WIOA focus on improving outcomes by organizing resources, services, and structures through a "customer" lens rather than the bureaucratic administration of federal or state resources. New partnerships and cross–system operations across Career Centers, Adult Education, Vocational Rehabilitation, and TANF/SNAP established through a statewide Memorandum of Understanding (MOU) based on the state goals and strategies in the Plan. The State MOU (attachment C–1) was designed to outline areas of agreement that help the Commonwealth implement the significant changes in WIOA including:

• Articulate a coordinated vision for organizing the broadly defined federally–funded public workforce system • Develop career pathways for business and individuals with barriers to employment or "shared" customers across WIOA programs • Define shared WIOA infrastructure costs between WIOA programs and Career Centers • Guide the establishment of 16 local area MOUs and agreements (which will require the design of partnerships and service delivery systems through the WIOA Core Program partners at the local level)

The development of the state MOU will help define the ways partners can work together on all of these changes. In particular, a renewed commitment to state–level partnerships will assist state and local partners in meeting the needs of both business customers and the workforce.

Statewide One–Stop Career Center Standards WIOA 20 CFR §678.800 requires that the state's network of One–Stop Career Centers be certified by the Local Boards. WIOA further mandates that the State Board, in consultation with chief elected officials and Local Boards, must establish objective criteria and procedures that Local Boards must use when certifying career centers. These new career center standards will further and be consistent with the Governor's and State Board's guidelines, guidance and vision. The new criteria must evaluate the One–Stop Career Center delivery system for effectiveness in addressing business and job seeker needs in the enhanced Massachusetts demand–driven workforce delivery system. In order to create and implement this new certification process, the State Board created the Career Center Standards and Process Workgroup (CCS&P). The CCS&P Workgroup is made up of a statewide diverse group of workforce professionals from WIOA, our workforce partners and business representatives. The group meets regularly and is in the process of rolling out Massachusetts' inaugural statewide career center standards in the areas of cost effectiveness, integrated services, accessibility, effective leadership, performance and responsiveness to the demand driven model. The standards will exceed WIOA mandates and will become a core driver of change through the WIOA–mandated career center

competitive process. The current draft of One–Stop Career Center Standards is included as Attachment G.

Workforce Development Board Certification Responding to the requirements of WIOA (20 CFR Part 679 Subpart C), the Commonwealth is enhancing an existing strategy to strengthen the capacity of local Workforce Boards by examining the challenges posed by the changing economic landscape and the needs of industry and businesses.

The Massachusetts biennial workforce board certification process for FY14 augmented the standards required for certification, the genesis of which was the 2008 "High Performing Workforce Board" initiative. Massachusetts' enhanced board certification standards are intended to move the Commonwealth's workforce boards further along a continuum toward performance excellence.

Strengthened by WIOA mandates, Massachusetts continues to drive improvements for the workforce system through continued high standards of excellence for Workforce Boards. The Workforce Development Board Certification (WDB) Workgroup, a sub–committee of the WIOA Jobseeker and Employer Steering Committee, has designed standards for Workforce Board certification pursuant to new WIOA responsibilities and these will be incorporated into enhanced local and regional delivery and project models and related policies.

Workforce Board Certification will establish new criteria that promote the articulation of regional workforce development activities to optimize services to residents, businesses and partners. The measurable standards that result will flip existing models and produce evidence that the work of the boards is both demand–driven and aligned with workforce resources through regional markets. Notes and materials from the WDB Certification Workgroup are located at: http://www.mass.gov/massworkforce/wioasubcommittees/workforce–development–board–wdb–certification/

In addition to the components required by past certifications (Strategic Plan, Scorecard/Dashboard, Revenue Plan) , Massachusetts Workforce Boards will be required to meet criteria related to the new WIOA Standards: (1) OSCC Operator Competitive Selection, (2) OSCC Oversight, (3) Youth Services Strategy, (4)Youth Services Oversight, (5) Demand–Driven Strategies and Solutions and (6) Partnerships/MOUs. The draft Workforce Development Board Certification Standards can be found in Attachment F.

As the Commonwealth implements the state strategies reviewed above, we expect to achieve changes across the One–Stop Career Center system.

KEY GOALS, OUTCOMES and WIOA STRATEGIES CHART The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/ Key Goals Align Economic, Education and Workforce Systems to Labor Market OSCC Priority of Services for Individuals with Barriers to Employment (Disabilities, Low–Skilled, Low–Income, TANF/SNAP, Veterans, etc.) Redesign and Coordinate Business Services (Demand–Driven 2.0) Expected Outcomes Resources and career pathways organized to economic need • Create deeper service pathways at OSCCs • Increase credentialing

and job placement rates Increase outcomes for businesses Strategy (WIOA Lever / Tool for Change) Regional Planning (Workforce Skills Cabinet Initiative leveraging WIOA requirement for Regional Planning) Reductions in OSCC Customer Volume (improving economy) • Declining Career Center traffic allows OSCCs to shift staff duties Redesign job seeker customer model for Career Centers statewide (through implementation of new Statewide OSCC Standards/ Competitive Selection Process) • Reorganize job seeker staff into "job ready" and "skill building" teams • Utilize assessment tools to segment customers into "job ready" and "skill development" service flows: • Individuals with barriers to employment work with "skill building" teams to be provided individualized case managed services • Individuals who are "job–ready" work with appropriate staff through self–directed and online tools to develop job profile and improve match to available jobs • Require OSCCs to incorporate new service design for individuals with barriers to employment in OSCC Standards / Competitive Selection Process to implement WIOA Priority of Service Requirement "Pathway mapping" across systems/ share resources (State/Local MOU requirement) • Leverage resources/ staffing from WIOA Core Program staff on "skill building" teams at OSCCs for customers with barriers to employment Tracking outcomes for individuals with barriers (state–designed performance dashboard) Redesign business customer model for Career Centers statewide (through implementation of new Statewide OSCC Standards/ Competitive Selection Process – TBD after federal regulations Spring 2016) • Coordinate staff development across core and partner agencies Tracking outcomes for business (state–designed performance dashboard)

MRC Vocational Rehabilitation and its Core Workforce partners developed a Memorandum of Understanding (MOU) for each of the 16 Workforce Investment Board (WIB) areas in the Commonwealth. The MOUs outline the activities that will be aligned across the partnership. These activities include but are not limited to: pre-employment vocational services, post-secondary education services, Adult Basic Education (ABE), One-Stop Career Center services, cross-training of staff, consultation on accessibility issues, sharing employer and labor market needs and information in specific geographic areas across the state, among others. The Commonwealth will establish a common client ID numbering system to share information and referrals between partners regarding common consumers. The MOUs address each region's infrastructure needs to operate successfully and ensure alignment.

The Commissioner of MRC is a member of the Statewide Workforce Investment Board (SWIB). In addition, MRC has staff members assigned to each WIB and career centers across the Commonwealth and plays key roles in the WIOA Steering Committee and associated WIOA planning committees including the Common Measures Committee, Policy and Youth Workgroup, ensuring the needs of individuals with disabilities are blended and braided into all workforce system activities.

The MRC's job placement specialists and other assigned MRC staff work closely with local career centers and core partners to provide high quality vocational rehabilitation services to persons with disabilities seeking expanded employment opportunities and to assist the career centers and other partners to better meet the needs of individuals with disabilities. MRC provides training, including disability sensitivity training, accessibility, and information and referrals for career center and partners.

MCB has staff members assigned to each WIB and career center across the Commonwealth and plays key roles in the WIOA Steering Committee and associated WIOA planning committees including the Common Measures Committee, Policy and Youth Workgroup, ensuring the needs of individuals with visual disabilities are blended and braided into all workforce system activities.

The MCB's employment specialists and other vocational rehabilitation counselors work closely with local career centers and core partners to provide high quality vocational rehabilitation services to persons with visual disabilities seeking expanded employment opportunities and to assist the career centers and other partners to better meet the needs of individuals with visual disabilities. MCB provides consultation on accessibility and training, including disability sensitivity training, accessibility, and information and referrals for career center and partners.

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.

Response is included in Section A.

In addition to the response included in Section A., the Commonwealth integrates information on how the workforce system will align with education programs and other activities through the Vision, Goals and strategies section.

Alignment with Career and Vocational Technical Education (CVTE) and Apprenticeship opportunities as well as other education programs and activities occurs at the local level in each region. The sixteen workforce boards, through their Board membership participation and required Strategic Plans develop strategies and actions to promote the alignment of all programs with WIOA-funded programs. Additionally, sector strategies and youth initiatives promote integration of services across programs.

At the state level, the Executive Office of Housing and Economic Development worked on a new economic development plan that focused on a high priority for aligned education and workforce activity. The WIOA state plan reflects these strategies and now informs new strategic planning for higher education for capital planning. This will lead to a new regional planning process established by the Secretaries of Education, Workforce and Economic Development, which will require the participation of CVTE and public higher education as well. The state plan also articulates the new the state-level requirements for each local umbrella WIOA MOU process. That process will require CVTE, community college and other partners to be part of the planning team. The process will energize these collaborations and Partners engage in designing new customer flow strategies for shared customers between workforce, education and other partners. In addition, the Commonwealth developed new state policies over the last 12 months to support On-the-Job Training and the expansion of apprenticeship to non-traditional occupations.

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 Workforce Development Boards and One–Stop Career Centers and the Core Partner Programs will continue to provide services to job seekers, consumers, participants, students based on the mission and directives of the existing resources and resulting service systems. Through the WIOA State Plan, these partners will work together to leverage relationships with the business community and to develop a coordinated approach to outreach and service delivery. Most importantly, connecting outreach activities to job placement across the partners is a significant task for a truly "integrated" system.

In addition, the new law created enhanced "priority of service" requirements to ensure that individuals with barriers (including individuals who are low–income, have limited skills, are recipients of public assistance, homeless, have a disability, limited English, age barriers or face other barriers to employment) are able to access critical employment and training services through the One–Stop Career Center system. In order to shift One–Stop Career Center practices to develop a priority of service, all Core WIOA Program Partners and other broader workforce partners must work together with One–Stop Career Centers to:

• Build out "pathway maps" or customer–centered design models for specific populations for "shared" customers between partner programs to create a clear understanding of how multiple providers, services and resources should support an individual person or business;

• Redesign the OSCC customer Flow and service practices to prioritize individuals with barriers and work across partner agencies;

• Utilize robust technology tools to scale–up practices and provide more significant supports for individuals with barriers to employment, including basic skill assessment, remediation, and career development tools;

• Sponsor cross–training for staff across partner agencies (Statewide MOU) to understand the needs of populations and available resources to make referrals and customize services based on customer need; and,

• Track and evaluate the outcomes for individuals who face arriers to employment (see federal WIOA measures and state–designed measures in Section II).

Individuals with barriers to employment including individuals in section II(a)(1)(B) will continue to utilize the federal and state resources designed for each population. These programs and services are described in Section II. Under WIOA, Massachusetts will look to redesign the connections between these federal and state resources focused on populations. This work is a key

focus for new work across the partners. Three of the strategies above are described in further detail.

1) Pathway Mapping – Customer–Centered Design The term "pathway" is utilized in many policy debates and program operations. Through the WIOA Planning Process, stakeholders worked through the idea of creating pathways to organize services (not just sector initiatives) similar to the generalized model in Chart 25 developed by CLASP. The Steering Committee has worked with stakeholders to create "service flow charts" for specific populations (including but NOT limited to youth, low–skilled (including Title II), low–income (including TANF and SNAP), individuals with disabilities (including Vocational Rehabilitation), older workers (including SCSEP), homeless, veterans, etc.). As described under further sections and in the draft statewide Memorandum of Understanding (MOU), state partners will work with representatives in local areas to define and build out similar pathways appropriate to regions.

The concept of organizing public services along a pathway continuum requires a new level of communication, referrals, staff cross–training, information technology tools to improve coordination, and overall focus on using data and information to track an individual's progress into other programs not administered by the organization that was the first point of contact for a participant (student, consumer, job seeker, client etc.). In addition, the ability to ensure that an individual moves into a next step implies that while individuals are engaged more strategically to produce stronger education/job/wage outcomes, less individuals will be served collectively.

Aligning services for individuals to ensure access to career pathway supports limits the concept of "universal access" or open enrollment to ensure that resources are prioritized or reserved for individuals referred in from other support services. For example, students who achieve a high school equivalency credential through Title II and need to transition to skill training and certification to achieve employment may be prioritized for an ITA through a Career Center thus limiting the pool of ITAs for the general OSCC population. Or, job seekers working with the OSCC who are focused on employment and develop a Career Action Plan that identifies a need for Title II adult basic education's ESOL support may be prioritized for enrollment in programs (currently faced with existing wait lists) based on the agreement between programs to prioritize career pathway development and employment in their region.

When an individual enters a One-Stop Career Center in MA they receive an assessment from OSCC staff, regardless of whether or not they have self-identified as a person with a disability.. OSCC staff serve all individuals to the best of their ability. When customers need services that are not available through the workforce development system there is a referral mechanism in place at each OSCC to immediately connect that customer with VR services. Further work is being done to streamline this process through local MOU discussions. Please refer to customer flow discussion in portal or master document.

Initial "pathway planning" is already taking place across the state in regions out in front of WIOA planning. For example, a pilot project is currently operating between the Fall River Career Centers and local Department of Transitional Assistance offices reflects the type of customer–centered design work that will be expected of regions under WIOA local MOUs. Massachusetts does not require that all TANF and SNAP clients enroll at One–Stop Career Centers due to limited resources at One–Stop Career Centers to provide intensive services or access to training resources through

WIOA. The pilot project set up a new referral process for appropriate TANF clients to the Fall River Career Centers. TANF recipients who "co–enroll" at the Fall River OSCC will access new services available through One–Stop Career Centers (some that did not exist a year ago and some to be designed between One–Stop Career Center Staff and DTA staff) including, customized orientation workshops, career and academic assessments using Career Ready 101, National Career Readiness Testing NCRC testing, intensive job search and work search preparation, basic computing skills plus the wrap around supports from DTA (child care, benefits, health care).

At a state level, through WIOA Planning and recent state legislation, DTA and DCS are considering a customer flow to ensure that OSCC staff participate onsite at DTA orientations and clients are referred for dedicated services at the OSCCs (jointly designed by DTA and the local WDB and OSCC). The DTA has awarded additional performance–based contracts to One Stop Career Centers statewide utilizing state resources for employment and training activities. State partners are working on a rationale and potential model for colocation of DTA staff at OSCCs as required in state welfare reform.

2) Redesign the OSCC Customer Flow: The Department of Career Services working with Workforce Development Boards across the state will realign staffing models across all One Stop Careers as part of the competitive selection process. The regions with work with the state to direct customer flow to an initial intake process that includes robust education and assessments (TORQ, CareerReady 101, career inventories, JobQuest profile etc) that moves individuals with marketable skills to a "Job Ready" team (integrated staffing) or a "Skill Building" team composed of staff you can bring case management, support services, access to HiSet, post–secondary or training programs, including the Community College navigators. (See new OSCC Customer Flow in Attachment D.) Under the state's new model for business services (demand–driven 2.0 – see next section), the Business Service Representatives at the One Stop Career Centers will work closely with both teams to ensure customer connections to the business customers who are hiring.

In addition, working with WIOA partners, the state will build statewide integrated, technology–based intake and information management system as the main entry portal for all partner staff and "shared" customers moving between programs and services for both job seekers and employers (the concept for IT solution is represented in Attachment D). Designing and implementing the technological infrastructure to execute a common intake/registration application with real–time triage processes that feature strong skills and transferability assessments, job matching and job referral, common case management and reporting systems across all partners is imperative to our ability to strengthen the consistency and quality of services provided by the system to job seekers and businesses.

3) Professional Development and Cross–Training The Department of Career Services will work with the Steering Committee members, including the WIOA and non–WIOA partners at the state level, to coordinate cross–training for staff. Additional cross–training on labor market information and technology tools is a high priority moving into WIOA implementation. Cross–training staff across all partners (economic development organizations, Workforce Development Boards, One–Stop Career Centers, TANF–SNAP, adult education, vocational rehabilitation, business services, veterans, and other key programs) on the online technology tools available to individuals across programs including JobQuest, TORQ, Career Information System, etc.

Models and Services for WIOA Target Populations

The WIOA and non–WIOA partners will continue to work with job seekers who represent populations who need additional support. Massachusetts will work on re–designing One–Stop Career Centers with its partners. In addition, grant–funded or state based initiatives often supplement and expand the public system's ability to work with individuals who face barriers to employment:

a) Age Barriers: MA–SCSEP works closely with the Executive Office of Labor and Workforce Development (EOLWD) in the implementation of WIOA to help promote and coordinate SCSEP and the One–Stop Career Center delivery system. State strategies of the State Plan outline specific steps in pursuit of the goals to achieve the vision for the workforce system. To that end, EOEA will work with EOLWD to enhance the services to customers of the One–Stop Career Centers by:

• Training Career Centers staff on the needs of people 55 and over

• Offering more training classes geared to people 55 and over

• Helping Business Service Representatives (BSRs) establish more effective employer pipelines to hire older workers

b) Low–Income, Low–Skilled: Many individuals who are homeless, receiving public assistance or public housing, CORI, or individuals with limited skills (LEP or lack of high school credentials etc) face challenges that require multiple supports offered across a range of partners. The state is looking to develop curriculum for cross–training to ensure staff at multiple agencies can help an individual understand available resources, the impact of work on wages and public benefits (benefits counseling or "cliff effect" information for TANF–SNAP), and next steps to move along a career pathway. The adult education network of providers will contribute information on evidence–based models that support integrated education and training, career pathways, wrap–around/college and career readiness support services to assist staff in building supports that create positive outcomes for low–income, low–skilled populations.

c) Individuals with Disabilities: One–Stop Career Centers, vocational rehabilitation programs and many other stakeholders work together to enhance and build employment related services for individuals with disabilities. The best resource for an individual is the vocational rehabilitation program given the level of resources, case management and post–placement support offered through the vocational rehabilitation system. In many cases, individuals who do not qualify or who would benefit from additional support also work with One–Stop Career Centers.

Over the years, Massachusetts has won several Disability Employment Initiative grants and other resources through USDOL Office of Disability and Employment Policy to strengthen the system's capacity to support individuals with disabilities. The Massachusetts Disability Employment Initiative (DEI) III Grant administered through a partnership with five Career Centers, Work without Limits, and the Institute for Community Inclusion. Grant supports programs aimed at improving employment outcomes for persons with disabilities. Of the 535 individuals who have enrolled in the program, 292 (55%) have achieved employment (2014–2015). The value of the Massachusetts DEI model is that it links access to education, credential training and job training

with benefits counseling with utilization of the federal Ticket to Work Program. Prior grants and resources for this population were solely focused on employment and did not expand work to enroll more individuals into post–secondary or training programs.

Through WIOA, the OSCCs, Vocational Rehabilitation, and other partners are participating in a customer–centered design process to identify new ways to integrate and share services. The goal is to transfer the best practices created by the Disability employment Initiative grants to regions of the state that were not awarded these resources.

d) Homeless: WIOA local boards shall collaborate with Massachusetts based Secure Jobs programs and Continua of Care to share information, cross–train front line staff and ensure that employment strategies meet the needs of homeless jobseekers in the community. Local Workforce Development Boards and One Stop Career Center currently develop local partnerships with shelters and organizations that specialize in services for homeless individuals.

Local Area Models –

Quincy

Quincy Career Center (QCC) and Father Bill's & MainSpring (FBMS) have for years partnered to make a difference for the homeless.

One successful example is the Homeless Veterans' Reintegration Program (HVRP) that provides services to assist in reintegrating homeless veterans into meaningful employment within the labor force and to stimulate the development of effective service delivery systems that will address the complex problems facing homeless veterans. FBMS has been a provider for the HVRP program serving the South Shore of Massachusetts since 2009. FBMS partners with the QCC to provide assessments, job skills and other training, case management, job placement services, and additional wrap–around support services. In addition, each homeless veteran served through the program is assisted with accessing permanent housing. All of this is designed to provide each veteran with an individualized set of services and housing to ensure they are re–connected to the workforce and remain stable in housing for the long–term. Coordination between FBMS and QCC maximizes available resources and leverages significant public and private dollars to create a holistic response for homeless veterans.

Brockton

Father Bill's and MainSpring operates their Secure Jobs Work Ready program out of CareerWorks. Their staff is currently located right next to our resource room in the middle of the center. This collaboration allows for CareerWorks staff to interact with FR Bill's staff regarding case management and in some cases utilizing Title 1 adult training funds. All Fr. Bill's Customers become members of CareerWorks which allows them to utilize the resource room as well as all of our workshops. In Addition a member of the CareerWorks Employer Services unit attends the weekly FR Bill's staff meeting to share recent job postings that have come into the center. With homelessness being such a huge barrier to employment the co–location of FR Bill's allows for the customer to take advantage of the full array of services offered by CareerWorks while simultaneously receiving intensive specialized counseling services from FR Bill's.

CareerWorks is also involved as a core member of the Working Cities Challenge Brockton team devising a plan to submit to the Federal Reserve Bank of Boston. The plan aims to end family homelessness in Brockton by targeting homeless families with children in the Brockton public schools. The foundation of the plan is based on expanding the FR Bill's work ready program by increasing services and support which includes services at CareerWorks. Brockton is one of 10 finalists for the grant.

e) Veterans: See section VII. Program–Specific State Plan Requirements and information on Jobs for Veterans state grant activities.

f) Long–term Unemployed: Governor Baker and Secretary Walker have dedicated resources to address the long–term unemployment challenges in Massachusetts. This initiative is referred to as TalentConnect. Massachusetts, in partnership with Commonwealth Corporation, the state's sixteen Workforce Boards and 32 One–Stop Career Centers, Higher Education and other appropriate partners will work together to braid our resources to support services for long–term unemployed individuals.

TalentConnect is an initiative that Massachusetts will implement beginning FY 2017. TalentConnect is an intensive and coordinated service delivery strategy with the purpose of helping long–term unemployed (LTU) individuals reconnect to the labor market. TalentConnect will tap into existing workforce development resources and look to bring new resources to bear to provide services that update the skills of LTU job seekers through occupational skills training and educational services and provide them with the opportunity to connect to employment opportunities through intensive coaching and job search, networking, internships, on the job training and apprenticeship programs. TalentConnect is a strategy targeted to serving individuals who primarily have been unemployed for one year or longer.

g) Ex–Offenders:

Workforce Regions:

Each Workforce Development Board and One–Stop Career Center build relationships with state and county correctional facilities to support ex–offenders with reintegration activities. Examples of this work include a best practice model in Hampden County. Hampden County Re–entry Partnership (HCRP) consists of the multiple facilities within the Hampden County Sheriff's Department; the two One Stop Career Centers, CareerPoint and FutureWorks; and the Hampden County Regional Employment Board. HCRP works with offenders to overcome known barriers through connection with community and business partners, In Hampden County, 3,040 re–entry customers received 42,560 workforce readiness and retention services over a three year period (2010–13). Of those re–entry customers, 58% obtained employment (1st quarter) and 52% retained employment (3rd quarter). These models exist within several other Workforce Investment Areas across the state.

State Level Work:

The Commonwealth of Massachusetts Department of Career Services' Reentry and Reemployment unit will work with the REO grantee to offer employment opportunities to justice–involved individuals by working with Massachusetts One–Stop Career Centers to help prepare jobs seekers

with a criminal record to re–enter the workforce. DCS also works with "criminal record friendly" companies focusing on the demand side of reentry to expand the pool of jobs available to ex–offenders and match ex–offenders with job openings. DCS works with ex–offenders to educate them in the various programs available to potential employers, such as the federal Work Opportunity Tax Credit (WOTC), and the DCS Bonding Program, which provides insurance protection to the employer against any theft for up to $5000 for duration of six months. This is a free services offered to any employer that is hiring a person with a barrier to employment. The WOTC program provides tax incentives to businesses that hire certain individuals with barriers to employment – including those with criminal records. This can be used as an incentive to hire individuals with criminal records. DCS is currently piloting a project with the Massachusetts Department of Revenue, and Massachusetts Probation in Bristol County Probate Court where parents who are in arrears on their child support and unemployed or underemployed – often times due to their status as a justice–involved individual – are referred to area career centers and case managed to assist in finding a job. The pilot has produced immediate success, as nearly 40% of the pilot's participants have found employment as a result of their participation in the program. DCS has also facilitated a criminal record–sealing program being conducted by a Boston area private law school and local career center. That program assists job seekers who have criminal records by introducing them to law school students who represent the job seeker in getting their criminal record sealed, thereby easing their transition back into the workforce. DCS works closely with area sheriff's departments and the Federal Bureau of Prisons and conducts resume writing and interviewing skills training for incarcerated individuals. DCS also has a long–standing collaboration with the New England Veterans Homeless Shelter, Massachusetts Parole Board and the Office of the Commissioner of Probation, and Federal Probation. DCS holds second chance job fairs for ex–offenders in collaboration with employers who are willing to hire this population. DCS routinely provides training to the parole board members on the workforce development system so they can refer potential parolees to career centers upon their release from incarceration.

Into 2016, EOLWD will work with appropriate state agencies to establish an Inter–Agency Workgroup on Ex–Offender Employment to promote and support successful "behind the wall" (pre–release), transitional planning and employment efforts. The group may explore:

• Utilizing the Massachusetts–based public workforce system to expand the capacity of regions and build formal regional connections between public safety, education, health and human services, and workforce systems

• Implementing data tracking and analysis needed in order to evaluate the impact of programming

• Providing state–issued identification cards at release to enhance chance of successful re–entry

Section IV of the MOU (Attachment C–1) outlines agreements between state–level partners with concrete steps to move toward a fully–integrated, and world–class system that includes all of the partners, including examples of career pathway mapping and a proposed One–Stop Career Center customer flow model.

At this time, neither the Massachusetts Rehabilitation Commission (MRC) nor the Massachusetts Commission for the Blind (MCB) are operating under an order of selection. It has determined that funds are sufficient to provide vocational rehabilitation services to all eligible individuals based on

an analysis of budget resources, new applicants, and new individuals determined eligible and new plans completed. At this time, based on these findings, we project that neither MRC nor MCB will be instituting an order of selection within the next three to four years, but will continue with an on-going analysis and planning process.

In the event that funds become insufficient to serve all eligible individuals, the MRC will implement an order of selection process. This process would be as follows: Individuals with the Most Significant Disabilities would be assigned to Priority Category 1, Individuals with Significant Disabilities would be assigned to Priority Category 2 and Individuals with a Disability would be assigned to Priority Category 3.

All individuals determined to be Individuals with the Most Significant Disabilities will be served first. Only after all of these individuals have been selected to receive services would individuals considered to be in Priority Category 2 be served.

After all individuals considered to be in Priority Categories 1 and 2 have been selected to receive services, then individuals in Priority Category 3 will be served.

Eligible individuals who have not been selected will be informed of their status and will be given the opportunity to appeal their priority assignment and be placed on a wait list within their category, based on the date of their priority decision, or have their case closed.

Individuals choosing to be placed on a waiting list will be contacted by the MRC after a year if not selected and given an opportunity to remain on the list or to have their cases closed. If the MRC is unable to contact the individual his or her case will be closed.

Individuals who choose to have their cases closed may also be referred for job placement and/or other services under the workforce system from other federal, state and local public agencies.

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.

Coordination and collaboration of the partners and entities that provide services to businesses has been and continues to be a major business service strategy for the Commonwealth. To that end, Massachusetts embarked on an Expanding Business Engagement (EBE) initiative in June 2012. That initiative was subsequently re–branded as MassBizWorks and continues to connect businesses to supports and services across Massachusetts agencies and the Massachusetts Workforce Development System to help businesses thrive and grow.

The key principles established to guide business services across partner agencies across the Commonwealth are as follows: 1. There is “no wrong door” for business services; business assessments are consistent, regardless of the entry point. 2. Staff always interact and operate in a

professional business manner. 3. Businesses need a single point of contact within a coordinated regional structure/strategy. 4. All staff, regardless of their role, needs to be well versed in the leading industry sectors in their region. 5. All staff have a role in collecting business intelligence and contribute to their organization and system's learning about business needs. 6. All staff, regardless of their role, must be well–versed in the needs of employers who are Federal Contractors to ensure that a diverse talent pool is available to meet their needs and to assist them with compliance of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) at 41 CFR Part 60–741 7. All staff represent the Massachusetts Workforce System (not just a specific center, program, or agency) and are ambassadors to other state system partners offering business services. 8. Business–based talent development service models (sector strategies, internships, apprenticeship) are priorities.

MassBizWorks continues to lead efforts around marketing, staff development and systems/communications with a primary focus of information sharing, coordinating and making linkages electronically. MassBizWorks created the foundation for the organization of a Business Strategies Workgroup under the WIOA Steering Committee to identify policies and strategies on how Massachusetts can leverage interagency collaboration to increase outcomes for businesses, meet business demand for hiring and talent development, and identify industry need for skills training models (on–the–job training, apprenticeship, sector strategies).

The Business Strategies Workgroup identified key issues for the workforce system to build capacity. The issues identified were direct inputs into the creation of the Workforce Skills Cabinet, State–level MOU and expectations to develop a consistent business customer flow across One–Stop Career Centers and partners.

The following is a narrative explanation of a chart. The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/.

System Culture

- "System Optimization by Businesses" is an overarching goal for the system.

Gathering Data and Business Intelligence

- Career Centers need access to lists of all employers by region, community etc. Confidentiality prevents using existing state LMI sources to create the list. Help–Wanted Online provides detailed listings of employers with job openings, but not a census of all employers.
- Explore state system automated methods to capture employer–hiring results for business customers from One–Stop Career Center referrals (wage record data does not address this need). One–on–one follow up by a staff person is staff intensive data entry. Currently, not all staff data enter into MOSES or JobQuest in a consistent manner.
- Develop a standard set of questions/tool for business intake and assessment to be used by business services staff from across agencies. This information will need to be accessible to

other business services providers so that businesses experience coordination and efficiencies.

Service Delivery Models/Partnerships

- Not all agencies with workforce development resources are currently part of the WIOA conversation (e.g. EOPPS and Shannon Grants). Key goal going forward.
- Should there be a lead entity for each of the entry points for business? (i.e. New businesses=MOBD, Talent sourcing=career centers, Pipeline Development=WDB/community colleges)
- Train staff on the use of existing technology tools to manage the candidate pool and source candidates based on employer demand. Understand why some staff choose not to use existing tools (JobQuest/MOSES etc.)
- Create quality control procedures for staff working with job seekers to maintain high quality of job applicants referrals. (Currently, job seeker can directly input their information into JobQuest the information quality ranges widely.)

Staffing and Professional Development

- Staff need to be trained on other agency resources, areas of expertise, and program requirements as they pertain to businesses
- Connections need to be made at the leadership and operational level across agencies/program areas — Peer–to–peer familiarity/relationship development.

Performance Metrics

- Front–line staff working across economic development, workforce and education, and human services need a method and IT tool to coordinate and synthesize services to businesses across agencies. MassBizWorks icon in MOSES is a start but not comprehensive.
- The whole system needs to have the ability to be measured as one system as it relates to businesses. Individual agencies cannot be working with businesses in certain ways and asking for different information and outcomes. Create statewide business metrics for WIOA.
- Some agencies currently do not invest resources in business services. How are they affected by business measures?

Grant Making or Funding

- Front line staff and organizations are worried about delivering high quality business services to a larger number of businesses without new resources. Explore the “demand driven” staffing models put in place in states like Ohio.

The Business Strategies Workgroup and the Performance Workgroup also developed performance metrics to capture the workforce system’s effectiveness in serving the business customer; these performance measures are included in Section II. The Executive Office of Labor and Workforce Development hired a new statewide Director for Business Services to finalize and execute a business customer flow to improve consistency and quality of service to business across One–Stop

Career Centers building a draft prototype of a "Demand–Driven 2.0" Model for business activity through One–Stop Career Centers.

GRAPHIC: DEMAND DRIVEN 2.0 MODEL: The federal portal does not provide the ability to include this graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

The new model creates a more centralized focus on a single contact (BSR) reaches out to establish business customer relationship to develop the business customer relationship. The BSR will work with business to:

– explain BSR role, role of OSCC and services

– qualify business customer's to accurately determine primary business need(s)

– if recruitment needs are surfaced obtain critical staffing information

– if not qualify non–staffing business service needs

– review Service Level Agreement (SLA) with the business customer

– determine next steps and conclude meeting with summarizing next step deliverables.

– communicate all relevant business information to OSCC Business Engagement Team (BET).

The OSCC Business Engagement Team (BET) will meet with lead BSR. The BET may consist of a Job Developer, Case Counselor, Trainer, Job Counselor, etc. This model existing in several OSCCs across the state, but it is not setup at all of the OSCCs. As OSCC customers are identified, the BET will implement assessment processes which will determine the customer's level of skills and how well they match the required skill sets of the position. Resumes of qualified OSCC customers will be forwarded to the business customer for further review. BET will confirm with business customer which OSCC customers will continue in the hiring process and which customers have been selected out. Next steps may include: customer participating in a telephone screen, conducting an assessment test and/or being scheduled for an in–person job interview. "Coaching up" our OSCC referrals to reduce their anxiety levels and improve their "soft skills" is an essential part of the OSCC referral process. As a team, the BSR/BET will follow up with both our OSCC referral customer(s) and our business customer on all scheduled points of interaction. Closely monitoring and correctly interpreting communication between both parties is very important. The BET with the BSR will work on a business recruitment strategy for the local area.

The Core WIOA program partners participate in the BizWorks organizing effort as well as the Business Strategies Workgroup for WIOA. In Massachusetts, Massachusetts Rehabilitation Commission (MRC) has a robust set of outreach and direct service activities with businesses across the state and most likely works with the highest number of employers across programs funded by Title II and Title IV of WIOA. MRC participates in a business strategy workgroup between key workforce partners as part of the Commonwealth's effort to coordinate services to employers

amongst partner agencies. MRC subscribes to the established key principles to guide business services amongst key partner agencies.

MRC has developed an innovative hiring event in partnership with the Office of Federal Contract Compliance Program for employment opportunities with federal contractors. The event prepares consumers for interviews, which are conducted on site and hiring offers are extended. Over 300 individuals to date have been employed through this program. MRC is looking to expand this model to other employers based on the success of the program. MCB consumers also have employment opportunities available through this initiative.

A key goal for the WIOA Business Strategies Workgroup going forward is to also actively engage the Massachusetts Business Leadership Network, which is an association of Massachusetts companies committed to a diverse marketplace that includes people with disabilities as both customers and employees. The Massachusetts Business Leadership Network (MassBLN) is an affiliate of the US Business Leadership Network (USBLN) initiative, a national business–led endeavor upholding workforce initiatives that enable qualified individuals with disabilities to succeed in the workplace.

At the state leadership level, Governor Baker created the Workforce Skills Cabinet (WSC), which aligns Labor and Workforce Development, Education, and Housing and Economic Development to gather ideas and strengthen the pipeline to employment. The cabinet is charged with finding a way to better meet the demand needs of employers by matching qualified talent to pipeline needs. A clear issue from the onset of the WSC included the wealth of resources to support business scattered across state agencies. MassBizWorks originally organized the frontline staff working with business in regions, however the state still needed to coordinate resources beyond tradition workforce partners at the state level across key Secretariats.

The Cabinet looked at the current view of government supports or assets from a business perspective to begin to identify solutions to move toward a more ideal approach to meeting the full cycle of business need.

In this pursuit, the WSC establish a Secretariat liaison or point of contact to act as lead for a newly created Governor's BizWorks Team (Business Response Team) to meet with businesses who engage with the Administration to assess talent needs, ensure communication and collaboration across partners, promote MassBizWorks staff development efforts. In addition, the group will help execute the identified need to promote data sharing and inform the results of the service provision to a business across multiple partner agencies. Collectively, these efforts will serve to enhance and align the workforce system's services to businesses.

Section IV of the MOU (Attachment C–1) outlines agreements between state–level partners with concrete steps to move toward a fully–integrated, and world–class system that includes all of the partners, including examples of career pathway mapping and a proposed One–Stop Career Center customer flow model.

GRAPHIC: BUSINESS RESPONSE: TODAY'S VIEW

GRAPHIC: BUSINESS RESPONSE: NEW MODEL

The federal portal does not provide the ability to include these graphics in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

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).

Education Partnerships, Leveraging Resources for Education, and Access to Post–Secondary Credentials The vision for the WIOA Plan to organize and promote the progression of individuals along career pathways depends upon a larger number of individuals moving into post–secondary attainment of credentials in order to meet the job demand in the Massachusetts economy. While higher education is not a required Core Partner program in WIOA, our higher education system, represented by the Department of Higher Education, is a key partner on the WIOA Steering Committee and in the implementation of the WIOA Plan. State leaders will focus on new strategies that assist more individuals, especially individuals with limited education and skill, in accessing higher education. That includes building on the state's past success with the USDOL TAACCT initiatives. In addition, new opportunities must be identified. Recently, conversations have started with the Department of Transitional Assistance and the Executive Office of Community Colleges to find opportunities to utilize SNAP to expand access to post–secondary credentialing through recruitment and SNAP ENT reimbursements. The Administration has continued to support sector initiatives in high demand occupations as well.

Over the last three years, the Workforce Board, OSCC, adult education and post–secondary systems have had the experience of rethinking the connections and pathways for individuals who need to move from low to mid to high skilled credentialing. We intend to build on those lessons. The Massachusetts' community colleges, in concert with the Commonwealth's higher education, economic development, adult basic education (ABE) and workforce development systems, and industry stakeholders coalesced to transform the delivery of education and training programs through Massachusetts' innovative "Transformation Agenda", funded through a USDOL Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant. Through accelerated programs linked closely to industry need, the Transformation Agenda built a systems approach to enable greater economic opportunities for Massachusetts residents. The goal of the Transformation Agenda was to develop a shared effort to support students along efficient career pathways into high–demand careers. This grant created new positions called Community College Navigators. These individuals are hired by Community College and work at the One–Stop Career Centers to provide support to unemployed individuals planning to earn post–secondary credentials.

State and local workforce development entities are integrated with community colleges to support better access to the colleges. New or revised accelerated and stackable programming is now being delivered at many campuses. Statewide teams developed and began implementing industry recognized curriculum in targeted industry sectors, and the ABE system and developmental education faculty from most campuses helped develop and are utilizing contextualized curriculum modules to better prepare students for high demand careers.

The work created through the Transformation Agenda TAACCCT grant is continued through an additional TAACCCT award. This grant supports many of the same alignment and reform strategies of the Transformation Agenda with a focus on STEM pathways. The Guided Pathways (GP) STEM grant is building linkages for unemployment individuals and students coming up into post–secondary to achieve degrees and certificates in STEM fields.

One–Stop Career Center staff are trained by staff paid for by the TAACCCT grants to train them on financial aid information. And, the Community College Navigators help One–Stop Career Center customers understand their higher education options, especially two–year programs. The combined grants have helped Massachusetts increase the number of individuals using WIOA funding through Individual Training Accounts at community colleges (compared to prior years of ITA expenditures).

In addition, the new Administration applied for a longitudinal data grant through US Department of Education to build out the capacity to share wage record data and information across education and workforce systems. This data analysis designed under this grant will open up new doors to understand which initiatives and interventions are most successful.

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.

In addition to the response included in Section E., education and training institutions are engaged in various ways throughout the system. For example, education and training providers partner together to provide integrated learning opportunities in response to employer demand, e.g. ABE providers with culinary arts training providers to meet the needs of employers. As Massachusetts increases its responsiveness as a demand-driven system (Demand Driven 2.0) partnerships are an outgrowth of the career pathways planning that has been done with the customer. Education and training institutions are robust participants in MassBizworks planning.

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).

The response to this section is included in the response to Section E., above.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

The response to this section is included in the response to Section E., above.

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.

As discussed in Section II goals and strategies, the Commonwealth developed its Economic Development Plan with significant input from the education and workforce systems. The Economic Development Plan is being utilized in the development of the WIOA State Plan. In addition, the Governor is leveraging the required WIOA regional planning process to create a new, integrated regional planning process (to be named) across the economic, education, and workforce Secretariats. The new regional planning structure will be based on an aligned regional map between workforce areas, economic development, and education regions. The new process will require seven coordinated teams led by Workforce Development Boards, Community Colleges and Vocational Technical Schools, and economic development (Massachusetts Office of Business Development) with additional partners (business leaders, community–based–organizations, etc.) to ensure that education and training systems are focused on the career pathways needed in the regional economy. The regional leadership from economic development will therefore drive the activities of the Workforce Development Boards and key WIOA partners through the resulting regional plans.

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.).

Systems to Support Coordination

Labor Market Information (LMI)

The primary operating systems for the workforce core partners are described below in the next section. The LMI Division within the Massachusetts Department of Unemployment Assistance operates the labor market information systems in Massachusetts, which is part of the Executive Office of Labor and Workforce Development. The Unit's data is possible because of its cooperative agreement with the United States Department of Labor's Bureau of Labor Statistics (BLS) and Employment and Training Administration (ETA) and the United States Census Bureau. The Division is focused on producing reliable and timely data in order to assist individuals make data–driven decisions in the areas of business, career and education.

Labor market data and economic statistics are publically available on the EOLWD website to help stakeholders make informed plans, choices, and decisions for a wide range of purposes, including business investment decision making, career planning and preparation, education and training offerings, job search opportunities, hiring, and public or private workforce investments. The Division also works with local workforce development system partners as well as external stakeholders to provide custom workforce data, which further the efficiency and impact of the system.

Currently, the core partners each have a myriad of tools to already available to assist customers in the development of career pathways and the state workforce agency offers these tools to partner agencies and their clients through online systems:

•Transferable Occupation Relationship Quotient (TORQ) – an LMI tool that provides a real time triage process, which analyzes an individual's occupational knowledge, abilities, and skills, and assesses the transferability of those characteristics to other, potentially more in demand, occupations they might not have considered.

• Massachusetts JobQuest – the workforce system's front–facing web application used by members of the public (job seekers and businesses) to access programs and services such as job search and application, training programs research and, for employers, to locate job candidates.

• ACT Career Readiness System– these tools, which are part of the ACT, Inc. career readiness system, match a person's reading, math and problem solving skills to the competencies required for an occupation. In addition, an assessment of career interests, work history and technical skill will further provide information on a person's targeted career pathway. Thus allowing staff to match the overall education and skill assets of the participant against occupational requirements of job openings for referral and/ or placement.

• System coordination would benefit from OSCC recognizing currently used and NRS approved ABE assessments when assessing basic skills or determining ABE student eligibility for training.

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

The core partners each have separate data and operating systems, which are described in detail in the next sub–section. To address immediate WIOA needs for the partners, the Commonwealth will explore the use of JobQuest as the main entry portal for individuals who may be "shared" between two WIOA enrollments (both job seekers and employers). In the long term, the WIOA Steering Committee will put together a working group to design or purchase new tools to support technological system integration of each agency's respective information needs in order to facilitate a consensus–driven redesign of the customer flow for our shared customers. This system would support an upfront common intake/registration application and case management tracking system. The concept would utilize the One–Stop Employment System (MOSES) as a job seeker and employer data warehouse tracking all services provided and programs and activities accessed by all shared customers across core program customers.

In addition to enrollment and tracking across systems, the partners will work on additional ways to utilize similar tools to develop career plans, assess skill levels and connect with the labor market information tools described above. For example, Titles I & II are working on using the ACT Career Ready 101 tools to assess reading and math for individual across systems. In addition, system coordination would benefit from OSCC with the ability to utilize and recognize ABE assessments currently used and NRS approved when assessing basic skills to determine ABE Title II student eligibility.

One–Stop Career Centers, Vocational Rehabilitation, Adult Education and other partners all utilize different action plans or career assessment tools. Adult Education uses the Education and Career Plan (ECP) as core tool, OSCCs use Career Action Plan (CAP) as core tool, Vocational Rehabilitation uses the Individualized Plan for Employment (IPE) and other partners such as Veterans programs or TANF and SNAP utilize different tools as well. The state partners will work together to review how the customer tools work together to build a set of common intake questions that can populate the various tools and to design cross–training to share areas of expertise, best practices, and ensure consistency and quality of education and career planning approaches across systems.

Data Collection and Reporting Systems for Core WIOA programs The primary workforce development programs are administered by the Department of Career Services (DCS) within the Executive Office of Labor and Workforce Development (EOLWD) and operate through the State's network of One–Stop Career Centers. DCS manages the Massachusetts One–Stop Employment System (MOSES) — a client/server application and database that serves as the unified management information, client tracking, case management and reporting system used by staff at career centers and other workforce development service providers in Massachusetts. The application is distributed through a Citrix interface providing users with flexibility for data entry and report access. MOSES collects information and tracks data through the MOSES database for the following programs: • Title I Adult • Trade Adjustment Assistance (TAA) • National Dislocated Worker Grants (formerly NEGs) • Title I Dislocated Worker (inc. Rapid Response) • Jobs for Veterans State Grant (JVSG) • Disability Employment Initiative Grants (DEI) • Title I Youth • Migrant Seasonal Farm

Worker (MSFW) • Unemployment Insurance employment assistance services and programs including Reemployment Services and Eligibility Assessment (RESEA)

Several web–based applications collect information and interface with the MOSES database, including: (a) JobQuest which is used by job seekers to access job listings, eligible training providers and courses, services and workshops at career centers, and assessment tools, such as TORQ and Career Readiness, and is also used by employers to post jobs and search for qualified applicants; (b) TrainingPro which is used by training providers to register for approval under WIOA ITAs, Trade TAA and UI Section 30 (TOP, Training Opportunity Program for UI Claimants); and (c) a new Foreign Labor Certification application through which employers/agents submit required H2A and H2B applications and DCS staff approve and manage the programs.

The Department of Elementary and Secondary Education's Adult and Community Learning Services (ACLS) provide adult basic education services. ACLS's SMARTT (System for Managing Accountability and Results Through Technology) is an Internet–based data management system used at the local level by adult education providers in Massachusetts for program planning and reporting. Used by programs to submit student–level data, SMARTT collects demographics, assessment, attendance, and goal attainment information required by the National Reporting System (NRS) under Workforce Investment Act (WIA), in addition to supplemental information required by ACLS.

At the state level, SMARTT provides program and aggregate data and a means to track program performance. It interfaces with systems that track information through data matching (e.g., University of Massachusetts, Educational Testing Service, National Student Clearinghouse, Department of Revenue) to capture student outcome information (e.g., assessment, high school equivalency obtainment, entry into postsecondary education, employment).

Cognos, SMARTT's companion, web–based reporting system, produces reports on student demographics, local program, regional, and statewide performance.

The Massachusetts Rehabilitation Commission (MRC) and the Massachusetts Commission provide vocational Rehabilitative Services for the Blind (MCB) that fall within the Executive Office of Health and Human Services (EOHHS). MRC and MCB are separate agencies and have individual management information and case management systems.

MRC has a web–based Management Information System known as MRCIS, which serves as the case management and data system for MRC's Vocational Rehabilitation Program. Data is tracked and managed at the client level for all MRC VR consumers. The system documents and covers all aspects of the VR process from referral to exit. The system is used to produce a quarterly data file entitled the RSA–911 report submitted to the Rehabilitation Services Administration containing detailed client and employment data.

MCB has a Management Information System known as System 7, which serves as the case management and data system for MCB's Vocational Rehabilitation Program. Data is tracked and managed at the client level for all MCB VR consumers. The system documents and covers all aspects of the VR process from referral to exit. The system will be modified to produce a quarterly data file

entitled the RSA–911 report submitted to the Rehabilitation Services Administration containing detailed client and employment data.

The Department of Transitional Assistance (DTA) within the Executive Office of Health and Human Services (EOHHS) administers the Temporary Assistance for Needy Families (TANF) and the employment and training programs under the Supplemental Nutrition Assistance Program (SNAP) through the BEACON system. DCS and DTA operate an interface between BEACON and MOSES by which DCS provides information on services that selected TANF recipients (identified as work ready) received at career centers.

The Department of Unemployment Assistance (DUA) within the Executive Office of Labor and Workforce Development administers the UI program in Massachusetts through its use of UI Online, a web–based system which serves as a self–service application that both job seekers and employers can use to engage with DUA. DUA staff also uses UI Online to manage DUA's operations.

As stated above, utilizing a system such as JobQuest as the main portal into the Massachusetts Workforce Development System will allow the Commonwealth to collect data and report on shared customers who have been provided services, and access program and activities across all core partner programs.

* 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.

State policies that will support implementation of state strategies are discussed elsewhere in this plan. The Commonwealth has developed policies and issuances to ensure implementation of the Governor's Workforce Development Strategies as delineated below. It will be an on–going development process as WIOA implementation and final federal regulations are complete.

The Massachusetts WIOA Steering Committee is leading the process for the development of a statewide MOU with core partners. The purpose of the MOU is to:

1. Articulate a coordinated vision for organizing the broadly defined public workforce system in Massachusetts to produce the best possible outcomes for customers – job seekers and businesses.

2. Describe the manner in which the WIOA program partners are legally authorized to participate in the delivery of services, under the provision of the Workforce Innovation and Opportunity Act, through the State and Local Workforce Development Boards, the One–Stop Career Centers and WIOA Core Program partners.

3. Establish agreement at the state level focused on designing partnerships and service delivery systems through the WIOA Core Program partners to ensure that Massachusetts businesses and job seekers, including those individuals with disabilities, low–income status, Veteran status, education or language barriers, and other individuals "shared" by the core program partners, achieve/demonstrate measurable and better outcomes in the areas of education, training, job placement, and wages.

4. Establish a definition and set of shared infrastructure costs to support newly designed partnerships and service delivery between the core program partners, specialized centers such as MRC Area Offices, and/or affiliated centers, and the local workforce development boards/One–Stop Career Centers in local areas as authorized by WIOA.

5. Guide the establishment of local area partnerships and MOU agreements on how services can be connected, integrated or enhanced by sharing staffing, resources or jointly designed services in ways that improve outcomes for "shared" customers – job seekers and businesses.

The execution of the statewide MOU will pave the way for the development of common policies across partner programs. A universal application is currently under discussion, as well as strategies for co–enrollment of shared customers.

The State Core Partners are meeting on an on–going basis to: identify shared common customers, develop integrated/common intake and registration, as well as the ability to enroll shared common customers into one database to serve as a data warehouse to report on outcomes of both job seeker and business customers.

Joint policy guidance will be provided by the State Core Partners on the development of a local Memorandum of Understanding (MOU). The guidance will instruct Local Boards, in conjunction with the Local Chief Elected Official and Core Partners to describe the local strategies to operationalize the service delivery design delineated within the State Combined Plan.

Local Boards will be guided throughout the MOU process by State Core Partners to ensure local agreements will include operational and service workflows, related referral processes, coordinated staff development and training, marketing and community integration, co–locations of staff (physical or virtual) and the nature and provision of related infrastructure and shared costs. Specific policy guidance will be provided by State Core Partners on negotiating and developing an agreement that reflects specific infrastructure/shared costs to be supported and the method by which the revenue will be supplied or the costs will be supported by each partner. And, those costs will take into consideration the proportionate share of use by each partner and expended solely for purposes allowable according to the partner authorizing statutes and other applicable legal requirements, including Federal cost principles. All policies and guidelines established regarding MOUs and infrastructure and shared costs will be included within the State Plan Modification in 2018.

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.

The Governor serves as the grant recipient for the Commonwealth. The Governor appoints most members of the (MA) Workforce Development Board (State Board) who in conjunction with the Governor provide leadership across the workforce system to ensure businesses secure a skilled workforce. The Executive Office of Labor and Workforce Development (EOLWD), on behalf of the Governor oversees the Massachusetts Department of Career Services, the designated State Workforce Agency (SWA) that holds primary responsibility for oversight of the Massachusetts Workforce Development System and will provide staff to the State Board. See Chart 26.

The Governor has designated 16 Workforce Development Areas and the Chief Elected Officials (CEO) within those areas to act as grant recipients.

Massachusetts Workforce Development Areas: Berkshire, Boston, Bristol, Brockton, Cape& Islands, Central Massachusetts, Franklin/Hampshire, Greater Lowell, Greater New Bedford, Hampden County, Merrimack Valley, Metro North, Metro South/West, North Central Massachusetts , North Shore and South Shore

The Local CEOs appoint the business–driven, Local Workforce Development Boards (Local Boards) who in conjunction with the CEO govern the system locally including 32 One–Stop Career Centers (27 comprehensive centers and 5 affiliate centers) (Attachment E), ensuring coordination across all core partners, developing workforce strategies that meet the needs of regional businesses, as well as job seekers. Leadership from the State and Local Boards are strengthened by requiring WIOA core partners to have representation on all workforce development boards; this partnership is further supported by requiring core partners to be signatories on the statewide MOU.

GRAPHIC: STATE GOVERNANCE of MASSACHUSETTS WORKFORCE DEVELOPMENT SYSTEM

GRAPHIC: LOCAL GOVERNANCE OF THE MASSACHUSETTS WORKFORCE DEVELOPMENT SYSTEM

GRAPHIC: WORKFORCE SYSTEM GOVERNANCE – LOCAL

The federal portal does not provide the ability to include these graphics in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

B. STATE BOARD

Provide a description of the State Board, including—

The Massachusetts Workforce Development Board (MWDB) is a 33–member board serves as an advisor to the Governor on building a strong workforce development system aligned with state education policies and economic development goals. The Board is charged with developing strategies that guide the Commonwealth's efforts in ensuring workers have the skills they need to fill the jobs businesses create, for a more prosperous Commonwealth, with higher wages for workers, larger profits for businesses and stronger communities for all.

1. MEMBERSHIP ROSTER

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

Governor

Charles D. Baker

Governor Designee:

Sherry Dong

Director, Community Health Improvement Programs

Tufts Medical Center

Legislature

Senator Eileen M. Donoghue

Senator, 1st Middlesex District

Massachusetts Senate

Representative Joseph Wagner

Representative, Eighth Hampden District

Massachusetts House of Representatives

Business & Industry Members

Donna Cupelo - Chair

President

Verizon New England

Aixa Beauchamp

President

Beauchamp and Associates

Joanne Berwald

Vice President, Human Resources

MESTEK, Inc.

Kristin Broadley

Owner

Centerville Pie Company

Anne Broholm

Chief Executive Officer

Ahead, LLC

Jesse Brown

Co-Founder/ Director of Operations

Heidrea Communications LLC

James Cassetta

President/CEO

WORK, Inc

Kathleen Cullen-Cote

Corporate Vice President of Human Resources

PTC Corporation

Driscoll DoCanto

Resident Director

Merrill Lynch

Eric D. Hagopian

President and CEO

Massachusetts Center for Advanced Design and Manufacturing

Danroy T. Henry, Sr.

Chief Human Resources Officer

Bright Horizons

Susan Mailman

Owner / President

Coghlin Electrical Contractors, Inc.

Juliette C. Mayers

President & CEO

Inspiration Zone LLC

Beth Mitchell

Director, Maritime and Strategic Systems Engineering

General Dynamics

Joanne Pokaski

Director of Workforce Development

Beth Israel Deaconess Medical Center

Beth Williams

President & CEO

Roxbury Technology Corporation

Raymond Wrobel

Vice President

Align Credit Union

Representatives of the Workforce

Labor

Warren Pepicelli

Executive Vice President

UNITE-HERE

John G. Mann

President

NAGE, Local 292

Apprenticeship

Elizabeth Skidmore

Business Representative/Organizer

New England Council of Carpenters

Community-Based Organizations

Dr. Pam Eddinger

President

Bunker Hill Community College

Carol Grady

Chief Operating Officer

JVS

Cassius Johnson

Senior Director of Public Policy and Government Affairs

Year Up

Gerard Burke

President & CEO

Hillcrest Educational Foundation

Titles I & III Representative

Secretary Ronald Walker, II

Executive Office of Labor and Workforce Development

Title II Representative

Secretary James Peyser

Executive Office of Education

Title IV Representative

Commissioner Nicky Osborne Massachusetts Rehabilitation Commission

Chief Elected Officials

Mayor Kimberley Driscoll

Mayor

City of Salem

Mayor Daniel Rivera

Mayor

City of Lawrence

Other Representatives

Juan Vega

Assistant Secretary for Communities and Programs

MA Executive Office of Housing and Economic Development

2. BOARD ACTIVITIES

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

Massachusetts Workforce Development Board Committees

At the first meeting of the Massachusetts Workforce Development Board on February 25, 2016, the State Board voted to convene the following committees which will allow the Board to carry out its state– and federally–mandated functions:

WIOA Oversight Committee

To oversee efforts related to the adoption and implementation of WIOA as outlined in the Massachusetts WIOA Combined State Plan. The committee will consider recommendations that have been identified and developed by the WIOA Steering Committee, bring forth topics and decisions for consideration by the full State Board, or approve WIOA–related policies on behalf of the full Board, as needed.

Labor Market and Workforce Information (LMWI) Committee

To use labor market and workforce information to identify areas of discussion and policy development for consideration by the Board. Tasks include: analyzing key metrics in workforce data and bringing subject matter experts, discussion topics and policy ideas to full Board meetings (topic examples: trends in labor force participation rate, the "gig economy", growing workplace automation); improving the capacity for the workforce system's use of LMWI; and developing performance standards for Workforce Boards' and workforce regions' use of Labor Market and Workforce Information.

Youth Committee

To coordinate efforts among partner agencies, organizations, and workforce regions to promote youth employment and career readiness. Tasks include developing a collective vision for youth workforce development; identifying statewide standards for Workforce Boards' youth policies and programming; developing policies to align policies, protocols, and resources across workforce partners.

Committee on Populations Facing Employment Challenges

To capitalize on the work of the Task Force for Persons Facing Chronically High Rates of Unemployment by identifying the policy and programmatic opportunities to improve employment outcomes for populations facing employment challenges (target populations) including the long–term unemployed, people with disabilities, veterans, African Americans, Latino Americans, Native Americans, and linguistic minorities. Tasks include: collecting and disseminating effective models; integrating demand–driven approaches with best practices in working with target populations; developing policies that align workforce partners and systems to be more responsive to the needs of the target population.

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 Baker–Polito Administration supports enterprise–wide performance management as a tool for both process and outcome improvement. As such the Administration embraced the new federal Indicators of Performance, as well as the latitude afforded states to create their own distinct indicators stemming from WIOA. A Performance Measurements Workgroup was established as part of the MWIB WIOA Steering Committee structure. The group consisted of internal and external members of the workforce development system and core partners under WIOA.

The Performance Measurements workgroup is currently exploring:

• Data each measure is meant to capture and what it would communicate;

• Available data sources / agency capacity to capture the data;

• Balance between exhaustive list and meaningful list;

• Whether the performance measures will apply to all core WIOA partners

• How the measures would be compared (i.e. by area, statewide, etc.);

• Developing baseline data on program performance;

• Future targets for performance measures.

Federally Required WIOA Measures The federal indicators of performance focus on employment outcomes in the second and fourth quarter after exit, median earnings in the second quarter after exit, credential attainment, and measurable skill gains for job seekers and adult education participants. For the first time, all partners and their federally funded programs will be measured in the same way for these same outcomes. While they are only a slight departure from the indicators captured and reported on by Workforce Investment Boards and One–Stop Career Centers, they represent a wholesale change for the other core partners. Moreover, a penalty could be applied to WIOA discretionary funds for repeated missed performance targets, which may create a new sense of shared accountability for shared customers and their outcomes. There is also a new federal indicator focused on “effectiveness in service to employers” that all partners would be measured on and required to report. As of the writing of this draft, this indicator is still under development with our federal regulators.

REQUIRED FEDERAL MEASURES (WIOA Legislation)

Included in the Measures:

• All measures applied to participants in each WIOA funding stream (reports separate by agency)

• All One–Stop Career Center Customers (Specific One–Stop Career Center report or statewide rollup)

• Title II participants (adult education)

• Title IV vocational rehabilitation participants (MRC and MCB)

Targets:

• Federal Government sets target for federal measures • First report period begins July 1, 2016

• The first year will serve as the baseline period as it is the first time any partner will be collecting this information in this format

Federal Measures:

Employed 2nd Quarter after Exit (federal measure)

Employed 4th Quarter after Exit (federal measure)

Median Earnings 2nd Quarter After Exit (federal measure)

Credential Attainment Rate (federal measure)

Measureable Skill Gains (based on training/education gains) – (federal measure)

Effectiveness in Serving Employers – (federal measure to be defined)

Given the significant change to performance measurement for several of the WIOA partners, there were efforts internal to each system (adult education, vocational rehabilitation, etc.) to better understand the impact of the required WIOA measures for each unique system as well. For example, in addition to the cross–agency WIOA Workgroup on Performance Measurement, the Adult and Community Learning Services (ACLS) department in Massachusetts created a stakeholder engagement process for providers in the field to better understand the implications and impact of the federal measures on adult education.

The WIOA performance measures provide one strategy for assessing the quality of the adult literacy services provided. In FY16, ACLS convened a WIOA Performance Measures Task Force comprised of five Massachusetts adult education directors and ACLS staff to:

• Review the WIOA performance measures and program performance data;

• Decide whether the federal measures should be part of a new state performance accountability system for awarding past performance points to local programs;

• Decide whether additional measures should be added; • Weight and rank the measures;

• Address implications; and

• Create a plan for rolling out the new system including a performance measures pilot for FY17.

ACLS continues to integrate the feedback and work with the adult education field into the cross–agency Performance Workgroup and the WIOA Steering Committee.

MA evaluates the performance of the workforce system quarterly and annually based upon negotiated local performance goals. As warranted, technical assistance and/or corrective action is provided based upon the result of the evaluations.

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.

State–Designed Performance Measures Although these federal indicators represent a significant step toward systems alignment and shared accountability, the various workgroups and the Steering Committee felt it was important to consider additional indicators that would specifically speak to our achievement of the goals previously outlined.

As such, the Steering Committee and Performance Measurements Workgroup developed measurement concepts that reflect the vision, goals and strategies outlined in prior sections. In particular, the Performance Measurements Workgroup identified gaps in the federal measures related to the results for specific job seeker populations, business customers and the long–term impact of education, training and supports on an individual's career pathway toward self–sustaining wages.

Currently, the Performance Measurements Workgroup is reviewing the following types of state–designed measures.

RESULTS FOR KEY POPULATIONS

A significant focus for WIOA and for the Baker Administration is to ensure that individuals who face barriers to employment benefit from public education, training and workforce programs in order to shift patterns of chronic unemployment for specific demographic populations and job seekers. While the WIOA federal measures look at job placement, states are not required to further review job placement data by population type. Massachusetts is considering state–designed measures that track job placement and results for specific populations WITHIN the required, federal data sets for each funding stream. Currently, the group is reviewing the proposed measures as shown in the table below.

Evaluation Question: Are programs achieving results for program participants?

Programs: WIOA Title I, WIOA Title III, Vets, Trade, WIOA Title II, WIOA Title III (for state, workforce areas and regions where appropriate)

a. Number and Percent of customers enrolled in training and employed in a training related job 2nd Quarter After Exit b. Number and Percent of Veterans Employed 2nd Quarter After Exit c. Number and Percent of Individuals with Language Barriers at Registration Employed 2nd Quarter After Exit d. Number and Percent of Individuals without High School Equivalency at enrollment that obtained a HS equivalency and who are Employed at 2nd Quarter After Exit e. Number and Percent of Individuals with a Disability Employed 2nd Quarter After Exit f. Number and Percent of Individuals receiving TANF or SNAP Employed at 2nd Quarter After Exit

BUSINESS CUSTOMER RESULTS

The required WIOA measure to look at the "effectiveness in service to employers" needs additional definition and refinement. The Steering Committee, Performance Workforce and Business Strategies Workgroups also identified a need to greatly improve the data collection and ability to report out on results for business customers, in particular those business customers working with One–Stop Career Centers. The WIOA partners outside of the One–Stop Career Center system do not serve the same volume of business customers and therefore need to continue to identify ways in which these types of measures would be meaningful and doable.

Evaluation Question: Are programs meeting the needs of Massachusetts' businesses?

Included in Measures: Business customers of One–Stop Career Centers (OSCC)

Target: • Create a Business Engagement/OSCC Dashboard • These measures will entail additional IT systems development and costs to collect data for the measures.

Business Service Measures – State Designed (Measures reported by Career Centers)

• Number of businesses served • Number of new businesses served • Number of repeat businesses served • Number of businesses served by industry type • Number of business visits weekly by business service representatives • Number and percent of businesses registered with OSCCs who hire customers • Number of hires per industry • Retention rate for individuals hired by businesses registered with OSCCs who hire customers

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.

Though not required, assessment results for the last two years are presented for each Core partner in the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/.

D. EVALUATION

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

The State may conduct evaluations and research projects with respect to the WIOA core programs in coordination with the State Workforce Development Board, local boards, and State partner agencies. These projects will include an evaluation component to be conducted by an independent entity and be consistent with evaluation requirements established by the Secretary of Labor and the Secretary of Education under WIOA.

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),

Title 1 Programs The Executive Office of Labor and Workforce Development (EOLWD) in an effort to provide a forum for annual review of the data used for formula allocations under WIOA Title I established a Workforce Allocations Task Force in 2014. The Task Force includes a representative of the State Workforce Board (serving as the chair) and representatives from local workforce boards, local career centers, local Fiscal Officers, and staff at EOLWD's Department of Career Services (DCS) responsible for development and distribution of WIOA Title I program allocations. The Task Force makes its recommendations to the Governor through the Secretary of Labor and Workforce Development. In addition, at the discretion of the Secretary, the Task Force may be called upon to recommend allocation methodologies for distribution of State funds appropriated for One–Stop Career Centers. DCS is responsible for computing the 16 local workforce area allocations for WIOA Title I programs based on the approved formula data and methodology and for providing the allocation levels to EOLWD's Finance Department. Local area allocations are published annually with the detailed input data and formulas through the Fiscal Year WIOA Local Annual Plan Guidance Policy, and are updated as necessary during the fiscal year if there are changes in federal allotment levels.

The state's unemployment rate for Program Year 2014/Fiscal Year 2015 (July 1, 2014 – June 30, 2015) was 5.1% and, therefore, in PY2016/FY2017 Massachusetts will have sub–state Areas of Substantial Unemployment (ASUs) defined in accordance with the methodology proscribed by the U.S. Department of Labor's Bureau of Labor Statistics (BLS) and Employment and Training Administration (ETA). It is anticipated that the State will have sub–state ASUs for the four program years beginning July 1, 2016.

WIOA Title I Youth and Adult local area allocations are computed in accordance with instructions in the WIOA sections identified above and are distributed by percentage share to the sixteen local Workforce Development Areas (local areas) according to the formula shown below.

Factor, Source and Weight

Average Number of Economically Disadvantaged Youths (Census Bureau, American Community Survey) 1/3

Number of Unemployed in ASUs (EOLWD, Department of Unemployment Assistance, Economic Research, BLS methodology) 1/3

Number of Excess Unemployed in ASUs (EOLWD, Department of Unemployment Assistance, Economic Research, BLS methodology) 1/3

A hold–harmless provision ensures that each local area's percentage share of the State allotments designated for local WIOA Title 1 Youth and Adult program activities does not fall below 90% of the local area's average percentage share for the prior two fiscal years.

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

WIOA Title I Youth and Adult local area allocations are computed in accordance with instructions in the WIOA sections identified above and are distributed by percentage share to the sixteen local Workforce Development Areas (local areas) according to the formula shown below.

Factor, Source and Weight

Average Number of Economically Disadvantaged Adults

(Census Bureau, American Community Survey)

1/3

Number of Unemployed in ASUs

(EOLWD, Department of Unemployment Assistance, Economic Research, BLS methodology)

1/3

Number of Excess Unemployed in ASUs

(EOLWD, Department of Unemployment Assistance, Economic Research, BLS methodology)

1/3

A hold–harmless provision ensures that each local area's percentage share of the State allotments designated for local WIOA Title 1 Youth and Adult program activities does not fall below 90% of the local area's average percentage share for the prior two fiscal years.

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

The Workforce Allocations Task Force reviews the formula for distribution of Title I Dislocated Worker funds to local workforce areas in accordance with requirements in WIOA section 133(b)(2)(B) and makes its recommendations to the Governor through the Secretary of Labor and Workforce Development. This review is done annually to ensure that the most current data are used for the formula allocations to local workforce areas.

The Task Force's final recommendations for Program Year 2016/Fiscal Year 2017 are shown below. The Task Force worked with DUA Economic Research to develop a viable data source for the Plant Closing and Mass Layoff Data factor to replace the BLS Mass Layoff Statistics data used in prior years.

A hold–harmless provision ensures that each local area's percentage share of the State allotment designated for local Dislocated Worker program activities does not fall below 90% of the local area's average percentage share for the prior two fiscal years

A summary is provided below of the formula per requirements in WIOA 133(b)(2)(B):

INFORMATION FACTOR: Insured Unemployment Data

DATA FOR PY16/FY17: CY 2015 Average Monthly UI Claimants

DATA SOURCE: UI claimant data, DUA Economic Research

WEIGHT: 30%

INFORMATION FACTOR: Insured Unemployment Data

DATA FOR PY16/FY17: CY 2015 Average Monthly UI Claimants

DATA SOURCE: UI claimant data, DUA Economic Research

WEIGHT: 30%

INFORMATION FACTOR: Unemployment Concentrations

DATA FOR PY16/FY17: CY 2015 Average Annual Unemployment Rate

DATA SOURCE: Labor Force Data, DUA Economic Research

WEIGHT: 25%

INFORMATION FACTOR: Plant Closing and Mass Layoff

DATA FOR PY16/FY17: CY 2015 Claimants in Layoffs of 25+

DATA SOURCE: UI Claimant Data, DUA Economic Research

WEIGHT: 5%

INFORMATION FACTOR: Declining Industries Data

DATA FOR PY16/FY17: 3–Year Job Loss in Declining Industries

DATA SOURCE: QCEW, DUA Economic Research

WEIGHT: 10%

INFORMATION FACTOR: Farmer–Rancher Economic Hardship Data

DATA FOR PY16/FY17: Not significant in MA at 0.16% of total employment

DATA SOURCE: None

WEIGHT: 0%

INFORMATION FACTOR: Long–Term Unemployment Data

DATA FOR PY16/FY17: CY 2015 Average UI Claimants 15+ Continuous Weeks

DATA SOURCE: UI Claimant Data, DUA Economic Research

WEIGHT: 15%

INFORMATION FACTOR: Long–Term Unemployment Data

DATA FOR PY16/FY17: CY 2015 Annual Total of UI Claimants Exhausting Benefits

DATA SOURCE: UI Claimant Data, DUA Economic Research

WEIGHT: 15%

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.

ACLS will issue an open and competitive Request for Proposals (RFP) and Request for Responses (RFR) in FY17 for the implementation of Title II services in FY18. Multi-year grants will be awarded based on regional allocations to successful applicants in order to establish a network of providers throughout the state to address the following considerations in each workforce region:

• Serve individuals identified as most in need of adult education and literacy activities including individuals with disabilities.

• Provide evidence of past effectiveness as specified in the RFP.

• Within each region fund programs that offer services aligned with the goals of the local plan as well as with the activities and services of the One-Stop Career Center partner(s).

• Ensure that program services offer sufficient intensity of instruction based on most rigorous research and evidence based reading instruction that includes the essential components of reading (e.g. STAR).

• Based on regional needs, ensure that programs offer (1) ABE preparation for high school equivalency credential instruction in math, reading, writing, and speaking based on rigorous research and effective educational practice; (2) and/or English language acquisition (English to Speakers of Other Languages) and civics education programs are based on second language acquisition (SLA) theories and the various hypotheses and explanations for how second languages are learned and factors that influence the process.

• Ensure that programs demonstrate effective uses of technology, including digital literacy distance education statewide.

• Ensure regional student access to contextualized instruction including education and training activities that facilitate student transition to and completion of postsecondary and training, obtainment and advancement in employment, and the ability to exercise the rights and responsibilities of citizenship.

• Ensure that programs provide evidence that services are delivered by well-trained instructors, advisors and administrators who meet state and program qualifications and have access to high quality professional development.

• Programs provide evidence of how they will coordinate with other services offered in the region (e.g. connections to local workforce development boards, One-Stop Career Centers, higher education and other educational institutions) to establish career pathways for students.

• Programs offer activities that are flexible in order to accommodate student schedules and coordinate support services (e.g. childcare, transportation) to enable individuals, including those with disabilities, to attend.

• Ensure that programs have the capacity to collect and report participant outcomes.

III.b.5.B.i. Multi-year Grants or Contracts:

The Commonwealth's response lacked adequate detail in the description of how it will be distributing AEFLA program funds within the Commonwealth. Furthermore, the Commonwealth did not: (1) adequately describe its competitive process and identify how many years will be awarded in multi-year grants or contracts; (2) address how it will make the application available to all eligible providers consistent with WIOA; and (3) describe how it will determine demonstrated effectiveness, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

Response:

Massachusetts will distribute AEFLA funds to provide adult education and literacy services in all 16 workforce regions of the Commonwealth. All entities of demonstrated effectiveness will be eligible to apply.

The projected timeline for implementing the FY18 Open and Competitive Request for Proposals (RFP) follows:

November 15, 2016	Release of RFP
February 15, 2017	Proposals due to ACLS
April 14, 2017	Funding recommendations are finalized
April 28, 2017	Awards announced to the field

However, due to the fact that Massachusetts will not have WIOA aligned local plans in place until July 1, 2017, the Adult and Community Learning Services Unit at the Department of Elementary and Secondary Education requested a waiver to postpone the competition until the workforce development regional local plans are in place (July 1, 2017). If granted the extension, the RFP to compete AEFLA funds will be released in the summer/fall of 2017 with program implementation on July 1, 2018.

(1) The Open and Competitive Request for Proposals (RFP) process will consist of two separate competitive processes.

A *regional* competition will make funding available for Community Adult Learning Centers (CALCs) offering ABE and/or ESOL services, which may also include Adult Career Pathways or bridge programs, Integrated Education and Training, and Integrated English Literacy and Civics Education grant programs, etc. The *regional* allocations will be determined using a formula that takes into account data from the American Community Survey. Successful applicants will be awarded funding based on the quality of their responses to the 13 considerations in Title II of WIOA. They will also be awarded points based on past performance. The regional competition will be reviewed for alignment with local plans by local boards.

A *statewide* competition will make funding available for programs that may include Adult Basic Education in Correctional Institutions (ABECI), Transition to Community College, Primary Instruction by Volunteers, Workplace Education, and Distance Learning Instructional Hubs, etc. Applicants will compete for funds based on a statewide allocation and be awarded funding based on the quality of their responses to the 13 considerations in Title II of WIOA without regard to the workforce regions in which they are located. The statewide competition will also be reviewed for alignment with local plans by local boards.

Successful applicants for CALC funding will be awarded a multi-year contract (ACLS is currently considering six-year and three-year contract lengths) according to cut points that reflect the quality of proposals, with six years of funding awarded to programs that score above the cut point and three years of funding awarded to programs that score below the cut point.

(2) The RFP process will ensure direct and equitable access to eligible providers. Massachusetts will ensure direct and equitable access for all bidders by posting and announcing the Open and Competitive RFP on the Department's website; conducting bidders' conferences in multiple locations across the state; providing training on program design and ABE data collection systems to

potential bidders; and answering all questions related to the RFP by posting them on a Q&A on the Department's website.

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.

Rebidding will be a multi-year procurement process that ensures alignment with the principles and requirements of WIOA and engages key stakeholders from the workforce development system. ACLS will:

• Develop an open and competitive Request for Proposals (RFP) and Request for Responses (RFR);

• Post and broadly disseminate the open and competitive RFP and RFR in order to ensure equitable access for all bidders;

• Conduct bidders' conferences in multiple locations across the state;

• Provide trainings for entities new to the state system to ensure equitable access to all bidders;

• Designate proposal review teams comprised of state adult education staff and regional LWDB representatives;

• Train proposal review teams;

• Review applications with LWDB representatives who will check proposals for alignment with regional priorities in the local plan during the review process; and

• Review funding recommendations from the reader teams.

• Notify programs about final funding decisions and post information on the ACLS website.

The Department will ensure that all eligible providers use the same application process and that all applications are treated in the same manner in terms of review and evaluation. All applications will be available to all eligible providers and each competition will use review teams, scoring procedures, and final determination procedures as per the direct and equitable provisions to award funds under sections 225, 231, and 243.

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.

By formula 85% of Massachusetts's VR funding goes to MRC and 15% of the VR funding goes to MCB.

While Massachusetts Commission for the Blind vocational rehabilitation funds are allocated to local offices as necessary throughout the year, the agency's currently approved state plan requires that funds for needed services be available to any eligible consumer without regard to location within the state.

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.

The Commonwealth's workforce system will be expanded and strengthened by aligning programs, services, and activities across core partners identified within WIOA. It is the goal of the state to create an integrated, technology–based intake and case management information system built around a main entry portal into the expanded Massachusetts Workforce Development System to be used by all staff and common customers (both job seekers and employers). This will entail designing and implementing the technological infrastructure to execute a common intake/registration application with real–time triage processes that features: strong skills and transferability assessments, job matching and job referral, common case management across all partners. This common intake and case management system is imperative to our ability to strengthen the consistency and quality of services provided by the system to job seekers and businesses.

Massachusetts is investigating creating a new online, "front end" interface built around a web–based platform such as JobQuest. JobQuest, currently in use by the One–Stop Career Centers, is the online application that connects to the MOSES database and is the front–facing web application used by members of the public (job seekers and businesses) to access programs and services such as job search and application, training programs research and, for employers, to locate job candidates. JobQuest can serve as a portal to register individuals working with WIOA Program partners who will be co–enrolled in the OSCC system for career development, job search, educational and occupational assessments, occupational training and job placement. The registration will include all data points required by each partner program. In this yet–to–be developed application, registration would trigger the process to establish eligibility across partner programs, allow customer access to all programs, services and activities offered through the partner agencies, and provide access to assessment and labor market information, as well as profiling tools. Access will be granted using a single user ID and password. The information captured at registration would be shared with partner agencies through file exchanges to populate appropriate fields within their respective data systems. The new IT system functionality will allow all program partners to easily register individuals at One–Stop Career Centers, track referrals and track the service results for those "shared" customers. Currently, no cross–program, cross–agency tracking process exists.

This new functionality will also serve to support the design of the new customer flows for shared customers described elsewhere in this plan and in the state MOU. Data interfaces with core agency partners will allow these agencies to integrate data within their own reporting databases.

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.

See response to 1 above.

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.

See response to 1 above.

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

The Department of Career Services will be responsible for coordinating production of the Annual Performance Report, the contents of which are described below and to be submitted per required report formats.

The State commits to performance reports that adhere to the requirements described under section 116, Moreover, the reports will include a mechanism for electronic access to the State local area and ETP performance reports.

WIOA Section 116(d)(2): Performance Reports – Required report content for core programs: (2) Contents of state performance reports. – The performance report for a State shall include, [subject to Data Validation] — (A) information specifying the levels of performance achieved with respect to the primary indicators of performance described in subsection for each of the programs described in subsection (b)(3)(A)(ii) and the State–adjusted levels of performance with respect to such indicators for each program; (B) information specifying the levels of performance achieved with respect to the primary indicators of performance described in subsection (b)(2)(A) for each of the programs described in subsection (b)(3)(A)(ii) with respect to individuals with barriers to employment, disaggregated by each subpopulation of such individuals, and by race, ethnicity, sex, and age; (C) the total number of participants served by each of the programs described in subsection (b)(3)(A)(ii); (D) the number of participants who received career and training services, respectively, during the most recent program year and the three preceding program years, and the amount of funds spent on each type of service; (E) the number of participants who exited from career and training services, respectively, during the most recent program year and the 3 preceding program years; (F) the average cost per participant of those participants who received career and training services, respectively, during the most recent program year and the 3 preceding program years; (G) the percentage of participants in a program authorized under this subtitle who received

training services and obtained unsubsidized employment in a field related to the training received; (H) the number of individuals with barriers to employment served by each of the programs described in subsection (b)(3)(A)(ii), disaggregated by each subpopulation of such individuals; (I) the number of participants who are enrolled in more than 1 of the programs described in subsection (b)(3)(A)(ii); (J) the percentage of the State's annual allotment under section 132(b) that the State spent on administrative costs; (K) in the case of a State in which local areas are implementing pay–for–performance contract strategies for programs— (i) the performance of service providers entering into contracts for such strategies, measured against the levels of performance specified in the contracts for such strategies; and (ii) an evaluation of the design of the programs and performance of the strategies, and, where possible, the level of satisfaction with the strategies among employers and participants benefitting from the strategies; and (L) other information that facilitates comparisons of programs with programs in other States.

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.

Massachusetts will consider development of a post–program follow–up capability on participant employment by use of wage record data and completion of education and attainment of degrees by use of higher education data. However, this capacity will not be pursued until more immediate data exchange and wage data matching processes are in place for all workforce partner agencies.

In addition, the new Administration applied for a longitudinal data grant through US Department of Education to build out the capacity to share wage record data and information across education and workforce systems. This data analysis designed under this grant will open up new doors to understand which initiatives and interventions are most successful.

Massachusetts will be using results from wage record matches of program exiters/completers on the required measures that asses employment, earnings and persistence in employment for one year following exit for the core WIOA programs. We will similarly follow up for the year following exit for program participants that entered training or postsecondary education as part of their program services. The state is pursuing an interface with core partner systems that will also provide information on shared customers and partner services. Matching with higher education is being considered through the use of data systems/warehouses, but these discussions are just beginning.

Massachusetts has a long-term goal of development of a longitudinal follow-up capability on participant employment using wage record data and completion of education and attainment of degrees by use of higher education data. However, this capacity will not be pursued until more immediate data exchange and required performance reporting are in place for all core workforce partner agencies.

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.)

Based upon the WIOA requirements to utilize wage record data for performance review and evaluation, Executive Office of Labor and Workforce Development lead a process with the Department of Unemployment Assistance to discuss WIOA wage record matching needs of partner agencies and to design MOUs with the partners to wage record match Core Program Partner participants to develop baseline data for the WIOA Plan. The Massachusetts Workforce Development Board, EOLWD, DUA will work with each of the Core Program partners to continue to meet performance accountability reporting requirements. Specific MOUs for ongoing wage matching are in progress.

In addition, the Administration filed state legislation will be modified to allow the use of wage record data for WIOA reporting. Additional legislation will be filedto meet the evaluation and research goals set to support data sharing with education agencies to evaluate the long–term impact of investment and workforce outcomes for individuals who move along a career pathway. The Commonwealth is setting up a Data Advisory Group across major Secretariats and agencies to help guide this process (building off the members of the WIOA Performance Workgroup) and to implement a recent US Department of Labor grant award to build out a longitudinal evaluation of education and workforce programs.

The Massachusetts Rehabilitation Commission (MRC) and the Massachusetts Commission for the Blind (MCB) each worked with the Executive Office of Labor and Workforce Development, Massachusetts Adult and Community Learning Services, and the Department of Unemployment Assistance (DUA) to initiate a Memorandum of Understanding (MOU) and data sharing agreement in order for MRC and MCB to obtain client-specific UI wage data records for the purposes of WIOA reporting and to measure progress on the Common Performance Measures.

Under WIOA, the Massachusetts Rehabilitation Commission is required to report VR data to the Rehabilitation Services Administration (RSA) through the RSA-911 report which will be submitted via the RSA portal on a quarterly basis with open and closed case data. As part of its WIOA reporting process to report data and to measure performance on the Common Measures to RSA, MRC will require individual level wage data from Unemployment Insurance data. MRC will be required to report data for consumers exiting from the Vocational Rehabilitation Program both successfully and unsuccessfully at the 1st, 2nd, 3rd, and 4th quarter after exit from the VR program for the following fields from Unemployment Insurance data from DUA based on Social Security Numbers provided by MRC to DUA using a secure interchange method of data transmission.

Data fields to be provided to MRC from DUA for matching records using an interchange secure data transmission system will be as follows:

• Unemployment Insurance Quarterly Earnings (at 1st, 2nd,, 3rd and 4th quarter after exit)

• Employer Name (at 1st, 2nd, , 3rd and 4th quarter after exit)

• Federal Employer Identification Number (FEIN) (at 1st, 2nd, 3rd and 4th quarter after exit)

• Matching Quarter

• NAISC Code

MRC will require a record for each matching client with individual earnings per employer.

The MOU agreement ensures adequate time for MRC staff to test the process for scripting this data into the RSA-911 report prior to the first quarterly submission as required by the final rules and regulations of the revised RSA-911 file. MRC will use the MRCIS case-management system to submit the RSA-911 data file to the RSA portal on a quarterly program schedule.

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.

All Federal and State laws and provisions concerning privacy of personal and business information for all partners will be strictly adhered to and protocols will be established to monitor all partners' access to and use of participant and employer data required to fulfill their programmatic requirements.

As such, the Commonwealth and its workforce development partners are subject to and must comply with all applicable federal and state regulatory and statutory requirements, and any amendment thereto, pertaining to confidentiality and privacy, including but not limited to: M.G.L. c. 151A, § 46; M.G.L. c. 66A; M.G.L. c. 93H; M.G.L. c. 151A, §46(c)(3); and 801 C.M.R. 3.00 et seq. In addition, Commonwealth and its workforce development partners must comply with the notification requirements of M.G.L. c. 93H (Security Breaches) and Executive Order Number 504 (Order Regarding the Security and Confidentiality of Personal Information), including any supplemental procedures or regulations thereto. DCS gives trainings to all staff on safeguarding personal and business information, and all DCS staff and workforce development partners must sign off on the EOLWD Confidentiality Policy.

See http://www.mass.gov/massworkforce/docs/issuances/policy/2007/0781.pdf (Workforce Issuance Number 07–81 – Identity Theft) and

http://www.mass.gov/massworkforce/docs/issuances/policy/2005/0576revised.pdf (Workforce Issuance No. 05–76 – Policy to Protect Confidential Information)

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.

Massachusetts has established policies for the delivery of priority of service for Veterans and eligible spouses by the state workforce agency or agencies, local workforce development boards and One–Stop Career Centers for all qualified job training programs delivered through the Commonwealth's workforce system. The policies: • Ensure that covered persons are identified at the point of entry and given an opportunity to take full advantage of priority of service. • Ensure that covered persons are aware of a) their entitlement to priority of service; b) the full array of employment, training and placement services available under priority of service; and c) any applicable eligibility requirements for those programs and/ or services. • Require local workforce development boards to develop and include policies in their local plan to implement priority of service for the local One–Stop Career Centers (OSCC) and for service delivery by local workforce preparation and training providers.

The Commonwealth's OSCCs are fully and seamlessly integrated with the full array of WIOA, Wagner–Peyser and other key workforce partner services co–located under one roof. The goal is to as quickly as possible deliver the desired and appropriate services. Prioritizing services to the targeted Veteran with an identified Significant Barrier to Employment (SBE) is facilitated by specifically "flagging" such "at risk" Veteran customers within the Massachusetts One–Stop Employment System (MOSES) database. The initial assessment identifies the individual's "job readiness". If the Veteran is not identified as having an SBE, services are provided on a priority basis by OSCC staff. If intensive services are appropriate, a case plan is developed and the Veteran is assisted directly by the DVOP or referred to supportive services, as appropriate.

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.

WIOA NPRM at 20 CFR §678.800 requires that the state's network of One–Stop Career Centers be certified by the Local Boards. WIOA further mandates that the State Board, in consultation with chief elected officials and Local Boards must establish objective criteria and procedures that Local Boards must use when certifying career centers. These new career center standards will further and be consistent with the Governor's and State Board's guidelines, guidance and vision. The new criteria will evaluate the one–stop career center delivery system for effectiveness in addressing business and job seeker needs in the enhanced Massachusetts demand–driven workforce delivery system. The new criteria will also ensure compliance with WIOA Section 188 nondiscrimination provisions and the Americans with Disabilities Act. In order to create and implement the One–Stop Certification process and policy under WIOA, the Massachusetts State Board created the Career Center Standards and Process Workgroup (CCS&P). The CCS&P Workgroup is comprised of a statewide diverse group of workforce professionals, representatives of core and other partner programs, including Vocational Rehabilitation, representatives of targeted customer groups, and business representatives. The group is in the process of rolling out Massachusetts' inaugural statewide career center standards in the areas of cost effectiveness, integrated services, accessibility, effective leadership, performance and responsiveness to the demand driven model. Accessibility standards include the examination of systems to ensure staff knowledge of and compliance with Section 188 of WIOA. The standards exceed WIOA mandates and will become a core driver of change through the WIOA–mandated career center operator competitive selection process.

Additionally, through the One–Stop Career Center standards development process, career center responsive service delivery structure was determined to be a critical element in career center operation. This includes assessing the career center location for accessibility to the communities it serves, whether hours of operation are responsive to all partners', possessing adaptive technology, and ADA–compliance.

The Workforce Development Board Certification (WDB) Workgroup, a sub–committee of the WIOA Jobseeker and Employer Steering Committee, is designing standards for Workforce Board certification pursuant to new WIOA responsibilities. These new Workforce Board standards will be incorporated into enhanced local and regional delivery and project models and related policies. The standards include the examination of board systems to conduct comprehensive annual reviews for programmatic and physical accessibility, including level of engagement of the disability community in conducting these reviews. New standards for certification will also require Workforce Boards to demonstrate how One–Stop Career Centers are incorporating a universal design approach as the

basis of standards for accessibility, ensuring a comprehensive process that focuses on both programmatic and physical access to meet the needs of a full array of customers.

Every One–Stop Career Center in Massachusetts is currently fully accessible and in compliance with WIA Section 188 regulations on non–discrimination. As stated above, the certification process for One–Stop Career Centers and the state guidelines for local WIOA plan submissions both address matters pertaining to physical and programmatic accessibility. The Massachusetts DCS Field Management and Oversight unit conducts on–site monitoring at all 32 One–Stop locations, using the set of One–Stop Career Center Quality Assurance Standards. Further, the Massachusetts Department of Capital Asset Management (DCAM) conducts an accessibility review for any new leases or lease renewal activities based on ADA guidelines. Policy dictates that if any deficiencies are identified that One–Stops are informed in writing of the findings and given a deadline for when corrections need to be completed. There are no outstanding issues currently.

DCS has made a commitment to work with the Local Boards and One–Stop Career Centers to make the One–Stop programs and services more accessible to individuals with disabilities. Last year, as part of its review of accessibility surveys, DCS determined the need to upgrade the adaptive technology available. Accessibility is part of One–Stop Career Center quality assurance and has been incorporated as a basic tenet in One–Stop staff training. The high percentage of individuals identified as having a disability utilizing the One–Stop system (double the national average) is indicative of the full accessibility of the One–Stop system.

The Massachusetts Department of Career Services adheres to Section 188 of WIA, The Governors Executive Order No. 478, and the Mass Workforce Policy No. 01–35. All One–Stops in the regions have incorporated practices to effectively serve persons with disabilities through required assistive technology and equipment at each center. Accessibility to serve job seekers with a disability is reviewed annually. Standard adaptive equipment for One–Stop Career Center's include: ZoomText, Jaws, Scanner for Jaws/ZoomText, Dragon Naturally Speaking hands–free voice activated software, Braille Labeler, Assistive listening devices, Text TTY line, height adjustable tables, and Trackball mouse, and other assistive technology.

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.

Massachusetts One–Stop Career Centers (OSCC) are required to develop standard operating procedures that include a Language Assistance Plan (LAP). The local LAP follows the Commonwealth's guidelines, policies, procedures and protocols as established within Mass Workforce Issuance 100 DCS 08.101

Language Services Assistance for Limited English Proficiency Customers. Specific assistance that is available:

Multi–Lingual Services Office: The EOLWD office of multi–lingual services is staffed by employees that speak 12 different languages who are prepared to assist any and all customers as needed.

Interpreter Services: In addition if the services are not available through the Multi–Lingual office, Career Center staff are asked to contact the language line that has been established.

Internal Volunteer Bi–lingual Staff: The Multi–Lingual office maintains an Internal Volunteer Bi–lingual staff list made up of Career Center staff across the Commonwealth who will assist customers as needed should all other avenues be unavailable.

Communications: Statewide communications are disseminated in 13 different languages to customers based on language preference as established during the enrollment process.

Language Flashcards: "I Speak" language flashcards are available at the front desk area for a customer to point to language of choice if they should not be able to speak English which will trigger the language assistance plan.

Websites: An "I Speak" ICON is located on all appropriate agency websites. The federal portal does not provide the ability to include the I Speak ICON in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

IV. COORDINATION WITH STATE PLAN PROGRAMS

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

The Commonwealth's workforce system will be expanded and strengthened by aligning programs, services and activities across a variety of core partners identified within WIOA through the development of a statewide Workforce Development Plan that utilizes the WIOA process for development.

The WIOA planning process started in November of 2014 through the creation of a new WIOA Steering Committee of the Massachusetts Workforce Investment Board. The WIOA Steering Committee and its sub–committees serve as the main organizing body for joint planning and coordination of WIOA core and partner programs. The WIOA Steering Committee and sub–committees are outlined in the chart below.

GRAPHIC: Chart 35 – WIOA PLANNING COMMITTEE STRUCTURE – The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Representation / Constituency

Adult Basic Education (ABE) Title II

Apprenticeship

Economic Development

Businesses / Business and Industry

Community Based Organization (CBO)

Higher Education

Local Workforce Investment Boards

One–Stop Career Centers

Organized Labor

Sector Projects, Research, Evaluations

State Administration for USDOL Programs – Titles I and III, TRADE, DOL Vet etc.

Temporary Aid for Needy Families, Supplemental Nutrition Assistance Program

Veterans

Vocational Rehabilitation

Workforce Policy

Workforce Skills Cabinet

Unemployment Insurance

Low–income individuals/CBO

Immigrant Workers

Agency/Organization

Adult and Community Learning Services (ACLS)

Division of Apprentice Standards (DAS)

Executive Office of Housing and Economic Development (EOHED)

Beth Israel Deaconess Medical Center*

BEST Corp.

Department of Higher Education (DHE)

Massachusetts Workforce Board Association

Massachusetts Workforce Professionals Association (MWPA)

AFL–CIO

Commonwealth Corporation

Department of Career Services (DCS)

Department of Transitional Services (DTS) /Executive Office of Health and Human Services (EOHHS)

Department of Veterans' Services (DVS)

Mass Rehabilitation Commission (MRC) / Executive Office of Health and Human Services (EOHHS)

Mass Commission for the Blind (MCB)/Exec. Office of Health and Human Services (EOHHS)

Executive Office of Labor and Workforce Development (EOLWD)

EOLWD, EOHED, Exec. Office of Education (EOE)

Department of Unemployment Assistance

Crittendon Women's Union

Massachusetts Office of Refugees and Immigrants

Executive Office of Elder Affairs

*Additional business focus groups provided input on the process and development of the plan.

WIOA STEERING COMMITTEE OBJECTIVES AND DELIVERABLES

The key objective of the WIOA Steering Committee is to develop a framework for WIOA implementation through identifying key priority and strategy issues (e.g. define demand–driven, "flip the system") to inform the WIOA workgroups and the WIOA State Plan, including:

• Setting–up functional workgroups that will report back to Committee. Workgroups will be outcome focused to ensure debate and dialogue lead to meaningful changes for our customers.

• Developing policy and operational recommendations to the appropriate decision–makers (i.e. MWIB, Secretaries, State Administrators, etc.)

• Meeting and developing state–level goals and policies to align the workforce system with job demand/industry need.

In addition, the WIOA Steering Committee's work focused on creation of the following deliverables:

• Develop "demand–driven" principles for workgroups

• Identify a framework for cross–agency partnerships to increase "system impact" (including state policy on infrastructure funding and integrated services through Career Centers) – MOU

• Initiate Pathway Mapping for customer populations (business, youth, disability, Veterans, low–income/low–skilled, etc.)

• Develop the WIOA State Plan: Review draft and move up to MWIB (draft due November 2015 / Final Plan due March 2016).

The Steering Committee embarked on its work by developing initial research and information on the capacity of the public workforce system to inform the vision, goals and strategies for the statewide plan through the following processes:

• Steering Committee brainstorming session

• Operation and convening of Steering Committee, Workgroups and Sub–Groups

• Regional meetings with workforce boards, CEOs and Career Center leadership (Department of Career Services)

• Research and input from the Governor's Task Force on Individuals Facing Chronic Unemployment (including listening sessions.

WIOA Steering Committee Vision Brainstorm Sessions

The WIOA Steering Committee looked at three key questions (see "Workforce Development Vision") and developed a list of ideas in response.

> Re–think approach to workforce system, refocus service delivery models

> Align the system and all its elements

> Employer–driven model, "flip the model"

GRAPHIC: WORKFORCE DEVELOPMENT VISION – The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

> Think about those "screened out", and resources that can be brought to bear to address their needs, ramps to basic skills

> Regular/routine contact with industry re: changing hiring needs/process (e.g. online applications)

> Be truly job–driven

> Define why we have an employer–driven model, and make mission/vision clear: to gather intelligence and form operational partners

> Look at effective models like Apprenticeship

> Stabilize workforce partner networks

> Need better consumer information for procuring training (Community Colleges, proprietary training programs)

> More robust collection of information

> Share/broadcast information

> Look at system capacity for meeting industry/training needs

> Formulate state policy informing training capacity

> Look at data collection systems (wage record matching, participant characteristics, timeliness of info)

> Look at local workforce board composition (effective and engaged Board members)

> Robust use of technology and social media

> Professional development of staff (training about training)

> Look at system in partnership with all stakeholders

Based on the ideas generated from the vision brainstorm, the WIOA Steering Committee structured the following meetings to be focused on two topics:

1. Topic 1: Re–think approach to workforce system, refocus service delivery models ("flip the model")

• Discussion: What does this mean in terms of systems–change and better outcomes for customers?

2.Topic 2: Define effective services across workforce partners.

•Discussion: How can statewide partnerships improve outcomes for job seekers, businesses and youth and job seekers with "barriers" to employment?

• How can Massachusetts increase outcomes for job seekers (hiring, skill alignment, etc.)?

• Implications for operating funding and services? (e.g. Co–location of staff, resource sharing, new referral, and follow–up processes, data analysis to show improved outcomes?)

• How should the state design WIOA Infrastructure Funding (core programs provide resources to Career Centers)?

• Services for individuals with "barriers" – what pathways exist for those "screened out" of programs (TANF, Adult Education, Vocational Rehabilitation, etc.)

1. Review and adopt regional Best Practices (Disability Employment Initiative grant, etc.)/MOUs

2. Referral processes across all core programs

3. Co–location of staff

Simultaneous to and in conjunction with the work of the WIOA Steering Committee, the WIOA workgroups convened to tackle issue–specific areas of work related to WIOA implementation.

Workgroup member composition consisted of representation from the major stakeholders in the workforce system, including core and partner programs. Participation was open to any interested parties, and the meeting minutes and announcements were posted on the WIOA website.

The following is an overview of the WIOA workgroups, their objectives and deliverables:

JOB SEEKER AND BUSINESS WORKGROUP

This workgroup coordinated the recommendations from the following sub–groups and identify state–level policy changes to create effective outcomes for job seekers and employers. It met as a large group and assigned individual workgroup members to sub–groups and suggested activities such as site visits, customer focus groups (especially business), and conversations with technical staff.

WIOA SUB–GROUP AREAS OF FOCUS AND DELIVERABLES

Individuals from each stakeholder type in the WIOA Steering Committee were invited to be in a subgroup

Business Strategies / Hiring Pipelines Workgroup

• How can Massachusetts increase outcomes for businesses (hiring, skill alignment, etc.)?

• What are best approaches to engage business community to address high–demand job openings, jobseeker skill gaps and hiring needs? How can interagency collaboration promote and coordinate promising models and approaches for Massachusetts?

• Identify industry need for apprenticeship, OJT, and sector strategies.

• Create a marketing/branding plan for existing and new services.

• Create and measure the 'relationship' with the business partner

Key Activity: Ongoing communication with all providers of 'business services' and convene business focus groups for deeper business feedback/engagement

Business Strategies / Hiring Pipelines Workgroup Deliverables:

• Business metrics that demonstrate value of workforce system to businesses, based on relationship as well as effectiveness with business partners/customers

• A business customer flow chart and model for business services at career centers

• A statewide policy to promote best practices and new model, inclusive of all state agencies that work with business partners

• Create a single point of authority for all state agencies working with business partners

• Create a single data collection point for above stated programs and services

Statewide Workforce Development Board (WDB) Certification Workgroup

• Review and improve the process and standards for Massachusetts Workforce Development Board certification.

• Establish criteria that is measurable across all boards and promotes the articulation of regional workforce development activities to optimize services to residents, businesses and Partners.

• Review current Massachusetts WIB certification process and compare to WIOA.

• Review new requirements for local board composition and responsibilities.

• Determine policies and processes that need to be updated.

• Determine how the policy priorities identified by the J&E Workgroup can be implemented in WDB certification.

• Determine standards for board certification that will help to improve outcomes for job seekers and businesses.

WDB Certification Workgroup Deliverables:

• Workforce Board policy guidance that delineates all of the elements required for Massachusetts Workforce Board biennial certification.

Career Center Standards and Selection Process Workgroup

• Analyze new WIOA provisions on career center standards and competitive selection and compare to current practice in Massachusetts (when draft regulations are available)

• Develop a common set of statewide career center standards and policies to guide workforce regions in a competitive selection process for career center designation. (It is expected that Workforce Boards and CEOs will add additional standards appropriate to goals of the region and unique labor market conditions.)

Center Standards and Selection Process Workgroup Deliverables:

• Statewide baseline Career Center Standards and policies

• Statewide guidance and policy for regions on career center selection process

Performance Measurement Workgroup

• Review WIOA Performance Measures and readiness of core program agencies to respond

• Identify systems impacts and changes needed by partner agencies

• Identify and develop new state–level performance measures to reflect workforce system goals

Performance Measurement Workgroup Deliverables:

Deliverables Associated with Federal Reporting Requirements

• Draft information collection/data requirements posted for comment on Federal Register

• Description of the primary indicators or performance with reference to federal documents – form core of a future Issuance

• Readiness status of core partners

Deliverables Associated with Benchmark Data for State Plan (DCS, ACLS, MRC, MCB, DTA)

• Develop of proposed goals for indicators of performance required in the state plan

• Memorandum of Understanding (MOU)/Inter–Agency Service Agreement (ISA) for data exchange

• Internal agency reviews

Deliverables Associated with State Level Metrics

• Statewide communication related to new state measures. These are under development, although it is expected that the following topics being covered:

> Outcomes related services provided to Shared Customers and effective partner collaboration

> Workforce Boards effectiveness

> One–Stop Career Center Performance and Standards

> Business Engagement and Demand Driven Services

Deliverables Associated with Training

• Data Entry – Youth Program staff

• Other (to be defined, though it is reasonable that they would relate to both federal and state measures)

Youth Workgroup

• New allowable models based on new youth provisions

• New policies related to 75% Out–of–School Youth Requirement and 20% work–based learning requirement

• Statewide requirements for local procurement of youth services

• Integration with other state programs (YouthWorks, SSI/SSDI/MRC/DDS transition services, etc.)

• Issues TBD by federal regulations

Youth Workgroup Deliverables:

• State–level coordination of youth–serving resources to drive local coordination

• Models for braiding of funds to serve populations with highest need (and traditionally underserved)

• Identification of new program models for ISY, OSY, and older youth

Eligible Training Provider List (ETPL) Workgroup

• Examine WIOA requirements and determine what guidance or further information may be required

• Determine actions that may best position Massachusetts to succeed in having a robust and inclusive Eligible Training Provider List (ETPL)

• Develop policy guidance with regard to the ETPL

• Notification of existing vendors of new changes

• Vendor eligibility

o Including data sharing with other agencies (Department of Licensure, Department of Labor Standards, etc.)

• Make changes to TrainingPro system

• Design better consumer information for choosing training options (community colleges, proprietary training programs, etc.)

o Dashboard on program results, by occupation, region, etc.

o More robust collection of information

o Share/broadcast information

o Look at system capacity for meeting industry/training needs

o Formulate state policy informing training capacity

o Look at data collection systems (wage record matching, participant characteristics, timeliness of info)

ETPL Workgroup Deliverables:

• Updated ETPL list

• State policy on process for vetting training providers

• State policy on data sharing among partners

• Protocols for producing/disseminating consumer information

Massachusetts Combined State Plan Public Comment Process

To further solidify WIOA implementation and coordination among the WIOA partners, the WIOA Steering Committee joined efforts to hold a collective public comment process on the Massachusetts Combined State Plan from January 22, 2016 to February 22, 2016. The partners include the Executive Office Labor and Workforce Development, Department of Career Services, Department of Unemployment Assistance, Adult and Community Learning Services (Adult Basic Education), Massachusetts Rehabilitation Commission, Massachusetts Commission for the Blind, Department of Transitional Assistance, and the Executive Office of Elder Affairs (SCSEP). The draft State plan was posted on the Massachusetts' WIOA State Plan website (http://www.mass.gov/massworkforce/state–plan) where interested parties could submit commentary and feedback on the draft plan. Concurrently, the WIOA Steering Committee held a series of four public forums on the draft State Plan in four different regions throughout the Commonwealth from February 11 –19th, 2016. These public forums featured a joint plenary session where all partners presented on the key highlights of the draft State Plan, followed by breakout sessions led by each of the plan partners in order to provide attendees an opportunity to pose questions and provide feedback on the draft plan directly to agency staff. All comments on the draft State Plan, and the notes from the public sessions are posted on the State Plan website.

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.

Massachusetts WIOA Planning Regions

The seven regions identified below have been designated as the Massachusetts WIOA Planning Regions.

1. Berkshire Region: Comprised of the Berkshire Workforce Development Area

2. Pioneer Valley Region: Comprised of the Franklin/Hampshire and Hampden Workforce Development Areas

3. Central Massachusetts Region: Comprised of the North Central and Central Massachusetts Workforce Development Areas

4. North Shore Region: Comprised of the Greater Lowell, Merrimack Valley and North Shore Workforce Development Areas.

5. Greater Boston Region: Comprised of the Boston, Metro North and Metro South West Workforce Development Areas.

6. South Shore Region: Comprised of the South Shore, Brockton, Bristol and Greater New Bedford Workforce Development Areas.

7. Cape Cod & Islands Region: Comprised of Cape Cod, Martha's Vineyard and Nantucket Workforce Development Area.

Massachusetts WIOA Local Workforce Development Areas: Berkshire, Boston, Bristol, Brockton, Cape Cod and Islands, Central Massachusetts, Franklin Hampshire, Greater Lowell, Greater New Bedford, Hampden County, Merrimack Valley, Metro North, Metro South West, North Central, North Shore and South Shore.

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.

Process and Identification of Local Areas On May 20, 2015, the Department of Career Services issued MassWorkforce Policy 100.DCS 03.100 "Initial Designation of Local Workforce Development areas," providing local chief elected officials the opportunity to request designation of the current workforce investment area as a workforce development area under WIOA. All of the sixteen local workforce areas designated under WIA requested and were granted designation under WIOA.

Massachusetts, through its Massachusetts One-Stop Employment System (MOSES) database maintains quarterly reports for each local area that determine local programmatic performance against federal performance goals. Each of the sixteen workforce areas in Massachusetts demonstrated successful performance. Staff of the Department of Career Services (DCS) determines the sustenance of fiscal integrity based on reviews of quarterly fiscal reports. Additionally, staff of the DCS Field Management and Oversight unit conducts annual local reviews for each of the sixteen local workforce areas, including an analysis of fiscal and programmatic performance.

Process and Identification of Planning Regions In November of 2015, EOLWD/DCS issued a policy describing the process that would be utilized by the Governor to identify and assign planning regions. The development of comprehensive regional partnerships facilitates alignment of workforce development activities with regional economic development activities, and better supports the execution and implementation of sector strategies and career pathways.

It is believed that regional cooperation may also lower costs and increase the effectiveness of services delivery to businesses that span more than on local workforce development area within a region and to job seekers through coordinator of shared services, processes and operations.

Process for determination of Planning Regions Pursuant to WIOA, Section 106(a), the Executive Office of Labor and Workforce Development (EOLWD) on behalf of Governor Baker presented draft proposed regions to the Workforce Skills Cabinet (i.e., Secretary of Labor and Workforce Development; Secretary of Economic Development; and Secretary of Education) as part of the Governor's regional planning process. These proposed regions were sent to local Chief Elected Officials, Local Workforce Boards, and the State Workforce Board for consultation via MassWorkforce Issuance 100 DCS 03.103. EOLWD and the State Board have reviewed comments on the proposed planning regional designations and finalized the regional designations in accordance with the above-cited issuance. The Massachusetts Regional Designation Policy is currently under development and will be operational beginning July 1, 2016.

Massachusetts WIOA Planning Regions The seven regions identified below have been designated as the Massachusetts WIOA Planning Regions: 1. Berkshire Region: Comprised of the Berkshire Workforce Development Area 2. Pioneer Valley Region: Comprised of the Franklin/Hampshire and Hampden Workforce Development Areas 3. Central Massachusetts Region: Comprised of the North

Central and Central Massachusetts Workforce Development Areas 4. North Shore Region: Comprised of the Greater Lowell, Merrimack Valley and North Shore Workforce Development Areas. 5. Greater Boston Region: Comprised of the Boston, Metro North and Metro South West Workforce Development Areas. 6. South Shore Region: Comprised of the South Shore, Brockton, Bristol and Greater New Bedford Workforce Development Areas. 7. Cape Cod & Islands Region: Comprised of Cape Cod, Martha's Vineyard and Nantucket Workforce Development Area.

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

DCS Policy 100.DCS 03.101, Unified Workforce Investment System Complaint and Appeals Process, posted on July 9, 2015 delineates the process to appeal the Governor's decision rejecting a request for designation as a workforce development area.
http://www.mass.gov/massworkforce/docs/issuances/wioa-policy/03-100.pdf (policy link fixed)

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

The appeals process relating to determinations for infrastructure funding will be included as a subpart of both the Local MOU guidance and the State One–Stop Infrastructure Funding Mechanism guidance and policies which are currently under development.

The appeals process relating to determinations for infrastructure funding is provided below. Please note the appeals process is part of a larger policy that is still under development and will be finalized in fall of 2016.

ONE-STOP PARTNER APPEAL OF ONE-STOP INFRASTRUCTURE AMOUNT DESIGNATED BY STATE UNDER STATE ONE-STOP INFRASTRUCTURE FUNDING MECHANISM

A One-Stop Partner may appeal a One-Stop Infrastructure amount established under the State Infrastructure Funding Mechanism on the basis that the State Board/Governor's determination is inconsistent with proportionate share requirement in 20 CFR 678.735(a), the cost contribution limitation in 20 CFR 678.735(b), or cost contribution caps in 20 CFR678.735.

The appellant may request a state-level appeal and/or formal appeal hearing in writing within 10 days of the State decision to impose the State One-Stop Infrastructure Funding Mechanism to finalize local Memorandum of Understanding (MOU).

The request for appeal and/or formal appeal hearing must be sent to:

Director

Massachusetts Workforce Development Board

Executive Office of Labor and Workforce Development

Charles F. Hurley Building

19 Staniford Street 4th Floor

Boston, MA 02114

If the appellant chooses to request an appeal without specifically requesting an appeal hearing, the State Board, or its' designee (Authorized State Official - ASO), may decide to either make a determination based solely on the information included in the case file or conduct further investigation and issue a written determination without scheduling a formal hearing.

In either case, the State Board/ASO must submit a written determination to the appellant within 30 days of receipt of the original appeal request or 30 days after having received additional information from further investigation or 30 days after a formal hearing request.

If the State Board/ASO has made a written request for information to the appellant or the appellant's authorized representative, and they do not respond within the given time frame the appeal is considered resolved.

If the State Board/ASO deems that a formal hearing is necessary or if the appellant specifically requests such a hearing, the State Board/ASO will notify the parties (in writing) that the matter has been scheduled for a formal hearing. The notice must inform the parties of the following conditions of the hearing process:

Formal Hearing Process

The notice must inform the parties of the following conditions of the hearing process:

• The date, time and location of the hearing.

• Instruction that the State Board/ASO will conduct and regulate the course of the hearing to assure full consideration of all relevant issues and that actions necessary to ensure an orderly hearing are followed.

• Instruction that the State Board/ASO must rule on the introduction of evidence* and afford the parties the opportunity to present, examine, and cross-examine witnesses.

* For clarity it must be noted that an administrative hearing is not the same as a Court of Law. Technical rules of evidence do not apply. It is up to the State Board/ASO to follow principles and procedures that are designed to assure credible evidence that can be tested through cross-examination.

In conjunction with the hearing process the State Board/ASO:

• May decide to make a determination based on the information included in the case file or investigate further prior to the formal hearing.

• May decide to conduct a hearing on more than one appellant if the issues are related.

• May permit (at his/her discretion) the participation of interested parties (amicus curae) with respect to specific legal or factual issues relevant to the complaint/appeal.

• May choose to conduct the hearing at a single location convenient to all parties (preferred) or, if that would represents a hardship for one or more parties, the State Hearing Official may elect to conduct the hearing by a telephone conference call.

• Must conduct the hearing and issue a written determination to the appellant, the respondent and any other participating interested parties within 30 days from the date the hearing was requested. The State Board/s/ASO's written determination must include:

? the results of the State level investigation;

? conclusions reached on the appeal;

? an explanation as to why the decision was upheld or not upheld;

A decision under this state appeal process is final and may not be appealed to the U.S. Secretary of Labor. 20 CFR 683.630(b)(3).

2. STATEWIDE ACTIVITIES

A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES.

The Commonwealth utilizes its' authority to set–aside 15% of its Title I Adult, Dislocated and Youth as Governor's Discretionary funding to accomplish all the required statewide employment and training activities under WIOA including: Program Administration and Oversight, Evaluation, Monitoring, Technical Assistance, establishing and disseminating information on: best practices, eligible training providers, and performance.

The Commonwealth has utilized these funds to: develop sector partnership initiatives in Healthcare, Manufacturing and STEM; and develop statewide initiatives to target specific customer populations, including, but not limited to homeless individuals, individuals with disabilities, long–term unemployed, out–of–school youth and other individuals facing significant barriers to employment.

Going forward,, the Commonwealth will utilize Governor's Discretionary funding to design and develop programs and initiatives responding to specialized business, job seeker and youth needs through innovative and responsive programming and to support the development of programs and activities that connect older out–of–school youth and other disconnected youth to education, training, and employment opportunities along career pathways that lead to economic self–sufficiency

The Commonwealth will continue to utilize this funding opportunity to explore effective strategies that will match businesses with a skilled workforce.

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

Rapid Response is a state function with the collaboration of other state and local partners including One–Stop Career Centers, Workforce Development Boards, Economic Development (both state and local) as well as many other entities as needed and appropriate. Coordination and cooperation is the key to the Rapid Response operation in the state of Massachusetts.

The Rapid Response team works to provide layoff aversion activities that are intended to prevent layoffs and downsizing from occurring if at all possible. This activity is completely dependent on the coordination of many programs (e.g. Work Share) and entities; Rapid Response acts as the convener of these activities. The provision of services in cases of layoffs and plant closings is the main activity of the Rapid Response team which includes the initiation of both the Trade Act and National Emergency Grant Activities.

The Department of Career Services (DCS) Rapid Response (RR) Team provides immediate statewide, early intervention and reemployment services for businesses and their employees impacted by layoffs and closings.

The RR team meets initially with the employer to assess the company's needs. The RR team will inform the company of services and alternatives that are available through the Commonwealth's MassBizWorks efforts (Examples: WorkShare, Tax Credits, RR Set–Aside Grants) that could lessen the impact and/or avoid the layoff. If the business is interested in exploring these options, the RR team will contact the appropriate state agencies to meet with the business and develop a lay–off aversion plan. In addition the RR team begins to develop a transition plan to support the impacted employees should the lay–off be unavoidable. The RR team will work with the local board and career center to design a service delivery strategy to accelerate the impacted employees return to work.

The RR team in conjunction with the career center will go on–site at the company, career center, or other location and conduct a "Gateway to Reemployment" session. The session includes all the necessary information the impacted employee needs related to Unemployment Insurance (UI) and healthcare benefits. If the employee needs assistance navigating the UI Online system, the RR Team will provide that support and assist in addressing any questions related to filing a UI claim.

This session serves as the "gateway" into the Massachusetts Workforce Development System and provides the impacted employees with information on the full array of services available at the One–Stop Career Centers throughout the Commonwealth. The RR team informs the employees that they will be required to register with the career centers as a condition of maintaining eligibility for UI benefits.

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.

In the event of a natural disaster, the Governor's office working with FEMA and a multitude of agencies join forces to evaluate how each agency can assist in the efforts to support the communities, businesses and employees who are impacted by such an unfortunate event.

Depending on the scope of the disaster and where intervention through the Massachusetts Workforce Development System is appropriate, EOLWD, DCS, and DUA will bring all parties together to address any and all workforce issues including RR activities, NDW Grant options, and the provision of on–site unemployment and reemployment assistance.

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

The Commonwealth's Rapid Response, Trade Adjustment Assistance (TAA), Trade Readjustment Assistance (TRA) and National Emergency Grants (NEG) now National Dislocated Worker (NDW) programs are fully integrated both programmatically as well as electronically through the TAARRNEG database. The TAA/TRA program is fully automated.

If the RR team determines that the employees of the company were impacted due to competition from a foreign country, the RR team will initiate a petition through the DCS TAA unit. This information is available to all parties including the career centers and DUA TRA unit. In cases where Rapid Response is not working with the employer upon notification that a petition has been filed, the TAA Unit notifies Rapid Response in order that outreach efforts to that employer can commence. The state also compiles a list of those workers who have filed UI claims against the company from the impact date to present through interfaces with the Massachusetts UI Online system and receives updates to those lists to provide notice to individual workers regarding the TAA Program. When available, the Trade Unit also uses list from employers to provide these notices. Two years ago, TAA sent their notification letters to readability experts to ensure the notices are understandable and comprehendible to workers receiving the notice. The notices reference the state's website and DOL's website for more detailed information regarding benefits and directions to contact their local One–Stop Career Center immediately. Notices are sent with babel notices for those that speak English as a second language.

Since the impacted worker has attended either a "Gateway Session" or a Career Center Seminar (CCS – Career Center Orientation) they were informed of the Trade program and its' benefits. Once

the TAA petition is certified all the impacted workers are notified immediately that they may be eligible for trade reemployment services and benefits and to visit a career center to begin the eligibility process. An ICON appears within the DCS MOSES (job seeker database) to inform the career center of the customers' pending eligibility. This information is also available in the DCS Central TAA unit, as well as, DUA TRA unit. All the TAA and TRA eligibility is processed electronically.

The job seeker works with the career center case counselor to determine the appropriate career pathway which in most cases leads to training. The job seeker receives case management throughout the TAA/TRA process and all information is readily available to all parties. In keeping with transparency, all TAA policies are disseminated to career center staff and posted through workforce issuances for the pubic to research and obtain. Training and quarterly conference calls are regularly conducted for field staff and state policies in place are all posted on the DCS website for staff and customers to reference. A dedicated phone line is also available for customers to contact the TAA Unit with other specific questions or concerns.

DCS has established a competitive process that allows local workforce areas to seek grants to address lay–off aversion strategies, bridging the gap between receipt of NDW Grants and staffing grants if a significant lay–off or multiple lay–offs that occur in a local area or region.

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.

On–the–Job Training (OJT) The success of the Massachusetts OJT National Emergency Grant has demonstrated that one of the most effective methods for ensuring sustainable employment for many customers is OJT. Massachusetts' initial OJT NEG award was made in June 2010, which gave impetus to the implementation of a statewide system for OJT in Massachusetts. Policy, standardized procedures, statewide training and technical assistance were developed, including a website: http://www.massworkforce.org/OJT/index.htm providing policy guidance, training presentations, OJT forms, sample training plans, outreach materials and other resources intended to support local areas in OJT implementation.

Under WIA, USDOL approved a sliding scale waiver for Massachusetts OJT employer reimbursement under the WIA DW formula program through June 30, 2017. Massachusetts continues to apply this waiver to the JD NEG project, as those funds were obligated under WIA. Massachusetts will apply for this waiver under WIOA.

Eighty–seven Massachusetts employers, the majority of which fall within the "small employer" category, experienced the benefit of hiring new employees with a comprehensive training plan supported by the OJT NEG, which has in–turn enabled many of these companies to expand. OJT continues to be heavily utilized under the JD NEG

Other Work–Based Training Models Several training providers in the Boston area possess experience and capacity to develop industry–specific contextualized training in advanced math and reading, as well as soft skills, career exploration and counseling support. Boston has also had success with integrated ESL/Skill Training models for the limited English population. The Merrimack Valley is also experienced in the development of additional career pathways which generally combine contextualized education and occupational skills training for individuals who may need language or educational remediation in combination with technical skill development to obtain employment; particularly in the health care or IT fields.

Massachusetts' Job–Driven and Sector Partnership NEGs are piloting "Innovative Work–Based Training" models that utilize customized training in cohorts to fill regional business needs for high–skilled employees. Employers report that they are receiving candidates who are trained and ready to hit the ground running, thereby increasing employee earning potential and the business bottom line.

On-the-Job Training (OJT) and Apprenticeship is available to WIOA Adult and Youth customers, as appropriate; and of course these tools are available to Partner programs as funding permits. The Commonwealth supports local sector initiatives through WIOA and other funding sources (e.g. Workforce Competitiveness Trust Fund), many of which incorporate work-based learning as part of

the service strategy. The MassTalent Connect Initiative will use OJT as a strategy (OJTs funded through the Workforce Training Fund Program) to further build out OJT as a strategy for individuals who are long-term unemployed, and therefore eligible as Adult participants. Massachusetts is in the process of preparing the application for the ApprenticeshipUSA State Expansion grant, the goal of which is to increase utilization of Apprenticeship by 5%; MA anticipates an additional 418 Apprentices over the next 18 months.

2. DESCRIBE HOW THE STATE WILL INCORPORATE REGISTERED APPRENTICESHIP INTO ITS STRATEGY AND SERVICES.

Massachusetts' Department of Apprentice Standards (DAS) resides within the Massachusetts Department of Labor Standards. DAS works closely with DCS to ensure information regarding apprenticeship sponsors and apprentice opportunities are conveyed to all business services staff and local workforce boards.

The Career Center Seminar includes an overview of Registered Apprenticeship (RA). DCS staff access RA employers by clicking "sponsors" on the Massachusetts DAS website and instruct job seekers to apply to Massachusetts RA Sponsors directly.

Massachusetts is a recipient of an American Apprenticeship Initiative grant, which we call the Massachusetts Apprenticeship Initiative (MAI). In addition to the statewide Apprenticeship Program administered by the Massachusetts Division of Apprentice Standards, this grant will permit and encourage employers who are new to Apprenticeship to experiment with that model. Twenty–five businesses have committed to approximately 300 Apprentice hires through the Massachusetts Apprenticeship Initiative (MAI); the goal of which is to broaden the use of the Apprenticeship model in MA, with a focus on high–demand industries and highly–skilled occupations.

It is our goal that the MAI will provide an opportunity to innovate and change our current apprenticeship system allowing new responses to apprenticeship training that can be effectively and efficiently tried, evaluated, and, where successful, shared across the targeted industries and the Commonwealth. One promising practice in effect through the MAI: workforce boards are acting as group sponsors for the small employers in their specific regions, thus reducing employer requirements and simplifying the system a bit to increase the appeal of Apprenticeship for the small employer.

The Massachusetts Community College system is comprised of 15 Community Colleges located within 50 miles of each other across the Commonwealth. Each college has a Business and Industry department that is in constant contact with employers and industry associations. Currently 6 of the 15 Community colleges are directly involved in the Massachusetts Apprenticeship Initiative. Our colleges routinely inform industry about the value of

3. PROVIDE THE PROCEDURE, ELIGIBILITY CRITERIA, AND INFORMATION REQUIREMENTS FOR DETERMINING TRAINING PROVIDER INITIAL AND CONTINUED ELIGIBILITY, INCLUDING REGISTERED APPRENTICESHIP PROGRAMS (WIOA SECTION 122).

The Department of Career Services and the Department of Unemployment Assistance jointly issued policy 100.DCS 14–100 "Massachusetts Eligible Training Provider List (Massachusetts ETPL) Initial and Subsequent Eligibility Process on June 16, 2015. Please follow the link to access the policy. http://www.mass.gov/massworkforce/issuances/wioa–policy/14–training/.

The Massachusetts Eligible Training Provider List (MA ETPL) Initial and Subsequent Eligibility Process policy 100 DCS 14-100 was revised on July 25, 2016. Please follow the link to the policy. http://www.mass.gov/massworkforce/docs/issuances/wioa-policy/14-100-1.pdf

Registered Apprenticeship and Related Instruction Training providers will be added to the Eligible Training Provider List in the fall of 2016.

Registered Apprenticeship (RA) sponsors and/ or their vendors are included on the Massachusetts Eligible Training Providers list. The RA Sponsors must apply to the local workforce board to be placed on the list. Massachusetts DAS accepts a training provider that appears on the licensing board's website for licensed occupations. For unlicensed occupations Massachusetts Division of Apprentice Standards (DAS) accepts vendors approved by Massachusetts Department of Education, in conjunction with Massachusetts Division of Professional Licensure (DPL) Occupational Schools Division. Massachusetts DAS approves in–house related instructional programs in unlicensed occupations if: the instructor has six or more years in the occupation, attends adult learning seminars through Massachusetts DESE, and curriculum materials are industry–approved. After the program receives RA approval from DAS, they can apply through the local boardto be placed on the ETPL list.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDING BY THE ADULT FORMULA PROGRAM.

Local Boards, One–Stop Career Center Operators and other local providers of federally–funded employment and training programs must review all policies and procedures to assure compliance with the POS requirements, including the assurance of POS requirements for Veterans at each point of entry for all applicable employment and training programs.

Massachusetts has developed training and will continue to revise and conduct training to staff of the Career Centers regarding POS related to of federal employment and training programs

• Career Center Staff must assure that at the initial contact point (point of entry) at Veteran and/or covered persons are made aware of: o their entitlement to priority of service; o the full array of employment, training, and placement services; and o any applicable eligibility requirements for those programs or services.

• State and Local policies and procedures will ensure: o monitoring and evaluation of priority of service will be incorporated within monitoring policies and procedures; and o all reporting requirements will be met.

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

Since WIOA allows a local board to transfer, if such a transfer is approved by the Governor, "up to and including 100% of the funds allocated to the local area under paragraph (2)(A) or (3), and up to and including 100% of the funds allocated to the local area under paragraph (2)(B), for a fiscal year between— (A) adult employment and training activities; and (B) dislocated worker employment and training activities."

The State will request a local Board who wishes to make such transfer to provide a brief justification supporting the transfer request. The justification must include a description of the effect on the following:

• The participants/population for whom the funds were originally allocated; i.e., assurance that the transfer of funds will not impact the level of services available to this population. • The number of participants to be served by each program. • The number of participants receiving training services for each program.

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)

Procurement policy 100 DCS 19.100 describes the criteria used by local boards in awarding grants for youth workforce investment activities. Procurement policy 100 DCS 19.100 also describes that program intake staff in collaboration with youth must develop an individual service strategy plan that is directly linked to one or more performance indicators. Based on discussions in the WIOA Steering Committee Youth Workgroup, there will be forth coming recommendations to revise the procurement policy for FY17 to require collaboration with the core partner programs for the alignment of education, training, and support services.

As WIOA is placing an emphasis on workforce development and preparing individuals for employment in a demand –driven system, occupational skills training and work experience program models will be encouraged. More robust career planning and training for occupations linked to industry needs are necessary. The procurement policy will place an emphasis on serving out–of–school youth ages 16–24, particularly out–of–school youth who are 22–24 year–olds and who are disconnected from service and resources. Local areas will be required to design pathways for youth, which are reflective of youth service needs as well as labor market and business needs.

Co–enrollment between core partner programs will be encouraged to the extent possible in the local areas. Local areas will be encouraged to outreach to the core program partners for recruitment of WIOA eligible youth. A referral process between the core programs will be established to identify the roles and responsibilities of the respective program staff.

Leveraging core program resources will lead to improved outcomes as well as a system that streamlining services for youth.

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.

To achieve improved outcomes for out–of–school youth, Massachusetts will implement integrated career pathways for youth 16 –24 across core program partners. Local Boards will identify the roles each local core program will have in supporting career pathways for youth. As part of the procurement process, local Boards will be encouraged to request responses that describe how core

programs will be aligned as a method to leverage resources to provide a continuum of services and improve outcomes for out–of–school youth. State level policies that outline a referral process for out–of–school youth to the core programs to acquire access to literacy skills, secondary credential attainment, public benefits, and pre–employment transition services as required under WIOA will be operationalized. Local partners will also be encouraged to collaboratively leverage resources for the purposes of improving outcomes for out–of–school youth by pursuing joint applications for "sector" initiative, expanded use of federal On–the–Job Training funding, expand Adult Career Pathway model piloted in regions, "pathways" funding on specific populations and career pathways, and align programming with state workforces partners such as YouthWorks.

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)

MassWorkforce Policy number 100 DCS 19.100 describes how State funds will be used to carry out Youth Program elements. The 14 program service elements must be identified through awards and grants or contract on a competitive basis as required in WIOA Sec. 123.

DCS monitors the 16 local areas on an annual basis; included within the monitoring is an examination of the availability of all 14 program elements.

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).

Utilization of the Youth Requires Additional Assistance barrier for program eligibility determination must be supported by a locally approved policy. The local definition must be approved by the Local Workforce Board and included in the Annual Plan. Implementation of the Youth Requires Additional Assistance barrier must include documentation that clearly demonstrates that the youth meet this definition. A. Definition – Mass Workforce Issuance 100 DCS 19.101.1 WIOA Title I Youth Eligibility Policy provides that the definition of a youth who requires additional assistance is defined as a low–income youth who requires additional assistance as defined and approved by the local workforce board. B. Operational Parameters – The term youth requires additional assistance in Mass Workforce Issuance 100 DCS 19.10.1 should be treated the same as the definition of barriers listed in WIOA section 129(a)(1)(B) and 129(a)(1)(C) and the income exceptions listed in WIOA section 129(a)(3). Local Workforce Boards that establish their own locally defined barriers must establish both a clear definition and verifiable methods for documenting such eligibility. C. Local Workforce Board Approval – According to the WIOA proposed regulations § 681.300 Local Workforce Boards may establish local approved "Requires Additional Assistance..." barriers. The activities leading to the adoption of new barriers must be formally documented and official minutes of the relevant Local Workforce Board's proceeding available for

review. D. Barrier Documentation Requirements – Each locally approved barrier must specify the allowable source documents that may be used by the framework service provider to determine a youth's eligibility. Local areas should review the youth section of Attachment B of Mass Workforce Issuance 100 DCS 19.101.1 to guide their development of documentation sources. E. Standard Operation Procedures – Local Workforce Boards must develop standard operating procedures for each locally defined barrier. Case management staff and youth vendors must be trained on the use of the barrier, including definition of the barrier, allowable documentation sources, and use of self–attestation in relation to the barrier. Information regarding the use of the Local Workforce Board's defined additional barrier should be recorded in the "Barriers Box" in MOSES. F. Record Keeping – Case managers must check off "Requires Additional Assistance Barrier" in MOSES and a comment notating the use of the locally defined barrier should be entered into the "Barriers Box". G. Case File – Hard copy documentation of all barriers shall be maintained in the youth case file. H. Annual Plan Addendum – Each Local Workforce Board must submit for review an addendum to its Annual Plan immediately upon adoption of a newly defined local "Youth Requires Additional Assistance" policy. The addendum should describe the newly approved barriers, the associated operational parameters, and all acceptable documentation requirements. A letter signed by either the Local Workforce Board Chair or Executive Director and including each of the following elements will suffice: • The board approved barrier(s); • summary of board authorized proceedings and date of approval; • the operational parameters for the barrier(s) including a definition; • the documentation requirements for each barrier; and • standard procedures for staff implementation. Attachment A provides examples of Youth Requires Additional Assistance barriers used by local areas across the nation. The examples listed in Attachment A are examples of youth characteristics drawn from state and local level policies throughout the country; Massachusetts does not endorse the use of any particular characters and the listing in Attachment A is not intended to be all–inclusive. For convenience, a template (Attachment B, Part 2) has been designed for local areas to record the documentation requirements of each locally defined "additional barrier". The template, based on Attachment B of Mass Workforce Issuance 100 DCS 19.101.1, should be included as part of the required addendum to the area's Annual Plan.

Please view the Massachusetts Youth Requires Additional Assistance policy by clicking on this link: http://www.mass.gov/massworkforce/docs/issuances/wioa-policy/19-104.pdf

Policy Attachments:

http://www.mass.gov/massworkforce/docs/issuances/wioa-policy/19-104a.pdf

http://www.mass.gov/massworkforce/docs/issuances/wioa-policy/19-104b.pdf

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.

ATTENDING SCHOOL An individual who is enrolled and attending a secondary or post–secondary educational program is considered in–school unless the individual attends a high school equivalency program or is enrolled in non–credit postsecondary courses in which case the individual is considered out–of–school. • According the Department of Labor, providers of Adult

Education under Title II of WIOA, YouthBuild Programs, and Job Corps programs are not considered schools. WIOA youth programs may consider a youth to be out–of–school for the purposes of WIOA youth program eligibility if they are attending Adult Education provided under Title II of WIOA, YouthBuild, or Jobs Corps. (§681.230).

NOT ATTENDING SCHOOL An individual who is not enrolled or not attending a secondary or post–secondary educational program is considered out–of–school. An individual who attends a high school equivalency program or is enrolled in non–credit postsecondary courses is considered out–of–school.

6. IF NOT USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE SPECIFIC STATE DEFINITION.

There are two definitions for basic skills deficient. WIOA Youth workgroup has suggested a pathways definition for the second basic skills definition.

The Massachusetts WIOA Youth Workgroup is recommending that the state establish a policy in accordance with WIOA Section 3 (5) (B) which describes in addition to youth who have English, reading, writing, or computing skills at or below the eighth–grade level, a youth is also considered "pathway deficient" if they do not meet the grade level needed for their chosen career pathway. "Pathway deficient" youth are not basic skills deficient but not at the grade level defined in their chosen career pathway. For example, an out–of–school youth who embarks on a career pathway to become a nurse may need to have a grade level of at least the 11th grade but instead has a ninth–grade level. While this youth is not basic skills deficient, the youth would be considered" pathway deficient" for the grade level defined in their pathway.

The State policy will be under development this Fall.

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).)

Not applicable to Massachusetts.

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;

Commonwealth of Massachusetts Executive Office of Labor and Workforce Development

Waiver Request: On the Job Training (OJT) Employer Sliding Scale Reimbursement

The Massachusetts Department of Career Services (DCS), on behalf of the Executive Office of Labor and Workforce Development (EOLWD), is requesting a waiver to the current allowable employer reimbursement rate of up to 50 percent of the wage rate of an On-the-Job Training (OJT) participant for the extraordinary costs of providing training and additional supervision related to the OJT as described in WIOA Section 134(c) (3)(H)(ii)(II). The waiver request has been developed in accordance with the WIOA guidelines in Section 189(i) (3) (B) and the WIOA Federal regulations at 20 CFR 680.720 (b).

Massachusetts is proposing a sliding scale of reimbursement to the employer based on employer size. Under the waiver, the following sliding scale will be implemented: up to 90% reimbursement for employers with 50 or fewer employees; up to 75% reimbursement for employers with 51 - 250 employees; and for employers with more than 250 employees, the statutorily defined 50% limit will continue to apply.

The waiver is requested for use with all WIOA formula funds: Adult, Dislocated Worker, and Youth, National Dislocated Worker Grants and other Discretionary grants, as appropriate. DCS looks forward to approval of this waiver for Massachusetts and, upon approval request that the waiver period be effective immediately.

A. The statutory and/or regulatory requirements for which the waiver is requested:

WIOA Section 134(c) (3)(H)(ii)(II) and the accompanying regulations as promulgated at 20 CFR 680.720 (b) state that employers may be reimbursed up to 50 percent of the wage rate of an OJT participant for the extraordinary costs of providing the training and additional supervision related to the OJT.

B. Description of the actions the state or local area has undertaken to remove state or local barriers:

There is no state or local statutory or regulatory barrier to implementing the proposed waiver.

C. Description of the waiver goals; relationship of goals to the strategic plan goals; and expected programmatic outcomes:

The waiver is consistent with national policy to develop a workforce system that is responsive to the demands of both individual and employer customers. The Commonwealth anticipates the following goals will be achieved with approval of the waiver request:

Maximize the flexibility needed to impact local economic vitality and direct resources where demand for services is greatest by assisting local areas in marketing OJT as a vehicle to engage employers, particularly in targeted sectors, to hire and provide training to new workers. This will build the capacity and future viability of both the workforce and the industries themselves. ? Assist with the transformation of the current workforce system to a demand-driven, sector based and regionally driven talent development pipeline. ? Increase training and transitional employment

opportunities for unemployed workers and hard-to serve youth and adults. ? Equip individuals with relevant job training and transferable skills in high-skill, high-wage, high-demand occupations and industries. ? Increase business usage of the local workforce system by providing added incentives to hire and train new workers.

Local workforce development partners have provided feedback with regard to employer needs for assistance with economic competitiveness in the current economic downturn. Allowing businesses to be reimbursed on a sliding scale will address the primary reason for prior limited use of OJT and increase employer participation. Employer feedback indicates that they will be more likely to use this opportunity if reimbursement was greater than 50%.

Small to medium-sized employers are responsible for 51% of all the jobs in Massachusetts, therefore the Commonwealth estimates that small to medium-sized employers will comprise a significant percentage of OJT opportunities. D. Description of the individuals impacted by the waivers:

D. Description of the individuals impacted by the waivers:

The need for training is especially acute for those workers most in need: dislocated workers transitioning to new occupations and industries, long-term unemployed individuals in need of advancing outmoded skills in order to catch up with emerging technologies, and low-income and entry-level workers seeking to start their careers in a weak economic climate. Approval of the waiver will increase training options for WIOA-eligible job seekers.

The reduced match requirement for employers, particularly new start-ups and other small to medium-sized businesses, will provide an attractive and cost-effective financial incentive, increasing the opportunity to utilize the OJT model to hire and train new workers. This waiver will allow Massachusetts businesses to more rapidly adapt to both technological and general marketplace changes by improving their capacity to expand and remain competitive with affordable OJT options uniquely designed to achieve their specific developmental goals.

E. Description of the process used to: Ensure meaningful public comment, including comment from business and labor; provide notice to any local board affected by the waiver; provide affected local boards the opportunity to comment; and monitor implementation:

The Department of Career Services (DCS) actively sought the input of local regions during the development of this waiver request. As with all major workforce policies and procedures, the Commonwealth has solicited dialogue and input from local workforce boards, one-stop career center operators and workforce development partners concerning the impact of this waiver. The local workforce areas overwhelmingly support this request based upon past experience with the utilization of this waiver under WIA.

DCS will monitor implementation of this waiver and work with the 16 local workforce development regions to implement the appropriate state and local policies to govern its individualized use by local regions.

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. No

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes

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.

The Commonwealth recognizes the importance of providing quality customer service to both our job seeker and employer customers. The Executive Office of Labor and Workforce Development/Department of Career Services (EOLWD/DCS) continues the process of assessing the current skill level of career center staff and analyzing the knowledge, skills and abilities needed to perform each job in the career center. A curriculum including a series of training modules has been designed and developed to deploy customized training to career center staff, including all partner staff to meet these training needs.

EOLWD/DCS continues the work of MassBizWorks providing training on standard staff business service knowledge and competencies across multiple state agencies that are responsible for the provision of a myriad of programs and services to the Commonwealth's employers.

EOLWD/DCS is invested in ensuring One–Stop Career Center management and staffs have the knowledge and understanding of the local, state, national and global economy as the Commonwealth implements a demand–driven system. EOLWD/DCS has focused in additional specific areas of professional development as follows:

Platform Skills: DCS has reviewed the levels and skills sets that are required to enhance/improve staff abilities to conduct one on one career counseling, workshops and public presentations and giving exceptional customer service to both job seekers and employers. These skills are critical to ensuring that the employer and jobseeker customers understand the depth and breadth of the services available to them and to promote knowledge and utilization of the Massachusetts Workforce Development System.

Labor Market Information (LMI): It is essential to understand that LMI touches every aspect of the job search, as far as locating and understanding the skills level of in–demand jobs, and how to identify transferable skills, or the need to upgrade current skills to meet the needs of employers. It also assists staff and customers identify appropriate salary demands and many labor trends. Staff and customers will also understand the need for researching companies and building interview skills to prepare for the interview and negotiate salaries. EOLWD/DCS has invested in tools to help in this effort.

Using Tools Effectively: Staff have and will continue to be provided training on: Help Wanted Online (HWOL), Mass Career Information Systems (Mass CIS), O*Net Online and TORQ. The training will demonstrate how to assist job seekers to search for and access valuable labor market information on industry trends and career projections that will inform their choices in seeking employment and/or training. Breaking down job descriptions and resumes to identify and focus on the skills required for the job utilizing such software, as TORQ will move Massachusetts significantly in a demand driven manner.

Business and Demand Driven Methodologies: By utilizing a variety of training and professional development resources including classroom training and online resources – such as www.workforce3one.org staff will stay current with the latest tools and techniques for enhancing employer engagement and connecting jobseekers with quality jobs.

Technology: EOLWD/DCS consistently upgrades its IT resources including hardware and software to ensure that staff is kept up to date with innovations in technology that assist them in providing high quality services to jobseekers and employers. Specific training is conducted on the statewide database, the Massachusetts One–Stop Employment System (MOSES), consistently as software and programming upgrades are made. Internal training sessions as well as online programs, webinars and video conferencing are used to keep staff, and subsequently customers, aware of advances in relevant technology resources and tools.

Social Media: Another important aspect of staff training and development will be to enhance their skills in the effective use of technology in the job search. Staff must be able to assist job seekers in utilizing technological tools such as using email, social media, and online job applications to communicate and to market their skills to employers. Understanding that many employers will review an applicant's Internet profile as a part of a background check is important. Mastering the use of electronic communication via email and other online applications is essential to ensuring that staff can communicate with job seekers for the purposes of doing outreach for targeted recruitment and connecting those job seekers to appropriate employers.

The Commonwealth is committed to providing consistent and current professional development activities and training to all staff within the Massachusetts Workforce System including the State Board, Local CEOs, Local Boards, Career Center Staff, including Core Partner staff and external Partners as well.

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.

The Commonwealth of Massachusetts is a fully integrated and interconnected workforce development system. The Massachusetts Executive Office of Labor and Workforce Development's (EOLWD) Departments of Unemployment Assistance (DUA) and Career Services (DCS) are responsible for the direct oversight of all the Massachusetts Workforce Development programs, including Unemployment Insurance (UI), Workforce Innovation and Opportunity Act (WIOA), and Wagner Peyser/Employment Services (ES) funded through the U.S. Department of Labor (USDOL). DCS/DUA continuously works to improve communication and integration internally and externally through the Massachusetts Workforce System. Internally, DCS and DUA have identified in each agency an integration and coordination liaison that tackles a number of cross agency issues and assist in training and development of all career center and call center staff. DCS/DUA has and will continue to provide training across the Commonwealth to career center staff, including partner staff, regarding the identification of potential UI eligibility issues. Career Center staff have been trained when conducting face to face interviews on how to utilize open ended questions regarding on–going work search strategies which are utilized across all job seeker customers. DUA/DCS have put protocols in place on how to report potential UI eligibility issues for adjudication. If career

center staff become aware of a potential UI eligibility issues that are outside the Reemployment Service Reemployment Eligibility Assessment (RESEA) process (notification of potential UI eligibility issues on RESEA claimants is conducted through a database system interface) DUA is notified immediately.

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

The Commonwealth has ensured that there has been on–site assistance at One–Stop Career Centers to assist individuals who are filing a UI claim since 2000 with the inception of One–Stop Career Centers. Since the launch of UI Online in 2013, DUA/DCS have collaborated to better streamline and improve on that service delivery within the career center system.

• Career centers have a dedicated bank of computers and telephone lines available which are accessible to any career center customer that needs assistance filing a claim for unemployment compensation. • Specialized trainings were and continue to be conducted at career centers so that staff can confidently assist individuals filing UI claims. • Along with the telephone banks, DUA instituted a DCS consultation line. This line is a direct connection from the career centers to DUA call center staff for additional assistance relating to all UI issues.

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

The Commonwealth revitalized its reemployment efforts to assist UI claimants and other unemployed individuals in 2009 to ensure a "holistic" approach to reemployment services that included designing a solid program that would be viable across all funding sources; flexibility in the design and implementation to allow each career center the ability to customize the re–design to meet the needs of their local customer population; and on–going partner and customer feedback to continually improve programs and services offered to our customers.

The revitalization was focused in two areas: Re–designing our Career Center Seminar – Orientation (CCS); and also a re–designed customer flow. This has assisted the Commonwealth in quickly adapting this approach to meeting the reemployment service needs to shared/common customers across all core partner programs, services and activities.

The premise is that the CCS is the main portal into the career center. This orientation provides customers information on, and access to, the full array of services, programs and activities available at or accessible from the career center. As part of the orientation the customer will complete a self–assessment of their work search strategies, if appropriate, complete the Career Readiness 101 assessment, complete a job profile, and with a career counselor review their approach to work search, their work search efforts, all their assessment results and establish the next appropriate step in their career plan. In short the career center can assist all customers to prepare to find their next job; explore options to upgrade their skills; access specialized services including core partner services; and/or connect to other community resources. As stated above, it is essential to include flexibility within the design to allow for customization at the local level that would directly meet the needs of local job seekers and employers.

Attendance at a CCS is mandated, as well as participation in all these reemployment service activities for UI claimants who have been deemed permanently separated (not work attached and most likely to exhaust) however, it is not mandated for all career center customers. Although all customers may not attend this specifically designed CCS, it is the regular practice of the career center to schedule all customers for a similar orientation that leads to the rest of the services, activities and programs offered by the career centers.

MA TalentConnect Governor Baker and Secretary Walker have dedicated resources to address the long–term unemployment challenges in Massachusetts. This initiative is referred to as TalentConnect. Massachusetts, in partnership with Commonwealth Corporation, the state's sixteen Workforce Boards and 32 One–Stop Career Centers, Higher Education and other appropriate partners will work together to braid our resources to support services for long–term unemployed individuals. TalentConnect is an initiative that Massachusetts will implement beginning FY 2017. TalentConnect is an intensive and coordinated service delivery strategy with the purpose of helping long–term unemployed (LTU) individuals reconnect to the labor market. TalentConnect will tap into existing workforce development resources and look to bring new resources to bear to provide services that update the skills of LTU job seekers through occupational skills training and educational services and provide them with the opportunity to connect to employment opportunities through intensive coaching and job search, networking, internships, on the job

training and apprenticeship programs. TalentConnect is a strategy targeted to serving individuals who primarily have been unemployed for one year or longer.

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;

Described in D.4, below.

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

Described in D.4., below.

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

Described in D.4, below.

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

This section includes a response to items number 1, 2 and 3, above. DCS/DUA have been joint-managing a successful Reemployment Assessment (REA) program since 2009. The Massachusetts model has always required all Permanently Separated (not work attached) UI Claimants to participate in upfront delivery of Reemployment Services (RES) which was followed by a reemployment eligibility assessment determination upon another visit to the career center.

The Commonwealth was well positioned with the inception of Reemployment Services Eligibility Assessment (RESEA) to expand and improve upon its model to provide an even more robust delivery of Reemployment Services for UI claimants.

UI claimants who are selected for this program must attend a CCS, receive defined reemployment services, and attend an REA. If they fail to do so, they will be indefinitely disqualified for UI benefits.

All permanently separated UI claimants (not work attached and most likely to exhaust) are enrolled in the RESEA program. The RESEA claimant is mandated to attend a CCS. As stated above, the CCS is the main point of entry into the career center where the claimant is introduced to the full array of service available to them through the Massachusetts workforce system. The goal is to immediately engage the job seeker and provide a “value added” experience for the UI customer. During the CCS, UI claimants complete a job search inventory, a skills assessment, and a Career Action Plan (CAP) with a job counselor.

A career center staff member then reviews work search activity, individually with the UI claimant. They discuss the number of jobs, types of jobs, industry of choice, labor market trends impacting the job market and the customer's methods of follow-up. Prior to leaving on this first visit, the RESEA customer is scheduled for additional career center services, as well as, a follow-up REA review.

The follow-up REA is another work test point where again career center staff ensure that the RESEA customer is on the right track in their work search efforts. Throughout RESEA participation the counselor provides guidance, (i.e. if the claimant is only applying to one industry the counselor will work with the claimant and prepare a job profile through the TORQ program to demonstrate to the claimant how his/her skills may be more broadly applicable).

All career center customers, including UI claimants are introduced to the myriad of labor market, career awareness and assessment tools available to assist them in their work search efforts, including but not limited to TORQ, HWOL, Mass CIS, Career Ready 101.

After reviewing the customers' assessment, the determination is made by the customer and counselor that the customer is in need of additional education and/or training to upgrade skills to meet the knowledge, skills and abilities that are in demand to improve the prospect for employment, they will begin that process together.

As stated above, if at any time during a UI claimant's journey through the Massachusetts workforce system it become evident that the claimant has a potential UI eligibility issue, DUA is notified immediately. If a RESEA customer does not attend or fully participate in required services, the Career Center staff record the non-attainment within the Massachusetts One-Stop Employment System (MOSES) database and that information is electronically transferred to UI Online database and triggers a potential issue.

UI Online and the MOSES database have several points of automated integration. As examples, information regarding profiled claimants and REA participants is seamlessly passed between the agencies. Upon successfully filing a claim, claimants receive a link to the Massachusetts job bank system known as JobQuest. This webpage also provides a number of resources, such as a listing of the career centers around Massachusetts and a link to start an assessment of their skills through TORQ. DUA and DCS are committed to continuously improve on creating linkages both through technology and programming to connect the claimant to reemployment service.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE--

1. ASSESSMENT OF NEED

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The agriculture industry relies heavily on farm workers to plant, tend and harvest a variety of crops in diverse operations. In Massachusetts, over time employers have diversified their operations to maintain the farm operating year–round and respond to the trends forced in part by the diverse population of the state. Although, there is no exact count of farm workers engaged in agricultural activities, the fact that U.S. agricultural workers are becoming increasingly scarce in the Commonwealth cannot go unnoticed. The most recent estimates from the U.S. Department of Agriculture (USDA) and the Massachusetts Department of Agricultural Resources (Massachusetts DAR) indicate that at a minimum there are about 15,659 hired farm/livestock workers employed in agriculture and a little above 28,000 agricultural jobs in the state.

Operating an agricultural business in the Commonwealth is not an easy task. Massachusetts farmers face higher labor and production costs than farmers in neighboring states. The MA growing season is short, and trying to extend the season is very costly. But Massachusetts farmers have responded to these challenges by participating on farmer's markets, developing models to provide fresh produce to consumers seeking organically grown products and by targeting the farm tourism industry.

The legal workforce that benefited from services available through the State Workforce Agency or other community based organizations, have migrated to the more skilled, non–seasonal, higher paying jobs. As a result, fewer numbers of local low skilled laborers continue to work in agriculture. The vacuum generated by the movement of workers to higher paying jobs is being filled by low skilled laborers coming from other countries by means of the current visa programs available to employers or through non–legal migration.

Agriculture remains an important component of the Massachusetts' economy and relies on an estimated 15,649 agricultural workers to support this multi–million dollar industry. These agricultural workers are primarily engaged in crop production (over 80%) and working in nurseries, fruits like apples, cranberries, peaches, and vegetables and to a lesser extent tobacco. The majority of workers are estimated to be seasonal workers living in the local community or coming in as day laborers. The workforce also consists of a small percentage (+/– 0.05%) of workers contracted through the H–2A program.

In the last few decades, agricultural employment through the H–2A Program has decreased +/– 60%. At the peak of agricultural activity in 2002, there were an estimated 1,200 H–2A visa workers coming to MA and a little over 500 MSFWs getting services at the following counties: Hampden, Hampshire and Franklin. Since then, the numbers of visa workers, MSFWs and employers decline to the lowest level in the program history. Some H–2A employers have found difficult to transition

from tobacco to other less profitable crop activities. Still, despite markets demand for locally grown crops and other agricultural products, fewer workers may be needed as agricultural establishments continue to downsize, consolidate and mechanize.

Massachusetts agricultural operations have diversified their businesses in order to compete with other states and imports from other countries. If we rank farm types by the numbers of farms, the predominant type of farms according to the USDA 2012 Census of Agriculture were horse farms, accounting for 1183 farms, or approximately 15% of all farms in MA. Close behind are the agricultural operations involved in cultivating and harvesting hay, accounting for 1,097 farms, or about 14% of all farms statewide. Followed by operations involved in Greenhouse, Nursery and Floriculture activities, these accounted for 968 farms, or about 12.5% of total farms. Vegetable farming accounted for 923 farms, or about 11.9% and finally; fruit and berry farming (including cranberry growers) which accounted for 779 farms, or about 10% of total farms in the Commonwealth.

Top 5 Crops / Activities – USDA 2012 Census of Agriculture

Commodity	Farms	Acres / Farm
Horse and other equine production	1183	34.6
Hay	1097	106.6
Greenhouse, nursery, floriculture	968	36
Vegetable and melon	923	45.7
Fruit, tree nuts and berries	779	103.4

Although, agriculture is present in all counties in Massachusetts to some degree, it is concentrated in 3 major pockets in eastern, central and western MA. The largest number of farms in Massachusetts is in Worcester followed by Plymouth, and Hampshire counties. It is important to note that the average farm size in the state from 2007 to 2012 increased by six (6) acres. (National Agriculture Statistics Services, 2012)

In an average year, the growing and harvesting season runs from mid–April to mid–October. The growing season for each crop activity heavily influences employment, for example: nursery employment work runs from early February to mid–July; shade and broadleaf tobacco work is from June to September; and greenhouses are from early March to late December, apples from early August to late October and berries from June to July.

Over the years, the needs of these individuals (U.S and non U.S.) continue to be the same; the average hired farm workers are older, less educated, more likely to be foreign–born, less likely to speak English, less likely to have housing that conforms to minimum standards, less likely to be in good health, and likely to be in need of legal assistance.

For Program Year 2015, the Massachusetts Department of Career Services has one designated Outreach Specialist position. The number of staff positions assigned to conduct outreach activities to MSFWs represents a 100% increase over the same period last year. However, the geographic

area covered by outreach staff and the State Monitor Advocate is much larger than the jurisdiction of the local offices that they assist. Staff providing outreach services will continue to be one full–time bilingual Central Office employee. To help ensure equity of service, the Central Office outreach worker will work closely with local office management in areas identified as having significant agricultural activity to assist in the identification of migrant and seasonal farmworkers (MSFWs) and coordination of services. The efforts of the State Outreach Worker may be supplemented by the State Monitor Advocate and to a limited extent local office Business Service Representatives (BSRs) will assist contacting employers, in areas of the state where significant migrant outreach workloads warrant additional assistance. BSRs are based at local One–Stop Career Center sites and bring to the employer relevant service information about programs and services available. This will be accomplished in large part through conducting employer–coordinated visits to worksites to meet with employers at the beginning and ending of the agricultural employment season.

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 addition to the response provided in section E.1., above, Major crop activities in the state for PY 2015 were: • Greenhouse/Nursery activities occur year round, and are concentrated mostly in the South Eastern, North Eastern and Central areas of the state, where approximately 4,700 are employed. • Cranberries account for approximately 4,000 jobs in an industry that normally employs up to 6,000 direct and indirect workers. The typical cranberry harvest season is Labor Day through the middle of November. • Vegetable activities occur from late May / early June through November, and are prevalent in the following counties: Hampshire, Worcester, Middlesex, Hampden, Bristol and Essex. Approximately 3,500 agricultural workers are employed. There are approximately 1,000 growers in the state. • Fruit/Apple harvest activities occur from late July – September and earlier in the year for pruning crews. Most of the apple activities are concentrated in the northern part of the state in Middlesex, Worcester and Franklin counties. Apple harvesting involves approximately 600 employers and 2,500 workers during the pre-harvest and harvest seasons. • Tobacco harvesting activities occur from May to September and are concentrated mostly in Hampden County with some activity in Hampshire County. Approximately 1,500 agricultural workers are employed.

As agriculture in Massachusetts evolves from traditional planting, picking and harvesting into a customer driven model (through Community Supported Agriculture) and becomes more diversified, the number of jobs directly related to the agricultural industry may decline. Currently, tobacco crop activity continues to decline due to restrictions and the number of markets available for the sale of the product. Over a decade ago, tobacco crop activity accounted for the majority of workers engaged in agriculture. Projections are that approximately 5,000 local agricultural workers and an additional 5,000 uncommitted migrant workers will travel to Massachusetts to meet needs in PY 2016. Crop activities/geographical areas, time frames, and projected numbers of MSFWs in each activity are expected to remain the same for the foreseeable future.

The numbers above are strictly based on activities associated to the tending of crops planted and harvested in the state. It is important to note that they do not account for agricultural activities associated to the breeding and care of livestock and poultry. This sector of the state's agriculture has seen a large increase in demand for local meats and poultry and could be generating more employment that some of the crop activities listed here:

Review of 2012 Agricultural Activity (based on NASS Survey) Greenhouse/Nursery Cranberries Vegetables Fruits Tobacco Labor Pre-harvest 2,000 1,000 1,500 750 500 Labor Harvest 2,000 2,500 1,500 1,750 500 Months of Heavy Activity Year round Fall Summer/Fall Late Summer/Fall Summer Est. High Est. Low Est. Local Seasonal Population +/- 6,000 N/A Proj. Ag. Openings Over 5,000 Migrant Worker Influx +/- 2,000 +/- 1,000 Proj. Number MSFW in Area +2,500 Est. MSFWs in the Area + 12,000

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.

Please refer to response in section E.1, above.

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:

For Program Year 2015, the Massachusetts Department of Career Services has one designated Outreach Specialist position. The number of staff positions assigned to conduct outreach activities to MSFWs represents a 100% increase over the same period last year. However, the geographic area covered by outreach staff and the State Monitor Advocate is much larger than the jurisdiction of the local offices that they assist.

Staff providing outreach services will continue to be one full–time bilingual Central Office employee. To help ensure equity of service, the Central Office outreach worker will work closely with local office management in areas identified as having significant agricultural activity to assist in the identification of migrant and seasonal farmworkers (MSFWs) and coordination of services. The efforts of the State Outreach Worker may be supplemented by the State Monitor Advocate and to a limited extent local office Business Service Representatives (BSRs) will assist contacting employers, in areas of the state where significant migrant outreach workloads warrant additional assistance. BSRs are based at local One–Stop Career Center sites and bring to the employer relevant

service information about programs and services available. This will be accomplished in large part through conducting employer–coordinated visits to worksites to meet with employers at the beginning and ending of the agricultural employment season. The Department of Career Services (DCS) will conduct outreach activities to locate, register and to inform migrant and seasonal farmworkers (MSFW) about the full array of employment and training services available through the Massachusetts One–Stop Career Center system (OSCCs), including services available through OSCCs partners.

In order to leverage resources and reach as many MSFWs as possible, the outreach specialist will coordinate outreach activities with other community based organizations or State/Federal agencies serving MSFWs, targeting large events where a significant number of MSFWs is likely to attend. The state monitor advocate and outreach specialist will continue to make use of appropriate media; i.e. flyers, brochures, cell phones, social media, etc. to reach MSFWs.

At a minimum, two pieces of printed material will be shared with potential MSFWs contacted through outreach activities' these include; 1) Workers' Rights information and 2) How to access OSCC services. Additional information on how to use the complaint system will be available for dissemination. For this purpose, DCS has developed bilingual (English/Spanish) brochures, flyers and electronic media postings. All outreach activities and services provided will be documented in the outreach log.

As in the past, DCS will continue to utilize the tools, techniques and approaches which have proved to be successful. Cooperating agencies such as the New England Farm Worker's Council (NEFWC), Mass Migrant Education, Migrant Health, Community Legal Services, etc. will continue to support DCS in locating MSFWs who need employment and training services or are in need of other assistance.

The number of MSFW contacts by the OSCCs and the outreach specialist is estimated to be 425. We estimate that (25x5) =125 of those contacts will be made by local office staff with the remaining (60x5) =300 contacts made by the DCS Outreach Specialist.

The total number of staff days to be used by DCS outreach staff will be (5x12)=60/year. This represents an increase of a 95% from the level of staff days devoted to outreach during the last program year.

The number of MSFWs contacts and staff days devoted to outreach activities by the NFJP WIOA 167 Grantee will be determined once they filed their report. Based on historical data, it is expected that they will be identifying approximately 125 workers and that they would spent cumulative of 50 days conducting outreach activities.

Chart 36:

Chart 36: Outreach Numerical Goals for 2016

Agency / Organization	Contacts	Days Spent

Agency / Organization	Contacts	Days Spent
OSCC / AJC	125	0
DCS Central Office	300	60
WIOA NFJP Grantee (NEFWC)	125	25
Totals	550	75

State strategy DCS is working with the New England Farm Worker's Council (NFJP WIOA Grantee) to update and finalize the cooperative agreement. In addition, we are looking forward to establishing new connections with other organizations that serve the MSFW population. Most recently, we have coordinated efforts with (Migrant Education, Migrant Health) the U.S. DOL, WHD Community Outreach and Resource Planning Specialist to start targeting employers and other organizations that could help improve our chances of reaching our goals.

Group orientation sessions are planned and arranged beforehand by the OSCC/outreach worker. The information, including handouts, presented at these sessions includes: • Services available at OSCCs, including job information available via the internet • Referrals to agricultural/non–agricultural employment, training, supportive services, testing, counseling, and other job development services; • Farmworker Rights (Federal and State Law, employment–related protections); • Job service complaint system; • WIOA information and eligibility requirements; and, • How to contact other organizations servicing MSFWs such as NEFWC, Mass Migrant Education, Legal Services, Migrant Health, and programs such as Food Stamps and others.

Sessions will include time for questions and answers. Outreach staff shall keep in mind that this activity can elicit complaints and/or the detection of apparent violations. In instances where group sessions may not be appropriate, the outreach staff shall contact MSFWs in the traditional manner.

Self–service registration is available electronically or in office during regular hours of operation. Individual applications may be taken during outreach, when necessary or appropriate. Where necessary, an explanation of the purpose and completion of the process shall be given preceding the actual registration. Applicants who visit the One–Stop Career Centers for services can register or self–refer themselves in order to access job opportunities and other needed services. The outreach staff may also assist MSFWs who are unable to complete the process.

Electronic self–service registration is available for all applicants. This will be the primary tool or method of registration, in office or during outreach. JobQuest and MOSES provide web–based self–service and staff managed intake and case management to support a virtual workforce center environment. Individual applications may be taken during outreach, on an as needed basis. Where necessary and appropriate an explanation of the benefits and protections afforded to registered applicants shall be given. Applicants who visit the One–Stop Career Centers for services can register and self–refer themselves, to job opportunities and other needed services in an electronic supported environment. The outreach and office staff must also assist MSFWs, including limited English proficient (LEP) customers, who are unable to complete the process.

Other tools to be used are: • Joint outreach planned or directed visits with NEFWC, U.S. DOL, WHD Outreach staff, etc.; • Provide presentations at agricultural meeting to other state agencies or community organizations; • Printed pamphlets in English/Spanish (or other languages as needed) which will be distributed to MSSFWs and/or posted in gathering areas; and • Packets of informational materials, in English/Spanish, will be provided to MSFW households and individuals, that explain services such as the range of supportive services available to them, community–based organizations that can assist them, filing/utilizing the complaint system, information about Massachusetts Laws, UI information, farmworker rights, and Federal Wage and Hour laws.

In accordance with applicable regulations: DCS established a procedure for handling grievances and complaints received from participants served under the Workforce Innovation and Opportunity Act (WIOA). During the OSCC orientation session customers are provided with information regarding the procedure to follow in the event a complaint needs to be logged against an employer or the SWA. Complainant or interested parties are advised to first file their complaint locally. This process is intended to allow for a resolution of any issue at the lowest level possible. The outreach specialist also shares the responsibility to inform customers and employers about the complaint resolution process.

Agricultural workers and applicants are provided with packets of informational materials in English/Spanish. The information provided to MSFW households, individuals and employers explains the services and protections available, including but not limited to: the range of supportive services, community–based organizations that can assist them, filing/utilizing the complaint system, information about Massachusetts Laws, UI information, farmworker rights, and Federal Wage and Hour laws, housing and field sanitation standards, Community Legal Aid, etc.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

Please refer to the information provided in number 2. Outreach Activities, above.

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.

In addition to the information provided in number 2. Outreach Activities, above, the topics listed below will be covered in specific detail in formal in-person training provided to outreach workers. Training for new hires will be scheduled within 90 days of the hire date. When possible, outreach workers will be allowed to benefit from State Monitor Advocate training. Training Topics: • The Migrant Seasonal Farm Worker (MSFW) outreach worker's primary responsibilities • Communication with MSFWs (written and oral presentations in Spanish or a language readily understood by the worker; State law/guidelines for accessing workers' work areas/living

areas/meeting spaces. • Coordination of outreach activities with public and private community service agencies and MSFW groups. o Maintenance of records of daily contacts to include information such as the number of MSFWs contacted, services provided, whether an application or complaint was taken and if a referral was made. During the months when outreach activities are conducted (April – October), monthly summary reports are to be submitted to the State Monitor Advocate. • Basic employment services provided to MSFWs (Assistance in the preparation of applications; Referrals to specific employment opportunities; Information about upcoming employment opportunities; Assistance in the preparation of either JS or non-JS related complaints; Receipt and subsequent referral of complaints to the ISCC complaint specialist or OSCC manager; Referral to supportive services for which the individual or a family member may be eligible; and Assistance in making appointments and arranging transportation for individual MSFWs or members of their family to and from OSCCs or other appropriate agencies, etc.) • Regulatory issues to include housing standards, prevailing wage and practice surveys, human trafficking, pesticides, field checks, employment law (discrimination, safety and health, etc.), UI eligibility. • Complaint process.

Additional resources include outreach worker access to State Monitor, access to on-line references, access to DCS and DUA personnel, handouts, desk references.

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.

In addition to the information provided in number 2. Outreach Activities, above, the outreach worker will participate in and receive the same level of training as staff working in the One-Stop Career Centers, with the requirement in mind to provide services to Migrant Seasonal Farmworkers that are "qualitatively equivalent and quantitatively proportionate" to the services provided to other jobseekers. The training modules designed by Department of Career Services (DCS) for this purpose encompass the array of services available to customers and employers. In addition, the outreach worker will receive training on housing standards, prevailing wage and practice surveys, human trafficking, pesticides, field checks, general employment laws (including discrimination, safety and health, etc.). With regards to UI eligibility issues, basic training will be coordinated between DCS and DUA and will provide the outreach worker with knowledge of UI basics (filing procedures, etc.) including information about the UI dispute resolution process. Outreach workers shall direct customers to the UI problem resolution unit for assistance. Customers will be informed that they must be prepared to provide detailed information when filing and if there is an eligibility issue on their claim. A DUA service representative will make determination(s) on any eligibility issues based on information provided by the individual/claimant and/or their employer(s). The outreach worker will also inform customers that they have the right to appeal any adverse determination.

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.

In addition to the information provided in number 2. Outreach Activities, above, the Human Resources Division (HRD), Training Office coordinates training resources to ensure Executive Office

of Labor and Workforce Development employees have the up-to-date skills they need to successfully perform their jobs.

The HRD Training Office assists with the design and presentation of instructional modules, webinars, PowerPoint presentations, and interactive media that build knowledge of current business processes and support transition to new systems. Among other offerings, the following training opportunities are available to all EOLWD staff: Building and Maintaining a Results Oriented Culture, Conflict Management & Dealing with Difficult Behavior, Leading Effectively Through Communication and Feedback, MS Word, Excel, PowerPoint, etc.

In addition, outreach workers can benefit from all training, webinars, seminars, conferences, etc. offered by cooperating federal or state agencies and agricultural groups.

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

Please refer to the informatoin provided in number 2. Outreach Activities, above.

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.

The Department of Career Services (DCS) recognizes the importance of the agricultural industry in the Commonwealth and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for DCS/OSCCs agricultural services comes from Wagner–Peyser (W–P) and the Foreign Labor Certification grant. The funds provided by U.S. DOL to DCS/OSCCs support the State Workforce Agency services and activities to include the processing of Agricultural and Food Processing Clearance Orders (ARS), H–2A–related job orders, the conduct housing inspections, agricultural Prevailing Wage and Prevailing, Normal and Common Practice surveys, collection agricultural crop and labor information, outreach activities, field checks, field visits, and complaint processing.

A number of employment–related services for job seekers and businesses are available at the Commonwealth’s network of One–Stop Career Centers.

Services for job seekers include: • Job search assistance and access to online job listings • Career counseling • Coaching on job search skills • Workshops on a variety of job search strategies • Access to resources including PCs, reference materials, resume building software, and economic data • Networking groups • Unemployment insurance walk–in services

As always, job seekers can access career planning assistance services, including working with experienced career counselors, attending workshops and short–term training, develop your resume, write cover letters, and more.

In many OSCCs, services are available in languages in addition to English. Depending on location, these languages may include Spanish, Chinese, Portuguese, Russian, Vietnamese, etc.

Employers can take advantage of employment and training resources such as assistance with recruitment and hiring, job matching with potential hires, workforce training grants and tax credit programs, etc.

In general services for employers include: • Access to qualified applicants • Applicant pre–screening • Posting of jobs • Assistance with small and large–scale recruitment activities • Help planning job fairs • Testing and assessment of job candidates • Targeted mailings • Labor market information • Information on training grants and tax credits

Some career centers provide training – Personal Computer, word processing, for example – on–site at the center. Not all services are available at all One–Stop Career Centers.

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

In addition to the response provided in number 3.A., above, the Wagner-Peyser Act requires that the United States Employment Service maintain a system for the orderly movement of workers within and between States. The Agricultural Recruitment System (ARS) assists agricultural employers with recruitment of qualified workers on a temporary or seasonal basis. The ARS provides protection to the workers who are not seeking permanent relocation, but rather temporary agricultural employment.

Through the ARS, State Workforce Agencies can systematically recruit and refer qualified workers from within a State and from other States when there is an anticipated shortage of workers. The regulations provide the use of the Agricultural or Food Processing Clearance Orders (ETA 790 Form) when recruiting workers for less than one year of employment.

Currently, the DCS Foreign Labor Certification Unit is responsible for the ARS program and for providing support to the One-Stop Career Centers (OSCC) that have the primary responsibility for providing ARS services to employers and workers. More specifically, the local centers and the outreach worker:

• Provide information about the ARS to employers and workers and, when appropriate, promote ARS use.

• Serve agricultural employers by helping them meet their needs for specific numbers of workers on specified dates.

• Assist workers by locating successive job opportunities and by referring them to those jobs in an expeditious and orderly manner.

• Ensure that all workers using OSCC offices have work applications and are offered all available employment services, benefits and protections, including the full range of counseling, testing, training, and job referral services.

• Provide current labor market information and other ES services to agricultural employers.

The State Monitor Advocate is responsible to assess the ARS program on a regular basis and to make recommendations to correct operational deficiencies, when warranted.

(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

In addition to the response provided in number 3.A., above, the Wagner-Peyser Act requires that the United States Employment Service maintain a system for the orderly movement of workers within and between States. The Agricultural Recruitment System (ARS) assists agricultural employers with recruitment of qualified workers on a temporary or seasonal basis. The ARS provides protection to the workers who are not seeking permanent relocation, but rather temporary agricultural employment.

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• Provide information about the ARS to employers and workers and, when appropriate, promote ARS use. • Serve agricultural employers by helping them meet their needs for specific numbers of workers on specified dates. • Assist workers by locating successive job opportunities and by referring them to those jobs in an expeditious and orderly manner. • Ensure that all workers using OSCC offices have work applications and are offered all available employment services, benefits and protections, including the full range of counseling, testing, training, and job referral services. • Provide current labor market information and other ES services to agricultural employers.

The State Monitor Advocate is responsible to assess the ARS program on a regular basis and to make recommendations to correct operational deficiencies, when warranted.

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).

The Department of Career Services (DCS) will continue to coordinate activities and services with the WIOA Section 167 National Farmworker Jobs Program (NFJP) grantee, the New England Farm Worker's Council (NEFWC), to identify MSFW needs, and to facilitate or provide intensive and training services. This will be facilitated by a Memorandum of Understanding. Currently, DCS and NEFWC are in the process of updating the existing MOU. Other cooperative agreements with the Mass Migrant Education Program and the Connecticut River Valley Farmworker Health Program (CRVHP) are anticipated to be in place within the next year. Yet, DCS does plan to engage other community based and/or private groups for the purpose of identifying, servicing and assisting MSFWs. MA One–Stop Career Centers offer integrated and universally accessible employment services that efficiently meet the needs of all customers including Migrant and Seasonal Farmworkers (MSFW) and Limited English Proficient (LEP) customers. Through existing partnerships in the One–Stop Centers, MSFWs have access to the following services through a single service delivery system: labor exchange services such as career counseling, vocational testing, veteran's employment and training services, resume writing, job search assistance workshops, reemployment workshops, referrals to ESL classes and job referrals. Other One–Stop services include adult, dislocated worker and youth services under WIOA, adult education, apprenticeship training, Unemployment Insurance and referral to supportive services. This approach facilitates access to core services and reduces the number of barriers otherwise faced by MSFWs and LEP customers and individuals with disabilities. Some of the partners working under the One–Stop Delivery System are co–located or have access to information through existing MOUs. Currently OSCCs staff encourages MSFWs and LEP customers to take advantage of the free ESL classes offered through MA Adult Literacy Hotline, Migrant Education (EDCO) or through the WIOA Section 167 Grantee. This is a critical component for developing the basic skills needed to secure sustainable employment and pursue career growth. Building on the existent infrastructure and with the development of new collaborative efforts we expect to reduce the barriers to accessing services by this targeted population. The SMA will continue to reinforce positive relationships with farm workers, farmers, Community Based Organizations (CBOs), Legal Services and other non–profit organizations while conducting outreach activities. During the next four years MA DCS will strive to build new and better relationships with MSFW / LEP service providers and plans to continue outreach to local farms to contract local workers and employers and promote the full range of services offered through the MA One Stop Career Centers system. Other activities being developed to attract new partners and retain existing service providers, include: • Develop and implement strategies which incorporate goals and objectives consistent with the WIOA requirements. • Establish and maintain communication through meetings and social media with stakeholders to keep them informed of the work and progress made. • Advocate for the inclusion of the WIOA 167 grantee at OSCCs locations across the state, per the direction established by the WIOA statutory

requirements. • Continue to foster good working relationships and collaborative efforts with stakeholders to help achieve the DCS and AOP goals.

In addition, the State Monitor Advocate (SMA) is committed to building stronger partnerships and collaborations to better align services available at local workforce areas to the needs of MSFWs and agricultural employers. As part of this effort, the State Monitor Advocate linked with the Connecticut River Valley Farmworker Health Program (CRVFHP) and became a member of the CRVFHP Advisory Council. The CRVFHP Advisory Council provides insight and guidance on issues affecting the accessibility of healthcare for agricultural workers and their dependents, along with identifying population shifts, changes to the regulatory framework, and other concerns affecting the agricultural community. DCS and the SMA will continue to promote stronger collaborative efforts with other State Agencies, such as MA Department Education, ORI, Agriculture, Public Health, USDA Rural Development and non–for profit organizations such as CRVFHP, MA Farm Bureau Federation, etc. to address and discuss issues regarding employment, literacy, health and the wellbeing of Massachusetts agricultural workers.

(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.

In accordance with 20 CFR Subpart B, 653.107(d) (1), (2), and (3), DCS has given the opportunity to the New England Farm Workers' Council (NEFWC), WIOA Section 167 grantee, to comment on the State Agricultural Outreach Plan. Any comments received after the submission date will be forwarded to the region, under separate cover.

(C) DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

The Massachusetts Department of Career Services (DCS), through its network of One-Stop Career Centers met the required 4 out of the 5 MSFW service level indicators for PY2011, PY2012 an

PY2014. During that period of time the proportion of MSFWs that received specific types of services were comparable to, and in most cases were higher than, those provided to all other Career Center customers.

PY2012, PY2013 and PY2014 "Referred to Supportive Services", was the only equity indicator consistently missed. DCS is working closely with the local One-Stop system providing T/A and training to improve and increase the provision and recording of this service.

During PY2013 the Commonwealth met only 3 out of 4 MSFW service indicator levels. It was determined through a DCS Quality Assurance review that customers that there were several customers that completed self-registrations which may have contributed to the inaccurate identification and recording of MSFW data, thus affecting the overall numerical goals. As a result of corrective action measures implemented in PY2013 the Commonwealth reports that it is back on track in meeting the 4 out of 5 service indicator levels in PY2014.

As part of the efforts to reach all service level indicators, DCS will continue to coach staff on MSFW service requirements.

Chart: Equity Indicators of Performance for years 2011 through 2014. This chart/graphic could not be included in the State Plan submission the federal portal. Please review the missing information by viewing the copy of Massachusetts State Plan posted on: mass.gov/massworkforce/state-plan.

(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.

In PY14, the outreach specialist visited a number farming operations across the state which employed seasonal, H–2A and year round employees. As a result the following was accomplished:

- Coordination of outreach efforts with the New England Farm Worker' Council (NEFWC)
- Conducted outreach to several employers resulting 40 outreach contacts and 10 MSFW's identified.
- Met with the Connecticut River Valley Farmworker Health Program (CRVFHP)
- Participated at the CRVHP symposium
- Met with representatives of the Mass Migrant Education Program.
- Attended EEOC conference
- Attended conference at UMASS Amherst for Domestic Fair Trade in the Northeast
- The DCS Outreach Specialist became a member of the New Entry Sustainable Farming Project
- Conducted follow–up visit to farmworkers confronting issues at their work place and provided assistance to both; employers and workers
- Outreach visit to Saint Rose Parish in Chelsea, Massachusetts
- Conducted outreach activities in Southeastern Massachusetts in conjunction with the Mass Migrant Education Program
- Updated and created outreach informational material

Chart 37 – Projected versus Accomplished activities:

Agency / Organization	Projected	Accomplished	Change (%)
OSCC / AJC	25	12%	
DCS Central Office	75	40	47%
WIA 167 Grantee (NEFWC)	250	*	*

* NFJP report not available.

The number of Migrant or Seasonal Farmworkers (MSFWs) in the state continues to be a moving target. There are no concrete numbers quantifying the number of workers engaged agriculture other than the Census of Agriculture. Conducted every five years by the U.S. Department of Agriculture's National Agricultural Statistics Service (NASS), the Census collects data on every aspect of U.S. agriculture. The most recent data from the Census places the number of workers employed in crop activities at 15,649, while the Massachusetts DAR statistical data list 28,000 workers engaged in agriculture production. Factors such as the transient nature of the MSFW population, the legal status and the underground economy make it difficult to enumerate this sector of the workforce. Taking into consideration all the factors affecting our ability to properly account for the MSFW population in the state, we estimate that the number MSFWs in the state will increase at a slower pace than the rest of the U.S. over the next few years. According to recent statistical data from the USDA and Massachusetts DAR, It is projected that at least 6,000 MSFWs and an additional 7,000 uncommitted MSFWs will be traveling to or through the Commonwealth over the plan period. As in the past, crop activities, geographical areas, time frames, weather conditions and level of wages will dictate how accurate our estimate will be. However, regardless all considerations the projected number of farmworkers is expected to increase slightly over the next few years. Future activities will include contact with coordination with local offices and the development of new tool to reach as many MSFWs as possible. It is important to note that the new outreach specialist will have responsibility for the operation of the outreach plan and must rely on strengthening existing relationships and developing new ones. In addition the following steps will continue to ensure compliance with the MSFW outreach program:

- Provide training on services to MSFWs to OSCC staff
- Update and develop material to be made available online
- Support OSCC and partner staff by providing technical assistance on servicing MSFW and LEP customers.

(E) STATE MONITOR ADVOCATE

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

In accordance with 20 CFR Subpart B, 653.l07 and as prescribed by Region I, the State Monitor Advocate participated in the preparation of the agricultural outreach plan and has been afforded the opportunity to approve and comment on the plan. Such review indicates that the plan has been

prepared properly, omitting none of the prescribed requirements and properly describing the activities planned for providing services to both agricultural employers and migrant and seasonal farmworkers (MSFWs).

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)).

In October 2013, Adult and Community Learning Services (ACLS), a unit of the Massachusetts Department of Elementary and Secondary Education (ESE), adopted the *College and Career Readiness Standards for Adult Education* (CCRSAE).To support alignment to the CCRSAE and increase instructional rigor, Massachusetts established policies requiring programs to have a unified curriculum aligned to the CCRSAE to guide Mathematics and English Language Arts (ELA) instruction, and to the*Massachusetts ABE Curriculum Framework for English for Speakers of Other Languages*(ESOL) and the CCRSAE for ESOL instruction. See http://www.doe.mass.edu/acls/frameworks/policy-fy14-17.html for specific curriculum policies.

Since then, Massachusetts has taken the following actions to develop the capacity of state and program staff to align curriculum and instruction with the CCRSAE. ACLS:

- developed internal trainings for state staff to build their capacity to deliver technical assistance (TA) to programs. The ACLS Program Developer for Curriculum provided multi-session trainings on the CCRSAE Mathematics and ELA standards and benchmarks, including the instructional shifts needed to implement the CCRSAE, and the Massachusetts ESOL standards in conjunction with the CCRSAE.
- convened annual curriculum conferences featuring national content experts focused on helping programs implement the CCRSAE. In FY16, ACLS convened the third annual conference, expanding it from the original one-day event to two consecutive "duplicate" days to allow more teachers and directors to participate. Programs were encouraged to send teams that worked in intensive sessions guided by national curriculum and CCRSAE experts on strengthening their programs' standards-aligned curricula and instruction.
- re-envisioned the statewide adult education professional development (PD) system, the System for Adult Basic Education Support (SABES), to focus on building program capacity to implement the CCRSAE. Five regional centers were replaced by three statewide instructional support centers in Mathematics, ELA, and ESOL and five program support centers. The centers contract with national experts, giving programs access to a wide variety of high quality intensive PD offerings in multiple formats including on-site coaching, a user friendly PD website, and high quality resources. The work of the PD Center for Educational Leadership and Strengthening Programs is particularly critical to the adoption of the CCRSAE in that it provides PD to develop the educational leadership of directors to effectively lead staff in implementing the CCRSAE and of teachers to develop their potential for coaching colleagues as practitioner leaders.
- required programs to submit a scope and sequence aligned with the CCRSAE for each level of instruction (i.e., beginner, intermediate, and advanced) in ELA, Mathematics, and ESOL to provide an indication of programs' capacity in curriculum development. These submissions allowed ACLS to identify programs struggling with curriculum development and refer them for PD, identify model scope and sequences to share with the field, and inform new PD offerings.

- developed Professional Standards for Teachers of Adult English Speakers of Other Languages and began developing Professional Standards for Teachers of ELA and Mathematics, which will inform PD offerings and classroom instruction. The standards reflect the intent of the content standards for students by outlining what is essential for teachers to know and be able to do to support students' college and career readiness.
- participated in national TA projects:

1. Massachusetts is one of 12 states participating in the national Standards in Action (SIA) project with representatives of the SABES PD Centers for Mathematics and ELA and ACLS staff. Participating states receive training to support the implementation of the CCRSAE using SIA teaching and training methods and materials with the goal that states develop a multiyear sustainability plan. Virtual and onsite guidance and support are provided to states through September 2016.
2. Massachusetts is one of 10 states participating in the national ESLPro project with representatives of the SABES PD Center for ESOL and ACLS staff. Participating states receive TA from subject matter experts to help build their capacity to serve English language learners (ELLs). Among other goals, participation will help states align PD with WIOA regulations; build the capacity of teachers who work with ELLs; and develop sustainability plans for beyond the project period.

- began the process of aligning the Massachusetts Adult Proficiency Test (MAPT), the state assessment for measuring ABE learner gains in Mathematics and Reading, with the CCRSAE.

Within three years, we will ensure that:

- all programs will have high quality curricular materials aligned to rigorous standards for all levels of instruction.
- ACLS and the PD system will support programs with teacher evaluation tools modeled after the K-12 system to ensure that instruction is aligned with the CCRSAE standards.

VI.a. Aligning of Content Standards:

The Commonwealth's response did not describe the process it is using to determine whether its adult education content standards are aligned with its K-12 standards as required by section 102(b)(2)(D)(ii)(I) of WIOA. or; Does the eligible agency indicate that it is using CCR Standards for Adult Education?

Response:

The *College and Career Readiness Standards for Adult Education* (CCRS), aligned with the K-12 Common Core State Standards, were adopted by Adult and Community Learning Services (ACLS) in October, 2013.

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 literacty 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.

Massachusetts adult education and literacy activities under Title II are provided by a network of approximately 125 service providers, professional development providers, and others collectively referred to as the ABE system. Service providers include school districts, community colleges, community based organizations, faith-based organizations, libraries, and correctional institutions serving adults who are low skilled, basic skills deficient (i.e., whose reading or computing skills are at grade level equivalent (GLE) 0-12), lack English proficiency, lack a high school diploma or its equivalent, or have not achieved an equivalent level of education. Under WIOA, ABE remains committed to serving disadvantaged adults and recognizes that students enroll for a variety of reasons (e.g., supporting children in school, pursuing a high school credential, improving English language skills for citizenship, or advancing in the workforce).

The ABE system provides academic instruction and educational services below the postsecondary level to these adults in order to:

1) assist them to become literate and obtain knowledge and skills for employment and economic self-sufficiency;

2) support the educational and skill achievement of parents and family members to participate in the educational development of their children and improve economic opportunities for families;

3) assist immigrants and ELLs in improving their English and Mathematics proficiency and understanding of the rights and responsibilities of citizenship; and

4) assist incarcerated individuals in strengthening their knowledge and skills to promote successful re-entry into society (Source: Program Memorandum OCTAE/DAEL 15-4).

For those competing in the labor market, the ABE system serves as an on-ramp to the workforce development system, enabling individuals not yet ready to participate in that system with opportunities that would otherwise be out of reach.

In FY15, using federal and state funds, the ABE system served:

Men / Women	7,296 / 11,939
Employed / Unemployed	8,806 / 5,088
Out of School Youth	2,284
In correctional institutions	1,496
Receiving public assistance	6,812
Parents with dependents <18	7,963

Massachusetts will extend funding for current programs for FY17, and during FY17, issue an open and competitive Request for Proposals (RFP) for implementation in FY18. All of the considerations for awarding grants and contracts under Title II Section 203 (2) will be addressed in the open and competitive RFP and will serve as the basis for establishing a statewide network of education programs that meet the requirement of Title II under WIOA. The RFP process will ensure direct and equitable access to eligible providers. Programs will continue to be supported by federal and state funds.

The following program activities receive federal and/or state funding.

- Community and Adult Learning Centers (CALCs) provide ESOL and/or ABE.

o CALCs provide literacy, ELA, and Mathematics instruction by offering a continuum of services at grade level equivalent (GLE) 0-8.9 and high school equivalency preparation at GLE 9-12. ESOL programs enroll non-native ELLs who lack English language skills (reading, writing, listening, and speaking), including some basic literacy skills. ACLS will review the current model for CALCs and make adjustments to program design policies for the next open and competitive procurement.

o ABE program curricula are aligned with the CCRSAE. For ELLs, curricula are aligned with the standards and benchmarks of the ABE Framework for ESOL and the CCRSAE standards and level-specific standards where supportive of ELLs' next steps for college and/or careers.

o Programs integrate Mathematics instruction for ESOL students.

o Educational and career advising supports students with the development of individual education and career plans as they pursue their college and career goals.

o Programs integrate level appropriate employability skills for students (e.g., workforce preparation, contextualized curricula, integration of job readiness skills).

o Integration of digital literacy will be accomplished through:

- an expanded DL model (in FY18) to increase student access to educational services, instructional intensity, and technology skill development.

- gradual increased access to technology for all CALC students as demonstrated in each program's Plan to Integrate Digital Literacy.

- expanded use of Career Ready 101. (See below.)

o CALCs participate in the Massachusetts Career Readiness Initiative (CRI), a statewide, multi-agency effort to increase the educational attainment of Massachusetts residents and assist them in securing a desirable career. In FY16 and beyond, CALCs are using ACT Career Ready 101, an online remediation tool for hard and soft skills, resume builder, and career exploration tool with the ability to assess and pair competencies, interests, and skill level to suggest appropriate jobs.

o Program staff and directors collaborate on multiple levels and for multiple purposes. ABE is represented on each statewide WIOA working group led by the workforce system. In each workforce region, one ABE director is selected to represent ABE on the local board and adult education directors are encouraged to participate in WIOA working groups, Local Workforce Development Board[1] (LWDB) planning meetings, and discussions of regional employment needs. Additionally, ACLS funds programs to provide direct service to One-Stop Career Centers (OSCCs) in the form of outstationing staff who help with intake, assessment, and referral of customers who need adult education classes. Through outstationing, ACLS funds programs to connect One-Stop Career Centers and ABE programs in that region. The outstationing model is being revised to ensure that outstationed ABE staff also connects eligible ABE students with partner services to ensure that eligible ABE students become "shared customers" with the workforce system and get the workforce related services they need. Based on regional needs, the outstatioining model could be adapted.

o ACLS supports and encourages the provision of family literacy activities/services to help adult learners who are parents and caregivers achieve their goals as learners, workers, and community members as well as their goals as parents and caregivers. FY15 data shows that 41% of enrolled students were parents of school age children. Programs use multiple tools to integrate family literacy, e.g.:

(1) ABE/ESOL Instruction: Programs provide parents and caregivers with language and literacy services of sufficient intensity and duration to help them achieve their goals as learners, workers, community members, and family members. Classes may be provided at the adult education center or in other locations in the community such as a school or community based organization.

(2) Contextualized Curriculum: Programs provide curriculum contextualized to meet the needs and goals of students who are parents and caregivers. Topics include but are not limited to reading and language development; understanding the Common Core State Standards and the results of their children's standardized testing; communication with children's teachers/schools; participating in parent-teacher conferences; rights of ELLs; special education; and high expectations for college and career readiness.

(3) Family Education Plans: Family education plans are an adaptation of Education and Career Plans, a tool used to capture the process of setting short- and long-term goals related to students' roles as learners, workers, community members, and family members.

(4) Family and Community Engagement as Collaboration with Community: Adult education programs in Massachusetts receive funding to support collaborative community activities. One option for collaboration is Family and Community Engagement to promote effective involvement of parents and the community in the success of children and schools. Partnerships with this focus include the local school district and/or one or more individual preK-12 schools or early education and care providers.

o See Section (c) Corrections Education and Other Education of Institutionalized Individuals for more information on Adult Basic Education in Correctional Institutions (ABECI).

o In FY17, ACLS will continue to fund Adult Career Pathways (ACP) programs in collaboration with regional workforce partners. Most ACP programs target industry priorities specific to their workforce region, recruit students with career-related goals, and help students prepare for further education and training by acquiring the academic and career readiness skills necessary to gain access to a career pathway in the targeted industries. In FY16, the work of ACP programs is guided by revised ACP guidelines informed by WIOA provisions including but not limited to the new WIOA career pathway definition. In the coming years, ACLS will continue to refine ACP policies and focus on adding a training component that leads to a credential/certificate. Making training available to ABE students may be accomplished by strengthening connections with OSCCs and LWDBs to leverage training resources. Integrated Education and Training models for the purpose of educational and career advancement will be supported in the Open and Competitive RFP.

o ACLS will fund a limited number of CALC programs to offer pilots of Integrated Education and Training in collaboration with vocational technical education programs in public school districts and/or other occupational training programs. Funds for the pilots will be available to currently funded ABE programs and awarded through an RFP process.

- Workplace Adult Education and Literacy Activities: ACLS awards Workplace Education Grants to education and business partnerships (and labor where the workforce is unionized) to provide multi-year contextualized instructional services to the incumbent workforce. The ACLS model for workplace education includes dedicated time for a multi-stakeholder planning process, and a team governance component established during the National Literacy Program grants funded by U. S. Department of Education in the 1990s. This model also promotes the development of contextualized curriculum and instruction to meet the needs of current and future students and employers.
- Workforce preparation activities include but are not limited to:

o integration of college and career readiness culture in all programs.

o development of Individual Education and Career Plans for students at all levels to promote college and career awareness.

- Integration of job readiness skills (i.e., level appropriate foundation skills) at all levels

- Integration of digital literacy at all levels to prepare adult learners for employment and further education and/or training (See section (e) State Leadership for more information on digital literacy.)

- Exposure to curriculum that builds students' career awareness and workforce readiness

o integration of ACT Career Ready 101 online curriculum. (Note: Approximately 75% of programs received licenses at no cost.)

o for students in higher levels, curriculum contextualized to in demand industries. (See the Massachusetts Community College Workforce Development Transformation Agenda curriculum modules targeting core topics in Mathematics and literacy contextualized to three key industries: healthcare, advanced manufacturing, and information technology.)

o in collaboration with workforce partners, further development and promotion of concurrent education and training opportunities through ITAs, participation in OSCC training programs, and other integrated education and training models.

- Transition to Community College Programs: The goal of these state-funded programs is to increase the number of adult education students who enroll and complete community college and bypass developmental courses. To achieve this goal, ACLS will evaluate the current model and make adjustments to ensure students are successfully moving from ABE programs to community colleges. These programs offer credit-bearing courses that equip students with the skills needed to succeed in college and careers. Intensive advising and a student cohort model are major components of the programs. All students who complete transition programs will have earned a minimum of six transferrable college credits.

In FY17, currently funded programs (i.e., a network of providers including local school systems, community-based agencies, faith-based organizations, community colleges, libraries, volunteer organizations, correctional facilities, labor management, and others) that submit successful continuation applications will receive continuation grants. Notice for continuation funding will be posted to ESE's Current Grant Funding Opportunities Page. Notice will also be given on the Adult and Community Learning Services website. Each continuation application will be assessed on the merits of its proposed program design, budget, and narrative responses related to activities aligned with WIOA. Awards will be contingent upon the provider demonstrating satisfactory performance and providing timely reporting. Programs will describe WIOA-related activities in which they are engaged (e.g., integrating digital literacy, Mathematics into ESOL instruction, and employability skills; strengthening connections with OSCCs, LWDBs, employers, and others).

In FY16 and FY17, in preparation for the open and competitive multi-year procurement process, ACLS will engage in the following activities:

- Undertake a comprehensive review of current policies and make policy adjustments as needed to ensure WIOA alignment including but not limited to the following:

o Establish ABE specific working groups to provide recommendations on WIOA implementation (e.g. performance measures task force for ABE, technology work group, ABECI work group)

o Consult with WIOA partners and other stakeholders to develop new policies to inform the open and competitive RFP

- Participate in Massachusetts WIOA stakeholder activities (e.g., WIOA Steering Committee, WIOA work groups) to establish and maintain collaborations among core partners and advance the state plan
- Participate in national WIOA activities organized by the U. S. Department of Education's Office of Career and Technical Education (OCTAE)
- Provide opportunities for programs to learn about WIOA (e.g. regional meetings across the state, WIOA content at annual Directors' Meeting conference and ACLS sponsored events, information shared through monthly communications with the field, ABE local representation on WIOA workgroups and task forces)
- To advance the state vision in the combined state plan at the regional level, each LWDB will have Memoranda of Understanding (MOU) between adult education and workforce partners modeled after the state level WIOA MOU by July 1, 2016.
- Massachusetts will use WIOA considerations specified in section 231(e) to develop an open and competitive Request for Proposals (RFP) to fund eligible providers to establish/operate programs that provide adult education and literacy activities (under Section 203), including programs that provide such activities concurrently.

o Ensure direct and equitable access for all bidders by posting and broadly disseminating the open and competitive RFP and providing training on program design and ABE data collection systems to potential bidders

o Conduct bidders' conferences in multiple locations across the state

o Designate and train proposal review teams comprised of state adult education staff and regional LWDB representatives

o Review applications with LWDB representatives. During the process, the LWDB representative will assess for alignment with regional priorities in the local plan.

VI.b. Local Activities:

(a) The Commonwealth's response did not provide or reference the complete list of considerations consistent with section 231(e) of WIOA to be used in making funding decisions for its local grants or contracts. (b) The Plan did not identify what activities would be provided concurrent with other activities.

Response:

(a) The 13 considerations in section 231(e) of WIOA will be embedded in the Part III questions (i.e., Required Program Information) of the FY18 Open and Competitive Request for Proposals (RFP) that Massachusetts will issue in November 2016. Applicants must describe how they will meet each of the 13 WIOA considerations. Responses will be assigned points based on a scoring rubric that weighs the extent to which applicants meet each consideration.

(b) All entities of demonstrated effectiveness will be eligible to apply. Applicants responding to the FY18 Open and Competitive RFP for Community Adult Learning Centers (CALCs) will provide these adult education and literacy activities concurrently with other activities:

- Family literacy activities: In FY15, using federal and state funds, the ABE system served 7,311 parents with dependents under 18 (38% of the total population served), an increase over previous years when an average of 33% of students served were parents. Based on this increase and in support of the WIOA vision for supporting parents and family members and the state's goals for K-12 students, Massachusetts will fund family literacy activities concurrently with adult education and literacy activities. Applicants will describe the need for family literacy activities in the communities they serve and propose services that better enable families to support their children's learning needs. Allowable services will include core ABE/ESOL instruction; contextualized curriculum; family education plans; and dedicated classes for Parent Education/Support, Parent/Child Interactive Time, and/or a combination of the two.
- Workforce preparation activities:Under WIOA, Massachusetts will build on its history of providing services that support low skilled individuals' transition to postsecondary education. Applicants will describe the need for workforce preparation activities in the communities they serve and propose services that integrate workforce preparation activities into adult education, literacy, and English language acquisition activities. Allowable services will include integration of a culture of college and career readiness; development of individualized education and career plans for students at all levels to promote college and career awareness; integration of ACT Career Ready 101 online curriculum; use of the Massachusetts Community College Workforce Development Transformation Agenda curriculum models for high demand industries; and/or development and promotion of concurrent education and training opportunities with workforce partners using, for example, ITAs and OSCC training programs.
- Integrated education and training and integrated English literacy and civics education: Massachusetts work expanding low-skilled individuals' access to career pathways in high-demand by providing career pathways dates back to Adult Career Pathways Capacity Building grants first issued in FY10. Massachusetts will continue supporting adult career pathways with Bridge to College and Career classes in addition to IET and IELCE programs. The intent of Bridge classes is to prepare ABE students for employment, enrollment in a postsecondary program, or enroll in a career pathway program such as an IET or IELCE program. Bridge class offerings can include, but are not limited to, math, writing, employability skills, and college and career readiness. Concurrent and contextual IET and IELCE services will be competed regionally. Applicants will describe the need for integrated education and training in the communities they serve, propose integrated education and training services, and explain how the proposed services align with the WDB regional plan. Grant priorities will be to partner with one or more employers; partner with a Chapter 74 Career/Vocational Technical Education program and/or postsecondary education and/or training provider to develop and deliver IET or IELCE curriculum and delivery models based on identified employer needs; target advanced manufacturing, health care, or STEM (other industries can be proposed and will be considered based on availability of funds); solicit employer input into the curriculum and program design to ensure the training prepares students to obtain employment in high demand industries; and collaborate with regional workforce partners and OSCC to help address challenges and connect participants

to employment opportunities. Massachusetts will provide a competition for IET and/or IELCE in each of the 16 workforce regions and intends to ensure these activities are available statewide.

- Workplace adult education and literacy activities: The workplace education model developed in Massachusetts in the 1990's, where workplace education partnerships among education providers, business partners, and unions (where the workforce is unionized) deliver contextualized instructional services to meet the needs of employers and the incumbent worker students, is still in place. Over time, however, policies have been enhanced based on best practices. For example, ACLS now requires a minimum number of instructional hours a partnership must deliver in order that students have sufficient time to make gains. Other policies have been instituted to strengthen partnerships and to encourage the integration of digital literacy in instruction. Partnerships are funded in two phases: planning and implementation grants for applicants that conduct a successful planning process. During implementation, workplace education programs include adult education and literacy activities concurrently with workforce preparation activities so that low-skilled incumbent workers can improve their skills and more easily advance to more high demand occupations with their current employers. Workplace education grants will be rebid in accordance with WIOA requirements.

Note:

Data Correction

B. Local Activities, a refinement of the information originally queried suggests a change should be made concerning what is reported for "Parents with dependents <18". Please change the number 7,963 to 7,311 as per the table below.

Men / Women	7,296 / 11,939
Employed / Unemployed	8,806 / 5,088
Out of School Youth	2,284
In correctional institutions	1,496
Receiving public assistance	6,812
Parents with dependents <18	7,311

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[1] For purposes of this document, LWDB applies to all workforce regions in Massachusetts including both Local Workforce Investment Boards (LWIBs) and Regional Employment Boards (REBs).

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.

ACLS has a longstanding history of supporting academic programs for institutionalized individuals. Currently, ACLS funds ABE programs in 10 of the 13 county houses of corrections and 2 of the 18 state prisons. These programs offer adult education and literacy and numeracy activities, including preparation for the high school equivalency exam. One of the purposes for Title II under WIOA is to assist incarcerated individuals in strengthening their knowledge and skills to promote re-entry into society. Massachusetts will continue to offer adult education to individuals incarcerated in Massachusetts to provide access to educational services that prepare them for employment, economic self-sufficiency, family roles, and responsible citizenship upon their release.

As a result of the open and competitive RFP process, Massachusetts plans to award for FY18 grants to correctional institutions for adult education and literacy services (GLE 0-8.9), high school equivalency preparation (GLE 9-12) and career pathways to support students in their next steps including their transition to re-entry. Additional services may include: integrated education and training, peer tutoring and transition to re-entry initiatives, and other post-release services with the goal of reducing recidivism. Applicants will be encouraged to leverage workforce resources to (1) develop career pathways and (2) support integrated education and training models. ABE programs in correctional institutions (ABECI) will be required to align curriculum to the CCRSAE and provide contextualized instruction as needed to support career pathways.

ACLS will require each eligible provider to use grant funds under section 225 of WIOA to prioritize serving institutionalized individuals who are likely to leave the correctional institution within five years.

At the state level, ACLS will collaborate with core partners, appropriate state agencies, and relevant ESE offices to leverage resources and explore promising practices in ABECI that lead to a reduction in recidivism.

VI.c. Corrections Education and other Education of Institutionalized Individuals:

The Commonwealth's response did not indicate 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.

Response:

The FY18 open and competitive process that Massachusetts will launch in November 2016 will make funding for corrections education available in an integrated Request for Proposals (RFP) with four separate RFPs for Adult Basic Education in Correctional Institutions (ABECI); Primary Instruction by Volunteers; Transition to Community College; and Distance Learning Hubs. All of the applicable considerations for awarding grants and contracts for Corrections Education under Title II Sections 225, 203(2) and 231(e) will be addressed in RFP. The RFP process will ensure direct and equitable access to eligible providers. All entities of demonstrated effectiveness will be eligible to apply.

Programs will continue to be supported by federal and state funds and Massachusetts will use applicable WIOA considerations specified in section 231(e) to fund eligible providers in correctional institutions to establish/operate programs that provide adult education and literacy activities under Section 225. Massachusetts plans to modify the RFP application, rubric, and/or scoring criteria for eligible providers in the state prison system due to: (1) their limitations in leveraging workforce resources to develop career pathways and support integrated education and training models (as stated in the Massachusetts State Plan) and (2) in giving priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Direct and equitable access for all bidders will be ensured by posting and broadly disseminating the open and competitive RFP and conducting bidders' conferences in multiple locations across the state.

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.

Pending further guidance from OCTAE, Massachusetts will create opportunities for ELLs, including professionals with degrees and credentials in their native countries, by integrating English literacy and civics education with integrated education and training.

Massachusetts will extend funding for current English Literacy and Civics Education programs for FY17. In addition, in FY17 the state will fund IEL/CE pilot programs and continue to work on related policies and develop guidance for local programs regarding IEL/CE. In FY17, the state will issue an open and competitive Request for Proposals (RFP) for IEL/CE program implementation in FY18. All of the considerations for awarding grants and contracts under Title II Section 211 (a) (2) to carry out activities under section 243 will be addressed in the open and competitive RFP.

VI.d.1. Integrated English Literacy and Civics Education Program (establish and operate): The Commonwealth's response did not adequately describe how the Commonwealth will establish integrated English literacy and civics education programs that provide educational services consisting of literacy and English language acquisition integrated with civics education - that is, instruction on the rights and responsibilities of citizenship and civic participation.

Response:

Integrated Education and Training (IET) and Integrated English Literacy and Civics Education (IELCE) Grants in Massachusetts are competitive grants designed for partnerships among ABE providers, Chapter 74 Career /Vocational Technical Education programs, postsecondary education or training providers, and/or employers that will be included in the FY18 Open and Competitive RFP process. All entities of demonstrated effectiveness will be eligible to apply.

The goal is to develop model programs that integrate ABE services concurrently and contextually with workforce preparation and training for occupations in high-demand industries that allow students to attain economic self-sufficiency. IELCE programs funded under Section 243 must be provided in combination with integrated education and training (IET) that is concurrent and contextualized with occupational skills training and civics education. The programs must be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment 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.

In civics education classes, ESOL instructors will be expected to integrate U.S. history, U.S. government, and civic engagement lessons into ESOL classes with the intent of building on students' knowledge of civics while increasing their English literacy skills. When appropriate, lessons will also be incorporated into the occupational training classes. U.S. history content includes covering significant dates and events that have shaped the country's development. U.S. government

content focuses on the structure and different branches of local, state, and federal government agencies, as well as the major documents that form the basis of U.S. Government. Civic engagement lessons will focus on developing student awareness and knowledge of civics and providing them opportunities to apply their knowledge in their communities. Most Massachusetts ESOL programs will also participate in the Massachusetts Coalition for Adult Education (MCAE) ongoing Meet and Greet Campaign, which trains students on self-advocacy and encourages them to contact their local elected officials to invite them to visit their programs. MCAE also helps programs organize State House visits to meet with representatives and senators.

Many programs will also continue to participate in the Massachusetts Alliance for Adult Literacy Adult Literacy Awareness Day at the State House in which current and former ABE students assemble to meet with elected officials. Many ABE programs also participate in advocacy activities sponsored by the Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA), an organization that promotes the rights and integration of immigrants and refugees.

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.

IEL/CE will include activities described under section 243. In addition students will have exposure to:

- a culture of college and career readiness including the development of education and career plans
- curriculum that builds students' language skills and incorporates career awareness and workforce readiness

As appropriate, students may also have access to:

- ACT Career Ready 101.
- curriculum contextualized to in demand industries as students get to more advanced levels. (See the Massachusetts Community College Workforce Development Transformation Agenda curriculum modules targeting core topics in Mathematics and literacy contextualized to three key Massachusetts industries: healthcare, advanced manufacturing, and information technology.)
- further education and training opportunities offered through the workforce system. This could be accomplished using, for example, individual training accounts (ITAs) and Title I programs for out-of-school youth who are ELLs.
- concurrent enrollment in OSCC training programs for students with the goal of obtaining employment and/or an industry recognized certificate.
- bridge classes/programs to postsecondary education or training opportunities.

In partnership with the OSCCs and LWDBs, programs will address regional industry needs by developing contextualized curricula and making referrals for ELLs who reach levels of English proficiency needed to succeed in further education and training. The goal of the IEL/CE in Massachusetts is to prepare ELLs for employment in in-demand industries and occupations that lead to economic self-sufficiency.

VI.d.2. Integrated English Literacy and Civics Education Program (funding):

(a) The Plan did not indicate how the grants and contracts awarded with section 243 funds will be competed and will comply with the requirements of Subpart C in title II of WIOA. (b) The Commonwealth's response did not address the activities that will be funded with section 243 funds.

Response:

(a) The FY18 open and competitive process that Massachusetts will launch in November 2016 will make funding for Integrated English Literacy and Civics Education (IELCE) available to each of the 16 workforce regions. The posting of the RFP to the Department's Current Grant Funding Opportunities and the Adult and Community Learning Services websites will afford direct and equitable access to all eligible providers. ACLS will respond to all questions about the RFP by integrating them into a single Q&A and posting them on the website, thus providing direct and equitable access to information about the RFP for all potential applicants. Applicants will be required to describe how they will meet each of the 13 WIOA considerations contained in Subpart C and responses will be assigned points based on a scoring rubric that weighs the extent to which applicants meet each consideration.

Massachusetts intends to fund at least one IET program per region, which can either be an IET program for ABE students, or an IELCE program for ESOL students in each of the 16 Massachusetts WDB regions. In addition, in order to raise the widest amount of awareness for the RFP, the Department will be encouraging integrated education and training partnerships with Chapter 74 Career/Vocational Technical Education (CVTE) programs. (Note: Three currently funded IELCE pilots all have a Chapter 74 CVTE partner).

(b) Eligible applicants will be Community Adult Learning Centers. Funds may be used to support personnel and non-personnel costs related to establishing or operating Integrated English Literacy and Civics Education programming that provides instruction including civics education concurrently with training services contextualized to specific occupations in high demand industries.

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.

In FY17 and beyond, state leadership funds will be used to achieve the purposes of the ACLS strategic plan for access, quality and effectiveness, and next steps for students and guide the transition of the adult education field to full WIOA implementation. ACLS will enhance current practices and adopt new practices as needed.

- Program specialists provide customized TA to programs through desk reviews and regular site visits with an overall goal of continuous improvement to ensure effective program administration and positive student outcomes. Site visits include classroom observations, meetings with key staff, and a review of required activities. Desk reviews consist of regular reviews of program data including enrollment, attendance, and assessment data.
- ACLS conducts an annual multi-session New Directors' Orientation designed to support the needs of recently hired directors. This orientation emphasizes educational leadership through the introduction of key initiatives such as WIOA implementation, the CCRSAE, continuous improvement planning, performance accountability, adult career pathways, and PD.
- ACLS visits a targeted number of programs for on-site, multi-day monitoring visits. The monitoring team, comprised of ACLS staff and a representative of the LWDB, conducts a thorough program review including a review of data and student and staff interviews; monitoring results are captured in a program monitoring report. The monitoring tool is based on Indicators of Program Quality that informed the *Program Self Evaluation and ACLS Monitoring Tool*. Program specialists monitor action plans for programs that are out of compliance. ACLS will review its monitoring process and accompanying tool to align with the goals of WIOA.
- ACLS collaborates at the state level with core partners and has played a significant role in the development of the combined state plan. The ABE State Director is a member of the WIOA Steering Committee and several ACLS staff participates in WIOA workgroups. ACLS staff will continue cross agency collaborations to ensure a successful implementation of the state plan and alignment with other core programs and one-stop partners. ACLS staff, in collaboration with the (Boston) Mayor's Office of Workforce Development, also holds regular meetings of the Adult Literacy Initiative in Boston. The convening of multiple programs located in the Boston area allows them to collaborate to better align services, avoid duplication of service, share expertise and resources, and strengthen partnerships with the two Boston OSCCs.
- To ensure successful implementation of policies and initiatives, ACLS holds a required annual statewide Directors' Meeting for programs. Regular communication with the field is ensured through monthly mailings that include announcements, resources, reminders, and updates on a wide variety of topics ranging from curriculum and assessment to data collection to leadership opportunities. See http://www.doe.mass.edu/acls/mailings/ for sample monthly mailings.
- ACLS also holds project-specific meetings for funded projects including STAR, Distance Learning, ACP, Transition to Community College, and ABECI to allow programs an

opportunity to participate in working groups and policy discussions, network, and share promising practices.

- ACLS has a dedicated staff position for PD and assigns program specialists to serve as liaisons to individual PD centers. These program specialists provide guidance to ensure that the PD system and ACLS policies are aligned.
- ACLS uses state and federal funds to support the SABES PD system, a coordinated and cohesive network of statewide PD centers for ELA, ESOL, Mathematics, assessment, digital learning, education and career planning, educational leadership, and use of SMARTT/Cognos (i.e., the state data collection and reporting systems).Some of the goals of the system are to: support the alignment with and implementation of the CCRSAE; improve instruction by offering high quality, research-based PD and increasing the number of licensed adult education teachers; better integrate digital literacy into instruction to prepare students for the technology demands of the Massachusetts workforce and postsecondary education; and develop strong educational leaders at the local level.

VI.e.1. State Leadership (required activities):

The Commonwealth's response did not indicate how the Commonwealth will use section 223 funds to support required activities (a) under section 223(a)(1)(A) and (b) under section 223(a)(1)(D) of WIOA.

Response:

(a) In Massachusetts, state leadership funds support the alignment of adult education and literacy activities with core partners and one-stop partners as articulated in the Combined State Plan. ACLS staff:

- participate in WIOA cross-agency activities to establish and maintain ongoing communication and coordination among core partners and ensure consistent messaging to all WIOA partners.

- provide T/A related to WIOA implementation including but not limited to guidance and support around collaboration with workforce partners (e.g., adult career pathways, shared customers).

- assist programs in collaborating with their local area partnerships and developing local MOUs as required. These MOUs will specify how services can be connected, integrated, or enhanced by sharing staffing, resources, or jointly designed in ways that improve outcomes for "shared customers" (e.g., youth, job seekers, and businesses).

- convene ABE directors that serve on the WDBs.

- work together to issue joint policies that guide WIOA implementation.

- work closely with workforce partners in Boston (i.e., the Mayor's Office of Workforce Development, two Career Centers, and the Private Industry Council) to ensure communication, coordination, and collaboration among the 28 funded programs in Boston. Additionally ACLS staff facilitate regular meetings among workforce partners, contribute to agendas for the 28 programs

quarterly, and facilitate meetings specifically focused on development of "outstationing" (i.e., Career Navigator) to bridge adult education programs and the one-stops.

(b) ACLS will provide grantee oversight to include, but not limited to:

- customized T/A provided by ACLS Program Specialists that includes desk reviews and site visits with an overall goal of continuous improvement.

- targeted on-site, monitoring by teams of ACLS staff that conduct a thorough program review grounded in the Indicators of Program Quality.

- targeted intervention (TI) provided by the ACLS-funded SABES PD Center for Educational Leadership and Strengthening ABE Programs to programs that fall in the lowest tier of the state's performance accountability system.

- Please note that ACLS will engage in a strategic review of its grant oversight activities this fall to ensure that all activities most efficiently use resources to maximize the quality of programs.

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

State leadership funds will be used to carry out permissible state leadership activities under section 223 of WIOA including, but not limited to:

- ACLS will promote quality instruction by developing the capacity of ABE educators. For example, ACLS staff will convene and oversee the Educator Policy Team which is developing a teacher evaluation modeled after the Massachusetts Model System for Educator Evaluation based on research that shows educator effectiveness is crucial to student success). ACLS will continue to develop policies that build teacher capacity and strengthen instruction, inform PD, and support the capacity of staff to implement the CCRSAE so that students gain the academic skills needed to be successful in their next steps.
- ACLS provides TA and PD (e.g., marketing ABE services to local businesses, developing workplace education partnerships, and contextualizing curriculum for multi-level workplace education classes) to workplace education programs.
- ACLS has a dedicated staff position to help build programs' capacity to develop high quality curriculum. (See Section (a) Aligning of Content Standards for additional information.)
- ACLS has led the implementation of the Student Achievement in Reading (STAR) initiative since 2010 in CALCs and ABECI programs with classes at the pre-Adult Secondary Education (pre-ASE) level. Programs have received STAR PD and training that teaches adult education instructors to use evidence-based reading instruction in the classroom.
- ACLS will lead the process of developing a multiyear statewide technology plan to address the integration of digital literacy in programs. This is anticipated to include but not be limited to refining the distance learning model, integration of digital literacy in PD offerings and, in partnership with workforce partners, implementing the Career Readiness Initiative.
- ACLS will support and guide the integration of literacy instruction and occupational skill training. ACLS provides guidance to career pathway programs across 16 LWDB regions in strengthening their ability to prepare students for careers in regionally identified industries

(e.g. healthcare, early childhood education, hospitality/customer service, and advanced manufacturing). An ACLS convened task force comprised of stakeholders from workforce development, higher education, and adult education will inform ACLS in refining policies for career pathway and integrated education and training program development. In addition, ACLS will continue to facilitate annual working meetings for career pathway programs to solicit feedback on guidance, share promising practices and models for integrated education and training and integrated English literacy and civics education, provide networking opportunities, and plan for expanded partnership collaboration.

- TA, guidance and support to transition to post-secondary education programs including state level collaborations with postsecondary educational institutions.
- State level guidance, policy and TA regarding required assessments.
- State level guidance and TA in understanding WIOA measures and meeting the state adjusted levels of performance described in section 116(b)(3).
- ALCS will provide other activities of statewide significance as needed to assist programs and promote the purpose of the adult education and family literacy programs.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Massachusetts first implemented an ABE performance accountability system in 2006. CALCs are held accountable for six performance standards, assigned performance points based on their performance in each standard, and sorted into four tiers. Programs that fall into tier 4, and occasionally programs in tier 3 that are at risk of falling into tier 4, are deemed to be in need of targeted intervention (TI) and at risk of losing funding. TI is provided by the state PD system, SABES, a process overseen by ACLS staff. Additionally, performance points are used as one of the criteria during open and competitive funding years. Since instituting the performance accountability system, programs overall have earned higher levels of performance points per year and fewer programs have fallen into the lowest tier.

WIOA performance measures provide one key strategy for assessing the quality of adult literacy services. In FY16, ACLS convened a WIOA Performance Measures Task Force comprised of five Massachusetts adult education directors and ACLS staff to:

- Review the WIOA performance measures and program performance data;
- Decide how the federal measures should be part of a new state performance accountability system for awarding past performance points to local programs;
- Decide whether additional measures should be added;
- Weight and rank the measures;
- Address implications; and
- Create a plan for rolling out the new system including a performance measures pilot in FY17.

In addition to using revised performance measures, Massachusetts will monitor and evaluate the quality of, and improvement in, adult education and literacy activities and disseminate information about models and promising practices using:

- annual on-site monitoring visits of a subset of programs. See Section (e) State Leadership for more details regarding monitoring.
- annual site visits conducted by program specialists. See Section (e) State Leadership for more details regarding site visits.
- desk reviews and ongoing TA from state-assigned program specialists. See Section (e) State Leadership for more details regarding desk reviews and TA.
- SMARTT and Cognos reports to evaluate program performance and guide improvement planning.
- annual refunding applications that allow ACLS program specialists an opportunity to assess the quality of services, and how programs are addressing challenges encountered during the year and working to overcome those challenges the following year.
- required annual policy meetings for adult education directors.
- research-based policies and guidelines. See Massachusetts Policies for Effective Adult Basic Education in Community Adult Learning Centers and Correctional Institutions and

Massachusetts Guidelines for Effective Adult Career Pathways Programs for examples of policy and guidance manuals.

- continuous improvement plans provide an opportunity to monitor the quality of adult education and advance emerging quality initiatives. In FY16, for example, programs were required to address at least one WIOA transition-related activity from among the activities highlighted in their continuation applications and encouraged to also include one or more WIOA-related curriculum activities.
- regular communications and guidance to the field (e.g., monthly mailings, project-specific meetings, SABES PD website).

In anticipation of WIOA data collection demands, ACLS is investing in a cutting-edge data collection and management system which will be fully deployed in FY17. This user-friendly, web-based application will be a significant improvement over the current system. The new system will:

- provide ACLS and local programs with intuitive tools to analyze and assess critical information.
- support local management of program operation (enrollment, testing, attendance, and staff assignments and credentials), thereby making it easier for directors to focus on ACLS Indicators of Program Quality and WIOA outcomes.
- create program and state performance reports on learner progress.
- match student records with WIOA partner data to report key employment and postsecondary education outcomes of shared customers.

ACLS will also collaborate with the ESE Audit and Compliance Unit to audit the data and finances of randomly selected programs each year to ensure quality.

VI.f. Assessing Quality:

The Commonwealth's response did not include a description of how it will assess the quality of its professional development (PD) programs designed to improve: instruction in the essential components of reading instruction, instruction related to the specific needs of adult learners, instruction provided by volunteers or paid personnel, and dissemination of information about models and promising practices.

Response:

Evaluating PD begins with a strong planning process. In FY16, ACLS and the Massachusetts PD system, SABES, adopted 11 High Quality Professional Development (HQPD) Standards. HQPD is defined as a set of "coherent learning experiences that is systematic, purposeful, and structured over a sustained period of time with the goal of improving teacher practice and student outcomes." PD development and planning are driven by information about where learners need to improve, and the practitioner change that is needed to support the desired learner change.

To align with HQPD Standards, SABES PD descriptions and learning objectives (LOs) focus on how teachers' practice will change, and the potential impact on their students as a result. PD descriptions describe the knowledge, skills, and attitudes that teachers need to address the identified student needs.

In FY16, grounded in content and quality standards, ACLS and SABES also developed a common evaluation protocol for PD that involves various phases and levels of data collection and in-depth inquiry:

- All PD offerings (e.g., face-to-face, online, conferences, webinars) are evaluated immediately following the PD based on LOs, the connection to the CCRS and ESOL Curriculum Frameworks, the connection to student and program outcomes, and the effectiveness of the presenters. Online PD is additionally evaluated for the ease of navigation of the tools being used and the level of support provided.

- Follow-up evaluations are sent to all practitioners between six weeks and six months following the PD activity to determine if and how they are using what they learned, and what additional supports they need to implement the desired change.

- Evaluation summaries and analyses are provided to ACLS by SABES PD Centers through annual performance reports which include:

a. Compiled quantitative and qualitative feedback from evaluations provided at the end of each PD activity.
b. Summaries and analyses of follow-up evaluations.
c. HQPD Rubrics that demonstrate the alignment of PD with HQPD Standards.
d. Analysis of if and how PD has had an impact on classroom and program practice.
e. Reflection on how feedback is used to inform revisions to PD activities as well as continuous improvement and planning.
f. Evidence that PD is informed by current and rigorous research.
g. Examples of local and national promising and best practices that are shared with programs, disseminated via the SABES website, and integrated into PD.

The effectiveness of PD is also evaluated by evidence and direct observation of practice. Examples include:

a. STAR-trained teachers are observed in the classroom for alignment with evidence-based reading instruction.

b. PD centers review and provide feedback on ABE program Curriculum Scope and Sequence and other materials aligned with the CCRS.

c. Participants in the online Integrating Math and ESOL course must submit a lesson plan that demonstrates how the teacher will make math accessible to ESOL learners.

d. New staff who complete the mandatory Foundations for New Staff must pass an online course including quizzes and a final test, and submit sample lesson plans.

e. Training for mandated, standardized NRS assessments requires participants to demonstrate competence by achieving a minimum score on practice tests.

f. New User Training for the data collection system (SMARTT) requires practitioners to demonstrate competence by completing sample data input.

g. ABE license-seekers are observed in the classroom or submit videos of classroom observations to determine if instructional practice aligns with license standards.

ACLS Program Specialists cull models and promising practices information from site visits, multi-day on-site monitoring, and annual continuation funding applications. These are disseminated by SABES on its website and in PD offerings for practitioners.

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 **Department of Elementary and Secondary Education**

Full Name of Authorized Representative: **Bill Bell**

Title of Authorized Representative: **Associate Commissioner for Administration & Finance MA Department of Elementary & Secondary 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:

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* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The Massachusetts Rehabilitation Commission has an active and productive State Rehabilitation Council (SRC). SRC members through their area consumer advisory councils, SRC subcommittees, task forces, quarterly meetings, and the annual consumer conference, have conducted surveys and needs assessments that have provided input to more effectively address the needs of individuals with the most significant disabilities.

Again this year, funds were deemed sufficient, for MRC to select all eligible individuals to receive vocational rehabilitation services regardless of priority category. Last year the SRC was consulted and supported the MRC in the decision to open all priority categories for services. In the event that future funding proves insufficient, the MRC in partnership with the SRC will re–evaluate the need to establish an order of selection in order to prioritize eligible individuals to receive services based on the severity of their functional limitations.

The SRC, through the SRC State Plan sub–committee, has made the following recommendations to the Commission: 1. Continue to provide soft skill training to consumers; 2. Review the definition of an individual with the most significant disability and the order of selection for services; 3. Improve communication to consumers and potential consumers 4. Promote on–the–job training, increased employer engagement and industry based trainings to expand the placement of consumers into previously untapped industries including opportunities in the STEM (Science, Technology, Engineering, and Mathematics) fields 5. Partner with community colleges and appropriate employers for consumer training in such fields as certified nursing assistant, medical assistant and pharmacy technician 6. Train counselors to provide information to consumers interested in artistic careers about freelancing, self– employment and employer based paths. 7. Establish an apprenticeship program for artists 8. Create a "State as a Model Employer (SAME)" task force to ensure state jobs are being directly marketed to people with disabilities

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

1. Continue to provide soft skill training to consumers: Soft skills training for VR staff has been completed by MRC Training Department. In addition, all area offices offer training in soft skills to all consumers, including transition aged individuals through job clubs and stand– alone programs open for all disability groups. Training is delivered using PowerPoint and includes opportunities to role play. Soft–skills training has been offered at the 2014 Consumer Conference as a stand–alone workshop and with a resume workshop at the 2015 Consumer Conference. Soft skill trainings have been offered in high schools to assist in the transition process from school to work. Currently MRC

has a RFR for soft skill training specifically for transitioning high school students as part of WIOA pre–employment services. The MRC Training Department is developing an e–Learning on soft skills with a private sector company that is close to completion to provide an easily accessible resource to VR counselors and Job Placement Staff. The e–learning will offer consistency of content and provide an available resource for offices to work individually or in groups with consumers in area offices. Once this training has been completed, access to the E–Learning will be available on the Commonwealth's Learning Management System, PACE. Soft skills will be added to the list of EOHHS mandatory training for all new counselors with an expectation that all training will be completed within 90 days. All other counselors will be required to complete the e–learning within one year. Staff will also have access for a refresher or as a reference as needed. Soft skills training materials (Power Point and other resources) for staff are on My MRC (MRC's intranet) under the section titles training unit.

2. Review the definition of an individual with the most significant disability and the order of selection for services: At this time, the order of selection is not an issue as MRC has not been operating under an order of selection since 2013 allowing services to all eligible consumers regardless of priority classification. With the passage of WIOA, MRC is required to expend 15% of its Title 1 budget on pre– employment services to students with disabilities aged 16 to 22. This change may necessitate a future re– assessment of the order of selection process and the definition of an individual with a most significant disability. In the event that funding becomes insufficient to select all eligible consumers an order of selection will operate to ensure that individual duals with the most significant disabilities will be selected for VR services first.

3. Improve communication to consumers and potential consumers: The MRC welcomes the SRC input into helping to enhance communication by reminding consumers that the vocational rehabilitation process is a working partnership that needs continued consumer and counselor contact to be successful. The new consumer orientation video assists in clarifying communication between consumers and counselors and clarifies expectations. MRC is continually working to enhance electronic communication, which has been identified through the Needs Assessment as an often–preferred mode of communication for many consumers. Ongoing MRC efforts to obtain email addresses for VR consumers has led to an increase in those addresses over the past several years, 1,500 new email addresses in the past year alone, a 8. 5% increase over the past year in the proportion of consumers in MRCIS with an email address in the system. As the job search process becomes more electronic it becomes more important for consumers to have the tools to communicate with employers and apply for jobs on line. Many VR Counselors have been working with their consumers in assisting them to get free Gmail or Hotmail accounts. MRC has also implemented a system enhancement to allow direct emailing of correspondence to consumers through the MRCIS system as well as the ability to text message that will make the process both faster and easier for consumers and counselors alike. The MRC's Commissioner's Office has been using social media like Facebook, LinkedIn, and Twitter for the past few years, and blogs through the EOHHS site. MRC is open to exploring any additional social media as it becomes available to communicate with consumers and employers. MRC has videoconferencing available at a few sites across the state and plans to extend that capacity as much as possible within the next several years for training, conferences and public hearings.

4. Promote on– the– job training, increased employer engagement and industry based trainings to expand the placement of consumers into previously untapped industries including opportunities in

the STEM (Science, Technology, Engineering, and Mathematics) fields: The MRC through its Job Placement and Employment Service Specialists cultivates business and employer relationships and peer partnerships which reflect the intent of the Federal Workforce Innovation and Opportunity Act (WIOA) of 2015 which calls for increased partnership and collaboration between public VR agencies and potential employers of VR consumers. MRC JPS/ESS staff use targeted workforce strategies through consumer assessments and training, targeted labor market information, and direct outreach to employers. This public–private partnership between MRC and employers creates private–industry job training opportunities for individuals with disabilities in high–growth industries, such as health care, transportation, manufacturing and customer services. MRC has developed a job driven training program to train and employ consumers as Pharmacy Technicians with CVS Health. The program started June 1, 2014. As of November 2015, there have been 45 hires through the program.

Other job–driven trainings have been developed with Advance Auto Parts for Sales and Driver positions; Enterprise for Service Agent, Driver, and Lot Attendant, The Home Depot, Lowes, G4S Security Solutions, and Allied Barton Security Services. MRC has developed a project with Manpower Training and Development Center to secure occupational web–based training, skills development and job matching for consumers in ten areas including: Microsoft Office Suite (2007. 2010) Microsoft Word, Excel and Power; Customer Service; Call Center, Administrative Assistant and Receptionist, Office and Clerical support, Packing and Product Preparation, Shipping and Receiving, Materials Inspection, Preparation for Employment, and Equipment Assembly. A total of 142 customers have been referred to date with 54 consumers referred in 2015. MRC has also purchased a software program called RESU Mate, a competitive tool utilized in the staffing and recruiting industries, to assist employment staff in basic job matching between available employment opportunities and consumer resumes and skills. All placement staff within the agency utilize the program. Use of the MRC's on–the–job training strategy has increased significantly. Many consumers who participate in an OJT obtain employment with the OJT employer and others are able to obtain employment elsewhere as a result of their participation in the OJT through which they gained a recent work experience. There were 190 OJTs in 2014, in 2015, 198 consumers participated in On–the–job training opportunities.

Another tool MRC uses to increase employer engagement is its annual Statewide Hiring Event. MRC has conducted these hiring events since 2013 in partnership with the Office of Federal Contract Compliance Program, to assist MRC consumers with securing competitive employment comparable with their interests and abilities. Over 250 consumers have been hired through these events to date.

5. Partner with community colleges and appropriate employers for consumer training in such fields as certified nursing assistant, medical assistant and pharmacy technician: It is MRC's practice to assist its consumers in accessing post–secondary educational opportunities through Community Colleges and other institutions. MRC continues to engage with employers for on–the–job trainings, job–driven trainings, and other training opportunities for its consumers. MRC closely works with Workforce Investment Boards (WIBs) and Community Colleges are represented on these boards.

MRC continues to enhance its electronic case management system (MRCIS) to capture post–secondary educational outcomes by consumers including attendance at community colleges,

outcomes and degrees and certifications received. This is also tied into the WIOA performance measure for credential obtainment.

6. Train counselors to provide information to consumers interested in artistic careers about freelancing, self– employment and employer based paths: It is the practice of the VR division to assist all consumers in making informed career choices in their field of interest and assist them in obtaining their goals, including those who are interested in artistic careers.

7. Establish an apprenticeship program for artists: Many apprenticeship programs exist for artists across the Commonwealth. MRC supports the expansion of on the job and apprenticeship programs in many fields. Two grant programs are offered by the Mass Cultural Council for traditional artists; Artist Fellowships Program and the Traditional Arts Apprenticeship Program. This second program provides a financial incentive for master artists to identify promising apprentices to whom they might pass on their traditional Skills. Review criteria include artistic excellence, the master's standing within the traditional community significance of the art form, quality of budget and work plan, and demonstrated commitment to the traditional art form. Another option in the Greater Boston area is Gateway Arts, a MRC provider who provides individualized, arts–based services to adults with disabilities that will enable them to create meaningful lives and careers in art. Gateway artists receive opportunities for local, national, and international recognition and sales. In addition, Massachusetts Museum of Contemporary Art's Assets for Artists program provides Financial support and professional development for artists. Artists selected to participate in the North Adams Project will receive artist–focused training and match money for investments in their creative enterprises. Artists currently living in North Adams or are willing to relocate to North Adams are eligible to apply.

8. Create a "State as a Model Employer (SAME)" task force to ensure state jobs are being directly marketed to people with disabilities: The State as a model employer program was a statewide initiative to hire more individuals with disabilities into state positions. MRC supports working with consumers to find appropriate employment in State government including MRC as well as in the private sector. A total of 72 consumers were hired by the state as a whole in 2015, while MRC directly hired 9 consumers. Many other individuals with disabilities have been hired and will be hired for Commonwealth positions. MRC has in the past and continues to offer internship programs to individuals with disabilities some of whom have obtained jobs at MRC post internship.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

The Massachusetts Rehabilitation Commission reviewed and responded to all recommendations provided by the Statewide Rehabilitation Council. MRC deferred on re-assessing the OOS category definitions. The MRC does not agree with the SRC that OOS needs to be reviewed at this time but will be re-evaluate in the future. MRC currently has sufficient funding to serve all consumers but in the event that there is insufficient funding, OOS categories will be reviewed and an OOS will be implemented as required.

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;

Not Applicable – MRC has not requested a waiver of Statewideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not Applicable – MRC has not requested a waiver of Statewideness.

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.

Not Applicable - MRC has not requested a waiver of Statewideness.

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;

The Massachusetts Rehabilitation Commission considers cooperation and collaboration with other agencies particularly human service agencies, to be essential and beneficial to most effectively serving people with disabilities and to providing the optimum opportunity for employment. Other agencies provide critical supports, necessary resources, and dedicated human service professionals all of which augment and enhance the Vocational Rehabilitation Program. For many years, the Massachusetts Rehabilitation Commission has worked closely and corporately with the staff of other agencies in serving mutual consumers. Collaboration often extends well beyond services to particular individuals. The Massachusetts Rehabilitation Commission works with other agencies to:

• Affect system change • Increase resources, funding and service options • Improve communication and mutual understanding among staff • Change public attitude toward issues of disability • Achieve common goals on behalf of those whom the agencies serve

The Massachusetts Rehabilitation Commission, in working with other agencies, takes a predictable approach to collaboration and puts forth an agenda that is common to all interagency relationships. First, linkages, agreements or understandings are established at state, regional and local levels. Typically, the state level, with input from regional and local personnel, develops a blueprint for collaboration and an action plan. The regional level oversees the implementation of the action plan. At the local level, the actions are activated and implemented. Comprehensive inter–agency cooperation requires the full commitment and participation of all three organizational levels. Inter–agency cooperation in which the Massachusetts Rehabilitation Commission participates typically encompasses all of the following collaboration measures:

• Planning: There is a statewide planning structure that establishes an action plan incorporating diverse needs and perspectives. This process results in a cooperative agreement, a memorandum of understanding, or some type of action plan to which two or more agencies are committed. • Information Exchange: A commitment is made to exchange information about resources, funding, policy and other matters necessary to mutual understanding of mission, goals, capacity, eligibility and the like. • Identification of Liaisons: Generally, both parties identify contact persons for the purpose of communication and referral and responsible persons for issues and problem resolution. • Cross–Training: All agency cooperation acknowledges the need for and addresses cross–training of personnel. This is not only critical to mutual understanding, but also is essential in effective, reciprocal utilization of services and appropriate referral.

Collaboration on Resources: Effective cooperation between agencies acknowledges that more can be done with less when resources are most effectively combined and when duplication is avoided whenever possible. Sharing or resources is much more than splitting the cost. It encompasses which agency does what for whom, when, where and how. Some of the rudiments for resource

collaboration are set forth in written agreements and planning documents. Much of this collaboration, however, can only happen at the service level through honest and regular communication. Cooperation in which the Massachusetts Rehabilitation Commission engages strives to set the environment conducive to the frankness, openness, and, whenever possible flexibility necessary for collaboration on sharing of resources. The Massachusetts Rehabilitation Commission has, with several agencies and organizations, written agreements, memoranda of understanding, written work plans and/or verbal commitments on which both parties have acted. Agencies with which such collaboration has occurred and has remained active locally and at the Statewide level include, the Executive Office of Health and Human Services, the Massachusetts Commission for the Blind, the Massachusetts Commission for the Deaf and Hard of Hearing, the Department of Mental Health, the Department of Developmental Services, the Social Security Administration, Medicaid/Mass Health, the Department of Transitional Assistance, the Executive Office of Labor and Workforce Development, and the Department of Elementary and Secondary Education.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. The MRC VR program and MRC area office have excellent relationships with these programs operated by the agency. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low–interest loans to consumers when other resources are not available to purchase needed adaptive technology.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

There are no programs in Massachusetts carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

The Massachusetts Rehabilitation Commission further collaborates with organizations that provide services, in whole or in part, to specific constituencies, including out of school youth. Among such organizations are the Massachusetts Association of Financial Aid Administrators, the Massachusetts Developmental Disabilities Council, the Arthritis Foundation, the Massachusetts Multiple Sclerosis Society, the Massachusetts Easter Seals, United Cerebral Palsy, the Massachusetts Head Injury Association, and the Epilepsy Association. These collaborations take the form of cooperative agreements and, sometimes, service contracts. The purpose, goals, and actions established in these agreements and contracts are very similar to the agendas set forth in interagency collaboration.

5. STATE USE CONTRACTING PROGRAMS.

The Commonwealth operates a Supplier Diversity Program including the following categories: Minority (MBE), Women (WBE), Service–Disabled Veteran (SDVOBE), Veteran (VBE), Lesbian, Gay,

Bisexual and Transgender (LGBTBE); and Disability–Owned Business Enterprises (DOBE). MRC participates in this program as part of statewide contracting as an equal opportunity initiative

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Massachusetts Rehabilitation Commission(MRC) and the Department of Elementary and Secondary Education(DESE) have signed a Memorandum of Understanding (MOU) to establish interagency cooperation between public education and public vocational rehabilitation agency regarding vocational rehabilitation services pursuant to the Workforce Innovation and Opportunity Act (WIOA) to provide individualized transition services for students with disabilities that lead to successful post–school outcomes in competitive integrated employment, postsecondary education and training, independent living and community participation.

Prior to the VR application, ESE will provide staffing resources and space at schools. MRC counselors are assigned to high schools and provide information about the agency, pre-employment transition services such as job exploration, work readiness, mentoring, and other pre-employment services in group settings to high school students with disabilities. MRC VR counselors are funded with VR resources to provide pre-employment group transition services prior to application. If students are found ineligible, MRC will collaborate with partners such as Education, Career Centers, DMH, DTA, and DDS to ensure appropriate referrals. In the event students are found ineligible, they can participate in MRC sponsored group activities such as career exploration events in collaboration with the schools. MRC is currently not under OOS and does not utilize a waitlist, however if a waitlist is established in the future, students can participate in group pre-employment and informational/referral activities sponsored by MRC.

MRC is mandated within WIOA to serve individuals with disabilities in high school aged 16 to 22. MRC services begin at the high school level and extend through post–secondary activities with the ultimate outcome being employment. MRC is working closely with local school districts on transition and WIOA Pre–Employment Transition Services. MRC has a counselor assigned to every public high school in the Commonwealth and has developed strong working relationships with the Department of Elementary and Secondary Education. MRC also provides supported employment services to youth through its local offices.

The MOU has been signed by DESE Commissioner Mitchell Chester and MRC Commissioner Adelaide Osborne and is in effect as of November 1, 2015. The MOU will be revised as needed.

The purpose of this memorandum is to establish interagency cooperation between the public education and the public vocational rehabilitation systems so that students with disabilities have access to transition planning and services. The Massachusetts Department of Elementary and Secondary Education (ESE) and the Massachusetts Rehabilitation Commission (MRC) are mutually committed to promoting individualized transition services for students with disabilities that lead to

successful post–school outcomes in competitive integrated employment, post-secondary education and training, independent living, and community participation.

The ESE is responsible for overseeing school district compliance with the federal special education law, the Individuals with Disabilities Education Act (IDEA); Section 504 of the federal Rehabilitation Act of 1973; and the Commonwealth's special education law, G.L. Chapter 71B. The MRC provides comprehensive services to individuals with disabilities to improve their quality of life and economic self–sufficiency in the community. The MRC Vocational Rehabilitation Program is authorized and funded under the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunities Act of 2014, P.L. 113–128 ("WIOA"). The MRC assists individuals with disabilities to obtain and maintain employment.

The Vocational Rehabilitation Program helps individuals with physical, psychiatric, and/or learning disabilities with the challenges of the modern workplace. WIOA promotes coordination of services in order to facilitate the transition of students with disabilities. Students transition from receiving educational and related services from school personnel, and pre–employment transition services (PETS) from the MRC, to the receipt of vocational rehabilitation services provided through the MRC, the designated state agency.

In accordance with the Rehabilitation Act of 1973 as amended by WIOA nothing in this memorandum will be construed to reduce the obligation under the IDEA (20 U.S.C. 1400 et seq.) of a local educational agency (LEA) or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities.

In accordance with IDEA, nothing in this memorandum relieves the MRC of the responsibility to provide or pay for any transition service that the agency would otherwise provide to students with disabilities who meet the MRC's eligibility criteria.

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 MOU outlines ongoing communication and collaboration between the ESE and the MRC at the state and local level. Designated staff from the ESE and the MRC at the state level will communicate on an ongoing basis, at least annually, to share information about legislative and regulatory changes and to review agency policy initiatives, resources, and other issues related to transition.

The following initiatives will foster local collaboration between the MRC's staff and LEAs:

Training and Guidance: ESE and MRC staff at the state level will collaborate on transition training activities for students, families, educators, rehabilitation counselors, and other involved staff, where needed and appropriate. ESE and MRC staff at the state level will collaborate, as needed and appropriate, to produce joint guidance on WIOA, and local collaboration.

Collaborative Work: The ESE will support and encourage LEAs to provide MRC staff with resources necessary to the MRC's work, such as access to meeting space, work space, telephones, and Wi–Fi or wired connection to the Internet. The ESE will support and encourage LEAs to provide information to the MRC's staff, or assist in obtaining information needed, from students with 504 plans or Individualized Education Programs (IEPs) and their families/legal guardians. This will facilitate provision of PETS to students who need them, and timely eligibility determination and documentation of vocational rehabilitation activities in the MRC case management system. As appropriate and consistent with applicable student records laws, this information could include student and family/legal guardian contact and personal information, student assessment data, IEPs, 504 plans, and Transition Planning Forms. The ESE will support and encourage LEAs to collaborate with the MRC to provide career development activities on local and regional levels, as appropriate. These activities could include career fairs, job shadowing, career exploration activities, family resource information sessions, internships, job support and coaching, and job driven trainings/work–based training in collaboration with Career Centers and other organizations. The MRC will designate staff in Area Offices to work cooperatively with LEAs to coordinate PETS and transition planning and services, and to disseminate information to parents/legal guardians and students about the MRC transition process as early as the student's 16th birthday.

The MRC will provide consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conference and conference calls), to assist LEAs in planning for the transition of students with disabilities from school to post–school activities. If a student is eligible for vocational rehabilitation services, this consultation and technical assistance should result in the MRC's development of an Individualized Plan for Employment ("IPE") before the student leaves the school setting and effective implementation of the IPE post graduation or when the student turns 22 years of age, whichever comes first. This consultation and technical assistance might include but is not limited to informational sessions with students, families/legal guardians, and school personnel regarding MRC services, including referral and eligibility information; and assigning a counselor point–of–contact for each high school to provide information, receive referrals, and develop IPEs with students. The ESE and the MRC will consider the provision of joint grant opportunities for purposes such as promoting collaboration between schools, the MRC, and community entities; the development of integrated school–to–post–school systems; and the promotion and statewide dissemination of best practices.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

The MOU covers compliance with state and federal laws and regulations pertaining to transition planning at the local level:

The ESE will provide ongoing guidance to LEAs regarding the responsibility to provide a free and appropriate public education ("FAPE") to students eligible for special education and Section 504 accommodation plans, as mandated by federal and state law. Guidance will include the requirements that IEPs specify needed transition services; that special education transition services be provided for each eligible student beginning at age 14; that representatives of participating agencies be invited to the IEP team meeting with the prior consent of the parent/legal guardian or student who has reached the age of majority; and that IEP Teams discuss the transfer of parental

rights to the student at least one year before the student turns 18. The ESE will also provide guidance to LEAs to facilitate Chapter 688 referrals to the appropriate agency for eligible students who will require ongoing supports and services from the adult service system.

On a regular basis, the ESE will monitor LEAs' development and use of policies and procedures, including those regarding Section 504 and the transition requirements of IDEA. All monitoring reports will be made publicly available on the ESE's web site. The ESE will provide guidance to LEAs, in accordance with 34 CFR 397.31, to inform LEAs that WOIA prohibits LEAs from entering into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which a youth with a disability is engaged in subminimum wage employment. The ESE assures that it will not enter such a contract or other arrangement.

The MRC will ensure that its Area Offices will determine eligibility for vocational rehabilitation services for students with disabilities and will provide PETS based on individual need. For those students eligible for vocational rehabilitation services, the rehabilitation counselor, together with the student, will develop an IPE stating the vocational goal and the services necessary to achieve it. These services may include: vocational guidance, work evaluation, skills training at a college or community rehabilitation program, adaptive equipment, and benefits counseling. Required PETS activities are: job exploration counseling; work–based learning experiences; counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education; workplace readiness training to develop social skills and independent living; and instruction in self–advocacy. The ESE and the MRC will provide guidance for local MRC staff and school district personnel on transition planning for students with disabilities that facilitates the development and implementation of IEPs under section 614(d) of the IDEA. MRC develops IPEs for students with disabilities as soon as possible.

MRC and DESE will review and revise forms, procedures, and provide technical assistance to local school districts regarding transition planning in compliance with state and federal laws and regulations.

The ESE will review the effectiveness of the IEP format which integrates transition planning into the form as a whole and will consider revisions as necessary or appropriate. The ESE will also consider revisions that might be necessary as a result of any changes in federal or state law. The ESE will invite MRC representatives to comment on any proposed changes that affect transition planning

The ESE and the MRC will coordinate, as necessary, to satisfy documentation requirements set forth at 34 CFR Part 397 with regard to students and youth with disabilities who are seeking subminimum–wage employment.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

The Massachusetts Department of Elementary and Secondary Education (ESE) and the Massachusetts Rehabilitation Commission (MRC) are mutually committed to promoting individualized transition services for students with disabilities that lead to successful post–school

outcomes in competitive integrated employment, postsecondary education and training, independent living, and community participation.

MRC and DESE understand their financial responsibilities under IDEA and WIOA and will work collaboratively to address any concerns that may arise in our workgroup. In addition, MRC has and will continue to develop strong working relationships between MRC Area Offices and LEAs which assists in facilitating open communication and resolution of issues. MRC collaborates with LEAs on shared consumer cases to ensure individuals receive quality services.

MRC will contribute 15% of its financial resources towards providing pre-employment transition services to high school students ages 16-22 with disabilities. Additionally, MRC will provide an array of pre-employment transition services. The high schools will provide in-kind contributions of staff time, space, and transition services/resources. MRC will continue to work closely with ESE to ensure adequate financial resources are available in the schools for high school students.

In accordance with the Rehabilitation Act of 1973 as amended by WIOA, nothing in this memorandum will be construed to reduce the obligation under the IDEA (20 U.S.C. 1400 et seq.) of a local educational agency (LEA) or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities. In accordance with IDEA, nothing in this memorandum relieves the MRC of the responsibility to provide or pay for any transition service that the agency would otherwise provide to students with disabilities who meet the MRC's eligibility criteria.

Designated staff from the ESE and the MRC at the state level will communicate on an ongoing basis, at least annually, to share information about legislative and regulatory changes and to review agency policy initiatives, resources, and other issues related to transition. ESE and MRC staff at the state level will collaborate on transition training activities for students, families, educators, rehabilitation counselors, and other involved staff, where needed and appropriate. ESE and MRC staff at the state level will collaborate, as needed and appropriate, to produce joint guidance on WIOA, and local collaboration.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The MRC Area Offices will provide outreach to high schools to assist in informing students with disabilities aged 16 to 22 who are receiving IDEA services or who are individuals with disabilities for the purposes of Section 504 of the availability of MRC's services. Outreach to these students occurs as early as possible in the transition process and at least two years prior to graduation or the student's 22nd birthday. MRC outreach information includes a description of the purpose of the vocational rehabilitation program, the eligibility requirements, application procedures, and the scope of services that may be provided to eligible individuals.

MRC is providing pre–employment transition services to individuals with disabilities in high school aged 16 to 22. MRC services begin at the high school level and extend through post–secondary activities with the ultimate outcome being employment. MRC is working closely with local school districts to identify students who require transition and WIOA pre–employment transition services.

MRC has a counselor assigned to every public high school in the Commonwealth and have developed strong working relationships with the Department of Elementary and Secondary Education.

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.

The Massachusetts Rehabilitation Commission (MRC) has, for many years, worked in partnership with Community Rehabilitation Providers (CRPs) to develop a wide array of programs and services to assist people with disabilities to achieve suitable employment outcomes. The MRC and CRPs have collaborated to develop programs including: Vocational Services; Competitive Integrated Employment Services (CIES) and a wide array of support services essential in vocational rehabilitation. This collaborative relationship has been achieved through open communication, sharing of ideas and resources, mutual support and understanding and inclusiveness of all partners in the development of and implementation of service design.

The MRC develops programs and services with the participation of providers in several forums. 1. Statewide Rehabilitation Council that meets twice annually. 2. Quarterly meetings with representatives of the Executive Committee of the Massachusetts Council of Human Service Providers. 3. Periodic district wide meetings with community rehabilitation programs. 4. Interagency and cross–disability agency councils. 5. Task specific work teams. 6. Massachusetts Association of People Supporting Employment first (MAAPSE) In partnership with MRC, CRP personnel actively participated in the process for competitive procurement, CIES, the disability employment pilot project work team and the mental health services work team. This included for the first time real pricing of community rehabilitation program services and performance reimbursement.

The MRC/CIES program provides vocationally rehabilitative employment services for participants and through State funding the availability for extended on–going supports after closure. CIES comprises five components, each associated with a specific service outcome. Through the component based service delivery system, consumers are able to receive the comprehensive individualized services and supports they need to achieve and maintain successful employment. CIES services may carry over from year to year, with approximately 30% of consumers completing their program each year. CIES Components include: Assessment; Job–Targeted Educational and Skills Training activities; Job Development and Placement; Initial Employment Support services and On–going and Interim Support services.

Program Design: The CIES program provides consumers services toward gaining competitive employment through five component services. Consumers enter or exit different components based on needs. The measures of success for the program are the number of consumers placed in jobs for 30 days or more, called Job Placements; and the number of consumers employed beyond 90 days, called Successful Employment Outcomes (SEOs).

The State contracts with Qualified Community Rehabilitation Providers (CRPs) to deliver CIES services. Providers are paid on a performance basis during the initiation and completion phases of services. Using a data management and billing system called EIM (Enterprise Invoice Management), and internal tracking, the CIES team tracks program enrollment, expenditure and outcomes. Data from the EIM system allows detailed analysis of provider performance and program results. CIES providers have consistently expended about 60% of CIES resources on Job Development and

Placement services. The number of consumers placed in jobs as a age of the number of total served has steadily increased. Budget reductions occurred through this period, based on the anticipated availability of federal funding. In FY15, MRC saw a year–to–year increase of 133 or 17% in successful employment outcomes, 899 CIES consumers (77% of all placements) reached competitive employment, with total annual earnings of about $8 million (on–going support services are delivered through MRC Statewide Employment Services Department and is designed to help individuals with the most severe disabilities that have been transferred from segregated employment to integrated employment opportunities with competitive wages paid by an employer. For FY'16, the goal will be to exceed 1000 placements. CIES is one of several employment tools which MRC uses to assist consumers in obtaining competitive employment. CIES is often used to assist individuals with more complex disabilities or situations into integrated employment opportunities with competitive wages paid by an employer.

The MRC CIES team continuously monitors and evaluates performance quality to ensure that consumers are given the opportunity to achieve the best possible employment outcomes, using tools such as site visits, data analysis, monthly reporting, quarterly team meetings, and annual provider and consumer surveys. The CIES program has proven its effectiveness in recent years by continuing to improve outcomes using available resources.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The MRC Supported Employment Program provides Supported Employment Services to consumers through its Statewide Employment Services office as well as through its local Area Offices', forty four (44) community rehabilitation providers, links with the local school system for transitioning youth and other state agencies such as the Department of Developmental Services and the Department of Mental Health especially through its clubhouse programs.

In October 1997, a Community–Based Employment Service (CBES) service delivery system was developed through the Employment Services Advisory Committee formed by SES. Later that year, the Massachusetts Rehabilitation Commission (MRC), Developmental Services (DDS), Massachusetts Commission of Deaf and Hard of Hearing (MCDHH) and the Massachusetts Commission of the Blind (MCB) collaborated on the release of a competitive bid for CBES. It was the first ever, interagency collaboration of its kind. Because of this effort, a supported employment consumer will be able to access through their state agency or agencies, a system of supports in a more streamlined fashion that incorporates collaboration, consumer choice and is outcome driven. This effort is designed to offer all reasonable and allowable supports to consumers, including extended services. Through this effort the disability agencies have a consistent pay scale, defined outcomes and can now easily cost share the support services for people with disabilities. The CBES service delivery system continues, slightly modified, with the existing agencies, as the Competitive Integrated Employment Services (CIES) service delivery system today.

Evidence of Collaboration regarding Supported Employment Services and Extended Services:

The MRC, Statewide Employment Services (SES) Department has been designated as the lead office for the Massachusetts Supported Employment Initiative. The Massachusetts Rehabilitation Commission has worked with other human service agencies to identify and secure funding for extended supports for individuals in supported employment. Funding for extended services is available from several sources contingent upon the consumer's disability, eligibility and the resources available to each state agency. This service delivery system is currently in place enabling state agencies to cost share the appropriate services needed for consumers to choose, find and maintain meaningful competitive supported employment. With the implementation of this initiative we have seen an increase in the availability of resources for extended services. However, the available funding is administered at local levels and each situation handled individually. Sources include:

Massachusetts Rehabilitation Commission (State Revenue)

Department of Developmental Services

Department of Mental Health

MRC Statewide Head Injury Program

Massachusetts Commission for the Deaf and Hard of Hearing

Social Security Administration Work Incentives

Private Sector Natural Supports

The Massachusetts Rehabilitation Commission continues to promote the collaboration with stake holders regarding supported employment services and extended services. This is also evidenced in the number of joint funded programs that have developed. Some examples of these collaborative programs are joint funding of services for individuals with intellectual disabilities between the MRC and the Developmental Disability Services (DDS); for individuals who are psychiatrically disabled between MRC and the Department of Mental Health (DMH); for individuals who have traumatic brain injuries between the Statewide Head Injury Program (SHIP) of the Massachusetts Rehabilitation Commission; and the Massachusetts Commission for the Blind.

As previously stated, for many years MRC has been collaborating with state agencies to promote collaboration regarding Supported Employment Services and Extended Services. An excellent example of that collaboration is an initiative among the MRC Salem Area Office, the DDS, North Shore Area Office and SES. This collaborative served 25 individuals who were receiving Day Services through DDS. This supported employment initiative utilize the counseling and guidance of the VR Counselors, the program coordination of the SES VR Counselors, the employment services of the Community Rehabilitation Providers (CRP's) and an the Service Coordination with an innovative position of "Facilitator" through the DDS. The agreement also assured long term support funding through DDS after successful employment outcome and VR closure.

Memorandum of Understandings: Further tangible evidence of MRC collaboration to promote supported employment is the recent initiative to develop and implement a Memorandum of Understanding (MOU) with DDS and the Department of Mental Health (DMH).

These MOUs are designed to improve collaboration, coordination and utilization of joint agency resources in ensuring quality service delivery and long term supports that result in competitive/supported employment outcomes for mutual consumers. This collaboration will be at the Regional and local levels. Through developing a process for conducting joint–service planning, implementing an ongoing data–sharing agreement, local liaisons/training and joint service planning, all consumers and specifically transition aged individuals be better served and able to achieve successful employment outcomes.

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

MRC's robust account management system is designed for us to hear first from employers regarding their specific labor market needs. MRC has several employer advisory boards strategically located across the Commonwealth through which we receive labor market information. MRC produces a labor market summary for the Commonwealth of Massachusetts and analyzes placement and employment trends by Standard Occupational Code. MRC will continue to strengthen agency use of labor market information Employer feedback has led MRC to develop an annual statewide hiring event to help address the needs of our consumers. MRC has regular local office briefings with employers on local labor needs. All of these enhance the agency's knowledge on local and statewide labor market needs. MRC utilizes job matching tools such as ResuMate to assist with job matching efforts to accommodate the needs of our consumers and employer partners.

MRC participates in a business strategy workgroup between key workforce partners as part of the Commonwealth's effort to coordinate services to employers amongst partner agencies. MRC subscribes to the established key principles to guide business services amongst key partner agencies and will work closely with WIOA core partners to expand services to employers.

MRC is continuing to target new employers and expand its employer account management system. Examples include the MRC Pharmacy Technician Training Program in direct partnership with CVS Health. The MRC VR division received a distinguished award (the Gould Award) from the Associated Industries of Massachusetts for its innovative pharmacy technician initiative with CVS. MRC has also received White House recognition for its Working Partners collaboration with Spaulding Rehabilitation Network.

As of SFY 2015, the JPS (Job Placement Specialist)/ESS (Employment Service Specialist) unit has implemented three Federal Hiring Events in partnership with MCB and the Office of Federal Contract Compliance Programs (OFCCP) to assist consumers with securing competitive employment comparable with their interests and abilities. MRC prepares consumers to interview for available jobs with employers participating in the event. Over 300 individuals over the last 3 years have been employed through this annual one day event. MRC is looking to expand this model to other employers based on the success of the program

WIOA emphasizes the use of job–driven and industry–based training through employer engagement. Use of the MRC's on–the–job (OJT) training and evaluation strategy has increased significantly. Many consumers who participate in an OJT obtain employment with the OJT employer and others are able to obtain employment elsewhere as a result of their participation in the OJT through which they gained a recent work experience. There were 190 OJT/OJE in 2014, 198 in 2015. MRC 's job driven training initiative with Advanced Auto Parts as resulted as of this date with over 80% of the participants receiving job offers.

MRC has developed a project with Manpower Training and Development Center to secure occupational web–based training, skills development and job matching for consumers in ten areas including: Microsoft Office Suite (2007–2010) Microsoft Word, Excel and Power; Customer Service; Call Center, Administrative Assistant and Receptionist, Office and Clerical support, Packing and Product Preparation, Shipping and Receiving, Materials Inspection, Preparation for Employment, and Equipment Assembly. A total of 142 customers have been referred to date with 54 consumers referred in 2015.

Other job–driven trainings have been developed with Advance Auto Parts for Sales and Driver positions; Enterprise for Service Agent, Driver, and Lot Attendant, The Home Depot, Lowes, G4S Security Solutions, the Kraft Group, and Allied Barton Security Services. MRC also held its first employer conference on October 28, 2015 to strengthen relationships with existing employers and to develop new ones.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

MRC will work with employers to coordinate transition services, including pre–employment transition services, for students and youths with disabilities across the Commonwealth of Massachusetts.

MRC provides OJT training specifically for youth and high school students with disabilities in vocational technical schools with CVS Caremark and Manpower that will offer both short and long term work based learning experiences to develop both skills and job readiness.

In Summer 2015, MRC developed a summer internship program for high school students and youths with disabilities in partnership with employers across the Commonwealth. These work–based learning experiences included workplace readiness training and provided valuable work experience and mentorship opportunities for participants. Over 300 internships were provided in the summer of 2015. These programs will continue to move forward as part of MRC's plan.

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;

MRC and the Executive Office have developed and signed a Cooperative Agreement to work collaboratively to promote the provision of services and long–term supports for individuals with disabilities who require such services to obtain and maintain competitive employment in accordance with WIOA. The MOU will be revised as needed in the future,

Cooperative Agreement: Massachusetts Rehabilitation Commission and the Executive Office of Health and Human Services Office of Medicaid

This Cooperative Agreement is being entered into between the Massachusetts Rehabilitation Commission (MRC) and the Executive Office of Health and Human Services (EOHHS) Office of Medicaid.

PURPOSE: The purpose of this Cooperative Agreement is to ensure that the Massachusetts Rehabilitation Commission (the state Vocational Rehabilitation (VR) agency) and EOHHS, the state agency responsible for administering the state's Medicaid program (through its Office of Medicaid) work collaboratively, to the extent practicable, to promote the provision of services and long term supports for people with disabilities who require long–term supports in order to obtain and maintain employment. This Cooperative Agreement is in accordance with Section 412(a)(7)(H) of the Workforce Innovation and Opportunities Act, which requires a state's VR agency to have a formal cooperative agreement with the state's Medicaid agency with respect to the delivery of VR services for individuals who have been determined to be eligible for Home and Community–Based Services (HCBS) under a Medicaid HCBS waiver.

COLLABORATION: MRC and EOHHS' Office of Medicaid have a well–established and long–standing relationship. MRC and the EOHHS' Office of Medicaid are committed to the promotion of independence and self–sufficiency through access to HCBS services for individuals with disabilities.

Pursuant to this Cooperative Agreement, MRC and EOHHS' Office of Medicaid, through joint planning and sharing of information, will work collaboratively to promote access to competitive integrated employment and will work to increase the number of successful employment outcomes for individuals with disabilities needing, and eligible to receive, long–term supports in order to find and keep a job.

In line with this Cooperative Agreement, MRC, and EOHHS state the following:

A. MRC provides the following services to individuals who apply for and are determined eligible for VR services, based on individual needs: a. vocational assessment, b. vocational counseling and guidance, c. funds for training/education, job placement, d. follow–up supports after training. B. EOHHS through its Office of Medicaid administers, and MRC serves as the Operating Agency for,

certain HCBS Waivers through which individuals with disabilities may receive long term services and supports in the community. The availability of such supports works to enable individuals with disabilities to achieve independence and economic self–sufficiency in the community. Many individuals receiving VR services from MRC are also enrolled in Mass Health (the state Medicaid program) and through Mass Health are supported in their efforts to live and work as independently as possible in the community.

C. Through participation in one of MassHealth's HCBS waivers and/or utilization of MassHealth State Plan services, disabled Mass Health members may receive services that support their efforts to obtain competitive integrated employment. These services may include, as appropriate:

1. Community Living Supports: A range of MassHealth state plan and HCBS waiver services that enable an individual to live in the community as an alternative to institutional care and which may include such services as home health aide and homemaker services, individualized home supports, independent living supports, home/environmental accessibility modifications, and personal care.

2. Pre–vocational Services: A range of learning and experiential type activities that prepare an individual for paid or unpaid employment in an integrated, community setting. Services may include teaching such concepts as attendance, task completion, problem solving and safety as well as social skills training, improving attention span and developing or improving motor skills.

D. Additionally, the following services may be available to eligible individuals receiving VR services from MRC or who are enrolled in a MassHealth HCBS waiver, subject to the rules and regulations governing each program: 1. Vehicle Modification 2. Transportation 3. Home/environmental accessibility modification 4. Supported Employment Services

COMMUNICATION Designated MRC and EOHHS Office of Medicaid staff will communicate on an ongoing basis, at least annually, to share information about legislative and regulatory changes and to review agency policy initiatives, resources, and other issues related to long term supports for mutual consumers under a MassHealth HCBS waiver program.

PROCEDURES FOR AMENDMENTS This Cooperative Agreement may be modified by mutual agreement of the parties. Any such modification will be preceded by Thirty (30) days written notice to all parties of the intent to modify this Cooperative Agreement. SIGNATORIES By signing this agreement, all parties agree that the provisions contained herein are subject to all applicable Federal, State and local laws, regulations or guidelines. By signatures affixed below, the parties specify their agreement:

Adelaide Osborne, Commissioner Massachusetts Rehabilitation Commission

Daniel Tsai, Assistant Secretary MassHealth

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

MRC and the Department of Developmental Services have signed a memorandum of Agreement to work collaboratively through joint planning and sharing of resources to expand access to integrated

employment services to increase the number of successful job placements for individuals with intellectual disabilities, especially those of transition age who have a goal of competitive employment and are eligible for services from both agencies. An updated agreement was signed by both agency commissioners and effective as of 11/4/2015. The MOU will be revised as needed in the future.

Memorandum of Agreement

Massachusetts Rehabilitation Commission and Department of Developmental Services

This Memorandum of Agreement (MOA) is being entered into by the named constituent agencies in the Commonwealth of Massachusetts, the Massachusetts Rehabilitation Commission (MRC) and the Department of Developmental Services (DDS).

Purpose:

The Massachusetts Rehabilitation Commission and the Department of Developmental Services through joint planning, and sharing of resources, will strive to expand access to integrated employment services and increase the number of successful job placements for individuals with intellectual disabilities, in particular those individuals of transition age, who have a goal of competitive employment and are eligible for services from both agencies.

Anticipated Outcomes:

1. Increase the number of transition age individuals with intellectual disabilities who obtain and maintain competitive employment.

2. Improved collaboration, coordination and utilization of joint agency resources in ensuring quality service delivery and long term supports that result in competitive employment outcomes for our mutual consumers. This will include funding from MRC for the up front employment services and a commitment from DDS for funding of the long–term, ongoing employment support services to help individuals successfully maintain competitive job placements.

3. Adherence to the DDS Home and Community Based Waiver Program requirements for the delivery of supported employment services.

4. Improved outreach, communication and coordination with local schools, individuals with developmental disabilities, families, employers and other stake holders in serving our mutual consumers.

5. Enhanced communication between DDS and MRC.

Service Agreement:

1. Eligibility Criteria:

a. Individuals who have been determined eligible for adult services by the Department of Developmental Services and are eligible for MRC services.

b. Individuals who have a goal of employment in an individual, competitive, integrated job working full–time or part–time. (Individuals would be hired by the business/employer, earning at least minimum wage and eligible for the benefits other employees in similar positions receive.)

c. Individuals who can benefit from the employment services provided by MRC to reach their employment goal. This includes individuals who may need long–term, ongoing, job supports from DDS to enable them to successfully maintain employment.

2. Target Group:

Individuals of Transition–Age (18 to 22), who are moving from school to adult life, and individuals up to age 24, with a particular focus on assisting students/young adults who have had work experience while in school, to assist them to directly enter a job upon completion of school, and/or to maintain a job obtained during their last year of school.

Adults who are over the age of 24, are eligible for services from both DDS and MRC, and have a goal of working in a competitive job.

3. Referral Process:

a. The DDS Area Office/Transition Coordinator will make a referral to the local MRC office at least one year before the student is scheduled to leave school.

b. MRC counselors may also identify individuals who have been referred to their agency for services to determine if they are also DDS eligible, and will contact the local DDS Area Office to confirm eligibility.

4. Services Provided

a. Both the DDS Transition/Service Coordinator and MRC Counselor will be participating members of relevant individual planning team processes, (including IEP–Individual Education Plan; ITP–Individual Transition Plan; IEP– Individual Plan for Employment IPE; ISP– Individual Support Plan).

b. Individuals may be eligible for the full array of services available through MRC based on

MRC policy and their needs.

c. Based on an individual's needs, it is expected that MRC will fund the upfront employment services which may include assessment, skills training, job placement, and initial job coaching and on–the–job supports.

d. For individuals who will require ongoing job coaching and employment supports to successfully maintain employment, DDS will provide funding for these long–term, ongoing employment

services. These services will be provided by DDS following the successful closure of the individual's case with MRC, which will not occur prior to a period of 90 days retention on the job.

5. Communication and Coordination of Services between Agencies:

a. There will be regular communication between MRC and DDS local area staff to facilitate collaboration, joint planning for service delivery, cross–agency information sharing and training to ensure all parties have current information about agency policies and practices including those related to referrals, eligibility requirements, and other pertinent information.

b. Area Directors and/or other lead designated staff will identify a process for identifying referrals and for regular communication to monitor services and other collaborative initiatives.

c. It will be important to clarify the expected responsibilities and roles of staff in each agency to support local service planning and service delivery. This will be determined by DDS and MRC managers at the local level. It is expected that both the MRC counselor and DDS Service Coordinator will work closely together with individuals when joint services are being provided, communicating regularly, participating in planning meetings, etc., to ensure an integrated and responsive approach when working with individuals and their families/guardians. This will promote a strong partnership to assist in addressing problems or concerns that might arise both on–the¬ job and outside of work that may have an impact on performance, as well as facilitate planning for ongoing employment support.

d. MRC counselors and DDS staff will abide by agency practices regarding regular communication, participation in planning meetings and collaboration in ensuring an integrated and responsive approach to working with consumers, their families/guardians and other community resources.

6. Reporting/Data Collection

A system for tracking the services provided to individuals jointly eligible for MRC and DDS services will be developed and implemented in order to assess the referrals, outcomes, impact and effectiveness of services provided to individuals who receive services as part of this MOA. Each MRC and DDS Area Office will be required to provide documentation on a regular basis.

This Memorandum of Agreement will be reviewed annually by the leadership of both agencies to identify areas for clarification, improvement, or additions to further promote collaboration and successful employment of individuals with intellectual disabilities.

This Memorandum of Agreement becomes effective as of January 17th, 2012.

Charles Carr

Commissioner

Date: 1–13–2012

Massachusetts Rehabilitation Commission

Elin M. Howe

Commissioner

Date: 1–13–2012

Department of Developmental Services

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

MRC and the Department of Mental Health Services have a Memorandum of Understanding effective as of June 14, 2014 to work collaboratively to identify the individuals that they mutually serve by implementing an ongoing date collection system, to foster joint service planning and interagency training to increase employment opportunities and positive employment outcomes for individuals with severe mental illness. The MOU will be revised as needed.

MEMORANDIUM OF UNDERSTANDING BETWEEN THE MASSACHUSETTS REHABILITION COMMISSION AND THE MASSACHUSETTS DEPARTMENT OF MENTAL HEALTH

I. Purpose

The Department of Mental Health (DMH) and the Massachusetts Rehabilitation (MRC) (collectively the "Agencies"), in recognition that employment is essential to the independence, dignity, and recovery of persons with serious mental illness, seek to increase employment opportunities and positive employment outcomes for the individuals they mutually serve, by improving inter–agency communications throughout their organizational structure; engaging in joint service planning at the individual and program levels, and formalizing a plan for on–going collaboration. DMH and MRC, through this Memorandum of Understanding (MOU), therefore seek to:

1. Establish an ongoing collaborative relationship between MRC, DMH, and their contracted providers, at the individual, site, area and executive levels; 2. Develop a system for regularly identifying the individuals they mutually serve; 3. Develop and implement a process that will facilitate DMH and MRC timely referring to each other individual who could benefit from receiving both MRC and DMH services; 4. Develop and implement a process for conducting joint–service planning for individuals mutually served by both agencies to enhance the individuals' employment opportunities; 5. Ensure that appropriate DMH and MRC staff are informed and trained on the services of the respective agencies provided to promote referrals, consultations regarding referrals and joint–service planning when appropriate; 6. Implement an ongoing data–sharing agreement to track employment service delivery and the outcomes associated with of such mutually–served individuals, to that will help the Agencies assess the effectiveness of this MOU; and 7. Develop a mechanism for exploring, developing and implementing joint initiatives beneficial to the individuals mutually served by the Agencies, including but not limited to the pursuit of new resources.

II. Identification of the Mutually Shared Individuals and Data Collection 1. Data Sharing Agreement. The Agencies agree to implement the attached data sharing agreement (Exhibit A) immediately for the purpose of establishing the current individuals they mutually serve. 2. IT Joint Workgroup. After the identification of the individuals who are currently being mutually served by the Agencies, the

Agencies MOU Contact Persons (identified in Section VI, below) shall facilitate the creation of a workgroup staffed by both agencies to determine how this shared population can be regularly updated. In addition, the workgroup shall determine how to capture and facilitate the sharing of information identified by the workgroup described in Section III.3. 3. Data for Assessing Effectiveness of MOU. The Commissioners of DMH and MRC, or their designees, will ensure that the Agencies establish protocols for capturing the following data to be used to assess the effectiveness of the MOU: a. The Annual number of mutually served individuals statewide b. The Annual number of mutually served individuals who have been successfully closed by MRC c. The Annual number of mutually served individuals who have been successfully closed by MRC with extended supports provided by DMH d. The Annual number of mutually served individuals who have been unsuccessfully closed by MRC c. The Annual number of DMH referrals to MRC f. The Annual number of MRC referrals to DMH g. Other such data as is allowed per data–sharing agreements, as necessary and agreed upon.

4. Consumer Input. MRC and DMH acknowledge the importance of input from persons utilizing the services described in this MOU and will incorporate such input in the evaluation of its effectiveness and functionality.

III. Local Liaisons/Training/Joint Service Planning

1. Local Liaisons. Each DMH Site Office, DMH facility, MRC Area Office, and the MRC Statewide Employment Services Department (SES) will designate a liaison(s) to serve as a central–point of contact and resource for the other Agency. The Liaisons must:

a. Provide their counterparts with information about and answer questions regarding their Agency's eligibility or referral process and the services they provide; b. Provide guidance to and/or confer with their counterparts, or designees, about the appropriateness of referring a specific individual served by one of the Agencies to the other for additional services; and when appropriate, helping to facilitate the filing and processing of the required application or referral form.* For this purpose, the Agencies acknowledge i. Referrals to MRC shall be made in good faith with the reasonable expectation that the person–referred: 1. Is interested in competitive, integrated employment, and 2. Has the potential to benefit from vocational rehabilitation services, including supported employment services, in order to achieve job readiness (as defined below) and competitive employment. 3. Job readiness shall not be a prerequisite for MRC eligibility. Job readiness is when an individual, following a period of preparation for work, can demonstrate specific work and social skills needed to qualify for a job.

ii. Referrals to DMH shall be made in good faith with the reasonable expectation that the person–referred: 1. Is interested in, and in need of, the services DMH offers, and 2. Is likely to meet criteria for DMH services. c. Help facilitate the coordination of employment related services provided by DMH, MRC or contracted providers to individuals mutually served by the Agencies*; d. Assist in resolving issues that may arises regarding an application for services, a referral for services and/or the coordination of care:* e. Notify or ensure notification to their counterpart/and/or the referral source as to the outcome of an application or referral filed on behalf of an individual being served by the other agency: and f. Ensure that the Agencies MOU Contact Persons have updated contact information for them.

Authorization to share information may be required from the respective individual for the sharing of information. When an authorization is required to allow for communications between the Agencies, the Agencies will implement procedures for ensuring that authorizations are sought. The Agencies acknowledge, however, that authorizations cannot be mandated.

2. Training. a. DMH and MRC, subject to available funding, agree to co–sponsor a state–wide MRC/DMH Training and Collaboration Forum for employees of DMH and MRC within one year of the start date of this MOU. The purpose of the forum is to further the goals of the MOU. DMH and MRC will seek to co–sponsor additional MRC/DMH Training and Collaboration Forums during the term of this MOU as are determined needed and feasible.

b. The MRC and DMH Directors of Training, or their designees, will meet at least annually to (i) review their planned trainings to determine if there are opportunities to open any to the staff of the other Agency (pending interest, availability of space and slots) and (ii) plan for joint trainings when appropriate.

c. DMH will provide a representative for planning and consultative purposes for MRC's Annual Mental Health Liaison Forum. 3. Joint Service Planning. a. At the State Level . The Agencies' MOU Contact Persons will facilitate the creation of a workgroup staffed by both agencies and contracted providers, as applicable, to establish protocols for the Agencies that will ensure compliance with the terms of this MOU and that the care of mutually served individuals in need of enhanced support to obtain or retain competitive employment will be coordinated to the extent practical and feasible. The protocols shall address: i. When authorizations are needed; ii. What information should be shared and the mechanism for sharing such information (e.g., what, when, how, and who); iii. The role of the individual; iv. Provider Involvement v. Key coordination points and the communications and actions to be taken at such points including but not limited to: 1. The period between an individual being referred to MRC and MRC services formally commencing; and 2. When individuals I) have completed a minimum of ninety–days of sustained employment; 2) have achieved a successful employment outcome (i.e. Status 26); and 3) demonstrate a need for extended supports to successfully maintain employment, DMH and MRC will coordinate and secure extended supports as reasonable, allowable, and consistent with the preferences of the person served. To the extent permissible under State and Federal privacy law, it is expected that MRC, prior to discharging a mutually shared individual, will convene a discharge planning meeting that includes DMH, applicable DMH service providers, and the individual to plan, when appropriate, for supports as necessary to assist the individual in maintaining employment. vi. Other such topics as are necessary to comply with and advance the goals of this MOU.

b. At the Regional Level. Each DMH Area Director and MRC District Director or their designee, shall meet with their counterpart, and with and the Statewide SES Director, or his/her designee, at least annually to address communication or collaboration issues and to address opportunities for additional collaborations.

c. At the Local Level. DMH Site Directors and MRC Area Directors, or their designees, will ensure that regular and as–needed communications occur between themselves and their respective offices to facilitate collaboration, joint planning for service delivery, and cross–agency information sharing. They shall develop protocols as needed to help resolve identified problems. In addition they shall so promote trainings to ensure all patties, including contracted providers, have current information

about agency policies and practices, including those related to referrals and eligibility requirements. They shall help facilitate implementation of the product developed by the workgroup described in Section III.3.ii, and support local liaisons described in Section III.1. Local offices shall seek to include contracted providers in local workgroups created to further the purpose herein described.

IV. New Initiatives and Assessment of MOU The Commissioners of DMH and MRC, or their designees, will meet at least annually to: a. Review the implementation and effectiveness of this MOU, including possible areas of clarification or improvement; b. Assess opportunities for additional collaborations, including joint–pursuit of new funding or blended funding; trainings agencies; and c Discuss other areas of focus as relevant and mutually agreed upon to further promote the successful employment and vocational rehabilitation of individuals in recovery with mental illness.

The MOU Contact Persons should work with the Commissioners, or designees, to formulate agendas for this meeting and for ensuring meeting minutes are captured. V. Duration and Amendments 1. Duration. This MOU shall become effective on the last signature date set forth below and it shall remain in full force and effect until (i) it is terminated by either Agency by giving sixty (60) written notice to the other Agency or (ii) if latter, June 30, 2025. 2. Amendments. An amendment to this MOU will be effective only if in writing and signed by both Agencies. VI. Memorandum of Understanding Contacts

1. DMH Contact Person Michael Stepansky, DMH Director of Employment Phone: (508)–616–3522 Email: Michaei.Stepansky@massmail.state.ma.us 2. MRC Contact Person Ted Mello, MRC Cape & Islands Area Director Phone: (508)–862–6643 Email: Edward.Mello@massmail.state.ma.us 3. Each agency may from time to time change its contact person above, upon appropriate notice to the other which shall include notice to the General Counsel for the other agency.

DEPARTMENT OF MENTAL HEALTH Marcia Fowler Commissioner Date: 6–14–2014

MASSACHUSETTS REHABILITATION COMMISSION Charles Carr Commissioner Date: 5–13–2014

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 Commission employs a total of 810 persons, 459 of whom are employed in the VR Program. Of this number, 281 VR counselors and first line supervisors, 31 are managers and 147 are program, technical, or administrative staff. All numbers represent full and part–time staff, not FTE. 28.6% of Commission staff is from minority backgrounds, 76.2% are women, 16.5% are persons with disabilities, and 1.6% are Vietnam–era Veterans.

Most counselors carry “general caseloads” consisting of consumers representing all disability populations; a smaller number of counselors carry “specialty” caseloads consisting primarily of consumers with the same/similar disabilities (i.e., severe mobility impairments, psychiatric disabilities). The Commission has served a total of consumers (in all statuses) annually which ranged from 30,599 to 34,640 in 2015. Looking forward, it is anticipated that the Commission will be serving at a minimum of 30,000 to 33,000 consumers (in all statuses) annually.

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

To adequately serve these numbers of individuals the number of VR counselors, first–line supervisors and managers would need to be maintained at the current level. MRC faces many personnel challenges in the next few years. In a workforce analysis conducted in 2012, 52% of employees were over the age of 60 with 68% eligible for retirement in 2019. This represents an increase in the average annual attrition rate from a historical rate of 5 to 7% to 8%. In addition, MRC faces challenges in recruiting entry–level VR counselors due to the small number of programs offering vocational rehabilitation counseling and the competition from private sector employment opportunities. Many other individuals will be approaching retirement age within the next five to 10 years as the average age in the Commission is 50 with over 20 years of agency experience. Several of these individuals are in manager and administrative positions in the central office which are paid through VR monies and many more are counselor, first line supervisor and manager positions in the field. At this time, MRC is able to back fill vacant staff positions and use post retirement staff and

interns to cover caseloads. MRC will be evaluating these approaches as part of an updated workforce plan in 2016.

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.

MRC faces many personnel challenges in the next few years. In a workforce analysis conducted in 2012, 52% of employees were over the age of 60 with 68% eligible for retirement in 2019. This represents an increase in the average annual attrition rate from a historical rate of 5 to 7% to 8%. In addition, MRC faces challenges in recruiting entry–level VR counselors due to the small number of programs offering vocational rehabilitation counseling and the competition from private sector employment opportunities. Many other individuals will be approaching retirement age within the next five to 10 years as the average age in the Commission is 50 with over 20 years of agency experience. Several of these individuals are in manager and administrative positions in the central office which are paid through VR monies and many more are counselor, first line supervisor and manager positions in the field. At this time, MRC is able to back fill vacant staff positions and use post retirement staff and interns to cover caseloads. MRC will be evaluating these approaches as part of an updated workforce plan in 2015.

The chart below represents the vacancies that were posted for this past year with projections based on this year projected over 5 years. A vacancy in a manager position can create vacancies at lower levels of the agency for example an area director vacancy may be filled by a unit supervisor creating a vacancy at that level which would be filled by a vocational counselor creating a vacancy in a counselor position. As stated previously these totals can also be affected by funding issues at the federal and state level.

Projections:

Vocational Rehabilitation Counselors

Total Positions: 267

Current Vacancies: 11

Projected Vacancies over next 5 years: 124

Managers

Total Positions: 43

Current Vacancies: 1

Projected Vacancies over next 5 years: 10

Program/Technical or Administrative Staff

Total Positions: 149

Current Vacancies: 3

Projected Vacancies over next 5 years: 36

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;

Universities in Massachusetts that have Rehabilitation Counseling programs at the bachelor and masters' level are: University of Massachusetts at Boston, Springfield College and Assumption College. Salve Regina is located in Rhode Island.

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

In a given academic year, upwards of 100 undergraduate students and 125 graduate students are enrolled in degree programs either full–time or part–time as rehabilitation "majors" at the colleges and universities referenced.

Last year one (1) person has completed the Master's degree in Rehabilitation Counseling program. MRC also anticipates two (2) additional graduates will complete their Master's degree in Rehabilitation Counseling in the forthcoming year

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.

Each year, upwards of 50 undergraduate students are awarded the Bachelor's degree and upwards of 60 graduate–level students graduate with credentials to qualify for certification by the Commission on Rehabilitation Counselor Certification and/or licensure by the Commonwealth of Massachusetts in the institutions.

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.

The MRC's plan for recruitment includes meeting with representatives from the Commission's Staff Development Department will continue to communicate on a quarterly basis with officials of the CORE accredited rehabilitation departments and officials responsible for minority outreach at Assumption College, Springfield College, Salve Regina, and the University of Massachusetts at Boston regarding pertinent information on the preparation of rehabilitation professionals and for the specific purpose of recruiting graduates for employment in the federal/state VR Program. Special emphasis will be given to students with disabilities and students from minority backgrounds. Additionally, Commission staff also regularly addresses rehabilitation students in the classroom setting providing them with an overview of the agency and the public rehabilitation program. Internal job postings are automatically sent to these institutions informing them of job openings and procedures to apply. A number of rehabilitation students also complete their field placement and practicum experience within the Commission affording them a realistic view of work in the Commission. The Commission has sponsored 84 paid internships since 2008; 41 of those interns have been hired as full time employees as Qualified Vocational Rehabilitation Counselors I/II or III's. MRC is anticipating 124 vacant QVRC positions over the next 5 years.

The Commission also maintains relationships with nearly 40 minority referral sources and routinely forwards all job postings to them thereby encouraging application for employment at all job levels from persons from minority backgrounds. Position openings are routinely advertised in minority and alternative newspapers (i.e. Boston Globe, Bay State Banner, Worcester Telegram and Gazette) and posted internally and externally on the Internet (MASSCareers, Indeed, Monster, SimplyHired, and LinkedIn).

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

The Massachusetts Rehabilitation Commission is utilizing a state approved certified Human Resource Division classification standard, to recruit and employ qualified counseling staff as required by WIOA. There are three levels of classifications in the Qualified Vocational Rehabilitation Counselor (QVRC) series. Incumbents of classifications in this series administer functional, skills analysis and other vocational assessment tests; review and analyze diagnostic information through tests, records, interviews and observations; develop, implement and monitor Individualized Plans for Employment (IPE); and provide job placement assistance and job development skills. The basic purpose of this work is to evaluate individuals with physical, emotional or other impairments or multi-impairments to determine eligibility for vocational rehabilitation services as mandated by federal statutes and guidelines.

There are three levels of classification in the Qualified Vocational Rehabilitation Counselor (QVRC) series. Incumbents of classifications in this series administer functional, skills analysis and other vocational assessment tests; review and analyze diagnostic information through tests, records, interviews and observations; develop, implement and monitor Individualized Plans for Employment (IPE); and provide job placement assistance and job development skills.

The basic purpose of this work is to evaluate individuals with physical, emotional or other impairments or multi-impairments to determine eligibility for vocational rehabilitation services under the Workforce Investment Act. QVRC- I is an entry-level position. QVRC- II is the fully competent level classification in the series and QVRC III is a supervisory level position. The following is the state certified Human Resource Division classification standard to recruit and employ qualified counseling staff as required by WIOA:

1. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR I:

Distinguishing Characteristics: This is the entry-level classification in this series. Incumbents perform work under guidance and within a framework of defined policies, procedures and standards. Incumbents seek guidance and advice from more experienced colleagues and focus on gaining the knowledge and experience to perform more independently and participate in work of a higher complexity.

Supervision Received: Incumbents receive close supervision from employees of a higher grade who provide direction, training, instruction, work assignments and frequent reviews of performance through formal and informal verbal and written reports for effectiveness and conformance to laws, rules, regulations and agency policies.

Incumbents may receive general direction from other work units to ensure accuracy and compliance with funding requirements.

Supervision Exercised: Incumbents may provide functional guidance to new employees. Functions Performed: At this level, Incumbents are expected to perform one or more of the following:

Conduct intake interviews with consumers who have physical, emotional, psychiatric or other disabilities to determine eligibility for vocational rehabilitation services. Determine eligibility through review and analysis of records, tests, observations and interviews, to identify consumers' needs and occupational interests and abilities, and to provide assistance with securing competitive employment. Make recommendations on appropriate programs and treatment interventions based on evaluation of needs. Coordinate vocational rehabilitation services for consumers, including rehabilitation teaching, social rehabilitation orientation, physical and mental restoration, vocational and on-the-job training, educational services, and pre and post-employment services. Maintain accurate records using information technology resources. Develop and maintain working relationships with public and private organizations, including employers, service providers, career centers and community groups to exchange information and resolve problems, to promote agency services and to evaluate the suitability of educational programs and employment and other consumer placement resources. Represent the agency in dealing with community groups, public and private organizations, vendors and other public agencies. Conduct individual skills training sessions based on the IPE to ensure that the needs of the consumers are being met. Conduct group

workshops for consumers to prepare for job opportunities, and coordinate the methods, materials and equipment used in training sessions. Monitor and evaluate consumer progress through individual meetings and on-site visits to ensure that the needs of the consumers are being met. Prepare and maintain case and progress notes for general information and to document and monitor changes to an individual's overall progress. Explain and answer inquiries made by consumers and/or their families and other interested parties relating to agency programs, objectives and services. Monitor and evaluate the consumer's progress through individual meetings, on-site visits and review of reports to assist consumer adjustment to new situations and determine whether or not services, programs or job placement is meeting the needs of the consumer.

Key Accountabilities: Incumbents at this level have the decision-making authority to:

Recommend how to proceed with the job referral process. Determine accommodation and training needs that may be required in the workplace and determine if training or other employer intervention strategies are needed post- placement in order to maintain consumer placement. Recommend purchase of equipment and materials including Assistive Technology for job placement. Recommend consumers to employers for employment opportunities. Prioritize cases/work flow. Develop, implement and monitor IPE with the consumer.

Relationships with Others: Key contacts and relationships for incumbents include consumers and their families/legal guardians; supervisors and agency managers and staff; medical professionals; legal officials; vendors and contractors; and community members and/or organizations involved with consumers and/or their families/legal guardians.

Working Environment: While performing the duties of this classification, incumbents work both in an office and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards

Physical Abilities: While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort. Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education and Experience: Applicants must have a (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor or (B) the substitution listed below.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of full- time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents are required to have the following at the time of hire:

1. Knowledge of evaluation methods and techniques to determine individual interests, aptitudes, skills and occupational preferences. 2. Knowledge of the principles and practices of assisting people in coping with physical and/or mental disabilities to meet their vocational, social and independent living needs. 3. Ability to gather information through questioning and observing individuals and by examining records and documents to assess consumer needs. 4. Ability to use a computer to conduct research, manage databases and produce written documents. 5. Ability to communicate information and ideas so others will understand; ability to appropriately document case activities and represent the agency in a professional manner. 6. Ability to interact effectively and establish rapport with diverse teams and groups of people. 7. Ability to maintain a calm manner and interact appropriately with others in emotionally charged or stressful situations. 8. Ability to analyze and determine the applicability of data, draw conclusions and make appropriate recommendations. 9. Ability to exercise discretion in handling confidential information.

2. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR II:

Distinguishing Characteristics: This is the fully competent professional level classification in this series. Incumbents have thorough knowledge of policies, practices, and techniques and have mastered the technical job content, perform work of greater complexity, exercise greater independence in making decisions and receive less supervision and review. At this level incumbents have sign off authority for individual caseloads and handle complex cases or transferred cases requiring exceptional mastery.

Supervision Received: Incumbents receive general supervision from employees of a higher grade who provide work assignments and facilitate performance reviews through formal and informal verbal and written reports for effectiveness and conformance to laws, rules, regulations and agency policies.

Supervision Exercised: Incumbents may provide functional direction to Qualified Vocational Counselor Level I or other employees of a lower grade through advice, guidance and assistance with tasks and participate in the training and mentoring of new employees and interns.

Additional Functions Performed: Incumbents perform the following: Consult with Qualified Vocational Rehabilitation Counselors to ensure that the skills and abilities of the consumer are an effective employment match. Provide vocational rehabilitation counseling advice to consumers deemed to present particular difficult challenges, such as persons with multiple disabilities, persons who have been unsuccessful with other rehabilitation counselors and persons who have an extended history with the agency to ensure provision of appropriate services. Confer with agency staff, consumers' families, employers, professional specialists and others to exchange consumer information and determine the appropriateness of employment opportunities and resources for education, training and job placement assistance. Assist in maintaining a relationship with the local Career Centers for the purpose of providing consumers with information about employment opportunities, job seeking and methods of applying for current employment opportunities.

Based on assignment, incumbents may perform one or more of the following: Participate in the development of at least at least one statewide or regional training program. Design, implement and conduct group workshops. Represent local offices at regional and statewide placement meetings and participate in local/regional/statewide initiatives. Monitor and evaluate employer satisfaction post-placement through on-site visits and telephone calls. Lead and organize office quality improvement projects. Provide technical assistance or act as an office liaison regarding specific populations to ensure outreach and appropriate service delivery to specific and underserved groups. Provide training and education to employers regarding the skills, abilities and limitations of consumers. Consult with employers to determine job expectations and market these employment expectations to Qualified Vocational Rehabilitation Counselor Level I and make specific recommendations to employers for hiring consumers.

Additional Key Accountabilities: Incumbents at this level have the decision-making authority to:

Determine content of training materials for group workshops. Independently manage and decision making ability to sign off on individual case load.

Relationships with Others: Key contacts and relationships for incumbents include consumers and their families/legal guardians; supervisors and agency managers and staff; medical professionals; legal officials; vendors and contractors; and community members and/or organizations involved with consumers and/or their families/legal guardians.

Working Environment: While performing the duties of this classification, incumbents work both in an office setting and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards.

Physical Ability: While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort.

Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education, and Experience: Applicants must have at least (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor and (B) two (2) years of full-time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers, or (C) any equivalent combination of the required experience and the substitutions below.

Applicants working with deaf and hard of hearing consumers must be proficient in American Sign Language (ASL) and may be required to demonstrate ASL proficiency through assessment by agency staff.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of full- time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents must satisfy all the requirements of the Qualified Vocational Rehabilitation Counselor I level plus the following at the time of hire:

1. Knowledge of the types and availability of public and private community based organizations providing vocational rehabilitation services to consumers. 2. Knowledge of the characteristics and trends of the local labor market. 3. Knowledge of the principles and practices of vocational counseling. 4. Knowledge of agency rules, regulations, policies, procedures and guidelines governing assigned responsibilities. 5. Ability to act as a mentor and provide guidance to others.

3. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR III:

Distinguishing Characteristics: This is the supervisory classification in this series and based on assignment may be a non-supervisory contract coordinator. Incumbents provide supervision and guidance on complex or specialized casework to Qualified Vocational Rehabilitation Counselor Level I and II's within their work unit. At this level, incumbents may perform the duties for Qualified Vocational Rehabilitation Counselor Levels I and II's but the primary focus is to provide formal and informal supervision and act as the liaison between Qualified Vocational Rehabilitation Counselors and agency management.

Supervision Received: Incumbents receive general supervision from employees of a higher grade who provide guidance, statistical review of unit and performance reviews through both formal and informal reports for effectiveness and conformance to laws, regulations and agency policies.

Supervision Exercised: Incumbents may exercise direct supervision over, assign work to and review the performance of Qualified Vocational Rehabilitation Counselor Level I and II or other employees of a lower grade.

Incumbents may provide functional direction to Qualified Vocational Counselor Level I and Level II or other employees of a lower grade through advice, guidance and delegation of tasks and participate in the training and mentoring of new employees.

Incumbents may participate in the interviewing process or may make recommendations for new hires.

Additional Functions Performed: Incumbents perform the following: Supervise and monitor unit activities such as consumer evaluations and case maintenance to ensure effective service delivery and compliance with agency policies and standards. Establish and maintain program and unit information systems. Prepare and monitor program and/or unit budget and allocation of funds. Develop and implement policies and procedures for assigned units and programs in accordance with agency regulations and applicable laws. Determine service delivery hours and caseloads to staff consistent with agency policies and consumer needs. Assist in the development and implementation of consumer needs assessment programs. Promote agency services to ensure appropriate referrals to the Vocational Rehabilitation Division. Coordinate state and federal compliance review audits; gather sample studies, conduct in-house reviews of cases for compliance and provide requested materials, information and evaluations to ensure agency compliance with federal, state and agency policies, procedures and regulations regarding vocational rehabilitation. Coordinate Supplemental Security Income (SSI) and/or Social Security Disability Insurance (SSDI) referrals; act as office liaison on all matters related to SSI/SSDI consumers receiving benefits from the Social Security Administration. Act as liaison regarding specific disabilities or special populations by attending meetings and providing information to counselors to ensure that the agency is reaching the specific populations, and to discuss current information on the target groups. Based on assignment, develop and negotiate contracts and grants with appropriate vendors; develop, negotiate and manage contract service budgets in order to assure program effectiveness and compliance with state and federal guidelines, policies and procedures.

Additional Key Accountabilities: Incumbents at this level have the decision-making authority to:

Evaluate job performance of subordinates, participate in the hiring and promotional process; notify management when corrective action may be appropriate; and provide support to enhance employee performance. Determine service delivery hours and caseloads to staff consistent with agency policies and consumer needs. Recommends contract and budget control actions by analyzing spending patterns and monthly and quarterly reports in order to maximize funds available for consumer services and to anticipate financial needs and assure appropriate transfer of funds. Review and sign off on case load for Qualified Vocational Rehabilitation Counselor I's and QVRC II's as appropriate.

Relationships with Others: In addition to the contacts listed for Qualified Vocational Rehabilitation Counselor Level I and II, key contacts and relationships for Qualified Vocational Rehabilitation Counselor Level III incumbents include regional directors, peers and advocates.

Working Environment: While performing the duties of this classification, incumbents work both in an office setting and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards. Physical Abilities:

While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort. Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education, and Experience Applicants must have at least (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor and (B) three (3) years of full-time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers, of which one (1) year must have been in a supervisory or leadership capacity or (C) any equivalent combination of the required experience and the substitutions below.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

Applicants working with deaf and hard of hearing consumers must be proficient in American Sign Language (ASL) and may be required to demonstrate ASL proficiency through assessment by agency staff.

Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of full- time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents are required to have all the requirements of the Qualified Vocational Rehabilitation Counselor I & II level plus the following at the time of hire:

1. Thorough knowledge of the types and availability of public and private community based organizations providing vocational rehabilitation services to consumers. 2. Thorough knowledge of the characteristics and trends of the local labor market. 3. Knowledge of the principles, practices and techniques of program budgeting. 4. Ability to supervise, including planning and assigning work according to the nature of the job to be accomplished, the capabilities of subordinates and available resources; controlling work through periodic reviews and/or evaluations; monitor and encourage subordinates to work effectively and efficiently; and determine the need for and wither recommend or initiate corrective action. 5. Ability to lead others and organize the efforts of others in accomplishing work objectives and performance standards. 6. Ability to communicate and work effectively with senior leaders.

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.

All vocational rehabilitation counselors are expected to meet at least the education and experience requirements of a QVRC. Promotional opportunities in the series would require more experience and/or a higher educational level.

IN-SERVICE TRAINING AND CONTINUING EDUCATION:

The commission's Staff Development Unit supports a wide variety of training and development programs for all staff through a comprehensive in-service training program. A series of workshops and seminars is planned in the following priority areas: basic rehabilitation practices, advanced rehabilitation practices, WIOA partnerships: employment outcomes, leadership development and succession training, computer skills, and secretarial skill development, and programs under Section 4 of the Assistive Technology Act of 1998 (operated by MRC). The Commission is authorized to award Continuing Education Units from the Council on Rehabilitation Counselor Certification. The Commonwealth's Board of Allied Health and Human Service Professions to maintain licensure also accepts these credits. In-service programs carry the appropriate number of continuing education units and enable staffs who qualify to maintain their counselor certification and/or meet licensure requirements. The unit has offered a series of training for managers, supervisors, as well as aspiring supervisors. These trainings are ongoing.

In addition to these in service training programs, MRC provides trainings to staff on 21st century labor trends, high growth occupations skills that are in demand, trainings on job accommodations and employment tax credits. These trainings are also available to employers at MRC's annual employer conference.

MRC has also worked with the state HR Division to develop a certificate program for aspiring managers and supervisors where staff works to gain leadership and management skills guided by a supervisor or manager serving as a mentor. Finally, MRC has developed and has operated an annual new staff orientation since 2011 to also assist with educating and retaining staff. MRC will be evaluating the results of these efforts as part of its 2016 update to the workforce plan.

MRC has the following procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The Commission acquires and routinely disseminates rehabilitation materials to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and training Centers, training guides and resource materials produced by recipients of RSA training grants, and products from the National Clearinghouse of Rehabilitation Training Materials. Additionally, each counselor and supervisor has a personal computer giving them access to a wide variety of software applications and thus putting a vast amount of information in the hands of both staff and consumers.

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 commission's Staff Development Unit supports a wide variety of training and development programs for all staff through a comprehensive in–service training program. A series of workshops and seminars is planned in the following priority areas: basic rehabilitation practices, advanced rehabilitation practices, WIOA partnerships: employment outcomes, leadership development and succession training, computer skills, and secretarial skill development, and programs under Section 4 of the Assistive Technology Act of 1998 (operated by MRC).

The Commission is authorized to award Continuing Education Units from the Council on Rehabilitation Counselor Certification. The Commonwealth's Board of Allied Health and Human Service Professions to maintain licensure also accepts these credits. In–service programs carry the appropriate number of continuing education units and enable staffs who qualify to maintain their counselor certification and/or meet licensure requirements. The unit has offered a series of training for managers, supervisors, as well as aspiring supervisors. These trainings are ongoing.

MRC has also worked with the state HR Division to develop a certificate program for aspiring managers and supervisors where staff works to gain leadership and management skills guided by a supervisor or manager serving as a mentor. Finally, MRC has developed and has operated an annual new staff orientation since 2011 to also assist with educating and retaining staff. MRC will be evaluating the results of these efforts as part of its 2015 update to the workforce plan.

The Commission acquires and routinely disseminates rehabilitation materials to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and training Centers, training guides and resource materials produced by recipients of

RSA training grants, and products from the National Clearinghouse of Rehabilitation Training Materials. Additionally, each counselor and supervisor has a personal computer giving them access to a wide variety of software applications and thus putting a vast amount of information in the hands of both staff and consumers.

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.

MRC has the following procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The Commission acquires and routinely disseminates rehabilitation materials and research to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and training Centers, training guides and resource materials produced by recipients of RSA training grants, and products from the National Clearinghouse of Rehabilitation Training Materials. Additionally, each counselor and supervisor has a personal computer giving them access to a wide variety of software applications and thus putting a vast amount of information in the hands of both staff and consumers.

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.

MRC has twelve VR counselors skilled in American Sign Language (ASL) and are qualified to work with consumers who are deaf; thirty are fluent in Spanish and work with Hispanic consumers; four are able to communicate in Cantonese; two in Vietnamese, three are fluent in Portuguese; three are fluent in Khmer, three are fluent in French/Haitian Creole, and one counselor is fluent in Hindi and Tamil. A smaller number of area directors, head clerks and other clerical staff are fluent in American Sign Language, Spanish, Khmer, Cantonese, Mandarin, Haitian Creole, or Portuguese. Eleven full– and part–time sign language interpreters are also on staff. The Commission also maintains a statewide contract with the Massachusetts Commission for the Deaf and Hard of Hearing to secure additional ASL interpreters and CART reporters, as needed. Staff with specific language skills and interpreters is geographically placed so as to coincide with population and other demographics relating to target consumer groups. This strategy will continue to be applied and staff with specialized skills added, as appropriate, for the upcoming year and beyond.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The information in the State plan pertaining to the RSA requirements for a Comprehensive System of Personnel Development is coordinated and shared with the appropriate State Department of Education unit consistent with the Individual with Disabilities Education Act to assure compliance and coordination of efforts.

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 Massachusetts Rehabilitation Commission (MRC) in conjunction with the Statewide Rehabilitation Council (SRC) conducted its annual Comprehensive Statewide VR Consumer Needs Assessment (CSNA) in the Fall of 2014. The Rehabilitation Services Administration (RSA) requires the MRC to conduct a Comprehensive Statewide VR Consumer Needs Assessment at least every three years, but the MRC administers it on an annual basis with the information and findings incorporated into the MRC's State Plan, Strategic Planning, and Quality Assurance Activities. The findings on consumer needs listed in this report are presented and shared with MRC Senior Management and VR staff, the entire body of the SRC, and other key stakeholders as part of the MRC's State Plan and continuous quality improvement processes. It is also publicly distributed via the MRC website. The 2014 CSNA process constituted a number of areas, including: a consumer survey; focus groups; analysis of key statistical and demographic information and facts; findings from other reports and surveys including the Consumer, Provider, and Counselor Satisfaction surveys, among others; and collaboration and discussion with the SRC and other key stakeholders.

The MRC 2014 Needs Assessment Survey was administered electronically via Survey Monkey in September and October 2014. A focus group of consumers was also conducted at the Consumer Conference in June 2014. There were 1,325 consumers who responded to the survey out of a total of 5,157 possible consumer recipients, for a response rate of 25.2%. The number of responses again exceeded the amount required to make statistically significant conclusions at a 99% confidence level, according to the Raosoft.com sample size calculator, by a wide margin. There was a 12.7% increase in the number of consumer respondents from the 2013 Needs Assessment Survey and a 19.4% increase in the number of consumers offered the opportunity to participate in the survey compared to 2013.

The main findings of the 2014 Comprehensive Statewide Needs Assessment can be summarized as follows:

1. The CSNA again confirms the fact that the majority of consumers served by the MRC are people with the most significant disabilities. The findings indicate that a majority of MRC consumers require multiple Vocational Rehabilitation (VR) services, transportation, and Community Living (CL) services and supports to assist them in their efforts to prepare for, choose, and obtain competitive employment. The need for multiple VR services was found to be slightly greater amongst individuals of diverse ethnic and racial backgrounds and for individuals with cognitive or psychological disabilities. The findings suggest that many consumers also require supported employment and ongoing and extended employment supports. The need for multiple CL services was greatest among individuals with physical or sensory disabilities.

2. Overall, the majority of MRC consumers believe MRC services are addressing all or most of their needs. 80% of consumers feel MRC services are at least somewhat effective in meeting their vocational service needs (up 2% from 2012). The majority of consumers (79.3%) are somewhat or very satisfied with the development of their Individualized Plan for Employment. Many of those who feel MRC services are not meeting their needs indicate they have difficulty maintaining contact with their counselor, have not been provided consistent or adequate information on services, or have experienced changes in their assigned counselors due to high levels of staff turnover.

3. Many consumers expressed strong praise and gratitude for the hard work and support provided by the MRC and its counseling staff. It is clear that MRC and its staff make a significant positive impact on the lives of many of its consumers. A need raised by consumers included better contact with their counselor and more information about available services and MRC procedures, including information and referral to other agencies. Some consumers may not have a complete understanding of what the MRC can and cannot do for them.

4. The most important and needed VR services listed by consumers were job placement (89%), career counseling (84%), supported employment (80%), benefits planning (78%), ongoing supports to assist in retaining employment (74%), On–the–Job Training or Job Coaching (71%), and College Education (68%). School to work transition, obtaining a high school diploma, and college education were the most needed services by consumers of transition age.

5. The most important job characteristics that MRC consumers indicated they are looking for in a job include a friendly job environment (95%), job satisfaction and personal interests (95%), earning a living wage (94%), an adequate number of hours worked per week (94%), vacation and other leave benefits (89%), and promotional opportunities (88%).

6. The most common occupational areas of interest listed by MRC consumers included Community/Social/Human Services (36%), Administrative (29%), Health Care (29%), Self–Employment (26%), Customer Service (25%), and Computers/Information Technology (23%). All but Self–Employment are amongst the top 10 occupational goals by Standard Occupational Code (SOC) in consumer employment plans in the MRCIS Case Management System. The high interest amongst consumers in Self–Employment may be a function of the economy driving more people to go into self–employment. A number of consumers desired additional information on self–employment.

7. Only 32% of consumers indicated that they are aware of the Independent Living Center in their area. Individuals with psychological disabilities, younger consumers, and those in the South and North District tended to be less aware of ILCs compared to consumers with other types of disabilities.

8. Transportation continues to be an area of great need for MRC consumers. The most important and needed transportation services and options listed by consumers are public transportation (21%), the Donated Vehicle Program (18%), driver's education and training (10%), the Transportation Access Pass (10%), information about transportation options (7%), and The Ride/paratransit (7%).

9. 36% of consumers find transportation to be a potential barrier to obtaining employment. Common reasons for how transportation is a barrier include inability to access jobs via public transportation, the cost of transportation, reliability and the time required to travel via public transit or paratransit, lack of access to a vehicle, lack of a driver's license, and the distance to available jobs.

10. The most important and needed Community Living services indicated by responding consumers were affordable, accessible housing and the Mass Access Housing Registry (59%), accessible recreational services (48%), the Consumer Involvement Program (40%), the Individual Consumer Consultant (ICC) program (39%), home care (33%), assistive technology (33%), and home modification (32%).

11. When factoring out consumers who indicate they do not require Community Living services, approximately 86% of MRC consumers indicated that MRC's services were somewhat or extremely useful in assisting them to maintain independence in the community. Many consumers reflected how the MRC's assistance has been tremendously valuable. Many consumers, however, were not aware of some or all of the CL services provided by the MRC. Others indicated they do not require CL services.

12. Finding affordable and accessible housing remains a challenge for many consumers due to economic conditions and the high cost of living in Massachusetts. The Independent Living Centers may be able to assist consumers in this area, and counselors may be able to refer consumers to other resources as well.

13. A total of 18% of consumers feel they require additional services and supports. This number has fallen by about 5% since 2011. These services include job placement and job training, financial assistance, transportation, affordable and accessible housing, information on available service, assistive technology, and services and supports from other state agencies.

14. The most important single service consumers are receiving includes job placement and job search services, assistance with college education, job training, vocational counseling and guidance, assistive technology, transportation, and assistance with obtaining supplies for school and work.

15. The majority of MRC counselors are satisfied with their ability to assist individuals with disabilities in obtaining competitive employment based on their skills, interests, needs, and choices. MRC counselors are at least somewhat satisfied with most services provided to consumers, including internal job placement services, services from Community Rehabilitation Providers, and education and training provided to consumers by schools and colleges. Communication with consumers and providers was also identified by counselors as an area for improvement. Counselors identified some areas that would assist them in doing their job better, including improved support and resources for job placement, increased information on job leads for consumers, additional job readiness trainings, and continued enhancements to the MRCIS system, among others.

16. Most consumers appear to be satisfied with services received from Community Rehabilitation Providers (CRPs). The majority of MRC staff also are somewhat or very satisfied with CRP services. Improved communication and information flow between CRPs and MRC staff may assist in improving service delivery to consumers and lead to more successful employment outcomes.

Recent vendor expansion efforts appear to have addressed CRP capacity needs, but there still appears to be additional capacity needed in certain geographic areas and for certain populations.

17. There are areas where additional MRC staff training may assist in improving the quality and effectiveness of VR services delivered to consumers. Specific areas include refresher trainings on the MRCIS case management system as well as on VR best practices, policies, and procedures and proper documentation of records.

18. The MRC has identified Asian and Pacific Islanders as being slightly underserved by the MRC's Vocational Rehabilitation program compared to their proportion in the overall state population. It is important to note that proportionally Asians have been the fastest growing group amongst all ethnic and racial groups served by the MRC's VR program over the last 10 years. This is also true in the state's general population. It is recommended that the MRC continue its outreach efforts to Asian communities. MRC has translated key agency marketing and information materials and is also working on translating all MRCIS correspondence letters into several Asian languages common in Massachusetts including Mandarin Chinese, Vietnamese, and Khmer as part of its Language Access Plan.

19. MRC is enhancing its Comprehensive Statewide Needs Assessment process to incorporate the assessment of the needs for pre–employment transition services by students with disabilities in the Commonwealth. MRC has added additional questions into its Needs Assessment Survey instrument and Counselor surveys to meet these new requirements. MRC also piloted a Youth Transition Service survey to consumers participating in 2015 Summer Internship programs and surveyed counselors on their knowledge of Pre–Employment Transition Services provided to students with disabilities by local education agencies. MRC has also added an Employer Satisfaction Survey to the Needs Assessment Process to address services to Employers.

B. WHO ARE MINORITIES;

The need for multiple VR services was found to be slightly greater amongst individuals of diverse ethnic and racial backgrounds.

Over the past ten years, MRC has seen an increase in African–American, Hispanic, and Asian consumers. Numerically, the largest growth is in Hispanic and African–American consumers. Proportionally, the largest growth in MRC's consumer population over the past decade has been among Asian and Hispanic consumers, which is consistent with the 2010 Census figures for Massachusetts. African–Americans are served by the MRC at a much higher rate than their rate in the overall population. Hispanic consumers are served by MRC at a rate consistent with their rate in the general population. It appears Asian/Pacific Islanders are slightly underserved in comparison with their rate in the overall state population (3.8% of MRC consumers compared to 6.1% for all MA population).

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The MRC has identified Asian and Pacific Islanders as being slightly underserved by the MRC's Vocational Rehabilitation program compared to their proportion in the overall state population. It is important to note that proportionally Asians have been the fastest growing group amongst all

ethnic and racial groups served by the MRC's VR program over the last 10 years. This is also true in the state's general population. It is recommended that the MRC continue its outreach efforts to Asian communities. MRC has translated key agency marketing and information materials and is also working on translating all MRCIS correspondence letters into several Asian languages common in Massachusetts including Mandarin Chinese, Vietnamese, and Khmer as part of its Language Access Plan.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

In order to meet the needs of individuals served through other components of the Statewide Workforce Development System, MRC continues its efforts to collaborate with other core partners in the workforce investment system to reduce unemployment of individuals with disabilities and to provide effective services to employers throughout the state, to seek out collaborative opportunities including possible projects and grants that may assist individuals with disabilities across Massachusetts in obtaining competitive employment, and to continue to work closely together on WIOA implementation including common performance measures, and developing methods to track shared consumers across the workforce system, among others.

MRC will work in collaboration with other core partners under WIOA to survey and identify the needs of individuals working with other components of the system. Some of the identified needs include; interviewing skills, resume development, job specific skills (CVS pharmacy technician training, Certified Nursing Assistant (CNA) Program, Advance Auto Parts, Lowes, and Home Depot retail training). MRC will continue to consult with core partners on the identified needs of their consumers as it relates to accessibility and access to employment opportunities, employment training, and provide employer trainings on disability awareness and job accommodations.

The Commission VR Program has a presence at the Massachusetts career centers; the MRC Commissioner serves on the State Workforce Investment Board (SWIB), and each Commission area director has a formal relationship with at least one career center. In addition, many area directors are on local workforce investment boards. Commission VR counseling staff make frequent visits and often conduct interviews at the local career centers.

The Commission's job placement specialists and other assigned Commission staff work closely with local career centers to provide high quality vocational rehabilitation services to persons with disabilities seeking expanded employment opportunities and to make the career centers more responsive to the needs of individuals with disabilities including providing disability sensitivity training for career center staff.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Among individuals served by MRC with less than a high school education at application, 95% indicate that transition services to assist in transitioning from high school to college and employment and 87% find pre–employment transition services for students with disabilities as important service needs. Obtaining a HS Diploma and College Education were also rated as

important services by youth. Results throughout the CSNA demonstrate a need for pre–employment transition services among high school students with disabilities and youth consumers of transition age and MRC is working to address this need through its WIOA initiatives.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

In terms of the need to establish, develop, or improve community rehabilitation programs within the State. Most consumers appear to be satisfied with services received from Community Rehabilitation Providers (CRPs). The majority (79%) of MRC staff also are somewhat or very satisfied with CRP services. Improved communication and information flow between CRPs and MRC staff may assist in improving service delivery to consumers and lead to more successful employment outcomes. Recent vendor expansion efforts appear to have addressed CRP capacity needs, but there still appears to be additional capacity needed in certain geographic areas and for certain populations.

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 .

The Needs Assessment Report indicates that among transition–age youth served by MRC, 95% find transition services to assist in transitioning from high school to college and employment and 87% find pre–employment transition services for students with disabilities as important service needs. Obtaining a HS Diploma and College Education were also rated as important services by youth. Results throughout the CSNA demonstrate a need for pre–employment transition services among high school students with disabilities and youth consumers of transition age and MRC is working to address this need through its WIOA initiatives.

MRC is working closely with local school districts on transition and WIOA pre–employment transition services, including those provided under the Individuals with Disabilities Education Act. MRC has a counselor assigned to every public high school in the Commonwealth and have developed strong working relationships with the Department of Elementary and Secondary Education.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

In 2013, there were 6,613,654 individuals living in the community in Massachusetts, of which 782,204 were persons with disabilities; a prevalence rate of 11.8%. This is a projection based on available data. Please note that this is the most up to date information available as of when the State Plan was developed.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

It is estimated that the Massachusetts Rehabilitation Commission will provide services with funds provided under part B of Title I of the Act as follows. a.Individuals to be provided services to determine eligibility: 9,000 b. Individuals to be provided services to determine order of selection priority assignment and vocational rehabilitation needs: 8,000 c. Individuals to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments: 7,150 d. Individuals with most significant disabilities to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments: 6,400

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

It is estimated that the Massachusetts Rehabilitation Commission will provide Supported Employment services with funds provided under part B of Title VI of the Act to 119 individuals.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

MRC is not under an order of selection – Not applicable.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

MRC is not under an order of selection – not applicable.

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.

It is estimated that the costs of services with funds provided under part B of Title I of the Act, including Social Security Administration reimbursement, to be 64 million dollars.

MRC is not operating under an order of selection.

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 Massachusetts Rehabilitation Commission has developed the following goals and priorities for the Vocational Rehabilitation and Supported Employment Programs. These have been identified based on the most recent Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2014 to survey the rehabilitation needs of individuals with disabilities. They are also based on recommendations and input from the SRC, and input from MRC Senior Management. Additionally, these goals include the new WIOA Common Performance Measures. MRC will review progress on these goals on a regular basis with senior management. The SRC has agreed to these goals.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Goal 1: Maximize Employment Retention for MRC Consumers Successfully Employed at Exit from Vocational Rehabilitation at the Second Quarter after Exit

Measurement: Employment Rate at the 2nd Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Establish baseline data over the next 2 program years Data Source: Closure Data from MRCIS Case Management System, RSA–911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 2: Maximize Employment Retention for MRC Consumers Successfully Employed at Exit from Vocational Rehabilitation at the Fourth Quarter after Exit Measurement: Employment Rate at the 4th Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Establish baseline data over the next 2 program years Data Source: Closure Data from MRCIS Case Management System, RSA–911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 3: Increase Median Quarterly Earnings for MRC Consumers Employed at Exit from Vocational Rehabilitation at the Second Quarter after Exit Measurement: Median Quarterly Earnings at the 2nd Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Establish baseline data over the next 2 program years. Data Source Closure Data from MRCIS Case Management System, RSA–911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 4: Maximize the Number and Proportion of MRC Consumers with Recognized Secondary and/or Post–Secondary Credential Attainment during Participation in the MRC VR Program Measurement: Number of MRC Consumers obtaining post–secondary education credentials and/or obtaining a secondary school diploma or equivalent during participation in the MRC VR Program (or up to 1 year after exit from program. For proportion, previous number divided by the total number of consumers served during the program year Target: Establish baseline data for the first two program years Data Source: Level of Education Data from MRCIS Case Management System, RSA–911 quarterly reporting Frequency: Annually

Goal 5: Maximize the Percentage of MRC Consumers Enrolled in Education and Training Programs leading to a recognized credential or employment achieving measurable skills gains during the Program Year Measurement: Number of MRC Consumers enrolled in education and training programs leading to employment or a recognized post–secondary credential achieving measurable skills gains during the program year with documented progress divided by total number of consumers receiving services through an IPE in the program year (Status 12–22) Target: Establish baseline data for the first two program years. Data Source: Level of Education Data from MRCIS Case Management System, RSA–911 quarterly reporting Frequency: Annually

Goal 6: Provide Effective Services to Employers in the Commonwealth of Massachusetts Measurement: Employment Retention Rate with the Same Employer at 2nd and 4th Quarter after Exit for MRC Consumers closed during the Current Program Year (Status 26 Closures) based on Employer Tax ID (EIN) in Unemployment Insurance Wage Data Target: Establish baseline data for the first two program years. Data Source: Status 26 Closure Data from MRCIS Case Management System, RSA–911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Quarterly, Annually

Goal 7: Maximize Successful Employment Outcomes for 90 Days or Greater to exceed last year's Program Year Outcome Measurement: Total Sum of Successful Employment Outcomes for MRC Consumers for the Current Program Year (Status 26 Closures) Target: 3,790 Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Goal 8: Maximize the number of Consumers Exiting the MRC VR Program whose Primary Source of Economic Support is from their own Employment Earnings Measurement: Proportion of Individuals Successfully Closed in Status 26 in the current fiscal year with a RSA–911 Employment Status Code of Competitive Employment in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage, currently is $10.00 in Massachusetts) whose Primary Source of Support at Closure is Personal Income (Code 1) minus the proportion of those consumers whose primary source of support at application was personal income (Code 1). Target: At or above 53% Data Source: MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Goal 9: Maximize the Number and Percentage of youth consumers served by MRC completing education and training programs, including post–secondary education. Measurement: Number and Percent of Youth Age 14 to 24 Completing Education and Training Programs. Measured by the flow of Youth Consumers moving from Status 18 Training and Education into Status 20 Job Ready or Status 22 Job Placement during the month/fiscal year divided by the total number of youth

consumers served in Status 18 Training and Education during the month/fiscal year Target: At or above 120 or 2% of youth consumers per month completing training or education, annual total of 1,440 or 14%. Data Source: Data from MRCIS Case Management System and EHS! Results Performance Management System Frequency: Monthly, Annually Goal 10: Maximize the Number and Percentage of high school students receiving pre–employment transition services from MRC. Measurement: Number of High School Student Consumers Served by MRC receiving Pre–Employment Transition Services (PETS) Target: 1,250* Data Source: Data from MRCIS Case Management System Frequency: Monthly, Annually *MRC expects this number to grow going forward.

Goal 11: Maximizing the Number of Successful Competitive Employment outcomes and the percent of Placements leading to Successful Employment Outcomes through MRC's Competitive Integrated Employment Services (CIES) programs in partnership with Community Rehabilitation Providers Measurement: Total Number of 90 Day Successful Employment Outcomes from CIES Program; Total Number of CIES Successful Employment Outcomes divided by the total number of 30 Day Placements for the CIES Program. Target: Exceed 850 Successful Employment Outcomes for CIES for the fiscal year and greater than 75% of CIES placements result in successful employment outcomes Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Goal 12: Continue to Increase Employment Outcomes through MRC's Employment Service Specialists, Employer Account Management System, and Annual Statewide Hiring Event. Measurement: Total Number of Successful Employment Outcomes achieved through the involvement of a MRC Employment Service Specialist in the current fiscal year, Total Number of Successful Employment Outcomes (Status 26 closures) with Employers participating in MRC's Account Management System in the current fiscal year, Total number of Successful Employment Outcomes (Status 26 Closures) from Consumers Participating in MRC's annual Statewide Hiring Event in the current fiscal year. Target: Exceed 300 Successful Employment Outcomes for Employment Service Specialists, exceed 65 Successful Employment Outcomes for Consumers Participating in the Statewide Hiring Event, and exceed 300 Employment Outcomes from Employer Account Management System. Data Source: MRCIS Case Management System, MRCIS Job Placement Module Frequency: Annually

Goal 13: Continue to provide consumers with an avenue to access employment and training opportunities through participation in the Donated Vehicle Program in partnership with Good News Garage, Measurement: Number of Consumers Participating in the Donated Vehicle Program who obtain a successful employment outcome or who enter training and education (Status 18) divided by the number of consumers participating in the Donated Vehicle Program during the current fiscal year. Target: Greater than 80% of Consumers participating in the Donated Vehicle Program during the current fiscal year result in successful employment outcomes or enrollment in training or education (Status 18) Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Goal 14: Maximize recruitment of Qualified Vocational Rehabilitation Counselors to address attrition from retirement through utilizing paid internships with Vocational Rehabilitation Counseling Graduate students. Measurement: Total number of internships provided to VR graduate students during the fiscal year, total number of former interns hired as VR counselors during the

fiscal year. Target: Provide 10 or more internships annually, leading to 3 or more interns hired as QVRCs upon completion of their internship and degree program. Data Source: Intern Tracking Reports, Human Resource Data from Staffing Reports Frequency: Annually

Goal 15: Provide Quality Vocational Rehabilitation Services leading to increased successful employment outcomes to individuals with Autism. Measurement: Number of successful employment outcomes as defined by Status 26 closures for MRC consumers with a Primary and/or Secondary RSA Disability Cause Code of 08. Target: Equal or greater to 100 Data Source: MRCIS Case Management System Frequency: Quarterly, Annually

Goal 16: Outreach to the Asian community through translation of key MRC documents and materials into Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. Measurement: Completion of translation of key materials into Khmer, Vietnamese, and Mandarin Chinese Target: Completion of MRCIS Letter Translation into Khmer, Vietnamese, and Mandarin Chinese, posting on MRC's website by the end of the program year, and incorporation of letters directly into MRCIS system. Data Source: N/A Frequency: Annually

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

MRC has based its goals and priorities on the most recent Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2014 to survey the rehabilitation needs of individuals with disabilities. They are also based on recommendations and input from the SRC, and input from MRC Senior Management. Additionally, these goals include the new WIOA Common Performance Measures.

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The Massachusetts Rehabilitation Commission (MRC) in conjunction with the Statewide Rehabilitation Council (SRC) conducted its annual Comprehensive Statewide VR Consumer Needs Assessment (CSNA) in the Fall of 2014. The Rehabilitation Services Administration (RSA) requires the MRC to conduct a Comprehensive Statewide VR Consumer Needs Assessment at least every three years, but the MRC administers it on an annual basis with the information and findings incorporated into the MRC's section of the Massachusetts WIOA Combined State Plan, as well as in MRC's Strategic Planning, and Quality Assurance Activities. The findings on consumer needs listed in this report are presented and shared with MRC Senior Management and VR staff, the entire body of the SRC, and other key stakeholders as part of the MRC's State Plan and continuous quality improvement processes. It is also publicly distributed via the MRC website. The CSNA process constituted a number of areas, including: a consumer survey; focus groups; analysis of key statistical and demographic information and facts; findings from other reports and surveys including the Consumer, Provider, and Counselor Satisfaction surveys; pilot youth and employer surveys; and collaboration and discussion with the SRC and other key stakeholders.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

MRC included the new WIOA common performance accountability measures under Section 116 of WIOA in its goals and priorities. MRC will be establishing baseline data on these measures for the first two program years as specified in the final requirements for the WIOA Combined/Unified State Plan.

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.

The Massachusetts Rehabilitation Commission has an active and productive State Rehabilitation Council (SRC). SRC members through their area consumer advisory councils, SRC subcommittees, task forces, quarterly meetings, and the annual consumer conference, have conducted surveys and needs assessments that have provided input to more effectively address the needs of individuals with the most significant disabilities. The agency and the SRC used the results of their review of consumer satisfaction studies and reports of the effectiveness of the VR program and the agency's performance on the RSA Standards and Indicators in their development of the goals and priorities.

Additionally, finding and recommendations from monitoring activities conducted under section 107 is also incorporated.

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.

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

B. THE JUSTIFICATION FOR THE ORDER.

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

C. THE SERVICE AND OUTCOME GOALS.

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

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.

MRC is not operating under an order of selection and does not anticipate that we will be operating under an order of selection in the next two years.

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.

MRC's Title VI Part B funds will be distributed consistent with Title VI, Part B requirements with the notation that rates, fees, and expenditures are subject to applicable Commonwealth of Massachusetts statutory, regulatory, and related requirements governing purchases of services and goods. Such parameters of the Commonwealth of Massachusetts govern, amongst other things, methods of procurement. Further, all providers of supported employment services need to qualify through the Commonwealth of Massachusetts' inter–agency contractual process. The Commission and the Commonwealth utilizes procurement methods, which, to the maximum extent possible, facilitate the provision of services, and affords individuals meaningful choices among the entities (providers) that provide the services. MRC will establish the consumer need for this service on a fiscal year basis and will then fund services for those consumers in that specific geographic location. In FY'16 MRC has established the following need areas and funding levels. Area, Disability Type, Funding of Clients served: Greater Boston /South District MH TBI DD ASP LD/ADHD PD $217,600, 55 consumers served

Western District MH TBI DD ASP LD/ADHD PD $111,638, 28 consumers served

Northeast District TBI MH DD ASP LD/ADHD PD $144,762, 36 consumers served

Statewide Total MH TBI DD ASP LD/ADHD PD $474,000, 119 consumers served

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

MRC will use 50% of Title VI Supported Employment Funds youths with disabilities to provide supported employment services based on their needs and services outlined in their individualized plan for employment. Services will be provided to assist youths with the most significant disabilities in choosing, obtaining, and maintaining competitive employment based on their interest, abilities, and skills. MRC will also make available Title VI funds for extended services for youths with the most significant disabilities to assist them in maintaining and advancing in competitive employment.

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 Massachusetts Rehabilitation Commission has worked with other human service agencies to identify and secure funding for extended supports for individuals in supported employment,

including youth with the most significant disabilities. Funding for extended services is available from several sources contingent upon the consumer's disability, eligibility and the resources available to each state agency. This service delivery system is currently in place enabling state agencies to cost share the appropriate services needed for consumers to choose, find and maintain meaningful competitive supported employment. With the implementation of this initiative we have seen an increase in the availability of resources for extended services. However, the available funding is administered at local levels and each situation handled individually. Sources include: Massachusetts Rehabilitation Commission (State Revenue) Department of Developmental Services Department of Mental Health MRC Statewide Head Injury Program Massachusetts Commission for the Deaf and Hard of Hearing Social Security Administration Work Incentives Private Sector Natural Supports

The Massachusetts Rehabilitation Commission continues to promote the collaboration with stake holders regarding supported employment services and extended services. This is also evidenced in the number of joint funded programs that have developed. Some examples of these collaborative programs are joint funding of services for individuals with intellectual disabilities between the MRC and the Developmental Disability Services (DDS); for individuals who are psychiatrically disabled between MRC and the Department of Mental Health (DMH); for individuals who have traumatic brain injuries between the Statewide Head Injury Program (SHIP) of the Massachusetts Rehabilitation Commission; and the Massachusetts Commission for the Blind.

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 Massachusetts Rehabilitation Commission, in cooperation with the State Rehabilitation Council (SRC), conducted a needs assessment during fiscal year 2015 to survey the rehabilitation needs of individuals with disabilities residing within the state. Strategies of the Vocational Rehabilitation and Supported Employment programs are established consistent with the needs and trends to achieve its goals and priorities, support innovation and expansion activities. These strategies are designed to overcome any barriers to accessing the VR and the Supported Employment programs

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

MRC provides an array of assistive technology services and devices to individuals with disabilities through the VR program and with partners.

The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low–interest loans to consumers when other resources are not available to purchase needed adaptive technology.

Another program is the Easter Seals Program of Adaptive Assistance. For the purposes of this program adaptive assistance is defined to be devices, aids, and enhancements for the elimination of barriers encountered by individuals with disabilities, primarily individuals with the most significant disabilities. Adaptive assistance is defined as services that either 1) supplement or enhance functions of the individual or

2) that impact on the environment through environmental changes, e.g., workshop modifications. Rehabilitation technology specialists may prescribe both types of rehabilitation technology services in order to create and/or maximize employment opportunities for the individual with a disability. The rehabilitation technology services are provided to lead to and/or expand vocational rehabilitation and employment opportunities.

Persons served under this program are applicants or clients of the Massachusetts Rehabilitation Commission Vocational Rehabilitation Program. Target population is individuals with the most significant disabilities for whom rehabilitation technology services are being considered as potentially eliminating barriers to vocational rehabilitation and/or enhancing vocational rehabilitation and employment opportunities. Population includes:

1. Applicants undergoing evaluation of vocational rehabilitation potential, especially when the disabling condition of the individual is of such a nature and severity that rehabilitation technology services could result in a determination of ineligibility

2. Eligible vocational rehabilitation clients for whom rehabilitation technology is being considered to assist the client to attain intermediate objectives and long–range rehabilitation goals

3. Eligible employed individuals to eliminate barriers to and/or enhance capacities for successful job performance.

Adaptive assistance evaluations, training, and consultations for individuals with disabilities served by the vocational rehabilitation program were:

1. Assessments of functional capacities of individuals with disabilities to include determinations of if and how the provision of rehabilitation technology services is likely to affect the capacity of the individual to perform successfully in competitive employment and/or enhance opportunities for the development of capacities for competitive employment;

2. Recommendations of specific rehabilitation technology for individuals with disabilities to include descriptions of related barriers to be eliminated and descriptions of functional capacities to be attained;

3. Rehabilitation technology training to affect the capacity of the individual with a disability to utilize specific assistive technology devices (equipment, or product system that is used to increase, maintain, or improve functional capabilities of individuals with disabilities) and thus perform successfully in competitive employment and/or enhance opportunities for the development of capacities for competitive employment; and

4. Consultations to be provided to Commission staff to address the elimination of disability–related barriers, improvement of opportunities for competitive employment, and the development of functional capacities of individuals.

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.

MRC has made a commitment to outreach to individuals with the most significant disabilities who are also ethnic and cultural minorities, especially to Asian communities who have been identified as under– served, by hiring bilingual staff to more effectively reach those communities and by the expectation that directors from local area offices are involved in outreach to local community agencies and organizations, especially those that serve ethnic and culturally minorities.

MRC also has an ongoing statewide Bilingual/Bicultural vocational rehabilitation counselor group who meet on a regular basis to: discuss and share resources on how to outreach to and serve cultural and ethnic minorities, develop new or translate existing agency forms and brochures, and

develop and conduct, in collaboration with the Commission's staff development unit, training programs for local and district offices.

MRC has translated key forms and informational materials into Spanish, Portuguese, Russian, French Creole, Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. MRC recently completed a project to translate all correspondence letters in its electronic case management system into Asian languages which are spoken by MRC staff include: Cantonese and Mandarin Chinese, Khmer and Vietnamese. MRC will continue to explore with the SRC unserved/underserved committee ways of expanding MRC's efforts in this area.

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).

MRC has implemented strategies to address the needs of students with disabilities, including pre–employment transition services, through a new multi–million dollar procurement. Specific services are addressed in consumers' individualized plan for employment based on their interests, choice, and needs. MRC closely coordinates pre–employment transition services with local educational agencies.

Through its MOU with the Department of Elementary and Secondary Education (DESE), MRC has established a working group to identify needs and best practices to improve and expand services for students with disabilities, including pre–employment transition services. This is incorporated as part of MRC's strategic planning process.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Over the past several years, MRC and community rehabilitation providers have worked in partnership to develop a variety of programs and services to assist individuals with disabilities to achieve suitable employment outcomes. These programs include: Vocational Services; Competitive Integrated Employment Services (CIES) and many support services that are essential in vocational rehabilitation.

MRC and community providers collaborate in developing programs and services in such forums as: Statewide Rehabilitation Council that meets twice a year; quarterly meetings with representatives of the Executive Committee of the Massachusetts Council of Human Service Providers; periodic district wide meetings with community rehabilitation programs, interagency and cross disability agency councils; task specific work teams and the Massachusetts Association of People Supporting Employment First (MAAPSE).

MRC Research and Development Department staff conducts training with agency managers from the VR and Supported Employment Programs at agency management conferences and at district and local area offices with unit supervisors on the standards and indicators and overall agency performance, what they mean, how they are derived from agency statistics and how they impact on

agency performance. The Research and Development department also presents on standards and indicators and Needs Assessment results to new counseling staff as part of their initial training. The Commission also provides automated reports on line for managers for use to educate staff and develop strategies for correcting performance in these areas.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

MRC has established an electronic reporting and performance measurement system to monitor, analyze, and report on the effectiveness and efficiency of the programs. This system will allow the agency to make improvements to ensure performance on the WIOA common performance measures. MRC will be establishing baseline data on these measures for the first two program years and reporting data to RSA.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

As a key partner in the statewide Workforce Investment system, MRC will continue to strengthen the alignment of the VR program with the other core programs of the workforce development system. MRC subscribes to the overall vision for the Massachusetts Workforce Investment system as described below.

All Massachusetts residents, including individuals with disabilities, will benefit from a seamless system of education and workforce services that supports career pathways for individuals and leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy. To achieve this vision, Massachusetts will engage businesses to understand their needs and develop an integrated education and workforce system that supports career pathways to prepare residents with foundation, technical, professional skills and information and connections to postsecondary education and training. MRC will work with its core workforce partners to: 1. Design career pathways across partners aligned with business demand 2. Improve foundation skills and transition to postsecondary education and training for individuals with barriers to employment 3. Assist individuals to achieve economic self–sufficiency through support services, labor–market driven credentialing, and employment 4. Meet the needs of job seekers and businesses who engage in the public workforce system (including partner programs)

The Commission VR Program has a presence at the Massachusetts career centers; the MRC Commissioner serves on the State Workforce Investment Board (SWIB), and each Commission area director has a formal relationship with at least one career center. In addition, many area directors are on local workforce investment boards. Commission VR counseling staff make frequent visits and often conduct interviews at the local career center. MRC is strengthening its relationships with the WIBs and Career Centers as part of its WIOA efforts.

The Commission's job placement specialists and other assigned Commission staff work closely with local career centers to provide high quality vocational rehabilitation services to persons with disabilities seeking expanded employment opportunities and to make the career centers more

responsive to the needs of individuals with disabilities including providing disability sensitivity training for career center staff.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The Massachusetts Rehabilitation Commission, in cooperation with the State Rehabilitation Council (SRC), conducted a needs assessment during fiscal year 2015 to survey the rehabilitation needs of individuals with disabilities residing within the state. The strategies of the Vocational Rehabilitation and Supported Employment programs are established consistent with the needs and trends to achieve its goals and priorities, support innovation and expansion activities. These strategies are designed to overcome any barriers to accessing the VR and the Supported Employment programs. MRC will utilize the following strategies to achieve each of its stated goals and priorities, consistent with the comprehensive needs assessment:

1. MRC will provide outreach activities to identify and serve individuals with the most significant disabilities which includes staff outreach to community and state agencies, schools, other public institutions, and the general public by contact and presentation by MRC local office, district and administrative staff, printed brochures, and agency consumer conferences.

2. The MRC Supported Employment Program provides Supported Employment Services to consumers through its Statewide Employment Services office as well as through its local Area Offices' forty four (44) community rehabilitation providers, links with the local school system for transitioning youth and other state agencies such as the Department of Developmental Services and the Department of Mental Health especially through its clubhouse programs.

3. MRC provides an array of assistive technology services and devices to individuals with disabilities through the VR program and with partners. The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low-interest loans to consumers when other resources are not available to purchase needed adaptive technology. MRC has identified how a broad range of assistive technology services and assistive technology devices will be provided to individuals with disabilities at each stage of the rehabilitation process; and has described how assistive technology services and devices will be provided to individuals with disabilities on a statewide basis.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

The Massachusetts Rehabilitation Commission reserves and uses a portion of the funds allotted to the Commission under section 110 of the Act for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities. Consistent with the findings of statewide assessment and goals and priorities identified

in conjunction with the State Rehabilitation Council, the Commission funds programs to address the needs of individuals with disabilities, primarily individuals with the most significant disabilities. Needs include:

1. Marketing Initiative

2. On the job training and on the job evaluations

3. IT web–based MRCIS and Hardware Initiative

4. Transportation: MRC is working diligently to address transportation barriers faced by its consumers. MRC publishes transportation resource fact sheets on its website and makes them available to consumers at its Area Office. MRC works with the Executive Office of Health and Human Service Transportation office on transportation for consumers and operates an innovative car donation program to assist individuals in accessing worksites. MRC will continue to work with transportation agencies to explore other transportation options for consumers.

5. Employment of Individuals with Disabilities in State Jobs: MRC places numerous individuals with disabilities into state government jobs each year, including at MRC. MRC has a diverse workforce with a high percentage of individuals with disabilities in the workforce. We have a key contact with the state's Human Resources Division to facilitate employment for consumers in state jobs.

6. Research Best Practices Models to Increase Employment of Individuals with Disabilities: Based on public comments regarding innovative employment programs, MRC will research best practice models designed to increase the employment rate of individuals with disabilities in Massachusetts. MRC will find out more about the suggested models including: the practices of North Dakota, South Dakota, Alaska, and Wyoming, which have achieved increased results of 50% employment rates of individuals with disabilities; Innovative youth employment models from Georgia, Nevada, Kentucky; and the RespectAbility Disability Employment First Planning Tool, among others.

7. CareerAccess Initiative: MRC will closely follow the CareerAccess initiative. CareerAccess is a community–driven proposed program to reform the current Social Security Administration's Supplemental Security Income Program (SSI) rules so that young adults with disabilities can work and achieve their full potential without risking losing their disability benefits. If the proposal is adopted by the Social Security Administration, MRC will help its consumers take full advantage of the program as part of their individual plans for employment.

8. Adaptive Van Driver Evaluation and Training

9. Re–allotment funded Workforce Investment with Employment Service Specialists and Vocational Rehabilitation Counselors

10. Summer Work Based Learning Experience

11. Apprenticeships: MRC will utilize available apprenticeship resources, including the ODEP guide to expand apprenticeship, to provide apprenticeship opportunities for individuals with disabilities

across the Commonwealth. As an example, MRC participates in the Merit Apprenticeship Program. Additionally, MRC has obtained a copy of the ODEP guide on apprenticeships.

12. Vocational Testing–Job Matching Occupational Specific Web–Based Training Initiative

13. Job–Driven Trainings with Employer Partners: At a local level, MRC is proposing that the state agencies, and their programs, and community based organizations who are working on placing people into jobs work together. Essentially, it is a public workforce system without walls. In this model, referrals are made to specific places, i.e. people with disabilities are referred to MRC. If MRC has a training program or relationship with a particular employer, they become the gatekeeper for that referral. If MRC is unable to fill the training program slots, then it is opened up to other people who can be referred from the Career Center, CBO's or other programs. The Gatekeeper function is a review of the person to ensure that they meet the minimum requirements to enter the training program. Information about what slots are opened, what the requirements are for various training programs and the status of referrals will need to get worked out with each area.

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.

MRC strategies to overcome barriers relating to access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program include the following:

1. Outreach activities to identify and serve individuals with the most significant disabilities. Commission activities include outreach to community and state agencies, schools, other public institutions, and the general public by contact and presentation by MRC local office, district and administrative staff, printed brochures and agency consumer conferences.

2. The MRC Supported Employment Program provides Supported Employment Services to consumers through its Statewide Employment Services office as well as through its local Area Offices' forty four (44) community rehabilitation providers, links with the local school system for transitioning youth and other state agencies such as the Department of Developmental Services and the Department of Mental Health especially through its clubhouse programs.

3. MRC has an ongoing statewide Bilingual/Bicultural vocational rehabilitation counselor group who meet on a regular basis to: discuss and share resources on how to outreach to and serve cultural and ethnic minorities, develop new or translate existing agency forms and brochures, and develop and conduct, in collaboration with the Commission's staff development unit, training programs for local and district offices.

4. MRC has translated key forms and informational materials into Spanish, Portuguese, Russian, French Creole, Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. MRC recently completed a project to translate all correspondence letters in its electronic case management system into Asian languages which are spoken by MRC staff including Cantonese and Mandarin Chinese, Khmer and Vietnamese.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

The Massachusetts Rehabilitation Commission developed the following goals and priorities for the Vocational Rehabilitation and Supported Employment Programs for the previous Federal Fiscal Year. These goals were identified based on the Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2013 to survey the rehabilitation needs of individuals with disabilities. Additionally, these goals are based upon agency performance on the RSA Standards and Indicators (using the FFY 2013 data set that was recently submitted to RSA), recommendations and input from the SRC, and input from MRC Senior Management. MRC will review progress on these goals on a regular basis with senior management. This is a report on progress on these goals based on FFY2014 and FFY2015 outcomes.

Goal 1: Maximize Successful Employment Outcomes for 90 Days or Greater to exceed last year's federal fiscal year outcome as stated in RSA Standard and Indicator 1.1

Measurement: Total Sum of Successful Employment Outcomes for MRC Consumers for the Current Federal Fiscal Year (Status 26 Closures) Target: 3,744 Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: Goal 1, of Employment Outcomes: FFY2014: Goal: 3,651 Outcome: 3,744 Variance: +93 FFY2015: Goal: 3,745 Outcome: 3,790 Variance: +45

In FFY2014, MRC met its annual Successful Employment Outcome goal for the Federal Fiscal Year and passed RSA Standard and Indicator 1.1 by achieving 3,744 employment outcomes. For FFY2015, MRC successfully achieved 3,790 Successful Employment Outcomes, exceeding its goal of 3,745 successful closures required to pass RSA Standard and Indicator 1.1 by a variance of 45. This marked the sixth straight Federal Fiscal year that MRC improved upon its previous year results in terms of successful employment outcomes.

Goal 2: Increase the Rehabilitation Rate of MRC Consumers receiving Services so that the Ratio of Successful Closures versus Unsuccessful Closures (Rehabilitation Rate) exceeds the RSA Standard of 55.8% as stated in RSA Standard and Indicator 1.2

Measurement: Total Successful Employment Outcomes for MRC Consumers for the Current Federal Fiscal Year (Status 26 Closures) divided by the sum of both total successful employment outcomes

(Status 26 Closures) and the total number of unsuccessful closures after receiving services (Status 28 Closures for the Current Federal Fiscal Year Target: Equal to or Greater than 55.8% Standard Data Source: Status 26 Closure Data and Status 28 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: Rehabilitation Rate

FFY2014: Goal: 55.8%. Actual: 59.81% Variance: +4.01% FFY2015: Goal: 55.8% Actual: 49.03% Variance: –6.77%

In FFY2014, MRC successfully exceeded its goal for the Rehabilitation Rate (the ratio of successful versus unsuccessful closures) by a variance of 4.01%, achieving a ratio of 58.91% and passing RSA Standard and Indicator 1.2. For FFY2015, MRC achieved a 49.03% Rehabilitation Rate, falling short of the 55.8% goal by a variance of 6.77%. Despite this, MRC passed the overall Federal Standards and Indicators for FFY2015 by achieving 4 of 6 overall indicators, and 2 of 4 primary indicators based on preliminary FFY2015 data. MRC continues to focus on successful Status 26 closures and to determine ways of reducing Status 28 closures.

Goal 3: Focus on Competitive, Integrated Employment Outcomes for MRC Consumers by Maximizing the Proportion of MRC Consumers Exiting the VR Program with Competitive or Self Employment with earnings at or above Minimum Wage (RSA Standard and Indicator 1.3)

Measurement: Total Number of Successful Status 26 Closures with a RSA–911 Employment Status Code of 1, 3, 4, or 7 in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage, currently is $8.00 in Massachusetts). Target: Equal to or Greater than 97% Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: % of Consumers Exiting with Competitive/Self Employment at/above Minimum Wage

FFY2014: Goal: 97% Actual: 96.9% Variance: –0.1% FFY2015: Goal: 97% Actual: 98.4% Variance: +1.4%

In FFY2014, MRC was close to its State Plan goal for the percentage of consumers exiting the VR program with competitive/self–employment at/above the Minimum Wage, achieving an outcome of 96.9%, and passing the RSA Standard and Indicator 1.4 Standard of 72.6%. For FFY2015, MRC had achieved a 98.4% outcome in this area and has achieved its FFY2015 goal and exceeded the RSA Standard in this area. Note that the only closures which do not meet this criteria are Homemaker and Unpaid Family Worker Status 26 closures. All MRC closures in competitive and self–employment were at or above minimum wage. Those closed as homemakers or unpaid family workers are done so based on consumer choice. MRC does not place consumers into sub–minimum wage employment. Performance under this standard has remained steady over the past four years. MRC will be phasing out homemaker closures as a result of the enactment of WIOA and language in proposed draft regulations.

Goal 4: Focus on serving individuals with significant disabilities by Maximizing the Proportion of MRC Consumers with Significant Disabilities who Exit the VR Program with Competitive or Self Employment with earnings at or above Minimum Wage (RSA Standard and Indicator 1.3)

Measurement: Total Number of Successful Status 26 Closures for individuals with a Significant Disability or Most Significant Disability code at closure and with a RSA–911 Employment Status Code of 1, 3, 4, or 7 in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage) Target: Equal to or Greater than 90% Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: % of Consumers with Significant Disabilities Exiting with Competitive/Self Employment at/above Minimum Wage

FFY2014: Goal: 90% Actual: 99.6% Variance: +9.6% FFY2015: Goal: 90% Actual: 99.2% Variance: +9.2%

In FFY2014, MRC successfully exceeded its State Plan goal for % of consumers with significant disabilities exiting the VR program with competitive/self–employment at/above the Minimum Wage by 9.6%, achieving an outcome of 99.6%, and passing the RSA Standard and Indicator 1.4 standard of 62.4%. For FFY2015, MRC achieved a 99.2% outcome in this area, exceeding its goal by 9.2%. The vast majority of MRC consumers are individuals with significant disabilities.

Goal 5: Improve Quality of Successful Employment Outcomes for MRC consumers by increasing the average hourly wage of employed consumers and the ratio of the MRC consumer hourly wage to the state average hourly wage (RSA Standard and Indicator 1.5)

Measurement: Average Hourly Wage for Status 26 Closures for individuals with a RSA–911 Employment Status Code of 1, 3, 4, or 7 in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage), Average Hourly Wage divided by Fiscal Year State Weekly Wage Data from Bureau of Labor Statistics calculated using methodology as specified in RSA instructions for calculating VR agency performance on Standard and Indicator 1.5 Target: An average hourly wage for MRC consumers at or above the level required to meet Standard and Indicator 1.5 ($15.43 for FFY2013); Positive increase in Average Hourly Wage for employed consumers from prior fiscal year Data Source: MRCIS Case Management System, Bureau of Labor Statistics Weekly Wage Data Frequency: Quarterly, Annually

Evaluation of Progress: Average Hourly Wage Compared to Prior Fiscal Year FFY2014: Actual: $12.69 Variance: –$0.05 FFY2015: Actual: $12.94 Variance: +$0.25

Evaluation of Progress: Ratio of Consumer Hourly Wage to State Average Hourly Wage FFY2014: Goal: .52 Actual: .416 Variance: –.104 FFY2015: Goal: .52. Actual: 408 Variance: –.112

In FFY2014, MRC's average consumer wage remained fairly flat compared to performance in FFY2013 and MRC fell short of its goal for the ratio of the average consumer hourly wage to the state average hourly wage. For FFY2015, MRC's average hourly wage was up 25 cents from FFY2014 and MRC successfully met its stated goal through this increase. The ratio of the consumer

hourly wage to the state average hourly wage remains steady. It must be noted that MRC's performance on the wage ratio is significantly impacted by the fact that Massachusetts is a high per capita wage state (average wage of $31.09 per hour based on the most recent BLS wage data), and the average consumer wage for consumers in FFY2015 to date is $12.94– up slightly from FFY2014. In order to pass this Indicator, given the current level of wages in the state, consumers would need to earn an average of about $15.90/hour. Performance is also impacted by the fact that MRC serves many consumers who have no or limited work histories, limiting the range of jobs that they may be qualified for. Additionally, some may not be able to work full time due to their needs. Despite these challenges, MRC has seen recent improvements in the average hourly wages for employed consumers. For the most recently completed Federal Fiscal year, the average hourly wage (based on SFY) was the highest since FY2007.

Goal 6: Maximize the number of Consumers Exiting the MRC VR Program whose Primary Source of Economic Support is from their own Employment Earnings as Defined in RSA Standard and Indicator 1.6.

Measurement: Proportion of Individuals Successfully Closed in Status 26 in the current fiscal year with a RSA–911 Employment Status Code of 1, 3, 4, or 7 in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage, currently is $8.00 in Massachusetts) whose Primary Source of Support at Closure is Personal Income (Code 1) minus the proportion of those consumers whose primary source of support at application was personal income (Code 1).

Target: At or above 53% Standard Data Source: MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: Consumers Exiting Program with earnings as Primary Source of Support\ FFY2014: Goal: 53% Actual: 59.3% Variance +6.3% FFY2015: Goal: 53% Actual: 59.1% Variance: +6.1%

In FFY2014, MRC successfully exceeded its target for the proportion of consumers successfully achieving employment and exiting the VR program with personal earnings as their primary source of support compared to their primary source of support at application for VR services by 6.3%. MRC also passed RSA Standard and Indicator 1.5 in this area. In FFY2015, MRC achieved a 59.1% outcome in this area as results remained steady from FFY2014. This allowed MRC both achieve and exceed its goal for consumers exiting the VR program with income earnings as their primary source of support.

Goal 7: Continue to Provide Vocational Rehabilitation Services to Consumers from Diverse Ethnic and Racial Backgrounds as defined in RSA Standard and Indicator 2.1

Measurement: The service rate for consumers of minority backgrounds divided by the service rate for non–minority consumers (Service rates calculated using methodology as specified in RSA instructions for calculating VR agency performance on Standard and Indicator 2.1) Target: Ratio at or above 80% Standard Data Source: MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: Services Provided to Consumers from Diverse Ethnic and Racial Backgrounds

FFY2014: Goal: 0.9 Actual: 0.936 Variance: +0.036 FFY2015: Goal: 0.9 Actual: 0.945 Variance: +0.045

In FFY2014, MRC successfully exceeded its target for the ratio of the service rate for consumers from minority backgrounds to the service rate for non–minority consumers. MRC also passed RSA Standard and Indicator 2.1 in this area. In FFY2015, MRC achieved a 0.945 outcome in this area, exceeding its goal for FFY2015. MRC serves a diverse group of consumers that is generally representative of the state population as a whole as indicated by performance in this area.

Goal 8: Maximize the Number and Percentage of MRC Consumers of Transition Age (Defined as Age 16–24 at Application as per RSA 107 Monitoring Tables) completing education and training programs, including post–secondary education.

Measurement: Number and Percent of MRC Consumers of Transition Age 16–24 at Application Completing Education and Training Programs. Measured by the flow of Youth Consumers moving from Status 18 Training and Education into Status 20 Job Ready or Status 22 Job Placement during the month/fiscal year divided by the total number of youth consumers served in Status 18 Training and Education during the month/fiscal year Target: At or above 120 or 2% of youth consumers per month completing training or education, annual total of 1,200 or 12%. Data Source: Data from MRCIS Case Management System and EHS! Results Performance Management System Frequency: Monthly, Annually

Evaluation of Progress: Consumers of Transition Age Completing Education and Training Programs FFY2014: Goal: 1,200/12% Actual: 1,671/18% FFY2015: Goal: 1,200/12% Actual: 1,703/16.9%

In FFY2014, MRC successfully exceeded its targets for both the number and percent of consumers of transition age (age 16 to 24 at application) completing training and education programs. Serving transition–age consumers effectively is a priority of MRC. In FFY2015, MRC successfully achieved its FFY2015 goals for outcomes in this area with 1,703 young consumers aged 16 to 24 completing training or education programs, representing 16.9% of all served youth aged 16 to 24 at application.

Goal 9: Maximizing the Number of Successful Competitive Employment outcomes and the percent of Placements leading to Successful Employment Outcomes through MRC's Competitive Integrated Employment Services (CIES) programs in partnership with Community Rehabilitation Providers

Measurement: Total Number of 90 Day Successful Employment Outcomes from CIES Program; Total Number of CIES Successful Employment Outcomes divided by the total number of 30–Day Placements for the CIES Program. Target: Exceed 825 Successful Employment Outcomes for CIES for the fiscal year and greater than 75% of CIES placements result in successful employment outcomes Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employment Outcomes through MRC's Competitive Integrated Employment Services Program (CIES) Fiscal Year: of CIES Successful Employment Outcomes FY2014: Goal: 825 Actual: 766 Variance: –59 FY2015: Goal: 825 Actual: 899 Variance: +74

% of CIES Placements Leading to Successful Employment Outcomes FY2014: Goal: 75% Actual: 81% Variance: +6% FY2015: Goal: 75% Actual: 77.4% Variance: +2.4%

Through its Competitive Integrated Employment Services (CIES) program in partnership with Community Rehabilitation Providers, MRC achieved both state plan targets under this goal in FY2015 by achieving 899 Successful Employment Outcomes through CIES, exceeding the goal by 74, and achieving a 77.4% rate of successful employment outcomes for consumers placed through CIES. This was a 17% increase from FY2014. In FY2014, MRC fell short of its employment outcome goal but exceeded its 90 day employment retention goal for CIES placements.

Goal 10: Continue to Increase Employment Outcomes through MRC's Employment Service Specialists, Employer Account Management System, and Annual Statewide Hiring Event.

Measurement: Total Number of Successful Employment Outcomes achieved through the involvement of a MRC Employment Service Specialist in the current fiscal year, Total Number of Successful Employment Outcomes (Status 26 closures) with Employers participating in MRC's Account Management System in the current fiscal year, Total number of Successful Employment Outcomes (Status 26 Closures) from Consumers Participating in MRC's annual Statewide Hiring Event in the current fiscal year. Target: Exceed 250 Successful Employment Outcomes for Employment Service Specialists, exceed 60 Successful Employment Outcomes for Consumers Participating in the Statewide Hiring Event, total number of Employment Outcomes from Employer Account Management System. Data Source: MRCIS Case Management System, Job Placement Database Frequency: Annually

Evaluation of Progress: Competitive Employment Outcomes through MRC's Employer Engagement Efforts (Employment Service Specialists, Account Management System, Annual Hiring Event)

FY2014: ESS Outcomes: Goal: 250 Actual: 296 FY2015: ESS Outcomes: Goal: 250 Actual: 424

FY2014: Hiring Event Outcomes: Goal: 60 Actual: 135 FY2015: Hiring Event Outcomes: Goal: 60 Actual: 94

Total number of Employment Outcomes from MRC Employer Account Management System (Statewide Accounts): MRC continues to focus on reaching out to employers and develop partnerships designed to lead to competitive employment outcomes for individuals with disabilities. This is tied into the emphasis of employer engagement under WIOA. MRC's Employment Service Specialists in coordination with the Job Placement Specialists continue to outreach to employers especially to those in high growth industries. Incorporation of the Employment Service Specialists into the VR process has been instrumental in assisting the division in exceeding its state and federal employment in difficult economic times. In FY2014, Employment Specialists contributed 296 successful employment outcomes and in FY2015, they contributed 424 employment outcomes to the annual overall employment outcome, exceeding the goal by 174 or 59%.

MRC operated its 3rd Annual Statewide Hiring Event during FY2015 in partnership with the US Office of Contract Compliance Program (OFCCP) with Federal Contractors, leading to 89 hires and 64 Successful employment outcomes to date.

Finally, MRC continues to expand its employer account management system. This system is operated by MRC's Employment Specialists and Placement Specialists in multiple labor market sectors to develop and maintain partnerships with employers to routinely hire and retain MRC consumers for available positions. The number of successful employment outcomes with statewide employer accounts increased from 334 to 388 in FY2015.

Goal 11: Continue to provide consumers with an avenue to access employment and training opportunities through participation in the Donated Vehicle Program in partnership with Good News Garage Measurement: Number of Consumers Participating in the Donated Vehicle Program who obtain a successful employment outcome or who enter training and education (Status 18) divided by the number of consumers participating in the Donated Vehicle Program during the current fiscal year. Target: Greater than 80% of Consumers participating in the Donated Vehicle Program during the current fiscal year result in successful employment outcomes or enrollment in training or education (Status 18) Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employment Outcomes and/or Enrollment in Training and Education as a result of MRC's Donated Vehicle Program

FFY2014: Goal: 80% Actual: 96% Variance: +16% FFY2015: Goal: 80% Actual: 100% Variance: +20%

In FFY2014 and FFY2015, MRC successfully met its state plan targets under this goal as 96% and 100% of consumers participating in MRC's Donated Vehicle Program respectively achieved a successful employment outcomes or enrolled in training and education programs, exceeding the goal of 80% by 16% for FFY2014 and 20% for FFY2015.

Goal 12: Maximize recruitment of Qualified Vocational Rehabilitation Counselors to address attrition from retirement through utilizing paid internships with Vocational Rehabilitation Counseling Graduate students.

Measurement: Total number of internships provided to VR graduate students during the fiscal year, total number of former interns hired as VR counselors during the fiscal year. Target: Provide 10 or more internships annually, leading to 3 or more interns hired as QVRCs upon completion of their internship and degree program. Data Source: Intern Tracking Reports, Human Resource Data from Staffing Reports Frequency: Annually Evaluation of Progress: Workforce Recruitment through Paid Internships for VR Counseling Graduate Students FFY2014: 12 internships provided, 6 hired FFY2015: 10 internships provided, 5 hired

MRC operated an ongoing paid internship program for students enrolled in VR Counseling degree programs, to provide VR college students with paid, real world experience and to serve as an avenue to recruit qualified individuals for VR counseling positions upon their graduation from VR counseling programs. Since 2008, 84 Internships have been provided, and 40 former interns have

been hired by MRC as VR counselors. This is a significant benefit to MRC as it helps provide a successful solution to offsetting the impact of staff retirements. MRC met its goal in FFY2014 and FFY2015 by providing at least 10 VR college internships annually with 6 former interns hired as counselors in FFY2014 and 5 in FFY2015.

Goal 13: Provide Quality Vocational Rehabilitation Services leading to increased successful employment outcomes to individuals with Autism. Measurement: Number of successful employment outcomes as defined by Status 26 closures for MRC consumers with a Primary and/or Secondary RSA Disability Cause Code of 08. Target: Equal or greater to 75 Data Source: MRCIS Case Management System Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employment Outcomes for Individuals with Autism Fiscal Year: of Employment Outcomes for Individuals with FFY2014: Goal: 75 Actual: 185 Variance: +110 FFY2015: Goal: 213 Actual: 75 Variance +138

In FFY2014, MRC met its goal for Successful Employment Outcomes for consumers identified in the MRCIS Case Management System as having Autism as a primary or secondary disability by achieving 185 employment outcomes for these consumers, exceeding the goal by 110. For FFY2015, MRC successfully achieved 213 Successful Employment Outcomes for consumers with Autism, exceeding its annual goal by a variance of 138, as successful employment outcomes for this disability group continued to increase.

Goal 14: Outreach to the Asian community through translation of key MRC documents and materials into Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. Measurement: Completion of translation of key materials into Khmer, Vietnamese, and Mandarin Chinese Target: Completion of Translation and Posting on MRC's website by the end of the fiscal year. Data Source: N/A Frequency: Annually

Evaluation of Progress: Outreach to the Asian Community FY2014: During Federal Fiscal Year 2014, MRC continued to make progress towards outreach to the Asian community though the translation of key agency informational materials into Khmer, Vietnamese, and Traditional Chinese. These have been made publicly available through MRC's website.

FY2015: During Federal Fiscal Year 2015, MRC completed a project to translate all client correspondence letters from the MRCIS web–based case management system into seven commonly used foreign languages in Massachusetts, including Khmer, Vietnamese, and Traditional Chinese (Mandarin). This will help to enhance services and accessibility to consumers in the Asian community. The letters have been posted to MRC's intranet for counselors to use and will be directly incorporated into MRCIS in the next system release.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

The following is an evaluation of the extent to which the MRC program goals described in the previously approved VR services portion of the Unified State Plan for the most recently completed federal fiscal years 2014 and 2015, were not achieved.

MRC achieved all of its goals and priorities as stated in the previous approved state plan (FFY2015) in at least one of the two years except for one goal, Standard and Indicator 1.5 (The ratio of consumer wage to overall state wage)

MRC historically does not pass this indicator because of the fact that Massachusetts has a very high state average wage. Due to the fact that MRC serves many consumers who have no or limited work histories, and may not be able to work full time due to their needs, it continues to be difficult to change this pattern. However, MRC can improve its performance in this area by ensuring that wages are accurately coded in the MRCIS system, focusing on employment outcomes in high growth industries, and through initiatives such as the Employer Account Management System, the Federal Contractor Hiring Event and the CVS Pharmacy Technician Training Program. MRC has continued to integrate greater amounts of information on labor market conditions and employment desired by consumers into our decision making. These continued efforts will assist towards improved performance in this area.

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.

Supported Employment Program FY2015 Goal Achievement:

Referrals: Goal: 228, Actual: 264

Applicants: Goal: 224, Actual: 185

Acceptances: Goal: 232, Actual: 162

IPEs: Goal: 188, Actual: 153

Employment Outcomes: Goal: 88, Actual: 94 Significant Disability Employment Outcomes: Goal: 88, Actual: 94 Served: Goal: 400, Actual: 518

MRC achieved most of its goals for the Supported Employment Program from the previous FFY2015 approved VR State Plan. This was in spite of staffing challenges due to retirements and staff turnover. In particular, there was an increase in the number of consumers successfully employed consumers and the number of consumers served through MRC's Supported Employment Program.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

MRC did not achieve some of its supported employment goals related to the number of applicants, acceptances, and IPEs developed during FY2015.

MRC has many employees who are reaching retirement age and who will be approaching retirement age within the next five to 10 years as the average age in the Commission is 50 with over 20 years of agency experience. At this time, MRC is able to back fill vacant staff positions and use post retirement staff and interns to cover caseloads. This has also impacted the Supported Employment Program. MRC will be evaluating these approaches as part of an updated workforce plan in 2016.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

The following is a summary of MRC achievement on the RSA Standards and Indicators. MRC is establishing baseline data for the WIOA common performance measures for the next two years as allowable under the state plan requirements and will report this data to RSA.

Standard and Indicator 1.1: Rehabilitation Outcomes Actual: 3,744 Standard: 3,651 Result: PASS

MRC had an excellent year in terms of successful employment outcomes made possible by the combined hard work and effort of its counselors, job placement specialists, employment service specialists, and other staff. As a result, MRC was able to continue to improve performance and increase the number of successful rehabilitations achieved in FY 2014.

Standard and Indicator 1.2: Rehabilitation Rate Actual: 59.8% Standard: 55.8% Result: PASS

MRC's Rehabilitation Rate increased from FFY2013 and marked the second straight year this Indicator was passed. MRC will continue to monitor and evaluate Status 28 closures and focus on Status 26 closures on an ongoing basis to maintain and improve our level of performance.

Standard and Indicator 1.3: Individuals with Disabilities in Competitive Employment above Minimum Wage

Actual: 96.9% Standard: 72.6% Result: PASS

MRC continues to pass this indicator as the agency continues its focus on employment of consumers with significant disabilities in competitive, integrated employment. The only closures which do not meet this criteria are Homemaker and Unpaid Family Worker Status 26 closures, and all MRC closures in competitive and self–employment were at or above minimum wage. Those closed as homemakers or unpaid family workers are done so based on consumer choice. MRC does not place consumers into sub–minimum wage employment.

Standard and Indicator 1.4: Rate of individuals w/ Significant Disabilities of all Individuals in Competitive Employment above Minimum Wage

Actual: 99.6% Standard: 62.4% Result: PASS

The overwhelming majority of MRC consumers continue to be those with significant and the most significant disabilities. MRC continues to focus on placing consumers with significant disabilities

into competitive employment in jobs at or above the minimum wage based on their needs, interests, preferences, and choices.

Standard and Indicator 1.5: Ratio of consumer wage to state wage (Primary)

Actual: .42 Standard: .52 Result: FAIL

MRC historically does not pass this indicator because of the fact that Massachusetts has a very high state average wage. Due to the fact that MRC serves many consumers who have no or limited work histories, and may not be able to work full time due to their needs, it continues to be difficult to change this pattern. However, MRC can improve its performance in this area by ensuring that wages are accurately coded in the MRCIS system, focusing on employment outcomes in high growth industries, and through initiatives such as the Employer Account Management System, the Federal Contractor Hiring Event and the CVS Pharmacy Technician Training Program. MRC has continued to integrate greater amounts of information on labor market conditions and employment desired by consumers into our decision making. These continued efforts will assist towards improved performance in this area.

Standard and Indicator 1.6: Personal Earnings as Primary Source of Support

Actual: 59.4% Standard: 53% Result: PASS

MRC passed this indicator again in FY 2014. Much effort has gone into assuring the accurate coding of the primary source of income of employed consumers both in and without the presence of other income such as SSA or other public benefits. MRC will continue to train staff in this area and validations have been added to the MRCIS case management system to avoid potential coding errors.

Standard and Indicator 2.1: Ratio of minorities served to non–minorities Actual: .94 Standard: .80 Result: PASS

MRC passed this indicator with a high score. MRC continues to make a strong commitment to achieve equality in service delivery. MRC counselors should be commended for their good work in dealing with the challenges and needs associated with diversity, and keeping it a priority.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

The Massachusetts Rehabilitation Commission utilized a portion of the funds allotted to the Commission under section 110 of the Act for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities. Activities for innovation and expansion include:

1. Marketing Initiative

2. On the job training and on the job evaluations

3. IT web–based MRCIS and Hardware Initiative

4. Transportation: MRC is working diligently to address transportation barriers faced by its consumers. MRC publishes transportation resource fact sheets on its website and makes them available to consumers at its Area Office. MRC works with the Executive Office of Health and Human Service Transportation office on transportation for consumers and operates an innovative car donation program to assist individuals in accessing worksites. MRC will continue to work with transportation agencies to explore other transportation options for consumers.

5. Employment of Individuals with Disabilities in State Jobs: MRC places numerous individuals with disabilities into state government jobs each year, including at MRC. MRC has a diverse workforce with a high percentage of individuals with disabilities in the workforce. We have a key contact with the state's Human Resources Division to facilitate employment for consumers in state jobs.

6. Research Best Practices Models to Increase Employment of Individuals with Disabilities: Based on public comments regarding innovative employment programs, MRC will research best practice models designed to increase the employment rate of individuals with disabilities in Massachusetts. MRC will find out more about the suggested models including: the practices of North Dakota, South Dakota, Alaska, and Wyoming, which have achieved increased results of 50% employment rates of individuals with disabilities; Innovative youth employment models from Georgia, Nevada, Kentucky; and the RespectAbility Disability Employment First Planning Tool, among others.

7. CareerAccess Initiative: MRC will closely follow the CareerAccess initiative. CareerAccess is a community–driven proposed program to reform the current Social Security Administration's Supplemental Security Income Program (SSI) rules so that young adults with disabilities can work and achieve their full potential without risking losing their disability benefits. If the proposal is adopted by the Social Security Administration, MRC will help its consumers take full advantage of the program as part of their individual plans for employment.

8. Adaptive Van Driver Evaluation and Training

9. Re–allotment funded Workforce Investment with Employment Service Specialists and Vocational Rehabilitation Counselors

10. Summer Work Based Learning Experience

11. Apprenticeships: MRC will utilize available apprenticeship resources, including the ODEP guide to expand apprenticeship, to provide apprenticeship opportunities for individuals with disabilities across the Commonwealth. As an example, MRC participates in the Merit Apprenticeship Program. Additionally, MRC has obtained a copy of the ODEP guide on apprenticeships.

12. Vocational Testing–Job Matching Occupational Specific Web–Based Training Initiative

13. Job–Driven Trainings with Employer Partners: At a local level, MRC is proposing that the state agencies, and their programs, and community based organizations who are working on placing people into jobs work together. Essentially, it is a public workforce system without walls. In this model, referrals are made to specific places, i.e. people with disabilities are referred to MRC. If MRC

has a training program or relationship with a particular employer, they become the gatekeeper for that referral. If MRC is unable to fill the training program slots, then it is opened up to other people who can be referred from the Career Center, CBO's or other programs. The Gatekeeper function is a review of the person to ensure that they meet the minimum requirements to enter the training program. Information about what slots are opened, what the requirements are for various training programs and the status of referrals will need to get worked out with each area.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Commonwealth of Massachusetts through its Human Services agencies and its secondary school special education programs, has been developing and expanding integrated work opportunities for individuals with disabilities, since 1978 because it became very evident that there was a vast number of people with disabilities for whom there were limited work options because of the nature and extent of support services they require in order to maintain employment. With the leadership of the Executive Office of Health and Human Services.

Massachusetts human service agencies began to examine ways in which integrated work opportunities could be extended to persons with the most significant disabilities including youth who need extensive support services to remain in the work setting as productive employees. Throughout the years, the Massachusetts Rehabilitation Commission, the Department of Mental Health, the Department of Developmental Services, the Commission for the Blind and the Commission for the Deaf and Hard of Hearing have been working together to shift and to share resources to create opportunities. The Department of Mental Health and the Department of Developmental Services have shifted programs and funding to develop and expand long–term support services at integrated work sites. Through its provider contracts, the Massachusetts Rehabilitation Commission set goals for conversion of sheltered work to supported employment and has worked with providers to develop more substantive support services that are long term and based on consumers' choices.

The Executive Office of Health and Human Services with the assistance of the Statewide Employment Services Department at the Massachusetts Rehabilitation commission organized a group "Strategic Alliances" whose plans included the development of a comprehensive employment system that would:

1. Increase the number of people with disabilities engaged in appropriate employment services.

2. Create a consistent definition and support services structure regardless of the agency through which the service is provided

3. Establish a contracting process and reimbursement mechanism for employment services, which would be guided by the same rules, regulations and guidelines regardless of the administering agency, and based on client choice.

4. Permit the evaluation of funding strategies for employment services through tracking, gap identification and service and budget advocacy.

There continues to be a very positive climate for the enhancement of this process in both the Administrative and Legislative branches of State government.

The Commonwealth of Massachusetts has clearly come to understand this great void in employment opportunities for many individuals with the most significant disabilities and has made a firm commitment to fill this void. Title VI, B funded programs and services represent a crucial component in the Commonwealth's overall plan for supported employment. As several State agencies develop long–term, State funded supported employment services and programs; the Title IV B program is instrumental in bridging the gap between unemployment or under employment to competitive employment with long–term support services for several persons with disabilities.

The Massachusetts Rehabilitation Commission has over 60 Qualified Community Rehabilitation Providers to offer Supported Employment services. These programs, located throughout the state, serve persons with an array of severe disabilities including autism, deaf/severely hearing impaired, severally physically disabled, long–term mentally ill, traumatic brain injured and dual diagnosed persons with intellectual disabilities and long–term mental illness and multiply disabled individuals.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Due to the vigorous emphasis on supported employment in Massachusetts, which has been spearheaded by the Executive Office of Health and Human Services, the Massachusetts Rehabilitation Commission, has resulted in funding for long–term support services. This will allow the Commission to continue the following goals: 1. Strengthen existing quality programs and replace ineffective/inefficient programs with new ones. Seventy providers have qualified to date.

2. Focus Title VI B funding on under–served or un–served consumers such as those who are severely physically disabled, Asperger's Syndrome, Deaf, or Brain Injured. Establish a large statewide pool of programs interested in and able to provide Supported Employment Programs and services, including long–term supports .

All Title VI B program participants who were enrolled in the supported employment program completed not more than 18 months of services funded by Title VI. All necessary long–term support services have been arranged to continue without use of Title I or Title VI B funding. Funding for extended long–term support services is available from several sources depending on the nature of the client's disability and the resources available to each service provider agency. Sources include:

1. IRS Section 44

2. United Cerebral Palsy Funding

3. Department of Mental Health

4. Department of Developmental Services

5. Private Sector Business Natural Supports

6, Massachusetts Commission for the Deaf and Hard of Hearing

7. Massachusetts Rehabilitation Commission Statewide Head Injury Program

8. Massachusetts Rehabilitation Commission State Revenue

9. Social Security Work Incentives

10. Natural Supports

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Massachusetts Rehabilitation Commission**

Name of designated State agency **Massachusetts Rehabilitation Commission**

Full Name of Authorized Representative: **Adelaide Nicky Osborne**

Title of Authorized Representative: **Commissioner**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 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

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 **Massachusetts Rehabilitation Commission**

Full Name of Authorized Representative: **Adelaide Osborne**

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant's Organization **Massachusetts Rehabilitation Commission**

Full Name of Authorized Representative: **Adelaide Osborne**

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES, STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A)(15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO EXPAND AND IMPROVE THE

PROVISION OF VR SERVICES TO INDIVIDUALS WITH DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.

M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

The designated State agency, or designated State unit, as appropriate, assures that it will:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above

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:

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* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

For some time, the MCB RC has been concerned that the availability and quality of braille instruction provided by school systems to elementary through high school age children can vary in quality and frequency from town to town. The MCB RC supports the agency's decision to take the lead in revitalizing the Braille Literacy Council. The MCB RC has also been very supportive of the agency's initiative to emphasize braille instruction as part of the Expanded Core Curriculum of the Department of Elemetary and Secondary Education. The MCB RC has made no specific recommendations during the past year to the agency on this issue.

The MCB RC is concerned about the increasing difficulty that blind job seekers have in filling out inaccessible company applications. The agency does have employment specialists as well as VR counselors who can help consumers but does agree that this is a major issue and that advocacy from consumer groups and collaboration is very important for the long term in making these websites more accessible. The MCB RC has made no specific recommendations during the past year to the agency on this issue.

MCB and the MCB RC are concerned that vending stands in Massachusetts have been on the decline. MCB has developed a strategic plan which with the active participation of the elected State Blind Vendors Committee that will be implemented. Stands are down from 60 to 31 in the state. Work is being done to make sure that our consumers have first opportunities when new stands open. Also, work is being done on making lottery machines more accessible.

The MCB RC has supported the strategic plan initiative and has made no additional recommendations during the past year to the agency on this issue.

MCB RC members remain very interested in the effects of MCB's usage of Section 257 (State statute) to evaluate the purchase pricing of services through community providers. The intent of the law is to simplify pricing and make it more efficient. MCB has explained that this rate restructuring will benefit consumers heavily impacted by older and more complicated pricing, including the deaf-blind and multiply-impaired populations. Most vendors are happy with the newer simpler 257 formula. MCB will continue to update the Council on this issue on a regular basis as implementation continues.

The Rehabilitation Council (MCB RC) has continued to review the consumer satisfaction studies conducted annually on a routine basis. The Council had in previous years provided input into the design of these studies as well as the design of the comprehensive needs assessment study. The data collection for the latest comprehensive needs assessment study was completed before the new

requirements for inclusion of need for pre-employment transition services were added. The MCB RC agreed with the agency's proposal for a separate needs assessment survey to be sent out for parents to fill out for this population (age 14-22) about their educational services, pre-employment transition services, transition services and vocational services. The MCB RC will work with the agency to develop a new comprehensive needs assessment methodology in line with the requirements and focus of WIOA on competitive integrated employment for the next scheduled comprehensive needs assessment (2017).

The MCB RC has had a long-term interest in transportation accessibility and its impact on the ability of consumers to pursue vocational objectives. The director of MCB's Mobility Unit attends a number of meetings on regional and statewide transportation issues and also attends the quarterly MCB RC meetings in order to keep the MCB RC informed about issues relevant to transportation accessibility. MCB and the RC are closely following new transportation options such as UBER, Lyft etc. A number of blind persons who are proficient with technology have benefitted from these services. While the MCB RC believes that lack of transportation is a major barrier to consumers' ability to participate in VR services and to obtain employment, it has made no specific recommendations during the past year to the agency on this issue.

MCB, in consultation with the MCB RC and a number of other agencies serving the blind, commissioned a comprehensive needs assessment that was completed in 2005. The methodology used for the assessment was a telephone poll conducted by UMass Poll of a random sample of registrants. The MCB RC was satisfied with the original comprehensive needs assessment conducted for MCB by the UMass Poll, so it was decided that MCB staff would replicate the comprehensive needs assessment. Other needs assessments were completed during FY 2009 and FY 2012. A fourth needs assessment, using the same questions and methodology was undertaken in 2014, using the assistance of summer interns and is nearing completion. During 2016, the Rehabilitation Council will be able to compare the results of the four comprehensive needs assessments and use this knowledge in making recommendations to the agency relative to strategic plans, goals and priorities to best meet the needs of legally blind consumers.

In addition, a separate needs assessment has been completed relative to the needs of youth aged 14-22 for educational services, pre-employment transition services, transition services, and vocational services. The MCB RC will work with the agency to develop a new comprehensive needs assessment methodology in line with the requirements and focus of WIOA on competitive integrated employment for the next scheduled comprehensive needs assessment (2017).

WIOA and its state plan requirements have been discussed at each quarterly meeting of the Rehabilitation Council since its enactment. The agency and the council have developed new goals and priorities and plans for innovation and expansion based on the new law. MCB and the Rehabilitation Council are in full support of the Workforce Development Plan Vision: All Massachusetts residents will benefit from a seamless system of education and workforce services that supports career pathways for individuals and leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy. The agency and the council are committed to the following paths to the realization of that vision:

• Work with Core Program partners to promote Career Pathways for individuals who are legally blind and to improve the one-stop delivery system.

• Strengthen the alignment of the MCB VR program with the other core programs of the workforce development system.

• Use state and regional labor market information analysis to develop more employment options for consumers who are legally blind, utilizing regional labor market data, regional economic development agencies, and business intelligence gathered from interactions with core partners.

• Participate in the development of a coordinated, streamlined regional strategy for business partner outreach and follow up.

The MCB RC members currently review the agency's performance on the Rehabilitation Services Administration (RSA) standards and indicators annually. The agency's performance on RSA standards and indicators has at all times met the minimum level of overall performance established by RSA.

Agency-specific results for FY 2013 are:

• Cases closed due to full rehabilitation. MCB passed this standard with 18 more cases closed than required.

• Competitive outcomes. Those placed in competitive jobs must earn at least minimum wage in 35.4% of cases. MCB passed; received 53.14% in this area.

• Percentage of clients being served with significant disabilities. RSA standard is 89%; MCB passed with 100 %.

• Average hourly earnings for competitive placements which exceed average State median hourly wage. RSA standard: 59%; MCB passed with 68%.

• Reliance on earnings as primary source of income among rehabilitation clients as opposed to other resources. RSA standard is 30.4%; MCB was measured at 25.46% and this was considered to be a failed standard. Since this result was due to a number of consumers who were able to retain their employment as a result of the services they received, the agency and the MCB RC are not concerned with this result.

• Compare number of successfully-closed cases who are in diverse minority populations to those closed who are non-minority. RSA requirement: 80%; MCB passed with 89.4%.

Agency-specific results for FY 2014 are:

• Cases closed due to full rehabilitation. MCB passed this standard with 12 more cases closed than required.

• Rehabilitation rate. Measures the percentage of clients whose cases were closed after receiving services that resulted in an employment outcome. RSA standard is 68.9%. MCB failed this standard with 66.4%.

• Competitive outcomes. Those placed in competitive jobs must earn at least minimum wage in 35.4% of cases. MCB passed; received 60.2% in this area.

• Percentage of clients being served with significant disabilities. RSA standard is 89%; MCB passed with 100%.

• Average hourly earnings for competitive placements, which exceed average state median hourly wage. RSA standard: 59%; MCB passed with 74%.

• Reliance on earnings as primary source of income among rehabilitation clients as opposed to other resources. RSA standard is 30.4%; MCB was measured at 24.8% and this was considered to be a failed standard. Since this result was due to a number of consumers who were able to retain their employment as a result of the services they received, the agency and the RC are not concerned with this result.

• Compare number of successfully closed cases that are in diverse minority populations to those closed who are non-minority. RSA requirement: 80%; MCB passed with 95%.

The MCB RC has made no specific recommendations during the past year on VR services and performance evaluations. It did make recommendations and participate as a partner in the development of the plan goals. All of the MCB RC recommendations on plan goals were adopted and are included in this plan.

The Rehabilitation Council submits an annual report to the Governor of Massachusetts and to the Rehabilitation Services Administration.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The MCB RC has made no specific recommendations during the past year on VR services and performance evaluations. It did make recommendations and participate as a partner in the development of the plan goals. All of the MCB RC recommendations on plan goals were jointly developed, agreed to, and adopted and are included in this plan (Section l. State Goals and Priorities).

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

No input or recommendations were rejected.

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;

Not applicable. The agency is not requesting a waiver of statewideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable. The agency is not requesting a waiver of statewideness.

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.

Not applicable. The agency is not requesting a waiver of statewideness.

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;

The Massachusetts Commission for the Blind falls within the purview of the Executive Office of Health and Human Services of the Commonwealth of Massachusetts. Other agencies within this organization include: the Department of Mental Health, Department of Developmental Services, Department of Public Health, Department of Children and Families, Department of Transitional Assistance, Department of Youth Services, Department of Elder Services, MassHealth, Board of Registration in Medicine, Division of Health Care Finance and Policy, Massachusetts Commission for the Deaf and Hard of Hearing, Massachusetts Rehabilitation Commission, Office of Child Care Services, Office for Refugees and Immigrants, Department of Veterans' Services, Chelsea Soldiers' Home, and Holyoke Soldiers' Home. The agency has strong cooperative and collaborative relationships with all of these agencies. Agency heads meet every two weeks to discuss issues of mutual concern and to resolve inter- agency problems. Other agency staffs meet collaboratively to work on numerous Secretariat-wide projects. The Vocational Rehabilitation Counselors in the agency's unit that provides specialized services to persons who are deaf-blind and intellectually disabled blind work closely with the Massachusetts Department of Developmental Services (DDS) to facilitate development and completion of plans and services for persons with developmental disabilities who may need their services in addition to vocational rehabilitation services. These specialized counselors also work very closely with the Massachusetts Commission for the Deaf and Hard of Hearing and staff of the Helen Keller National Center to provide coordinated services to deaf-blind persons.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Massachusetts Commission for the Blind has excellent relationships with the programs funded under section 4 of the Assistive Technology Act and administered through the Massachusetts Rehabilitation Commission. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low-interest loans to consumers when other resources are not available to purchase needed adaptive technology. A number of MCB consumers benefit each year from these programs.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

While Massachusetts is not predominately a rural state, there are rural communities, especially in central and western Massachusetts. When appropriate, the agency works with organizations such as Berkshire Grows, the Northeast Center for Food Entrepreneurship, and the Small Business

Resource at Cornell University in developing vocational opportunities for consumers. The agency makes frequent referrals to the SNAP program of the U.S. Department of Agriculture that is administered by the Department of Transitional Assistance in Massachusetts; MCB has also participated in special outreach initiatives of that program.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

Massachusetts has a number of programs for out-of-school youth that MCB works with to provide services for individual consumers. During the past year, MCB has been working closely with the Partners for Youth with Disabilities (PYD), a non-profit agency that empowers youth with disabilities to reach their full potential by providing transformative mentoring programs, youth development opportunities, and inclusion expertise. After a pilot in one region, MCB received a one-year grant of $43,000 from the National Institute on Disability and Rehabilitation Research (NIDRR) to provide the service statewide. MCB offers all transition-age students and out-of-school youth mentoring through the Partners for Youth with Disabilities Mentor Match program. The Mentor Match pairs youth and young adults with disabilities with adult mentors who best fit their personality, interests, and skills. MCB has identified and matched 34 mentors and 34 young consumers for the program. Participants in the pilot program suggested that the agency also include networking opportunities among all of the mentors and the consumers involved. In response to this suggestion, the provider has hired a mentoring events specialist and held 18 group events across the state during 2015. These events focus on topics such as goal setting, job search, stress management, and professional communication. Since the grant-funded program has been quite successful this year, MCB will fund it in future years for all interested consumers. Two MCB staff members have been invited to present a national webinar for VR professionals on this initiative.

5. STATE USE CONTRACTING PROGRAMS.

While the Massachusetts Supplier Diversity Program does not specifically include businesses owned by persons with disabilities, certification of Service-Disabled Veteran-Owned Business Enterprises and Minorities and Women owned businesses is included. Some consumers of the Massachusetts Commission for the Blind have been able to take advantage of this program to increase their business and vocational opportunities.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Massachusetts Commission for the Blind‘s plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities include:

• The development and implementation of a new agreement with the Massachusetts Department of Elementary and Secondary Education (DESE). The Massachusetts Commission for the Blind has a long-standing cooperative agreement relative to the services provided to legally blind children that was out-of-date. During the past year, the two agencies met a number of times to develop an updated agreement and to address problem areas and new initiatives. Specific provisions of the agreement are described in Section C. below.

• The continued provision of consultation and technical assistance to the education agency relative to the transition of students with disabilities from school to post-school activities, including pre-employment transition services and vocational rehabilitation services. • The continued transition planning by MCB and education personnel that facilitates the development and completion of students‘ individual education programs through the Chapter 688 process described in Section B. below.

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 Massachusetts Commission for the Blind had a long-standing cooperative agreement relative to the services provided to legally blind children that was out-of-date. During the past year, the two agencies met a number of times to develop an updated agreement and to address problem areas and new initiatives. The new agreement that has been finalized describes the roles and responsibilities, including financial responsibilities of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services. It also provides for regular communication and information sharing on topics of mutual interest such as agency policy initiatives; resources; transition activities, including pre-employment transition services; the Massachusetts Curriculum Frameworks; and the Expanded Core Curriculum for legally-blind students.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

MCB conducts formal transition planning in conjunction with education personnel that facilitates the development and completion of students' individualized education programs through the following process. As indicated above, MCB falls within the purview of the Executive Office of Human Services of the Commonwealth of Massachusetts. Chapter 688, a state law passed in 1984 mandated that the Executive Office of Health and Human Services establish a Bureau of Transition Planning to assure the provision of adequate transitional planning services to disabled persons completing special education. The Bureau of Transitional Planning monitors an inter-agency cooperative planning process that requires the participation of all relevant human services agencies. An individual transition plan must be developed by the agencies at least six months before the termination of special education services. This plan must be approved by an inter-agency Transitional Advisory Committee, the Secretary of Human Services, and the consumer or his guardian. The plan outlines the services to be provided and identifies the agency responsible for the provision of each service. This process assures that an individualized plan for employment is developed and approved for each student determined to be eligible for vocational rehabilitation services before the student leaves the school setting. MCB has found that this transitional planning process has clarified agency responsibilities and has made it much easier to arrange necessary support services to enable consumers to participate in vocational rehabilitation services.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

A new agreement with the Department of Elementary and Secondary Education (DESE) has been finalized that describes the roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services.

Specific provisions of the agreement include:

• Regular Communication - DESE and MCB representatives will meet semi-annually and as necessary to communicate and share information on topics of mutual interest including, but not limited to, legislative and regulatory changes; agency policy initiatives; resources; transition activities, including pre-employment transition services; the Massachusetts Curriculum Frameworks; and the Expanded Core Curriculum for legally blind students.

• MCB assistance with Braille Literacy and Curriculum for Legally Blind Students - MCB with the participation of the Braille Literacy Advisory Council (BrLAC) will advise DESE on issues related to Braille Literacy, the implementation of the Unified English Braille Code (UEB), the Massachusetts Curriculum Frameworks, and the Expanded Core Curriculum for legally blind students.

• Coordination with AIM Library - MCB will contact all eligible students identified through the mandatory report of legal blindness and will provide information about the purpose and benefits of the Accessible Instructional Materials Library ("AIM Library"). The AIM Library will share

information with MCB about users who grant permission. MCB will provide information on available services to newly identified eligible individuals.

• DESE Guidance for School Districts - DESE, with the assistance of MCB, will provide school districts with guidance on using the Expanded Core Curriculum with eligible students. DESE, with the assistance of MCB, will develop guidance for school districts on the Workforce and Innovation and Opportunity Act of 2014; on MCB services for legally blind students and how such services can be accessed; on developing collaborative relationships with MCB caseworkers, on procedures for including caseworkers in the development of IEPs and transition plans, and accessing pre-employment transition services.

• DESE will provide local school districts with technical assistance to facilitate district compliance with G.L. c. 71B, §§ 12A-12C.

• MCB's role as the federally designated Vocational Rehabilitation Agency for Blind Individuals - A referral to MCB may be made when a student is 14 and older. MCB will determine if a student is eligible for MCB vocational rehabilitation services. If a student is eligible, MCB will coordinate the development of an Individualized Plan for Employment ("IPE") before the student leaves the school setting and will oversee implementation of the IPE, post-graduation or when the student turns 22 years of age, whichever comes first.

• For students eligible for MCB service and who are discussing transition, MCB may be invited to participate as a member of the IEP Team and may recommend transition services and goals consistent with the IPE for the student.

• MCB will provide information, as requested, to school districts about school and community-based vocational training and integrated employment (including supported employment) training for transition-aged eligible students available through MCB regional offices. MCB will designate staff in regional offices to provide technical support to school districts on legal blindness, independent living skills development, the Expanded Core Curriculum for legally blind students as it relates to the General Curriculum, and transition services, including pre-employment transition services.

• Both DESE and MCB shall abide by state and federal laws and policies concerning student and client records confidentiality, and agency policies and procedures.

• DESE will provide school districts with technical assistance and guidance concerning special education law and policy and will monitor compliance.

• In accordance with the Rehabilitation Act of 1973 as amended by WIOA, nothing in this agreement will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) of a local educational agency (LEA) or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities.

• In accordance with IDEA, nothing in this agreement relieves MCB of the responsibility to provide or pay for any transition service that the agency would otherwise provide to students with disabilities who meet MCB's eligibility criteria.

• Disputes regarding MCB financial responsibility for services provided or recommended by MCB for blind students will be resolved by the MCB Deputy Commissioner.

• The agreement shall be in effect for ten years subject to biannual review. It may be revised upon agreement by the parties or terminated by either party upon written notice to the Commissioner of intent to withdraw.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

As described in Section B. above, identification and outreach are accomplished by transition planning by MCB and education personnel that facilitates the development and completion of students' individualized education programs through the Chapter 688 process.

MCB provides children's services to legally-blind children under its state social services funding. Children participating in these services are referred by their social workers to vocational rehabilitation counselors when they are age 14. Referrals from this program are a major component of outreach for the provision of pre-employment transition services, transition services, and other vocational rehabilitation services.

An MCB vocational rehabilitation counselor is developing, in conjunction with the Massachusetts Federation for Children with Special Needs (the state Parent Training and Information Center), an information packet for the parents of children with visual impairments on the pre-employment transition services and transition services offered by the MCB vocational rehabilitation program.

In addition, all legally blind children and adults in Massachusetts are registered with the Massachusetts Commission for the Blind as a consequence of the state's mandatory reporting law and, thus, identified. MCB regularly reaches out to all registrants between the ages of 14 and 22 to acquaint them with the agency and its services and to offer pre-employment transition services, transition services, and other vocational rehabilitation 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.

In accordance with the procedures of the Commonwealth of Massachusetts, the Massachusetts Commission for the Blind has contracts with all private, non-profit vocational rehabilitation service providers that it purchases services from. Statewide rates and technical specifications are established in these contracts for the services most commonly purchased from non-profit vocational rehabilitation services providers including: vocational evaluation, supported employment, on-site job coaching and job development. These contracts are subject to competitive bidding; solicitations are posted on the COMMBUYS website maintained by the Commonwealth of Massachusetts. As required by the Rehabilitation Act, one member of the State Rehabilitation Council represents a non- profit provider. In addition, several other members happen to work for non-profit providers. During the past two years, MCB has developed enhanced public-private collaborations with the Commonwealth's significant non-profit service providers for the blind to leverage MCB's resources. The organizations include Perkins, the Carroll Center, and Massachusetts Association for the Blind (MAB) Community Services. MCB recently entered into a Memorandum of Understanding with MAB to provide enhanced services to consumers of MCB's Older Blind Independent Living Program using a medical occupational therapy model at no co-payment cost to the consumer or MCB. The agency has also been collaborating with the Perkins School in its new initiative, the Perkins Business Partnership, which is now actively assisting 28 MCB job-ready consumers to optimize their resumes and to obtain job interviews. The agency also collaborated with Perkins in the development of a symposium this past May on cortical visual impairment (CVI), which has emerged as a leading cause of blindness and impediment to employment for MCB consumers under the age of 22. This symposium was designed to help vocational rehabilitation counselors, teachers of the visually-impaired, and allied professionals to better understand the pre-employment work readiness and independent living needs and vocational rehabilitation needs of students and youth who are, or potentially are, legally blind due to cortical visual impairment. MCB is exploring other ways to increase collaboration and regular communication with all of the Massachusetts non-profit agencies that serve blind consumers to improve the provision of services to persons who are legally blind.

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.

In October 1997, a Community-Based Employment Service (CBES) service delivery system was developed through the Employment Services Advisory Committee. Later that year, the Massachusetts Rehabilitation Commission (MRC), the Department of Developmental Services (DDS), the Massachusetts Commission of Deaf and Hard of Hearing (MCDHH) and the Massachusetts Commission of the Blind (MCB) collaborated on the release of a competitive bid for CBES. It was the first interagency collaboration of its kind. Because of this effort, a supported employment consumer is able to access a system of supports in a more streamlined fashion that incorporates collaboration and consumer choice and is outcome driven. This effort is designed to offer all reasonable and allowable supports to consumers, including extended services. Through this effort the disability agencies have a consistent pay scale, defined outcomes and can now easily cost share the support services for people with disabilities. The CBES service delivery system continues, slightly modified, with the existing agencies, as the Competitive Integrated Employment Services (CIES) service delivery system today. In recent years, MCB has contracted with an increasing number of new providers of community-based supported employment services. The results of these services have varied, but the agency's positive experience in the cases of some consumers who have needed very intensive supported employment services. The Massachusetts Department of Developmental Services (DDS) and the Massachusetts Department of Mental Health (DMH) have over the years worked cooperatively with MCB and provided extended services to a number of legally blind persons that have been provided supported employment services by MCB. During 2015 and 2016, MCB has collaborated with the DDS on plans to expand services to mutual consumers that include an initiative to better identify consumers who could benefit from supported employment services and are not receiving them at this time. A new Memorandum of Agreement that includes provisions for use of joint agency resources to ensure quality service delivery and long term supports for supported employment was executed in November, 2015. This includes a formal commitment of funding from MCB for appropriate supported employment services and a commitment from DDS for funding of the long-term, ongoing employment support services when needed. The agreement also provides for cross-training of staff. In accordance with the requirements of the Rehabilitation Act, MCB executed a WIOA Cooperative Agreement with MassHealth in January, 2016. In addition, discussions this year with the Massachusetts Rehabilitation Commission (MRC) have clarified that MCB consumers who have been rehabilitated into competitive integrated supported employment will be eligible to receive funding for on-going supports under its state-funded Extended Ongoing Supports Program. MCB is very appreciative of the help and advice that the MRC Extended Ongoing Supports Program provided and expects that the availability of this resource will increase the opportunities for supported employment for legally blind consumers who have significant secondary disabilities but do not qualify for on-going supports from another state or private agency.

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

During the past two years, MCB has participated in several hiring events with the Massachusetts Rehabilitation Commission that were sponsored by the Office of Federal Contract Compliance Programs (OFCCP). Federal contractors are required to set a hiring goal of having 7% of their employees drawn from qualified workers with disabilities by regulations promulgated in 2013. It is called a hiring event instead of a job fair because the consumers are matched with job openings and apply online for those jobs prior to the event and real job interviews are conducted with specific employers during the event itself. Forty-five MCB consumers completed approximately 70 interviews with employers who had openings in their areas of interest. A number of consumers had second interviews and some have since obtained employment.

The agency conducted an in-service presentation in 2014 for the employers doing business with OFCCP; this presentation drew thirty-two contractors, many of whom were not at the hiring event. MCB has held several smaller in-service presentations for OFCCP contractors during 2015 and intends to continue and expand its outreach to OFCCP contractors using several strategies including: participation in hiring events, scheduling group and individual in-service presentations and assistive technology demonstrations, and contact with individual OFCCP contractors on behalf of consumers who are applying for jobs. The agency has begun to incorporate a hiring event, with scheduled job interviews for consumers who have applied online for specific jobs, into its annual job fair for individuals with visual impairments that is held each October.

MCB employment specialists participate in regional employment collaboratives that share information on employer needs at regular meetings. The members of these collaboratives also share job listings across agencies.

MCB has obtained a grant from the Job-Driven Technical Assistance Center at the Institute for Community Inclusion (ICI). The purpose of the grant is to enhance the collaboration among MCB, the Carroll Center, and the Perkins Business Partnership in order to more effectively meet the job placement needs of both consumers and employers. As part of the project, a shared database of potential employers, job openings, and job seekers will be developed. The agencies will then be better able to coordinate with employers and to collaborate in targeted job outreach and placement.

MCB is currently exploring the best avenues to solicit employers' opinions about additional mutual cooperation to identify competitive integrated employment and career exploration and pre-employment transition opportunities for consumers and students with disabilities. The agency will use the knowledge and expertise of those Rehabilitation Council members who represent business, labor, and industry and that of the members of the Perkins Business Partnership, an alliance among Perkins, the Carroll Center for the Blind, and the Massachusetts Commission for the Blind in this endeavor.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The Perkins Business Partnership (PBP) is major initiative to coordinate with employers in the provision of transition services, including pre-employment transition services, for youth and of employment-related services to other consumers who are visually-impaired or blind. PBP is an alliance between Perkins, the Carroll Center for the Blind, the Massachusetts Commission for the Blind and some of the region's best-known businesses (including large banks, hospitals, and insurance companies) that is working to break down barriers to employment and expand opportunities for individuals who are blind. PBP also provides the following services to employers: Information on workplace accommodations, information on interviewing candidates who are blind, and accessibility consulting.

As described in Section 1. above, MCB has obtained a grant from the Job-Driven Technical Assistance Center at the Institute for Community Inclusion (ICI). The shared database of potential employers, job openings, and job seekers being developed will help MCB to coordinate with employers and to collaborate in targeted job outreach and placement for consumers receiving pre-employment transition and transition services.

MCB is currently exploring the best avenues to solicit employers' opinions about additional mutual cooperation to identify other competitive integrated employment and career exploration and pre-employment transition opportunities for students with disabilities.

MCB has had extensive experience over the past ten years in collaborating with employers to provide career exploration opportunities, pre-employment transition services, and transition services within its summer internship program to more than 600 consumers. Approximately, 90 consumers will participate in the program this summer.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Massachusetts Commission for the Blind has always had a good relationship with MassHealth, the program that provides Medicaid services in Massachusetts. About 20% of the agency's consumers benefit from the program. MassHealth services have been key comparable benefits that have enabled many VR consumers to reach their vocational goals. The agency's state-funded Deaf-Blind Extended Supports Program also works closely with MassHealth to provide services under the Home and Community-Based waiver that can provide the underpinning of vocational outcomes in some cases.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

The Vocational Rehabilitation Counselors in the agency's unit that provides specialized services to persons who are deaf-blind and intellectually disabled and blind work very closely with the Massachusetts Department of Developmental Services (DDS) to facilitate development and completion of plans and services for persons with intellectual disabilities who may need DDS services in addition to vocational rehabilitation services. These specialized counselors also work closely with the Massachusetts Commission for the Deaf and Hard of Hearing and staff of the Helen Keller National Center to provide coordinated services to deaf-blind persons.

During 2015 and 2016, the agency collaborated with the DDS on plans to expand services to mutual consumers in order to increase the number of transition age individuals with intellectual disabilities and legal blindness that obtain and maintain competitive, integrated employment. As a first step, the agencies agreed to share and match data in order to identify all consumers who are potentially eligible for services from both agencies. When the data match was completed, approximately 1,800 consumers had been identified. A further review by DDS indicated that 400 of these consumers would be appropriate for screening and assessment for VR services.

MCB intends to conduct (possibly with the assistance of an organization such as the Institute for Community Inclusion) an assessment of some of these 400 consumers' situations to determine whether they are likely to be interested in receiving vocational rehabilitation services, pre-employment transition services, or supported employment services at this time. The two agencies have executed a Memorandum of Agreement that includes provisions for use of joint agency resources to ensure quality service delivery and long-term supports that result in competitive, integrated employment outcomes. This will include funding from MCB for appropriate vocational rehabilitation and supported employment services and a commitment from DDS for funding of the long- term, ongoing employment support services when needed.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

Over the years, the Massachusetts Department of Mental Health (DMH) has worked cooperatively with MCB by providing extended services and other services to some legally blind persons that have received supported employment services and other services from MCB. In addition, the MCB Commissioner recently met with the Commissioner of Mental Health to discuss ways to strengthen the relationship, particularly related to the provision of pre-employment transition services and supported employment services. Both Commissioners agreed to develop a Memorandum of Understanding to share and match data in order to identify all consumers who are potentially eligible for services from both agencies, to formalize referral mechanisms, and to provide cross-training for each agency's staff on the services available and eligibility for services A draft MOU is being developed.

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 average caseload per MCB vocational rehabilitation counselor is 70 vocational rehabilitation consumers. Growth in MCB's consumer base has been fairly static during the past few years. Based upon this pattern and an agency turnover rate of 5-10 % and an expected increase in retirements, it is projected that there will be a need for some 25-30 entry-level direct services staff over the next five years. The agency estimates that in FY 2015 and FY 2016, it will serve approximately 1,500 legally blind individuals. The agency believes that numbers and types of personnel listed below are adequate and will continue to be adequate in five 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. Administrative Staff: 17 Rehabilitation Counselors: 18 Program Managers: 11 Other Direct Service (AT engineers, OM, RT, etc.): 37 Direct Service Supervisors: 10 Clerical and Support Staff: 24

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

Current vacancies: Administrative Staff: 0 Rehabilitation Counselors: 1 Program Managers: 0 Other Direct Service (AT engineers, OM, RT, etc.): 1 Direct Service Supervisors: 1 Clerical and Support Staff: 1

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Projected vacancies over the next five years: Administrative Staff: 9 Rehabilitation Counselors: 12 Program Managers: 4 Other Direct Service (AT engineers, OM, RT, etc.): 10 Direct Service Supervisors: 6 Clerical and Support Staff: 6

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;

Assumption College

Springfield College

University of Massachusetts at Boston

Many MCB staff have graduated from these programs over the years; one staff member was awarded an M.S. in Rehabilitation Counseling at the University of Massachusetts in December, 2015.

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

In a given academic year, upwards of 100 undergraduate students and 125 graduate students are enrolled in degree programs, either full-time or part-time, as rehabilitation "majors" at Assumption College, Springfield College, Salve Regina, and the University of Massachusetts at Boston.

One staff member is currently pursuing an M.S. in Rehabilitation Counseling at Assumption College.

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.

Each year, upwards of 50 undergraduate students are awarded the Bachelor's degree and upwards of 60 graduate level students graduate with credentials to qualify for certification by the Commission on Rehabilitation Counselor Certification and/or licensure by the Commonwealth of Massachusetts.

Many MCB staff have graduated from these programs over the years; one staff member was awarded an M.S. in Rehabilitation Counseling at the University of Massachusetts in December, 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.

As part of its ongoing In Service Training Program, MCB's Staff Development Unit regularly conducts needs assessments of the professional staff to identify training requirements and areas needing attention. The Staff Development Unit also utilizes the resources of Technical Assistance Center at the Institute for Community Inclusion for needs assessment data; direct training programs; and referral and evaluation of trainers, lecturers, and presenters. MCB's Staff Development Unit utilizes this data to plan, budget and provide the most comprehensive training plan possible. MCB is a leader in the area of adaptive technology and has long utilized its in-house resources to keep its professional staff current in this area. Training on the Rehabilitation Act is regularly included in the annual training calendar. Recruitment is conducted through mechanisms such as the Massachusetts online job recruitment site and at job fairs. Preparation is accomplished through new staff orientation, supervision, and on-going training. MCB has had a particularly fruitful relationship with the graduate rehabilitation-counseling program at Assumption College. MCB has been able, over the past several years, to recruit four graduate students to complete internships at the agency. Six graduates, trained in rehabilitation of the blind, have been hired as MCB rehabilitation counselors. MCB also has developed a positive relationship with the University of Massachusetts, Master of Science in Rehabilitation Counseling program and has hired three recent graduates as rehabilitation counselors. Another Massachusetts college, Cambridge College, has recently begun offering coursework in Rehabilitation Counseling. MCB has contacted the college to find out more about their program and has begun to send job openings to the college.

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

In accordance with 34 CFR 361.18 c (2)(I), the highest requirements in the State applicable to a professional discipline means the highest entry-level academic degree needed for any national or State approved or recognized certification, licensing, or registration requirement. In Massachusetts, pursuant to 34 CFR 361.18 (c) (2)(I), the degree needed if a person chooses to apply for state licensure is a master's in rehabilitation counseling or a related field. Persons who have attained a master's degree in rehabilitation counseling or have been awarded a license in rehabilitation counseling by the Board of Allied Mental Health and Human Services Professions before July 1, 1999 are deemed to have met the academic standard. Meeting the academic standard requires the attainment of a master's degree in rehabilitation counseling or a related field from a recognized educational institution and successful completion of a graduate-level course in each of the following areas: • Job Placement or Occupational Information; • Vocational Assessment and Evaluation; • Vocational Counseling; and • Medical or Psychosocial Aspects of Disabilities The Massachusetts Commission for the Blind defines a person with a master's degree in a related field as one who has a master's degree with a major in Counseling, Guidance, Psychology, Education, Special Education, Social Work, Human Services, Human Development, Sociology, or in a major that has been

determined to be comparable by the Massachusetts Commission for the Blind. Some years ago, the Massachusetts Commission for the Blind developed an Action Plan to Comply with Section 101(a)(7) of the Rehabilitation Act in conjunction with the Regional Office of the Rehabilitation Services Administration. This plan called for completion of a plan by which all existing Vocational Rehabilitation Counselors (VRCs) who did not have a master's degree in rehabilitation counseling or a related field would be on a mandatory schedule to fulfill this academic requirement, consistent with the ongoing provisions of federal law and in accordance with the MCB State Division of Human Resources and labor union policies and/or agreement(s). All vocational rehabilitation counselors who did not meet this standard have now completed additional graduate-level work to meet CSPD requirements. The Massachusetts Commission for the Blind has for a number of years begun to apply the master's-level standard to new hires, if at all possible. MCB is awaiting the promulgation of final regulations for the Workforce Innovation and Opportunity Act to revise its personnel standards in compliance with the new regulations.

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.

The Massachusetts Commission for the Blind has for a number of years, begun to apply the master's-level standard to new hires, if at all possible. MCB is awaiting the promulgation of final regulations for the Workforce Innovation and Opportunity Act to revise its personnel standards in compliance with the new regulations.

In addition, the Massachusetts Commission for the Blind supports and funds graduate-level training for its professional staff through its Staff Development Unit. MCB actively recruits new rehabilitation staff from area graduate-level college and university programs. The agency also provides a number of short-term training opportunities for vocational rehabilitation staff. Examples of short-term training provided in FY 2015 and 2016 include:

- Employment of Individuals with Psychiatric Disabilities

- Eye Diseases, Functional Impact and Treatments

- Psychopharmacology

- VR Case Management

- VR Orientation

- Welcoming the Stranger (Refugees)

- Understanding the Individual Education Plan & An Introduction to the Transition Planning Process

All vocational rehabilitation staff attended a symposium this past May on cortical visual impairment (CVI), which has emerged as a leading cause of blindness and impediment to employment for MCB consumers under the age of 22. This symposium was a joint effort of MCB and the Perkins School for the Blind. It was designed to help vocational rehabilitation counselors, teachers of the visually-impaired, and allied professionals to better understand the pre-employment work readiness and independent living needs and vocational rehabilitation needs of students and youth who are, or potentially are, legally blind due to cortical visual impairment.

The Steering Committee of the Massachusetts Workforce Investment Board will work with the Steering Committee members, including the Department of Career Services, the Massachusetts Rehabilitation Commission and the Massachusetts Commission for the Blind, to coordinate cross-training for staff. Additional cross-training on labor market information and technology tools is a high priority moving into WIOA implementation. Cross-training staff will be available across all partners (economic development organizations, Workforce Development Boards, One-Stop Career Centers, TANF-SNAP, adult education, vocational rehabilitation, business services, veterans, and other key programs) on the online technology tools available to individuals across programs including JobQuest, TORQ, Career Information System, etc. MCB VR staff members have also participated in several webinars offered by the Job Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC):

• Introduction to Customized Training (CT) in a Job-Driven Economy

• Introduction to Labor Market Information (LMI) in a Job-Driven Economy

MCB intends to take advantage of any other webinars and training opportunities on workforce and labor force needs offered by the JDVRTAC.

The agency also offers participation in an Aspiring Supervisor Certificate Program in order to prepare interested staff to apply for supervisory positions that are expected to become vacant within the next few years.

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 Massachusetts Commission for the Blind has for a number of years, begun to apply the master's-level standard to new hires, if at all possible. MCB is awaiting the promulgation of final regulations for the Workforce Innovation and Opportunity Act to revise its personnel standards in

compliance with the new regulations. In addition: The Massachusetts Commission for the Blind supports and funds graduate-level training for its professional staff through its Staff Development Unit. MCB actively recruits new rehabilitation staff from area graduate-level college and university programs. The agency also provides a number of short-term training opportunities for vocational rehabilitation staff. Examples of short-term training provided in FY 2015 and 2016 include:

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- Eye Diseases, Functional Impact and Treatments
- Psychopharmacology
- VR Case Management
- VR Orientation
- Welcoming the Stranger (Refugees).
- Understanding the Individual Education Plan & An Introduction to the Transition Planning Process

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MCB intends to take advantage of any other webinars and training opportunities on workforce and labor force needs offered by the JDVRTAC.

The agency also offers participation in an Aspiring Supervisor Certificate Program in order to prepare interested staff to apply for supervisory positions that are expected to become vacant within the next few years.

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.

The Commission acquires and routinely disseminates rehabilitation materials and research to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and Training Centers, training guides and resource materials produced by recipients of RSA training grants, and literature from the American Foundation for the Blind and the National Research and Training Center on Blindness and Low Vision at Mississippi State University. In addition, each counselor and supervisor has a personal computer giving them access to a wide variety of software applications and websites to acquire rehabilitation materials and research reports.

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 three Vocational Rehabilitation Counselors, one Client Assistance Worker, and two Rehabilitation Teachers who are fluent in Spanish. One VR supervisor speaks French and the language of the Congo; one speaks Italian. MCB also has one Rehabilitation Teacher and three staff who are fluent in Cantonese. Two staff members are fluent in Polish.

MCB VR counselors who work with deaf-blind individuals are proficient in American Sign Language.

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.

In 2014 MCB conducted cross-training with the Massachusetts Department of Elementary and Secondary Education and the Federation for Children with Special Needs, the parent organization of the Parent Training and Information Center in Massachusetts. Subjects covered included transitional planning and the Massachusetts law, Chapter 688, that provides a two-year coordinated planning process for students whose entitlements to special education services will end when they graduate from school or turn 22 years of age. The Memorandum of Understanding between MCB and the Department of Elementary and Secondary Education contains provisions to explore ways to develop cross-training opportunities on transition and pre-employment transition services. On January 24, 2016 staff of the Federation for Children with Special Needs conducted a training session for MCB vocational rehabilitation staff on Understanding the IEP and an Introduction to the Transition Planning Process.

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;

MCB, in consultation with the MCB SRC and a number of other agencies serving the blind, commissioned a comprehensive needs assessment that was completed in 2005. The methodology used for the assessment was a telephone poll conducted by UMass Poll of a random sample of registrants. The MCB RC was satisfied with the original comprehensive needs assessment conducted for MCB by the UMass Poll, so it was decided that the comprehensive needs assessment would be replicated by MCB staff. Other needs assessments were completed during FY 2009 and FY 2012. A fourth needs assessment, using the same questions and methodology was undertaken in 2014 and completed in 2015.

MCB and the Rehabilitation Council will work with the agency to develop a new comprehensive needs assessment methodology in line with the requirements and focus of WIOA on competitive integrated employment for the next scheduled comprehensive needs assessment (FFY 2017).

Major Findings of the Comprehensive Needs Assessment Survey:

EMPLOYMENT ASSISTANCE — For those interested in finding better employment opportunities, 81.5% (62.5% very, plus 19% somewhat) wanted to hear about jobs successfully done by people who are legally blind, up significantly by 20.5% from the previous (61%) 2011 Needs Assessment of the Blind Community. And 93% of respondents thought it very or somewhat important to decide what kinds of work would be possible for them. 57% responded that training in a rehabilitation center program was very important to them, up 14% when compared with the previous (43%) survey.

SUPPORTED EMPLOYMENT - 54% of respondents indicated that an employment program that provides an on-job coach in performing a job (supported employment) was very important to them. This is an important finding in that MCB has found it difficult to interest many consumers in appropriate supported employment services. A significant barrier has been the fear of consumers and their families that the consumer may lose eligibility for day habilitation services and other support if the consumer participates in supported employment services and fails to achieve long-term funding for the services. Currently, MCB is working with the Massachusetts Association for the Blind and Visually-Impaired (MABVI) to develop a specialized Project Search supported employment program for MCB consumers with intellectual disabilities who are currently served by MABVI through the Department of Developmental Disabilities. An important feature of this initiative is that, with the cooperation of the Department of Developmental Disabilities, these consumers will not lose access to their current programs if they should need these services in the future.

The data collection for the latest comprehensive needs assessment study was completed before the new requirements for inclusion of need for pre-employment transition services were added by WIOA. The MCB RC agreed with the agency's proposal for a separate needs assessment survey to be sent out for parents and consumers to fill out for this population (age 14-22) about their educational services, pre-employment transition services, transition services and vocational services.

Major Findings of the Pre-Employment Transition Services Needs Assessment Survey:

AWARENESS OF PRE-EMPLOYMENT TRANSITION SERVICES - There is a general lack of awareness among consumers and their families of the availability of pre-employment transition services:

- Only 42.7% or 50 consumers were aware of cooperation or coordination between their school and Massachusetts Commission for the Blind in providing or planning services for them.
- Only 29.2% or 33 consumers have been offered transition or pre-transition employment services by Massachusetts Commission for the Blind counselor.
- Only 28.6% or 32 consumers have been offered transition or pre-transition employment services by their school system.
- 33.3% or 39 consumers were not aware that Massachusetts students of age 14 - 22 received special education services and had Individualized Education Programs (are on an IEP) or 504 Plan which were eligible for pre-employment transition services and transition services.

LOW PARTICIPATION IN VOCATIONAL REHABILITATION SERVICES - Only 23.7% of the respondents were receiving vocational rehabilitation services from the Massachusetts Commission for the Blind. This is despite the fact that the agency offers vocational rehabilitation services to each person registered as legally blind at the age of 14. There is a clearly a need for more effective outreach. The survey itself was used as an element of MCB's intensified outreach to students. In response to a question, 112 or 73.2% of the respondents indicated that they would like more information about transition and pre-employment transition services, and 83 (72.2%) of them responded that they would like to be contacted by a Massachusetts Commission for the Blind counselor. All requests were referred to the appropriate region to contact the consumer.

The full analysis and report of the pre-employment transition services needs assessment survey is in Section E. below.

The full analysis and report of the most recent comprehensive needs assessment is below.

MASSACHUSETTS COMMISSION FOR THE BLIND ANALYSIS OF THE NEEDS ASSESSMENT OF THE BLIND COMMUNITY

Paul Saner, Commissioner

2 0 1 5

INTRODUCTION The Massachusetts Commission for the Blind has conducted a needs assessment of the blind community. The following data summarize findings from a telephone survey conducted from June, 2013 through January 2014. This survey asked consumers 49 questions about their level of satisfaction with various services, as well as their needs in terms of services, support, information and education, social activity and living arrangements. A random respondent selection was used. A total sample of 231 Massachusetts legally blind individuals was achieved. There were 29,308 legally blind registrants in Massachusetts in 2013. Respondent cooperation, response rate and call completion were satisfactory. Responses varied significantly across age and gender. There were 231 respondents, with 41% male and 59% female, as compared to 41% male and 59% female in the total registration of legally blind in Massachusetts in 2013. 38% of respondents were under 65 years old, and 62% over 65 years old, as compared to 35% under 65 years old and 65% over 65 years old in the Massachusetts total blind population in 2013. In this survey, 8% of survey respondents were working (3% full-time and 5% part-time) in 2013, and 92% reported that they were not working. It was noted that 63% of those survey respondents who were not working were retired, and 29% of them were not at all employed. For those survey respondents with jobs, the number was up 2% when compared with the 6% of survey respondents who were working at the time of the previous survey in (2% full-time and 4% part-time). Overall, 79% of respondents over 65 years old indicated that there was adequate support for their needs, but 86% of all the respondents in all ages reported adequate support for their needs in the 2011 Needs Assessment of the Blind Community.

TOPLINES

EMPLOYMENT EMPLOYED — At the time of the survey, 92% of respondents reported that they were not working, 3% were employed full-time, and 5% employed part-time. Much of the variation in responses was due to the age and gender of respondents. Those respondents under 65 were much more likely to be employed (17% versus 3% for those over 65), and men were more likely to be employed than women (9% versus 7% for women). For employed respondents, men over 65 were more than three times more likely to be employed than women over 65 (16% versus 5%).

SEEKING EMPLOYMENT — Overall, 28% of those respondents not at all employed were interested in finding a job or more work (17% were very interested and 11% were somewhat interested). However, 72% of this group was not or not very interested in more work (10% were not very interested and 62% were not interested at all). For those respondents already employed part-time, 8% of them were somewhat interested in finding a job or more work, but 92% of them were not at all or not very interested in other employment opportunities. For those respondents already employed full time, 14% of them are very interested in finding a new job or more work. Age once again provided a stark contrast in those interested in finding a job or more work. None of those respondents aged over 65 were interested in finding a job or more work. For those respondents who were not at all employed and were very or somewhat interested in employment opportunities, 100% of them were under age of 65. 37.5% of men and 62.5% of women were very interested or somewhat interested in finding employment opportunities. When age and gender are both considered, for all the respondents who were not employed at all and aged under 65, 13% of men were very or somewhat interested in employment; however, 22% of women were interested in employment opportunities.

EMPLOYMENT ASSISTANCE — For those interested in finding better employment opportunities, 81.5% (62.5% very plus 19% somewhat) wanted to hear about jobs successfully done by people who are legally blind, up significantly by 20.5% from the previous (61%) 2011 Needs Assessment of the Blind Community. And 93% of respondents thought it very or somewhat important to decide what kinds of work would be possible for them. 54% of respondents indicated that an employment program that provides an on-job coach in performing a job was very important to them. 57% responded that training in a rehabilitation center program was very important to them, up 14% when compared with the previous (43%) survey. There were 19% of respondents who indicated that their ability to get along with others was the most important thing that had led to their success on their job, versus 12.5% who cited job skills and hard work; 6% cited all of the above things. However, 50% of respondents indicated other unspecified important things that had led to their success on their jobs. In getting their jobs, 15% of respondents indicated that they received the help from an agency, versus 15% from their family and friends. 10% of them answered an advertisement of a job opening; 5% of them stated that their employment was the result of being at the right place at the right time; and other (55%), but none of them got the help from a school placement service. In looking for jobs, only 24% of respondents said that they had ever used the services of a one-stop career center or the state employment service.

TRAVEL AND SAFETY TRAVEL COMFORT LEVEL — As expected, 89% of respondents said that they could travel safely at home and in familiar indoor areas, (61% very safely and 28% somewhat safely). This is down 2% from the previous (91%) 2011 Needs Assessment of the Blind Community. In addition, 37% of respondents under 65 and 63% of those over 65 claimed that they could travel very safely or somewhat safely in their home and familiar indoor areas. Outside the home, respondents' comfort levels declined and also varied considerably by age of respondent. Overall, 69% (35% very safely and 34% somewhat safely) said that they could travel safely outdoors in familiar areas. This was down 4% from the previous (73%) 2011 Needs Assessment of the Blind Community. However, 42% of those under 65 compared to 58% of those over 65 indicated that they could travel very or somewhat safely outdoors in a familiar area. In unfamiliar areas outdoors, there were 43% of respondents (17% very safely and 26% somewhat safely) who said that they could travel safely. This was up 3% from the previous (40%) survey in 2011. In addition, 44% of respondents under 65 and 56% of those over 65 claimed that they could travel very safely or somewhat safely in unfamiliar outdoor areas.

NEEDS TRANSPORTATION — 88% of respondents (53% very and 35% somewhat) said that their transportation needs were met. This was down 4% from the previous (92%) 2011 Needs Assessment of the Blind Community. 42% of men under 65 claimed that their transportation needs were satisfactory, versus 58% of men over 65, while 35% of women under 65 said their transportation needs were satisfactory, versus 65% of women over 65. It is important to note that 66% of respondents said that they could not use public transportation safely. This has increased 9% from the previous 57% in 2011. Age of respondent was certainly a factor in comfort level with public transportation; 56% of those under 65 and 72% of those over 65 felt not very safe or not safe at all in using public transportation. However, 44% of those under 65 and only 28% of those over 65 felt that they could use public transportation very or somewhat safely. When age and gender are examined in combination, we see that men and woman under 65 years old had the equal ability to use public transportation (50%); both sexes felt comfortable with public transportation and said that they could use it very or somewhat safely. But 53% of woman over 65 years old indicated that they could use public transportation very or somewhat safely, compared to only 47% of men.

PRIMARY MODES OF TRAVEL — The majority (54%) of respondents said that their families met their transportation needs; an additional 14% primarily used the Ride; 10% primarily depended upon friends; and 13% said that they primarily used public transportation. Use of public transportation was down 1% from the previous (14%) surveyed in 2011. In addition, use of public transportation was particularly strong among men under 65 (10% compared to 8% for women under 65), and 5% of men over 65 also used public transportation as their primary means of transportation, compared to 4% of women over 65. In addition, those women over 65 were more likely than other groups to rely on family as their primary means of transportation (38% compared to 20% for men over 65), and 28% of women under 65 compared to 21% for men under 65.
INFORMATION AND EDUCATION NEWS SOURCES—Overall 63% of respondents said that TV was the most reliable source of information for news and current events; it was up by 4% from the previous (59%) survey in 2011. 33% of females under 65 and 44% of those over 65 indicated that TV was the most reliable source of information for news and current events, while 22% of males under 65 and 23% of those over 65 used TV as their most reliable source of news and current events. Radio (20%) was the second most popular source of news and information; it was down 1% from the previous (21%) survey in 2011. However, radio was less popular for women under 65 (9% versus 10% for those over 65). Instead 14% of males under 65 and 8% of those over 65 used radio as their second most popular source of news and current events. Using the Internet (8%) was the third most popular source of news and information. It was down 1% from the previous (9%) survey in 2011. Younger respondents indicated that the internet was their most reliable source of information for news and current events than did those over 65 (75% versus 25% of those 65 and over). In addition, men were slightly more likely (55%) to claim that the internet was their most reliable source of information for news and information, versus 45% for women. Overall, 98% of respondents indicated that their current source for news was reliable and convenient for them.

INFORMATION SOURCES — 15% of respondents (3% very important and 12% somewhat important) said they were looking for more and better sources of information with tape (39%) and large print (36.5%) topping the format choices, compared to the previous survey in 2011; at that time the same percentage of respondents (7% very important and 8% somewhat important) indicated that they were looking for more and better sources of information with tape (22%) and large print (35%). In addition, 21% of respondents said that they preferred to use the computer to look for more and better sources of information, up 8% from the previous level of 13% in 2011.

EDUCATIONAL OPPORTUNITIES — Overall 40% of respondents indicated that support is available to assist them in pursuit of their education or employment goal. However, about 35% of respondents indicated that no educational opportunities were available at all. This was up 20% when compared to 15% in the previous survey in 2011. Only 7% of respondents aged under 25 believed that educational support was available versus 30% of those 65 and older.

COMPUTER USE — About 41% of respondents currently use computers. This was up 9% from the previous survey (32%) in 2011, but it was up significantly, by 23%, when compared with the 2005 Massachusetts Blindness Community Needs Assessment (18%). Age was the largest factor determining computer use, with 60% of those under 65 using computers, compared to 40% of those 65 and older. For those respondents age over 65, use of computers was up 7% when compared to 33% of those surveyed in 2011. The most common reasons for not using a computer were “not interested” (38%), “can’t see the screen” (31%), “don’t know how” (21%), and “can’t afford one” (7%). Those 65 and older were almost six times as likely as those under 65 (85% versus

15%) to say that they were not interested in computer use. Those 65 and older were most likely (77% compared to 23% of those under 65) to say that they do not know how to use computers. However, 56% of respondents aged over 65 indicated that they could not afford computers, compared with 44% of those respondents aged under 65. Most (69%) computer users use some sort of adaptive technology. Two of the most common adaptive technologies used were large print (49%) and speech (31%).

COMPUTER SKILLS — About 34% (24% very and 10% somewhat important) of respondents thought that computer skills were important for the job market. However, among those respondents aged under 65 (and most likely to be looking for employment opportunities), 78% believed computer skills to be very or somewhat important. 71% of those respondents over 65 (most of them were not looking for employment opportunities felt that computer skills were not that important to them. Overall, 43% of respondents (25% very important and 18% somewhat important) indicated that internet skills were important for successful daily living; this percentage was 69% among those respondents under 65 years of age.

SOCIAL ACTIVITY & LIVING ARRANGEMENTS LIVING ARRANGEMENTS — 78% of respondents that said their housing needs were met very well. This was down slightly by 1% from the previous (79%) survey in 2011. About 37% of respondents indicated that they live alone, down 2% when compared to 39% in the 2011 survey. 59% of respondents live with family members.

SOCIAL ACTIVITY — 67% of respondents (26% very active and 41% somewhat active) indicated that they had an active social life, up 4% from the previous (63%) survey in 2011. However, transportation (27%) and not enough opportunities to participate in social or recreational activities (6.5%), plus lack of economic resources (6.5%) are the problems that prevent them from participating more in social or recreational activities.

PERSONAL RELATIONSHIPS — 31% of respondents (9% a lot and 22% some) said that their lack of, or loss of, vision had seriously affected their relationships with their spouse or family, up 9% from the previous survey (22%) in 2011. Women were more likely to respond in the affirmative—67% stated that their lack or loss of vision affected their spouse or family relationships some or a lot, versus 33% for men. For women, age of respondent made a great deal of difference. 79% of women over 65 years of age and 50% of them under 65 indicated that their lack of, or loss of vision had seriously affected their relationships with their spouse or family. The response for men was 21% a lot or some for those aged over 65 years and 50% for those aged under 65. 13% of respondents thought they needed personal or group counseling, up 4% from the previous survey (9%). 54% of respondents who thought they needed personal or group counseling were under 65 years of age and 46% of were over 65. PERSONAL CARE — 75% of respondents said that they could successfully take medications very well, up 7% from the previous survey (68%). However, certain groups were significantly less confident. Of males under 65 years of age, 62% reported that they could not successfully take their medications at all, compared to 38% of those females under 65 years of age. Overall, 75% said they could groom themselves very well, up 4% from the previous survey (71%). Younger respondents reported less success than those over 65 years of age (35% reporting somewhat or very well versus 65% of those 65 and over). About 41% of respondents reported that they could cook very well. This was up slightly by 1% from the previous survey (40%). Women reported substantially more success than men, with 65% reporting they are very or somewhat successful compared to only 35% of men.

SERVICES FOR THE BLIND — 34% of respondents named MCB as the governmental agency that provides the most help relating to their visual impairment, down significantly by 20% from the previous survey (53%) in 2011. 10% named the Perkins School. Others named Carroll Center for the Blind (2%), MAB Community Services (2%), Lowell Association for the Blind (0.5%) and Talking Information Center (0.5%), but 51% of respondents received help from other organizations relating to their visual impairment.

GREATEST DIFFICULTIES—Overall, 37% of respondents reported a non-specified problem was the greatest difficulty they face today because of their vision loss. 35% of them indicated that transportation was the second greatest problem. However, 23% of females and 11% of males over 65 indicated that transportation was the greatest difficulty they faced. Recreation (12%) was the third greatest problem; employment (8%) was the fourth greatest problem; "Taking care of their homes" (6%) was the fifth greatest problem; and "all of the above problems" was accounted for only 2% of respondents. Overall, 45% of respondents said that they missed driving most by themselves because of their vision loss; another unspecified problem (19%) was cited second; reading without assistance (17%) was the third; traveling independently (14%) was the fourth most missed activity; and working (4%) was the fifth one.

Survey Results Summary

In summary, there were 231 survey respondents with 41% male and 59% female. 38% of them were under age of 65 years and 62% over 65. 84% of them were Caucasian. 38% of them had some college or had graduated from college; and 36% of them were high school graduates. 8% of survey respondents were working (3% full-time and 5% part-time), and 92% of them were not working (63% were retired, and 29% were not at all employed).

• 79% of respondents aged over 65 years indicated that there was adequate support for their needs.

• 28% of those respondents not at all employed were very or somewhat interested to find a job or more work.

• 81.5% of those respondents who were interested in finding better employment opportunities reported that it was very or somewhat important to them to learn about jobs successfully done by people who are legally blind.

• 57% of respondents indicated that deciding what kind of work would be possible for them was very important. 57% responded that training in a rehabilitation center program was very important.

• 54% of respondents said that an employment program that provides an on-job coach in performing a job was very important to them.

• 76% of respondents did not use the services of a one-stop career center or the state employment service.

• 15% of respondents indicated that they got their job with help from an agency versus 15% from the help of their family and friends and 10% answered an advertisement of a job opening.

• 89% of respondents indicated that they could travel safely at home and in familiar indoor areas, but 69% said that they could travel safely outdoors in familiar areas.

• 43% of respondents reported that they could travel very safely or somewhat safely in unfamiliar areas outdoors and 66% of them said that they could not travel safely by using public transportation.

• 88% of respondents indicated that their transportation needs were met and 54% of their families provided them with transportation as their primary means of transportation.

• 98% of respondent reported that their current source for news was reliable and convenient for them. 63% of them indicated that TV was their most reliable source of information for news and current events.

• 15% of respondents said that they were looking for more and better sources of information, with large print (36.5%) and tape (39%) cited as their favorite information formats.

• 69% of respondents were using adaptive technology. 49% of them mostly used large print as their adaptive technology. 31% used speech as their adaptive technology.

• 41% of respondents are currently using a computer; 38% of them were not interested in using a computer. 31% of them could not see the screen; this was the most common reason stated for not using a computer.

• 43% of respondents said that email or internet skills were very or somewhat important to them for successful daily living.

• 95% of respondents' housing needs were very or somewhat well met; 59% of them lived with their family members.

• 67% of respondents' social and recreational life was active. 27% of them said that transportation problems prevented them from participating more in social or recreational activities.

• 78% of respondents did not have the need for personal or group counseling. 69% of them felt that their lack of vision or loss of vision had not much or not at all affected their relationships with their spouse or family.

• Survey respondents could manage very well or somewhat well in grooming (91%), taking medications (85%) and cooking (67%).

• In addition to another non-specified agency or organization, 34% of respondents rated the Massachusetts Commission for the Blind as the top agency providing them with help relating to their visual impairment versus the second one, Perkins School for the blind (10%).

• 35% of respondents indicated that transportation was the greatest problem they faced today due to their vision loss; 45% of them rated driving as the activity which they miss doing the most.

• 63% of respondents own their home. However, for those respondents who were renting their homes, 64% of them were living in public housing such as city/town elder housing or housing projects, etc. In addition, 90% of them did not have children 18 or younger in their household.

• The highest percentage (27%) of survey respondent reported their income was in the range of $10,000 to $24,999; the second highest one (20%) was less than $10,000. In sum, of the 231 respondents, the survey indicated that the majority of these respondents believe that the greatest needs services are in the following areas:

• Transportation: Transportation was the greatest difficulty they had, and they missed driving the most as well. Some respondents said that they could not use public transportation safely.

• Vocational Services: The majority of the respondents mentioned the need for "assistance in finding a job", "job search training", "on-the-job training", "a job coach", "help to choose the best possible job", "training in a rehabilitation center program", and "vocational skills and counseling or college training".

• Services to Improve Independent Living: The majority cited the need for orientation and mobility services or training, and dissemination of better/more reliable sources for information to improve independent living. The majority of those respondents over 65 said that internet skills were important for successful daily living.

• Adaptive Equipment or Technology: There is a need for more adaptive equipment or technology services, skills and training. The current rate of computer use by the respondents over age of 65 was up significantly when it was compared with the previous surveys. Plus, the rate for the respondents preferring to use the computer to look for more and better sources of information was up.

• Recreation: Recreation was the third greatest problem that the respondents faced; some respondents need help to have more recreation opportunities.

• Follow up Services: Some of the respondents may need vocational rehabilitation or independent living social services in order to improve their daily living. In addition, Massachusetts Commission for the Blind (MCB) has been rated as the agency to provide the most help, training and services to these legally blind respondents.

2014

SURVEY INSTRUMENT AND FREQUENCIES

EMPLOYMENT

1. Are you currently employed full time, part time or not at all?

Category	Percent
Full time	3%
Part time	5%
Retired	63%
Not at all	29%

2. How interested are you in finding a job or more work?

Category	Percent
Very interested	17%
Somewhat interested	11%
Not very interested	10%
Not interested at all	62%

How important are the following to you?

3. Learning about jobs that people who are blind have done successfully?

Category	Percent
Very	62.5%
Somewhat	19%
Not very	6%
Not at all	12.5%

4. Deciding what kind of work would be possible for you?

Category	Percent
Very	86%
Somewhat	7%
Not very	0%
Not at all	7%

5. Training in a rehabilitation center program?

Category	Percent
Very	57%
Somewhat	36%
Not very	7%
Not at all	0%

6. An employment program that provides an on-job coach for you to perform a job?

Category	Percent
Very	54%
Somewhat	38%
Not very	0%
Not at all	8%

7. What was the most important thing that led to you getting a job?

Category	Percent
Help from an agency	15%
Help from family and friends	15%
Answered an ad	10%
School placement service	0%
Right place right time	5%
Other	55%

8. If help from an agency, which one?

_____

EDUCATIONAL PROJECT AND REHABILITATION CENTER

9. What is the most important thing that has led to your success on the job?

Category	Percent
Ability to get along with others	19%

Category	Percent
Job skills	12.5%
Hard work	12.5%
An interested person	0%
Other	50%
All	6%

10. How often have you used the services of a one-stop career center or the state employment service?

Category	Percent
Often	7%
Some	5%
Not very	12%
Not at all	76%

TRAVEL AND SAFETY

11. How safely can you travel in your home and familiar indoor areas?

Category	Percent
Very safely	61%
Somewhat safely	28%
Not very safely	5%
Not safe at all	6%

12. How safely can you travel outdoors in familiar areas?

Category	Percent
Very safely	35%
Somewhat safely	34%
Not very safely	13%
Not safe at all	18%

13. How safely can you travel outdoors in unfamiliar areas?

Category	Percent
Very safely	17%
Somewhat safely	26%
Not very safely	26%
Not safe at all	31%

NEEDS TRANSPORTATION

14. How safely can you travel using public transportation?

Category	Percent
Very safely	17%
Somewhat safely	17%
Not very safely	16%
Not safe at all	50%

15. What is your primary means of transportation?

Category	Percent
Taxi	5%
Family	54%
Friends	10%
The Ride	14%
Public transportation	13%
Walking	4%
All	0.42%

16. How well are your transportation needs met?

Category	Percent
Very	53%
Somewhat	35%

Category	Percent
Not very	9%
Not at all	3%

INFORMATION AND EDUCATION

17. Currently what is your most reliable source of information for news and current events?

Category	Percent
TV	63%
Radio	20%
News line Program	2%
Internet	8%
Newspaper in Braille or Large Print	4%
Other	4%

18. Is your current source for news reliable convenient for you?

Category	Percent
Yes	98%
No	2%

19. Is it important to you to be able to access a better/more reliable source for information?

Category	Percent
Very important	3%
somewhat important	12%
Not very important	31%
Not at all important	54%

20. What information format do you most prefer?

Category	Percent

Category	Percent
Braille	3%
Tape	39%
Large print	36.5%
Computer	21%
Have no ability to read now	0.5%

21. How available is the necessary support to assist you in pursuit of your education or employment goal?

Category	Percent
Very available	20%
somewhat available	20%
Not very available	25%
Not at all available	35%

22. Are you currently using a computer?

Category	Percent
Yes	41%
No	59%

23. Do you use adaptive technology?

Category	Percent
Yes	69%
No	31%

24. What adaptive technology do you use?

Category	Percent
Speech	31%

Category	Percent
Large print	49%
Braille	2%
Other	18%

25. Why are you not currently using a computer?

Category	Percent
Not interested	38%
Can't afford one	7%
Can't type	3%
Can't see the screen	31%
Don't know how	21%

26. How important are computer skills to you for the job market?

Category	Percent
Very important	24%
Somewhat important	10%
Not very important	10%
Not important at all	56%

27. How important are email or Internet skills to you for successful daily living?

Category	Percent
Very important	25%
Somewhat important	18%
Not very important	10%
Not important at all	47%

SOCIAL AND LIVING ARRANGEMENTS

28. How well are your housing needs met?

Category	Percent
Very well	78%
somewhat well	17%
Not very well	4%
Not well at all	1%

29. Do you live alone, with family, or a roommate(s) who is blind or sighted?

Category	Percent
Alone	37%
Family	59%
Visually impaired person	1%
Sighted person	3%

30. How active is your social and recreational life?

Category	Percent
Very active	26%
somewhat active	41%
Not very active	18%
No active at all	15%

31. What prevents you from participating more in social or recreational activities?

Category	Percent
Transportation	27%
Lack of economic resources	6.5%
Not enough opportunities	6.5%
Other	60%

32. How seriously has your lack of vision or loss of vision affected your relationship with your spouse or family?

Category	Percent
A lot	9%
Some	22%
Not much	23%
Not at all	46%

33. Do you feel the need for personal or group counseling?

Category	Percent
Yes	13%
No	78%
Unsure	9%

How successfully can you complete the following?

34. Cooking

Category	Percent
Very well	41%
Somewhat well	26%
Not very well	9%
Not well at all	24%

35. Grooming

Category	Percent
Very well	75%
Somewhat well	16%
Not very well	3%
Not well at all	6%

36. Taking medications

Category	Percent
Very well	75%
Somewhat well	10%
Not very well	4%
Not well at all	11%

37. What organization or governmental agency provides you with the most help relating to your visual impairment?

Category	Percent
Massachusetts Commission for the Blind	34%
Perkins School for the Blind	10%
Carroll Center for the Blind	2%
MAB Community Services	2%
Greater Boston Aid to the Blind	0%
Lowell Association for the Blind	0.5%
Talking Information Center	0.5%
Recording for the Blind and Dyslexic	0%
National Braille Press	0%
Other	51%

38. What is the greatest problem you face today due to your vision loss?

Category	Percent
Transportation	35%
Employment	8%
Recreation	12%
Taking care of my home	6%
Other	37%
All of above	2%

39. What do you miss doing the most due to your vision loss?

Category	Percent
Driving	45%
Reading without assistance	17%
Traveling independently	14%
Working	4%
Other	19%
All	1%

DEMOGRAPHICS

40. Do you own or rent your home?

Category	Percent
Own	63%
Rent	37%

41. If renting, are you living in public housing? (i.e. city/town elder housing, housing projects etc.)

Category	Percent
Yes	64%
No	36%

42. Do you have children 18 or younger in your household?

Category	Percent
Yes	9.6%
No	90.0%
Don't Know	0.4%

43. Would you mind providing us your age, we have several brackets to choose from?

Category	Percent
18 - 25	1%

Category	Percent
26 - 35	4%
36 - 45	8%
46 - 55	9%
56 - 65	14%
Over 65	62%
Don't Know	0%
Younger than 18	2%

44. Do you feel that there is adequate support for your needs as a senior?

Category	Percent
More than enough	29%
Just enough	50%
not adequate	12%
not adequate at all	9%

45. What is the last grade of school or college that you have completed?

Category	Percent
Less than High School	13%
H.S. Grad	36%
Some College	22%
College Grad	16%
Post Grad	11%
Don't Know	2%
Refused	0%

46. Would you mind telling us your ethnicity?

Category	Percent
African American	5%
Asian American	2%
Hispanic	6%
Caucasian	84%
Multicultural	1%
Don't Know	2%

47. Would you mind giving your ZIP CODE? _____

48. This question concerns income, we have several brackets to choose from, would you be willing to provide an answer?

Category	Percent
Less Than $10,000	20%
Between $10,000 and $24,999	27%
Between $25,000 and $34,999	7%
Between $35,000 and $49,999	4%
Between $50,000 and $74,999	3%
Between $75,000 and $150,000	5%
More Than $150,000	2%
Don't Know	32%

49. RESPONDENT'S GENDER

Category	Percent
Male	41%

Category	Percent
Female	59%

B. WHO ARE MINORITIES;

• 12% of the respondents to the Comprehensive Needs Assessment Survey identified themselves as members of minority groups. Their reported needs did not differ significantly from the other respondents.

• Over the past ten years, MCB has seen an increase in African-American, Hispanic, and Asian consumers as well as consumers who do not speak English fluently. For FY 2013, the RSA minority background service indicator for MCB was 89.4%. For FY 2014, the RSA minority background service indicator for MCB was 95%. 30% of the consumers currently receiving VR services from MCB are members of minority populations.

• The agency's needs assessment studies and public hearings have for a number of years identified the lack of availability of English as a Second Language (ESL) instruction for blind persons as a very serious problem. MCB has also continuously advocated for the availability of English as a Second Language instruction in accessible media. MCB advises ESL programs on resources for accessible instructional materials, but unfortunately, few are available. The agency believes that the increased partnership under WIOA with Adult Education and Literacy programs will facilitate cooperation to address this long-standing problem.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

2% of the respondents were under age 18 and 1% aged 18-25. Their reported needs did not differ significantly from the other respondents. However, Congress, RSA, and MCB have clearly identified youth as an underserved group in light of their needs for pre-employment transition services and transition services. The data collection for the latest comprehensive needs assessment study was completed before the new requirements for inclusion of need for pre-employment transition services were added. The MCB SRC agreed with the agency's proposal for a separate needs assessment survey that has been sent out for parents to fill out for this population (age 14-22) about their educational services and pre-employment transition services, transition services and vocational services. The analysis of this needs assessment survey will be integrated with the comprehensive needs assessment. In addition, a similar needs assessment survey is being conducted with Teachers of the Visually Impaired. Preliminary analysis of these two surveys indicates that there is a clear need for pre-employment transition services.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

In looking for jobs, only 24% of respondents said that they had ever used the services of a one-stop career center or the state employment service.

MCB's practice is to refer all VR consumers to one-stop career centers but many experience unwelcoming behavior and immediate referral back to MCB. As a result of such reports, there is a widespread perception among the blind community that they will not receive any help at a one-stop career center. The agency is hoping that a new partnership under WIOA as well as the act's new emphasis on disability as a priority will strengthen the commitment of one-stop centers to serve persons with disabilties and to provide full accessibility. MCB has, over the years, offered to

place staff on-site at the one-stops, to provide staff training on blindness and accessibility, and to provide consultation to one-stop career centers on the accessibility of materials and software with limited success. It seems that, with the implementation of WIOA, the career centers are more open to using MCB as a resource (rather than referring the consumer back) than they have been in the past. Several meetings to discuss these issues are currently scheduled.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

2% of the respondents in the Comprehensive Needs Assessment Survey were under age 18 and 1% aged 18-25. Their reported needs did not differ significantly from the other respondents. However, Congress, RSA, and MCB have clearly identified youth as an underserved group in light of their needs for pre-employment transition services and transition services. The data collection for the latest comprehensive needs assessment study was begun before the new requirements for inclusion of need for pre-employment transition services were added. The MCB SRC agreed with the agency's proposal for a separate needs assessment survey that has been sent out for parents to fill out for this population (age 14-22) about their educational services and pre-employment transition services, transition services and vocational services. The analysis of this needs assessment survey will be integrated with the comprehensive needs assessment. In addition, a similar needs assessment survey is being conducted with Teachers of the Visually Impaired. Preliminary analysis of these two surveys indicates that there is a clear need for pre-employment transition services.

Major Findings of the Pre-Employment Transition Services Needs Assessment Survey:

AWARENESS OF PRE-EMPLOYMENT TRANSITION SERVICES - There is a general lack of awareness among consumers and their families of the availability of pre-employment transition services:

- Only 42.7% or 50 consumers were aware of cooperation or coordination between their school and Massachusetts Commission for the Blind in providing or planning services for them.
- Only 29.2% or 33 consumers have been offered transition or pre-transition employment services by Massachusetts Commission for the Blind counselor.
- Only 28.6% or 32 consumers have been offered transition or pre-transition employment services by their school system.
- 33.3% or 39 consumers were not aware that Massachusetts students of age 14 - 22 received special education services and had Individualized Education Programs (are on an IEP) or 504 Plan which were eligible for pre-employment transition services and transition services.

LOW PARTICIPATION IN VOCATIONAL REHABILITATION SERVICES - Only 23.7% of the respondents were receiving vocational rehabilitation services from the Massachusetts Commission for the Blind. This is despite the fact that the agency offers vocational rehabilitation services to each person registered as legally blind at the age of 14. There is a clearly a need for more effective outreach. The survey was used as an element of MCB's intensified outreach to students. In response to a question, 112 or 73.2% of the respondents indicated that they would like more information about transition and pre-employment transition services, and 83 (72.2%) of them responded that

they would like to be contacted by a Massachusetts Commission for the Blind counselor. All requests were referred to the appropriate region to contact the consumer.

The full analysis and report of the pre-employment transition services needs assessment survey is below.

The Transition and Pre-employment

Transition Services Needs Assessment

Survey

Massachusetts Commission for the Blind

2 0 1 6

The Transition and Pre-employment Transition Services Needs Assessment Survey

In the spring of 2015, a short survey was sent to all 960 persons between the ages of 14-22 who were registered as legally blind with the Massachusetts Commission for the Blind. There were 119 respondents to this survey for a response rate of 12.4%. This specific questionnaire was sent out to give consumers the opportunity to indicate their needs relative to transition and pre-employment transition services and let them to know that the new changes to federal law enacted in 2014 have added Pre-employment Transition Services to Transition services for students with an Individual Education Plan (IEP) or "504" Plan. The survey asked them to express their concerns and rate their current or future needs as they related to the program.

In the 2014 Massachusetts Commission for the Blind (MCB) Central Register Report, there were 953 consumers between the ages of 14-22, 3.3% of the total registration of 28,868. There were 119 or 12.49% consumers between the ages of 14-22 who responded to the Transition and Pre-employment Transition Services Needs Assessment Survey.

Below are the results of the survey of consumers' individual transition and pre-employment transition service needs. The questionnaire had three choices: "Yes", "No", and "Do Not Know".

For the consumers who answered "Yes" for the following services:

- 67.8% or 78 consumers were receiving services at school under an Individual Education Plan (IEP) or "504" Plan.
- 66.7% or 78 consumers were aware that Massachusetts students aged 14 - 22 may receive special education services under Individualized Education Programs (are on an IEP) or may be eligible for transition services under a "504" Plan.
- 42.7% or 50 consumers were aware of cooperation or coordination between their school and the Massachusetts Commission for the Blind in providing or planning services for them.
- 34.8% or 40 consumers have signed a release to allow their school to invite the appropriate Massachusetts Commission for the Blind counselor or case worker to attend their IEP meetings.

- 29.2% or 33 consumers have been offered transition or pre-employment transition services by Massachusetts Commission for the Blind counselor.
- 28.6% or 32 consumers have been offered transition or pre-employment transition services by their school system.
- 24.1% or 28 consumers were receiving accommodations at school to help them to participate in the general curriculum under a “504” Plan.
- 23.7% or 28 consumers were receiving vocational rehabilitation services from the Massachusetts Commission for the Blind.

For those consumers who answered “No” for the following services:

- 69% or 78 consumers have not been offered transition or pre-employment transition services by their Massachusetts Commission for the Blind counselor.
- 67.9% or 76 consumers have not been offered transition or pre-employment transition services by their school system.
- 63.6% or 75 consumers were not receiving vocational rehabilitation services from the Massachusetts Commission for the Blind.
- 50.9% or 59 consumers were not receiving accommodation at school under a “504” Plan.
- 39.1% or 45 consumers have not signed a release to allow their school to invite the appropriate Massachusetts Commission for the Blind counselor or case worker to attend their IEP meetings.
- 35.9% or 42 consumers were not aware of cooperation or coordination between their schools and the Massachusetts Commission for the Blind in providing or planning services for them.
- 33.3% or 39 consumers were not aware that Massachusetts students aged 14 - 22 who receive special education services and had Individualized Education Programs (are on an IEP) or “504” Plan are eligible for transition services.

For those consumers who answered “Did not know” for the following services:

- 26.1% or 30 consumers did not know that they could sign a release to allow their school to invite the appropriate Massachusetts Commission for the Blind counselor or case worker to attend their IEP meetings.
- 25% or 29 consumers did not know how to receive accommodations at school to help them to participate in the general curriculum under a “504” Plan.
- 21.4% or 25 consumers did not know that there should be cooperation or coordination between their schools and the Massachusetts Commission for the Blind to provide or plan services for them.

Answered By the Choice	Received Vocational Rehabilitation Service or not from MCB	Received services at school under IEP Plan/“504” Plan	Received accommodation at school under "504" Plan	Awarded Student aged 14-22 who received special education & IEP/“504” Plan
Yes	23.7%	67.8%	24.1%	66.7%
Yes	28	78	28	78
No	63.6%	24.3%	50.9%	33.3%
No	75	28	59	39
Do Not Know	12.7%	7.8%	25.0%	NA

Answered By the Choice	Received Vocational Rehabilitation Service or not from MCB	Received services at school under IEP Plan/“504” Plan	Received accommodation at school under "504" Plan	Awarded Student aged 14-22 who received special education & IEP/“504” Plan
Do Not Know	15	9	29	
Total	100.0%	100.0%	100.0%	100.0%
No. of Consumers	118	115	116	117

Answered By the Choice	Offered Transit-Ion/Pre-employment Transition Service by School System to Client	Offered Transit-ion/Pre-employment Transition Service by MCB Counselor	Were aware of Cooperation Between School & MCB in Providing/Planning Services	Signed a Release to School to Invite MCB Worker to Attend IEP Meetings
Yes	28.6%	29.2%	42.7%	34.8%
Yes	32	33	50	40
No	67.9%	69.0%	35.9%	39.1%
No	76	78	42	45
Do Not Know	3.6%	1.8%	21.4%	26.1%
Do Not Know	4	2	25	30
Total of Consumers	100.0%	100.0%	100.0%	100.0%
Total of Consumers	112	113	117	115

In addition, this survey asked the consumers to rate their current or future needs by five different levels of priority such as Essential, High Priority, Medium Priority, Low Priority, and Not a Priority for the following services:

- Postsecondary Education (after high school, i.e. college)
- Vocational Training
- Integrated Employment (including supported employment)
- Independent Living Skills (i.e. orientation and mobility, rehabilitation teaching)
- Job Exploration Counseling (i.e. looking at programs or training leading to employment)
- Work-based Learning Experience, such as in-school or after school work experience, internships, apprenticeships, or on the job training
- Counseling on opportunities for postsecondary educational program or higher education
- Instruction in self-advocacy, individual rights, self-determination skills, and the informed consent process, as well as peer mentoring

For all consumer aged 14-22

who rated their current or future service needs

Level of Priority	Post-secondary	Vocational Training Education	Integrated Employ- ment	Independent Living Skill	Job Exploration Counseling
Essential	34.5%	32.5%	37.7%	44.8%	37.7%
Essential	39	37	43	52	43
High	21.2%	25.4%	21.9%	19.0%	22.8%
High	24	29	25	22	26
Medium	15.9%	20.2%	21.1%	13.8%	12.3%
Medium	18	23	24	16	14
Low	18.6%	18.4%	15.8%	16.4%	21.1%
Low	21	21	18	19	24

Level of Priority	Post-secondary	Vocational Training Education	Integrated Employ- ment	Independent Living Skill	Job Exploration Counseling
Not a Priority	9.7%	3.5%	3.5%	6.0%	6.1%
Not a Priority	11	4	4	7	7
Total of Clients	100.0%	100.0%	100.0%	100.0%	100.0%
Total of Clients	113	114	114	116	114

For all consumers aged 14-22

who rated their current or future service needs

Level of Priority	Work- based Learning Experience	Counseling on Opportunities for Post-Secondary Education/Higher Education	Instruction In Self-advocacy, Individual Rights, & Peer Mentoring
Essential	38.3%	29.3%	28.1%
Essential	44	34	32
High	20.9%	23.3%	24.6%
High	24	27	28
Medium	12.2%	14.7%	24.6%
Medium	14	17	28
Low	20.0%	25.9%	15.8%
Low	23	30	18
Not a Priority	8.7%	6.9%	7.0%
Not a Priority	10	8	8
Total	100.0%	100.0%	100.0%
of Clients	115	116	114

Survey results indicated that the five leading essential current or future needs in the Transition and Pre-employment Transition Services Needs Assessment Survey were:

1. Independent living skills, 44.8% or 52 consumers.

2. Work-based learning experience, 38.3% or 44 consumers.

3. Integrated employment, 37.7% or 43 consumers; tied with Job exploration counseling, 37.7% or 43 consumers.

4. Postsecondary education, 34.5% or 39 consumers

5. Vocational training, 32.5% or 37 consumers.

The next high priority current or future need of the consumers in the Transition and Pre-employment Transition Services Needs Assessment survey were as follows:

1. Vocational training, 25.4% or 29 consumers.

2. Instruction in self-advocacy, individual rights and peer mentoring, 24.6% or 28 consumers.

3. Counseling on opportunities for post-secondary education or higher education, 23.3% or 27 consumers.

These findings suggest that the independent living skills services, work-based learning experience, integrated employment, counseling in job finding, instruction in self-advocacy, individual rights and peer mentoring, opportunities for post-secondary education or higher education, and vocational training were consumers' most urgent and essential needs.

The medium priority current or future needs by the consumers in the Transition and Pre-employment Transition Services Needs Assessment Survey were:

1. Instruction in self-advocacy, individual rights, and peer mentoring, 24.6% or 28 consumers.

2. Integrated employment, 21.1% or 24 consumers.

3. Vocational training, 20.2% or 23 consumers.

The lowest priority current or future needs by the consumers in the Transition and Pre-employment Transition Services Needs Assessment Survey were:

1. Counseling on opportunities for post-secondary education or higher education, 25.9% or 30 consumers.

2. Job exploration counseling, 21.1% or 24 consumers.

3. Work-based learning experience, 20% or 23 consumers

The data also found that some consumers rated as low priority: counseling on opportunities for higher education (25.9% or 30 consumers), job finding counseling (21.1% or 24 consumers), work based learning experience (20% or 23 consumers), post-secondary education (18.6% or 21 consumers), vocational training (18.4% or 21 consumers), independent living (16.4% or 19 consumers), and integrated employment (15.8% or 18 consumers) as well as instruction in self-advocacy, individual rights, and peer mentoring.

For those consumers aged 14-22 who were receiving vocational rehabilitation services:

There were 23.7% of the total consumers who indicated that they were receiving vocational rehabilitation services from the Massachusetts Commission for the Blind. For those 28 consumers, 71% or 20 of them were aware that in Massachusetts students between the ages of 14 and 22 who receive special education services and had Individualized Education Plan (were on an IEP) or had a

“504” Plan were eligible for transition services; 31% or 8 of them had been offered transition or pre-transition employment services by their school system, but 69% or 18 of them had not been offered those services by their school. 56% or 15 of them had been offered those services by Massachusetts Commission for the Blind counselors, and 44% or 12 of them had not been offered those services by MCB counselors. 73% or 19 of them were aware of cooperation or coordination between their schools and the Massachusetts Commission for the Blind in providing or planning services for them, but 15% or 4 of them were not aware those cooperation or coordination, and 12% or 3 of them did not know that there should be cooperation or coordination.

Overall, most of consumers who were receiving vocational rehabilitation services (88% or 13) had signed a release to allow their school to invite the appropriate Massachusetts commission for the Blind case worker to attend their IEP meetings.

For consumers who were receiving vocational rehabilitation services, the responses about current or future needs on the following services were as follows:

Level of Priority	Post- Secondary Education	Vocational Training	Integrated Employ- ment	Independent Living Skill	Job Exploration Counseling
Essential	52.0%	48.0%	54.0%	54.0%	46.0%
Essential	14	13	15	15	13
High	30.0%	26.0%	19.0%	29.0%	36.0%
High	8	7	5	8	10
Medium	11.0%	11.0%	18.0%	4.0%	4.0%
Medium	3	3	5	1	1
Low	4.0%	11.0%	7.0%	7.0%	11.0%
Low	1	3	2	2	3
Not a Priority	4.0%	4.0%	4.0%	7.0%	4.0%
Not a Priority	1	1	1	2	1
Total of clients	100.0%	100.0%	100.0%	100.0%	100.0%
Total of clients	27	27	28	28	28

Level of Priority	Work- based Learning Experience	Counseling on Opportunities for Post-secondary Education/Higher Education	Instruction In Self-advocacy Individual Rights, & Peer Mentoring
Essential	57.0%	36.0%	41.0%
Essential	16	10	11
High	25.0%	25.0%	30.0%
High	7	7	8
Medium	4.0%	18.0%	19.0%
Medium	1	5	5
Low	7.0%	18.0%	4.0%
Low	2	5	1
Not a Priority	7.0%	4.0%	7.0%
Not a Priority	2	1	2
Total of Clients	100.0%	100.0%	100.0%

Level of Priority	Work- based Learning Experience	Counseling on Opportunities for Post-secondary Education/Higher Education	Instruction In Self-advocacy Individual Rights, & Peer Mentoring
Total of Clients	28	28	27

The above data indicated that for consumers who were receiving vocational rehabilitation services, their five leading responses for the most essential current or future need in the Transition and Pre-employment Transition Services Needs Assessment Survey were:

1. Work-based learning experience, 57% or 16 consumers.

2. Integrated employment, 54% or 15 consumers; tied with Independent living skills, 54% or 15 consumers.

3. Postsecondary education, 52% or 14 consumers.

4. Vocational training, 48% or 13 consumers.

5. Job exploration counseling, 46% or 13 consumers.

Their next high priorities for current or future needs in the Transition and Pre-employment Transition Services Needs Assessment survey were as follows:

1. Job Exploration Counseling, 36% or 10 consumers.

2. Post-Secondary Education, 30% or 8 consumers; tied with instruction in self-advocacy, individual rights and peer mentoring, 30% or 8 consumers.

3. Independent Living Skills, 29% or 8 consumers.

4. Vocational Training, 26% or 7 consumers.

5. Tied: Work based learning experience, and counseling on opportunities for post-secondary education or higher education, 25% or 7 consumers.

6. Integrated Employment, 19% or 5 consumers.

Their medium priorities for current or future needs in the Transition and Pre-employment Transition Services Needs Assessment Survey were as follows:

1. Instruction in self-advocacy, individual rights, and peer mentoring, 19% or 5 consumers.

2. Tied: Integrated employment, and counseling on opportunities for post-secondary education or higher education, 18% or 5 consumers.

3. Vocational training, 11% or 3 consumers, tied with post- secondary education, 11% or 3 consumers.

4. Tied: Independent Living Skills, job exploration counseling and work-based learning experience, 4% or one consumer.

These findings suggest that the consumers aged between 14-22 and receiving vocational rehabilitation services need work-based learning experiences, integrated employment, independent living skills services, and opportunities for postsecondary education or higher education. Their other most urgent and essential needs were vocational training, and job exploration counseling.

For all consumers aged 14-22 who rated their current or future service needs:

All consumers aged 14-22 rated their current or future service needs by five different levels of priority such as Essential, High Priority, Medium Priority, Low Priority, and Not a Priority for the following services:

- Postsecondary Education (after high school i.e. college)
- Vocational Training
- Integrated Employment (including supported employment)
- Independent Living Skills (i.e. orientation and mobility, rehabilitation teaching)
- Job Exploration Counseling (i.e. looking at programs or training leading to employment)
- Work-based Learning Experience, such as in-school or after school work experience, internships, apprenticeships, or on the job training
- Counseling on opportunities for postsecondary educational program or higher education
- Instruction in self-advocacy, individual rights, self-determination skills, and the informed consent process, as well as peer mentoring.

In summary, relative to the above services, all consumers between ages 14-22 in the survey indicated that their urgent and essential service needs were as follows:

1. Independent Living Skills, 44.8% or 52 consumers.

2. Work-based learning experience, 38.3% or 44 consumers.

3. Tied: Integrated employment, and job exploration counseling; 37.7% or 43 consumers

4. Post-secondary education, 34.5% or 39 consumers.

5. Vocational training, 32.5% or 37 consumers.

6. Counseling on opportunities for post-secondary education/higher education, 29.3% or 34 consumers.

7. Instruction in self-advocacy, individual rights, and peer mentoring, 28.1% or 32 consumers.

Of the 119 respondents, 112 (73.2%) of them indicated that they would like more information about transition and pre-employment transition services, and 83 (72.2%) of them would like to be contacted by a Massachusetts Commission for the Blind counselor. All requests were referred to the appropriate region for contact.

Transition and Pre-employment Transition Services

Needs Assessment Survey

1. Are you receiving vocational rehabilitation services from the Massachusetts Commission for the Blind?

Yes No Do Not Know

2. Are you receiving services at school under an Individual Education Plan?

Yes No Do Not Know

3. Are you receiving accommodations at school to help you participate in the general curriculum under a "504" Plan?

Yes No Do Not Know

4. Are you aware that in Massachusetts students between the ages of 14 and 22 who receive special education services and have Individualized Education Programs (are on an IEP) or "504" Plan are eligible for transition services?

Yes No

5. Have you been offered transition or pre-transition employment services by your school system?

Yes No

6. Have you been offered transition or pre-transition employment services by your Massachusetts Commission for the Blind counselor?

Yes No

7. Are you aware of cooperation or coordination between your school and the Massachusetts Commission for the Blind in providing or planning services for you?

Yes No Do Not Know

8. Have you signed a release to allow your school to invite the appropriate Massachusetts Commission for the Blind case worker to attend your IEP meetings?

Yes No Do Not Know

Please rate your current or future need for the following services:

9. Postsecondary education (after high school i.e. college)

Essential High priority Medium priority Low priority

Not a priority

10. Vocational training

Essential High priority Medium priority Low priority

Not a priority

11. Integrated employment (including supported employment)

Essential High priority Medium priority Low priority

Not a priority

12. Independent Living (i.e. Orientation and mobility, rehabilitation teaching)

Essential High priority Medium priority Low priority

Not a priority

13. Job exploration counseling (i.e. looking at programs or training leading to employment)

Essential High priority Medium priority Low priority

Not a priority

14. Work-based learning experience (i.e. internships, apprenticeships, on the job training)

Essential High priority Medium priority Low priority

Not a priority

15. Counseling on opportunities for postsecondary educational or higher education

Essential High priority Medium priority Low priority

Not a priority

16. Instruction in self-advocacy, individual rights, as well as peer mentoring

Essential High priority Medium priority Low priority

Not a priority

17. Would you like more information about transition and pre-employment transition services?

Yes No

18. Would you like to be contacted by a Massachusetts Commission for

the Blind counselor?

Yes No

Please include your name, address, email and current telephone

number if you or your child would like to be contacted.

_____
_____
_____

Please add any needs or comments you may have:

_____
_____
_____
_____

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Massachusetts has numerous well-regarded community rehabilitation programs. There are several that specialize in serving persons who are blind or visually-impaired: the Perkins School for the Blind, the Carroll Center for the Blind, the Lowell Association for the Blind, and MAB Community Services. In the 2015 Comprehensive Needs Assessment, respondents were asked: "What organization or governmental agency provides you with the most help relating to your visual impairment?" While 34% of respondents named MCB as the organization that provides the most help relating to their visual impairment, 10% named the Perkins School. Others named Carroll Center for the Blind (2%), MAB Community Services (2%), Lowell Association for the Blind (0.5%), but 51% of respondents received help relating to their visual impairment from other organizations that were not listed.

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 .

As stated in a previous section:

The data collection for the latest comprehensive needs assessment study was completed before the new requirements for inclusion of need for pre-employment transition services were added. The MCB SRC agreed with the agency's proposal for a separate needs assessment survey that has been sent out for parents to fill out for this population (age 14-22) about their educational services and pre-employment transition services, transition services and vocational services. The analysis of this needs assessment survey will be integrated with the comprehensive needs assessment. In addition, a similar needs assessment survey is being conducted with Teachers of the Visually Impaired. Preliminary analysis of these two surveys indicates that there is a clear need for pre-employment transition services.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

The number of potentially eligible legally blind persons in Massachusetts is approximately 27,000, the number of persons currently registered as legally blind; approximately, 65% of the registrants are aged 65 and older.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The Massachusetts Commission for the Blind estimates that approximately 1,500 legally blind individuals per year will receive VR services as active consumers during FY 2016 and FFY 2017. The opportunity for the caseload to grow substantially is limited by the fact that the agency only serves persons who are legally blind or deaf-blind. The definition of legal blindness in Massachusetts is: A person is legally blind if his/her visual acuity is, with correction, 20/200 or less in the better eye, or if, regardless of visual acuity, the peripheral field of his/her vision is reduced to a radius of 10 degrees or less.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

It is estimated that 20-30 individuals with the most significant disabilities will be provided with Supported Employment services.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

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 projected annual cost of services for FFY 2016 and FFY 2017 is approximately $10,000,000. About $7,500,000 will be from Section 110, the Basic Vocational Rehabilitation Program. Approximately, $75,000 will be from Supported Employment Funds.

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.

Goals and priorities were jointly developed and agreed to by the Massachusetts Commission for the Blind and the Massachusetts Commission for the Blind State Rehabilitation Council

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Goal I: To have sufficient resources to serve all eligible individuals, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

Monitor the agency budget and regularly advocate full funding of the VR program to ensure that in the years ahead the MCB can carry out its obligations to its many consumers. A measure for evaluation is the amount of state vocational rehabilitation funds appropriated by the Massachusetts Legislature.

Monitor the allocation of funds for the Deaf-Blind Extended Supports Program and the Supported Employment Program. A measure for evaluation is the amount of state funds appropriated by the Massachusetts Legislature for the agency's state-funded Deaf-Blind Extended Supports Program. Some of these funds are used for on-going supported employment services after VR services are completed.

Goal II: To develop more employment options for VR consumers, including supported employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

-Develop and implement plans to increase training opportunities for transition and pre-employment transition) consumers who are not going to college.

-Continue and expand the agency's internship program for legally blind students and youth who are attending college and high school graduates who are not going to college or out-of school youth with the result that the number of students and youth participating increases each year. Coordinate the agency's internship program with other pre-employment transition services.

-Expand and develop a wide range of pre-employment transition services to enhance transition and employment opportunities for students who are legally blind and for potentially eligible students with disabilities as mandated by the Workforce Innovation and Opportunity Act (WIOA).

-Assist the other components of the statewide workforce development system in assisting individuals who are legally blind by: offering to provide all One-Stop Career Centers with an evaluation of their accessibility to visually-impaired consumers; providing on-site VR services to legally blind consumers who have scheduled appointments at One-Stop Career Centers; providing training about blindness and visual impairment to the workforce development agencies; providing consultation to workforce development staff; working with workforce development agencies to develop apprenticeship and on-the-job training opportunities for legally blind consumers; identify job-driven training opportunities for legally blind consumers; and developing an improved referral process among the partner agencies. Since apprenticeships have seldom been available to legally blind consumers, MCB will contact the Massachusetts Division of Apprenticeship Standards, the U.S. Department of Labor's Office of Disability Employment Policy, and the Connecticut Board of Education and Services for the Blind to learn more about apprenticeships for legally blind persons and how to access opportunities through the Massachusetts Apprenticeship Initiative (MAI) or other resources in Massachusetts and New England.

-Follow closely the CareerAccess initiative. CareerAccess is a community-driven proposed program to reform the current Social Security Administration's Supplemental Security Income Program (SSI) rules so that young adults with disabilities can work and achieve their full potential without risking losing their disability benefits. If the proposal is adopted by the Social Security Administration, MCB will help its consumers take full advantage of the program as part of their individual plans for employment.

Goal III: To help legally blind persons, including students and potentially eligible students, to develop and increase the independence needed to be successful in competitive employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

-Advocate and educate consumers and public officials on pedestrian safety issues which impact travel by pedestrians who use a white cane or service dog to seek and maintain employment.

-Advocate for better access to and improvement of public transportation and paratransit systems in order to increase the employment outcomes of persons who are legally blind.

-Increase consumers' access to adaptive equipment as measured by the number served by the agency's Technology for the Blind Unit or referred to the Carroll Center's training program.

-Increase pre-employment transition, transition, and college students' access to educational materials, resources and websites.

-Advocate for improved accessibility of federal and state government and private internet sites and documents,

Goal IV: Increase the effectiveness and efficiency of vocational rehabilitation services delivery, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

-Annually review the agency performance on RSA standards and indicators and on other statistical measures of effectiveness and recommend actions to improve performance when appropriate.

-Improve communication and collaboration between VR counselors in MCB's regional offices and VR counselors in MCB's Deaf-Blind Extended Support Unit to enhance services to consumers.

-Improve communication and collaboration among MCB staff (VR counselors, children's service workers and social workers) in order to facilitate services to pre-employment transition consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate departments within MCB and programs offered by service providers to meet these individuals' needs.

-Improve communication and collaboration between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including eligible and potentially eligible pre-employment transition consumers.

-Provide appropriate after-school assistive technology and orientation and mobility services as pre-employment transition services to eligible and potentially eligible middle and high school students.

-Provide appropriate job exploration and counseling pre-employment transition services such as mentorships and exposure to real life career information.

-Provide appropriate work readiness pre-employment transition services in areas such as financial management, budgeting, and social skills.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

The goals and priorities are based on an analysis of the following areas:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The Rehabilitation Council (MCB RC) has continued to review the consumer satisfaction studies conducted annually and the comprehensive needs assessment on a routine basis and the members and the agency have used them in developing the goals and priorities.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

The agency and the Rehabilitation Council look forward to using the performance accountability measures of section 116 of WIOA once final regulations are published and the baseline measurements are developed in conjunction with RSA. WIOA and its state plan requirements have been discussed at each quarterly meeting of the Rehabilitation Council since its enactment. The agency and the council have developed new goals and priorities and plans for innovation and expansion based on the new law.

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.

The agency and the Rehabilitation Council used the results of their review of consumer satisfaction studies and reports of the effectiveness of the VR program and the agency's performance on the RSA Standards and Indicators in their development of the goals and priorities.

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 Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

B. THE JUSTIFICATION FOR THE ORDER.

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

C. THE SERVICE AND OUTCOME GOALS.

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

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.

The Massachusetts Commission for the Blind is not under an Order of Selection and does not anticipate that an Order of Selection will be necessary in FFY 2016 or FFY 2017.

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.

One of MCB's major goals for FY 2017 is to expand provision of supported employment services, particularly to students and youth with disabilities. This will be a formal, explicit FY 2017 objective for each VR manager overseeing the delivery of direct consumer services and will be been incorporated into his or her individualized goals and objectives document for the year. It is projected that a number of additional consumers (statewide) will be evaluated for their potential participation in supported employment programming and 20-30 of them will be appropriately served under the Supported Employment Program. MCB will increase its outreach efforts to individuals with blindness and intellectual disabilities, multiple disabilities, acquired brain injury including individuals not eligible for the extended supports from the Department of Mental Health or the Department of Developmental Services. The clarification that MCB consumers who have been rehabilitated into competitive integrated supported employment will be eligible to receive funding for on-going supports under the Massachusetts Rehabilitation Commission's state-funded Extended Ongoing Supports Program will be extremely helpful. The agency has during the past several years created several new positions in its Deaf-Blind Extended Supports Unit. A major objective of MCB's Deaf-Blind Extended Supports Unit is to better provide specialized, intensive VR services to a group of multi-disabled consumers who are thought to be currently underserved; these are consumers who are not deaf or intellectually disabled, but have very significant disabilities such as mental illness or brain injury in addition to blindness. Emphasis on serving deaf-blind and deaf-blind and intellectually disabled consumers who are leaving Special Education programs provided by the public schools and providing appropriate adult services, including supported employment, will continue. The agency's Deaf-Blind Extended Supports Unit has a goal that fifteen such consumers will be served under Title VI programming in FFY 2016. The agency's experience indicates that supported employment can be a very effective service for deaf-blind consumers and also for consumers with blindness and multiple disabilities. In past years, MCB has been involved with several other agencies, including the Massachusetts Rehabilitation Commission, in a successful effort to expand the number of providers of supported employment services. This effort has resulted in more choices for consumers; performance based contracting has been adopted as an incentive to promptness and flexibility in service provision and to successful outcomes. While MCB has provided staff training on supported employment a number of times over the years, the agency has many new VR counselors. The agency, in collaboration with the TACE Center, conducted a training program on supported employment for all VR staff in November, 2014 and will repeat this training over the next several years, including the changes made by WIOA.

MCB will distribute any FFY 2017 Title VI resources from a centrally located blanket service contract, which has been established within the Deputy Commissioner budget center. This instrument enables MCB to encumber funds for authorized supported employment services with a wide variety of community based vendors located in any of our six regional areas.

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

As stated in the previous section:

One of MCB's major goals for FY 2017 is to expand provision of supported employment services, particularly to students and youth with disabilities. This will be a formal, explicit FY 2017 objective for each VR manager overseeing the delivery of direct consumer services and will be been incorporated into his or her individualized goals and objectives document for the year.

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.

As stated in a previous section: The Massachusetts Department of Developmental Services (DDS) and the Massachusetts Department of Mental Health (DMH) have over the years worked cooperatively with MCB and provided extended services to a number of legally blind persons that have been provided supported employment services by MCB. During 2015 and 2016, MCB has collaborated with the DDS on plans to expand services to mutual consumers that includes an initiative to better identify consumers who could benefit from supported employment services and are not receiving them at this time. A new Memorandum of Agreement that includes provisions for use of joint agency resources to ensure quality service delivery and long term supports for supported employment was executed in November, 2015. This includes a formal commitment of funding from MCB for appropriate supported employment services and a commitment from DDS for funding of the long-term, ongoing employment support services when needed. The agreement also provides for cross-training of staff.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

The goals, jointly developed by the agency and the Rehabilitation Council, are listed below along with the priorities and strategies for innovation and expansion that will be used to reach the gvfvoals.

Goal I: To have sufficient resources to serve all eligible individuals, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

Monitor the agency budget and regularly advocate full funding of the VR program to ensure that in the years ahead the MCB can carry out its obligations to its many consumers. A measure for evaluation is the amount of state vocational rehabilitation funds appropriated by the Massachusetts Legislature.

- Monitor the allocation of funds for the Deaf-Blind Extended Supports Program and the Supported Employment Program. A measure for evaluation is the amount of state funds appropriated by the Massachusetts Legislature for the agency's state-funded Deaf-Blind Extended Supports Program. Some of these funds are used for on-going supported employment services after VR services are completed.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The agency's success in maintaining or increasing its state budget.

Goal II: To develop more employment options for VR consumers, including supported employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Develop and implement plans to increase training opportunities for transition and pre-employment transition consumers who are not going to college.
- Continue and expand the agency's internship program for legally blind students and youth who are attending college and high school graduates who are not going to college or out-of-school youth with the result that the number of students and youth who participate increases each year.

- Coordinate the agency's internship program with other pre-employment transition services
- Assist the other components of the statewide workforce development system in assisting individuals who are legally blind by: offering to provide all One-Stop Career Centers with an evaluation of their accessibility to visually-impaired consumers; providing on-site VR services to legally blind consumers who have scheduled appointments at One-Stop Career Centers; providing training about blindness and visual impairment to the of workforce development agencies; providing consultation to workforce development staff; working with workforce development agencies to develop apprenticeship and on-the-job training opportunities for legally blind consumers; identify job-driven training opportunities for legally blind consumers; and developing an improved referral process among the partner agencies.
- Expand and develop a wide range of pre-employment transition services to enhance transition and employment opportunities for students who are legally blind and for potentially eligible students with disabilities as mandated by the Workforce Innovation and Opportunity Act (WIOA) through: implementation of the new agreement with the Massachusetts Department of Elementary and Secondary Education (DESE); working more closely with schools and teachers of the visually-impaired; working more closely with the Massachusetts Federation for Children with Special Needs (the state Parent Training and Information Center) to provide better outreach and information to parents about pre-employment transition services, vocational rehabilitation services, and the opportunities for coordination and cooperation between MCB and school personnel; providing group pre-employment transition services both after-school and during school vacations.
- Strengthen agency use of labor market information. MCB vocational rehabilitation counselors use the Occupational Outlook Handbook website of the Bureau of Labor Statistics, the Massachusetts Labor Market Information website, and the American Foundation for the Blind Explore Careers website in counseling consumers about vocational choice. Agency data show that computer science, education, human services, and customer service occupations predominate among jobs obtained by consumers who are legally blind. Data shows that these fields are all growing in the state of Massachusetts. The agency intends to offer updated training on the use of these and other resources to counselors and employment specialists.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of consumers who complete the agency's internship program.
- The number of students who participate in pre-employment transition services.

Goal III: To help legally blind persons, including students and potentially eligible students, to develop and increase the independence needed to be successful in competitive employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Advocate and educate consumers and public officials on pedestrian safety issues which impact travel by pedestrians who use a white cane or service dog to seek and maintain employment.
- Advocate for better access to and improvement of public transportation and paratransit systems in order to increase the employment outcomes of persons who are legally blind.
- Increase consumers' access to adaptive equipment as measured by the number served by the agency's Technology for the Blind Unit.
- Increase pre-employment transition, transition, and college students' access to educational materials, resources and websites.
- Advocate for improved accessibility of federal and state government and private internet sites and documents.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of consumers who are served by the agency's Technology for the Blind Unit and the Carroll Center's training program.

Goal IV: Increase the effectiveness and efficiency of vocational rehabilitation services delivery, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Annually review the agency performance on RSA standards and indicators, performance accountability measures under section 116 of WIOA, and on other statistical measures of effectiveness and recommend actions to improve performance when appropriate.
- Improve communication and collaboration between VR counselors in MCB's regional offices and VR counselors in MCB's Deaf-Blind Extended Support Unit to enhance services to consumers.
- Improve communication and collaboration among MCB staff (VR counselors, children's service workers and social workers) in order to facilitate services to pre-employment transition consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate departments within MCB to meet these individuals' needs.
- Improve communication and collaboration between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including eligible and potentially eligible pre-employment transition consumers.
- Provide appropriate after-school assistive technology and orientation and mobility services as pre-employment transition services to eligible and potentially eligible middle and high school students.
- Provide appropriate job exploration and counseling pre-employment transition services such as mentorships and exposure to real life career information.
- Provide appropriate work readiness pre-employment transition services in areas such as financial management, budgeting, and social skills.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of students who participate in pre-employment transition 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.

Relevant strategies listed in the previous section:

• Increase consumers' access to adaptive equipment as measured by the number served by the agency's Technology for the Blind Unit.

• Increase pre-employment transition, transition, and college students' access to educational materials, resources and websites.

• Advocate for improved accessibility of federal and state government and private internet sites and documents.

• Improve communication and collaboration between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including eligible and potentially eligible pre-employment transition consumers.

• Provide appropriate after-school assistive technology and orientation and mobility services as pre-employment transition services to eligible and potentially eligible middle and high school students.

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.

The agency has long placed a high priority on outreach to minority and underserved persons. The agency has for some years had a Diversity Committee within the agency. The committee consists of the Commissioner, the Director of External Affairs, vocational rehabilitation counselors, representatives of the agency Staff Development Unit, and support staff. The goal of the committee is to increase access to services for multi-cultural and minority consumers. The Diversity Committee has participated in the development of the curriculum for agency diversity training and has promoted staff attendance at community conferences which address issues relevant to provision of services to specific groups such as immigrants from Sub-Saharan Africa and Cambodia.

One strategy which the Diversity Committee uses is to invite the staffs of community groups with which the agency would like to develop closer relationships to attend luncheons at MCB and share information and recommendations about outreach to minority group members who are legally blind.

The agency has three Vocational Rehabilitation Counselors and two Rehabilitation Teachers who are fluent in Spanish. The agency also has on staff one Vocational Rehabilitation Counselor who is fluent in Portuguese and thus able to better serve the large Portuguese population in eastern Massachusetts. One VR counselor speaks French and the language of the Congo; one speaks Italian. The agency has installed the Language Line interpreter service in all of its offices to assist counselors in working with consumers who speak all languages, especially uncommon ones. Language Line offers interpretation of more than 140 languages. For home visits, MCB contracts with Catholic Charities for language interpreters in the community who can interpret languages such as Khymer (a language of Cambodia), Chinese, French, Russian, Polish, Croatian, Vietnamese, and Spanish.

The agency has a Director of External Affairs who coordinates a formal program of outreach to all minorities and underserved populations in cooperation with grass roots community organizations. Responsibilities of the Director of External Affairs include:

• Identification of agencies and associations serving minority communities throughout the state. Typically, the Coordinator writes a letter of introduction and requests an opportunity to speak to the group. • Attendance at health fairs, church groups and other community events relevant to members of minority communities. MCB is listed is the Boston Community Health Education Center Resource Guide which leads to numerous invitations to attend events to promote the agency's services among Boston's minority communities. • Advocacy for the availability of English as a Second Language instruction in accessible media. The agency's needs assessment studies and public hearings have for a number of years identified the lack of availability of ESL instruction for blind persons as a very serious problem. A Massachusetts consumer group, the Association of Blind Citizens, has developed an audio (tape and CD) ESL course for blind and visually-impaired persons. • The MCB Director of External Affairs continues to explore ways to address the needs of minority communities. During 2017, MCB will continue to focus on outreach to individuals with minority backgrounds who are blind or visually impaired. MCB's Director of External Affairs will continue to attend multi-cultural events and network with partnering agencies. MCB's Director of External Affairs will continue to be active in the Commonwealth of Massachusetts' Affirmative Marketing Program and to offer suggestions to agencies on SOWMBA certified vendors.

The agency's Staff Development Unit has for a number of years worked to assist staff to better address the needs of traditionally underserved minority groups. Each a training program on cultural diversity and rehabilitation issues is offered to vocational rehabilitation staff. In addition, the Director of External Affairs continues to arrange periodic luncheon seminars for staff on topics relevant to provision of services to minority populations.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

Relevant strategies and methods listed in a previous section: • Develop and implement plans to increase training opportunities for transition and pre-employment transition consumers who are not going to college. • Continue and expand the agency's internship program for legally blind

students and youth who are attending college and high school graduates who are not going to college or out-of-school youth with the result that the number of students and youth who participate increases each year. Coordinate the agency's internship program with other pre-employment transition services. • Expand and develop a wide range of pre-employment transition services to enhance transition and employment opportunities for students who are legally blind and for potentially eligible students with disabilities as mandated by the Workforce Innovation and Opportunity Act (WIOA). • Increase pre-employment transition, transition, and college students' access to educational materials, resources and websites. • Improve communication and collaboration among MCB staff (VR counselors, children's service workers and social workers) in order to facilitate services to pre-employment transition consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate departments within MCB to meet these individuals' needs. • Improve communication and collaboration between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including eligible and potentially eligible pre-employment transition consumers. • Provide appropriate after-school assistive technology and orientation and mobility services as pre-employment transition services to eligible and potentially eligible middle and high school students. • Provide appropriate job exploration and counseling pre-employment transition services such as mentorships and exposure to real life career information. • Provide appropriate work readiness pre-employment transition services in areas such as financial management, budgeting, and social skills.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Not applicable.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

• Annually review the agency performance on RSA standards and indicators, performance accountability measures under section 116 of WIOA, and on other statistical measures of effectiveness and recommend actions to improve performance when appropriate.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

Relevant strategies in a previous section:

• Assist the other components of the statewide workforce development system in assisting individuals who are legally blind by: offering to provide all One-Stop Career Centers with an evaluation of their accessibility to visually-impaired consumers; providing on-site VR services to legally blind consumers who have scheduled appointments at One-Stop Career Centers; providing training about blindness and visual impairment to the workforce development agencies; providing consultation to workforce development staff; working with workforce development agencies to develop apprenticeship and on-the-job training opportunities for legally blind consumers; identify job-driven training opportunities for legally blind consumers; and developing an improved referral process among the partner agencies.

Since apprenticeships have seldom been available to legally blind consumers, MCB will contact the Massachusetts Division of Apprenticeship Standards, the U.S. Department of Labor's Office of Disability Employment Policy, and the Connecticut Board of Education and Services for the Blind to learn more about apprenticeships for legally blind persons and how to access opportunities through the Massachusetts Apprenticeship Initiative (MAI) or other resources in Massachusetts and New England.

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 stated in a previous section:

The Rehabilitation Council (MCB RC) has continued to review the consumer satisfaction studies conducted annually and the comprehensive needs assessment on a routine basis and the members and the agency have used them in developing the goals and priorities.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

The goals, jointly developed by the agency and the Rehabilitation Council, are listed below along with the priorities and strategies for innovation and expansion that will be used to reach the goals.

Goal I: To have sufficient resources to serve all eligible individuals, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

Monitor the agency budget and regularly advocate full funding of the VR program to ensure that in the years ahead the MCB can carry out its obligations to its many consumers. A measure for evaluation is the amount of state vocational rehabilitation funds appropriated by the Massachusetts Legislature.

- Monitor the allocation of funds for the Deaf-Blind Extended Supports Program and the Supported Employment Program. A measure for evaluation is the amount of state funds appropriated by the Massachusetts Legislature for the agency's state-funded Deaf-Blind Extended Supports Program. Some of these funds are used for on-going supported employment services after VR services are completed.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The agency's success in maintaining or increasing its state budget.

Goal II: To develop more employment options for VR consumers, including supported employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Develop and implement plans to increase training opportunities for transition and pre-employment transition consumers who are not going to college.
- Continue and expand the agency's internship program for legally blind students and youth who are attending college and high school graduates who are not going to college or out-of-school youth with the result that the number of students and youth who participate increases each year. Coordinate the agency's internship program with other pre-employment transition services.
- Expand and develop a wide range of pre-employment transition services to enhance transition and employment opportunities for students who are legally blind and for potentially eligible students with disabilities as mandated by the Workforce Innovation and Opportunity Act (WIOA) through: implementation of the new agreement with the Massachusetts Department of Elementary and Secondary Education (DESE); working more closely with schools and teachers of the visually-impaired; working more closely with the Massachusetts Federation for Children with Special Needs (the state Parent Training and Information Center) to provide better outreach and information to parents about pre-employment transition services, vocational rehabilitation services, and the opportunities for coordination and cooperation between MCB and school personnel; providing group pre-employment transition services both after-school and during school vacations.
- Assist the other components of the statewide workforce development system in assisting individuals who are legally blind by: offering to provide all One-Stop Career Centers with an evaluation of their accessibility to visually-impaired consumers; providing on-site VR services to legally blind consumers who have scheduled appointments at One-Stop Career Centers; providing training about blindness and visual impairment to the of workforce development agencies; providing consultation to workforce development staff; working with workforce development agencies to develop apprenticeship and on-the-job training opportunities for legally blind consumers; identify job-driven training opportunities for legally blind consumers; and developing an improved referral process among the partner agencies.
- Strengthen agency use of labor market information. MCB vocational rehabilitation counselors use the Occupational Outlook Handbook website of the Bureau of Labor Statistics, the Massachusetts Labor Market Information website, and the American Foundation for the Blind Explore Careers website in counseling consumers about vocational choice. Agency data show that computer science, education, human services, and customer service occupations predominate among jobs obtained by consumers who are legally blind. Data shows that these fields are all growing in the state of Massachusetts. The agency intends to offer updated training on the use of these and other resources to counselors and employment specialists.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of consumers who complete the agency's internship program.
- The number of students who participate in pre-employment transition services.

Goal III: To help legally blind persons, including students and potentially eligible students, to develop and increase the independence needed to be successful in competitive employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Advocate and educate consumers and public officials on pedestrian safety issues which impact travel by pedestrians who use a white cane or service dog to seek and maintain employment.
- Advocate for better access to and improvement of public transportation and paratransit systems in order to increase the employment outcomes of persons who are legally blind.
- Increase consumers' access to adaptive equipment as measured by the number served by the agency's Technology for the Blind Unit.
- Increase pre-employment transition, transition, and college students' access to educational materials, resources and websites.
- Advocate for improved accessibility of federal and state government and private internet sites and documents.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of consumers who are served by the agency's Technology for the Blind Unit and the Carroll Center's training program.

Goal IV: Increase the effectiveness and efficiency of vocational rehabilitation services delivery, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities:

- Annually review the agency' performance on RSA standards and indicators, performance accountability measures under section 116 of WIOA, and on other statistical measures of effectiveness and recommend actions to improve performance when appropriate.
- Improve communication and collaboration between VR counselors in MCB's regional offices and VR counselors in MCB's Deaf-Blind Extended Support Unit to enhance services to consumers.
- Improve communication and collaboration among MCB staff (VR counselors, children's service workers and social workers) in order to facilitate services to pre-employment transition consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate departments within MCB to meet these individuals' needs.
- Improve communication and collaboration between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including eligible and potentially eligible pre-employment transition consumers.

- Provide appropriate after-school assistive technology and orientation and mobility services as pre-employment transition services to eligible and potentially eligible middle and high school students.
- Provide appropriate job exploration and counseling pre-employment transition services such as mentorships and exposure to real life career information.
- Provide appropriate work readiness pre-employment transition services in areas such as financial management, budgeting, and social skills.

Measurement Methodology:

- The Rehabilitation Council's annual evaluation of the agency's progress toward the goal.
- The number of students who participate in pre-employment transition services.

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.

As stated in a previous section:

The agency has long placed a high priority on outreach to minority and underserved persons. The agency has for some years had a Diversity Committee within the agency. The committee consists of the Commissioner, the Director of External Affairs, vocational rehabilitation counselors, representatives of the agency Staff Development Unit, and support staff. The goal of the committee is to increase access to services for multi-cultural and minority consumers. The Diversity Committee has participated in the development of the curriculum for agency diversity training and has promoted staff attendance at community conferences which address issues relevant to provision of services to specific groups such as immigrants from Sub-Saharan Africa and Cambodia. One strategy which the Diversity Committee uses is to invite the staffs of community groups with which the agency would like to develop closer relationships to attend luncheons at MCB and share information and recommendations about outreach to minority group members who are legally blind. The agency has three Vocational Rehabilitation Counselors and two Rehabilitation Teachers who are fluent in Spanish. The agency also has on staff one Vocational Rehabilitation Counselor who is fluent in Portuguese and thus able to better serve the large Portuguese population in eastern Massachusetts. One VR counselor speaks French and the language of the Congo; one speaks Italian. The agency has installed the Language Line interpreter service in all of its offices to assist counselors in working with consumers who speak all languages, especially uncommon ones. Language Line offers interpretation of more than 140 languages. For home visits, MCB contracts with Catholic Charities for language interpreters in the community who can interpret languages such as Khymer (a language of Cambodia), Chinese, French, Russian, Polish, Croatian, Vietnamese, and Spanish. The agency has a Director of External Affairs who coordinates a formal program of outreach to all minorities and underserved populations in cooperation with grass roots community organizations. Responsibilities of the Director of External Affairs include: • Identification of agencies and associations serving minority communities throughout the state. Typically, the Coordinator writes a letter of introduction and requests an opportunity to speak to the group. • Attendance at health fairs, church groups and other community events relevant to members of minority communities. MCB is listed is the Boston Community Health Education Center Resource Guide which leads to numerous invitations to attend events to promote the agency's services

among Boston's minority communities. • Advocacy for the availability of English as a Second Language instruction in accessible media. The agency's needs assessment studies and public hearings have for a number of years identified the lack of availability of ESL instruction for blind persons as a very serious problem. A Massachusetts consumer group, the Association of Blind Citizens, has developed an audio (tape and CD) ESL course for blind and visually-impaired persons. The MCB Director of External Affairs continues to explore ways to address this need. During 2017, MCB will continue to focus on outreach to individuals with minority backgrounds who are blind or visually impaired. MCB's Director of External Affairs will continue to attend multi-cultural events and network with partnering agencies. MCB's Director of External Affairs will continue to be active in the Commonwealth of Massachusetts' Affirmative Marketing Program and to offer suggestions to agencies on SOWMBA certified vendors. The agency's Staff Development Unit has for a number of years worked to assist staff to better address the needs of traditionally underserved minority groups. Each a training program on cultural diversity and rehabilitation issues is offered to vocational rehabilitation staff. In addition, the Director of External Affairs continues to arrange periodic luncheon seminars for staff on topics relevant to provision of services to minority populations.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

The following is an evaluation of the extent to which the MCB VR program goals described in the previously approved VR services portion of the Unified State Plan for the most recently completed program year, 2015, were achieved.

During FFY 2015 and 2016, the Massachusetts Commission for the Blind worked with the Rehabilitation Council on the mutually-agreed upon goals and the use of Title I funds for innovation and expansion activities. The narrative interwoven with the goals below provides a report of progress in achieving the VR program goals; it describes factors that impeded the achievement of the goals and priorities, to the extent they were not achieved, and provides a report on how the funds reserved for innovation and expansion activities were utilized in the preceding year. One baseline for evaluation is a survey of MCB RC members' annual evaluation of progress towards the goals.

Goal I: To have sufficient resources to serve all eligible individuals, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal. Priorities • Monitor annually the budget and regularly advocate full funding of the VR program to ensure that in the years ahead the MCB can carry out its obligations to its many consumers. A measure for evaluation is the amount of state vocational rehabilitation funds appropriated by the Massachusetts Legislature. • Monitor annually the allocation of funds for the Deaf-Blind Extended Supports Program and the Supported Employment Program. A measure for evaluation is the amount of state funds appropriated by the Massachusetts Legislature for the agency's state-funded Deaf-Blind Extended Supports Program. Some of these funds are used for on-going supported employment services after VR services are completed.

Report of Progress: The agency has had sufficient resources to serve all eligible individuals during FY 2015 and 2016. The Massachusetts Legislature has continued to fund the agency's VR program sufficient to match federal funds. The Rehabilitation Council has been very active in advocating for increased vocational rehabilitation funding at the state level. In fact, the Massachusetts Legislature has appropriated approximately the same amount of state vocational rehabilitation funds each year as were appropriated in SFY 2009. The SFY 2016 state appropriation for vocational rehabilitation services is about 1% higher than SFY 2015. The SFY 2016 state appropriation for the state-funded Deaf-Blind Extended Supports Program is enough to cover the need for more residential services for those consumers who are turning age 22. This program provides residential and day services, including on-going supported employment services to individuals with the most significant disabilities.

The willingness of the Massachusetts Legislature to fund the agency's VR program sufficient to match federal funds has enabled MCB to apply for and receive a considerable amount of re-allotment funds from RSA each year.

MCB RC Evaluation: In FY 2013, members rated the agency's progress as Very Good (4 out of 5). In FY 2014, members rated the agency's progress as Very Good (3.8 out of 5). An updated evaluation will be made in 2016.

Goal II: To develop more employment options for VR consumers, including supported employment, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal. Priorities: • Develop and implement plans to increase training opportunities for transition-age consumers who are not going to college. • Continue and refine the agency's internship program for legally blind students who are attending college; explore ways to expand the program to include recent high school graduates who are not going to college with the result that the number of students participating increases each year.

Report of Progress: • The development of increased training opportunities for transition-age consumers who are not going to college continues to be a major focus area. During FFY 2015, MCB worked with Project SEARCH, an initiative that began in Cincinnati, Ohio to develop a program tailored for MCB consumers in Massachusetts. Project Search is a nine-month school-to-work program that takes place entirely at the workplace. MCB has chosen two providers: the Carroll Center for the Blind and the Polus Center for Social and Economic Development. The agency was able to recruit two large hospitals as worksites. Nine MCB consumers just completed working at the work sites with the goal of identifying career objectives and gaining work experience. There was a job coach at each work site to provide hands-on training and support to the participants. Project Search has had a 70% job placement rate in its programs in Ohio and other states. At least five participants have been hired, although some are still per diems. MCB intends to continue to expand Project Search to meet the needs of consumers who choose to participate in this kind of program. A new program is beginning this spring at the same worksites. MCB will consider other types of worksites such as hotels in the future if there is consumer interest. • The Deaf-Blind Extended Supports Unit has one counselor who provides specialized, intensive VR services to a group of multi-disabled consumers who are thought to be currently underserved; these are consumers who are not deaf or intellectually disabled, but have very significant disabilities such as mental illness or brain injury in addition to blindness. • The agency continues to explore ways to increase its use of on-the-job training (OJT) and unpaid work experiences for all consumers. The OJT services pay part of the wages of a legally blind employee during a training period of one or two months. During FFY 2015, the agency has been able to arrange two OJT positions. Several recent OJT trainees have obtained permanent jobs with other employers after completing the OJT experience. • During the past two years, MBC has participated in several hiring events with the Massachusetts Rehabilitation Commission that were sponsored by the Office of Federal Contract Compliance Programs (OFCCP). Federal contractors are required to set a hiring goal of having 7% of their employees drawn from qualified workers with disabilities. It is called a hiring event instead of a job fair because the consumers are matched with job openings and apply online for those jobs prior to the event and real job interviews are conducted with specific employers during the event itself. Forty-five MCB consumers completed approximately 70 interviews with employers who had openings in their areas of interest. A number of consumers had second interviews and some have since obtained employment. The agency held an in-service presentation in 2014 for the employers doing business

with OFCCP; this presentation drew thirty-two contractors, many of whom were not at the hiring event. MCB has held several smaller in-service presentations for OFCCP contractors during 2015 and intends to continue with this initiative. • The agency has also begun to incorporate a hiring event, with scheduled job interviews for consumers who have applied online for specific jobs, into its annual job fair for individuals with visual impairments that is held each October. • MCB has two job clubs for consumers in the Greater Boston area who are actively seeking employment. • For the past several years, agency staff has regularly conducted a two-session course of soft skills training for prospective student interns and job-ready consumers. Soft skills are those interpersonal skills such as cooperativeness, politeness, and friendliness that enhance an individual's on-the-job interactions, job performance and career prospects. For the third year, all of those participating in the intern program this summer attended this course. This year, MCB was able to offer the training in each of its offices, making attendance more convenient for consumers. In addition, courses are held for other job-ready consumers. MCB also provides a one-day Essential Skills Training for transition-age youth. This training covers soft skills and other career development skills for younger consumers. Based on feedback from consumers and counselors, this training will be expanded this year to offer consumers more opportunities to interact with employers and to include other pre-employment transition components such as occupational information and career exploration. • Recognizing that many employers are now using telephone interviews to screen applicants, the agency for several years has contracted with Phone Interview Pro, a company that provides consumers with a thirty-minute interview that simulates an actual interview with an experienced corporate evaluator. The consumer and the counselor are then provided with a detailed, personalized report of the interview that identifies strengths and areas that need improvement. A second interview is then arranged to give the consumer the opportunity to practice what he or she has learned from the first interview. MCB counselors have referred approximately 45 consumers to undergo this evaluation during FY 2015. The majority of the consumers find the experience to be very beneficial. • In the fall of 2014, the agency once again co-sponsored a Job Fair for Individuals with Visual Impairments in partnership with the Carroll Center for the Blind, Perkins, Massachusetts Department of Developmental Disabilities Services, MAB Community Services, and the National Braille Press. Approximately 100 blind and visually-impaired consumers attended. Approximately thirty Massachusetts employers participated, a 50% increase from 2013. The employers accepted resumes and explained job opportunities at their companies. The agencies held a similar job fair in October, 2015. • The agency's internship program continues to grow. In the summer of 2015, 93 students (a 20% increase over the previous year), including some high school students, participated. Approximately 400 consumers will have completed one or more internships since the program began in 2004. An agency study conducted in FY 2012 showed that 93% of the interns have had successful outcomes from the internship experience; that is, the intern has either finished school and obtained a job or is on track with his or her individual plan for employment. • Several MCB staff attended and hosted an information table at the statewide Massachusetts STEM Summit that was held in October 2014 and 2015 at the DCU Center in Worcester. The purpose of these conferences was to promote education and employment of youth in the fields of science, technology, engineering, and mathematics. It has been held for the past eleven years and, typically, has more than 800 educators and employers in attendance. • RespectabilityUSA, a national non-profit organization, has made a number of suggestions through the public comment process of innovative employment programs for the agency to explore. MCB intends find out more about the suggested models: • the practices of North Dakota, South Dakota, Alaska, and Wyoming, which have achieved increased results of 50% employment rates of individuals with disabilities. • GA, Nevada, Kentucky innovative youth practices. • the RespectAbility Disability Employment First Planning

Tool • the RespectTheAbility campaign • STEM programs for individuals with disabilities, like the "Autism Advantage" program focused on Microsoft, SAP and Specialisterne who hire individuals with autism for software testers, programmers, system admins, data quality etc. (Delware)

MCB RC Evaluation: In FY 2013, members rated the agency's progress as Very Good (3.8 out of 5). In FY 2014, members rated the agency's progress as Very Good (3.6 out of 5). An updated evaluation will be made in 2016.

Goal III: To help legally blind persons to increase their independence, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal.

Priorities: • Advocate and educate consumers and public officials on pedestrian safety issues which impact pedestrians who are legally blind and issues regarding laws pertaining to the white cane and the use of service dogs; • Advocate for better access to, and improvement of, public transportation and paratransit systems throughout the Commonwealth. • Increase consumers' access to adaptive equipment as measured by the number served each year by the agency's Technology for the Blind Unit. • Increase students' access to accessible textbooks. • Advocate for improved accessibility of federal and state government documents and internet sites.

Report of Progress: • The agency has been able to increase consumers' access to both adaptive equipment and accessible textbooks during FY 2014 and 2015. The agency's Technology for the Blind Unit will serve approximately 1,200 VR consumers during FFY 2016. The staff of the unit includes two new technology specialists who are able to provide extended training in Word, Outlook, and basic navigation and eight rehabilitation engineers. • The agency has been able to continue to enhance the independence and educational and vocational potential of blind children by providing adaptive equipment and software on a limited basis to elementary and middle-school aged children under its state-funded social services program. These services enable these young consumers to transition to pre-transition employment and vocational rehabilitation services at age 14 with the same level of technical skill as their sighted peers. In addition, MCB intends to revise its policies under the vocational rehabilitation program to provide more adaptive equipment and training to pre-employment transition consumers to allow them to improve their work readiness, vocational, and independent living skills when they are not in school. • MCB has been working with providers to develop new options for pre-employment transition services. The Carroll Center for the Blind has developed a work readiness program to address several needs. One that is frequently mentioned by counselors and other professionals is for students, who may be expert in the use of telephones and tablets, to become proficient in the use of Microsoft Office products and educational and job-search applications. Another need is for students to use technology to enhance independent living skills needed for employment by using GPS applications, etc. The work readiness program will be held one Saturday each month during the school year and will address a variety of independent living, computer, and social skills. • MCB, in conjunction with the Massachusetts Rehabilitation Commission, issued a Request for Response (RFR) to solicit other providers to develop new pre-employment transition programs. Six of the respondents have developed programs for legally blind students. In general, the programs meet 2-3 days a week after school and cover topics such as soft skills, resumes, interviewing, career development, and occupational information. • The agency has a Youth Council with 16 members between the ages of 14 and 22. The council meets quarterly. Among the goals of the Council are leadership development and collaboration with other youth councils such as those advising the Mayor of Boston and the

Governor of Massachusetts. The Youth Council will be asked to help MCB in developing and refining relevant pre-employment transition services for their peers. • Approximately 45 MCB consumers and a number of MCB staff attended the Annual Consumer Conference that was held in June 2015. The Massachusetts Commission for the Blind sponsors this annual conference in conjunction with the Massachusetts Rehabilitation Commission, and the Massachusetts Commission for the Deaf and Hard of Hearing, and the Massachusetts Statewide Independent Living Council. About 400 consumers who are blind or who have other disabilities attend. The conference offered a unique opportunity for consumers, employers, advocates and all people with disabilities to network with one another and with agency staff in an educational environment and to have a direct impact on the agencies' policies and practices. • MCB participated in the Boston Abilities Expo at the Boston Convention and Exhibition Center in September 2015. MCB staff hosted a booth at the expo to demonstrate the latest assistive technology devices, to allow attendees to speak with Assistive Technology staff, and to learn more about other MCB programs and services.

MCB RC Evaluation: In FY 2012, members rated the agency's progress as Very Good (4 out of 5). In FY 2013, members rated the agency's progress as Very Good (3.8 out of 5). In FY 2014, members rated the agency's progress as Very Good/Excellent (4.4 out of 5). An updated evaluation will be made in 2016.

Goal IV: Increase the effectiveness and efficiency of vocational rehabilitation services delivery, as measured by the Rehabilitation Council's annual evaluation of the agency's progress toward the goal. Priorities: • Review annually the agency performance on RSA standards and indicators, WIOA performance measurements, and on other statistical measures of effectiveness and to recommend actions to improve performance when appropriate. • Improve communication among all MCB VR staff between VR counselors in MCB regional offices and VR counselors in the MCB Deaf-Blind Extended Supports Unit to enhance services to consumers who would otherwise not receive necessary services. • Improve communication among MCB staff (VR counselors, children's service workers and social workers) in order to facilitate services to consumers who have reached their fourteenth birthday and to identify on a case-by-case basis the most appropriate department within MCB to meet these individuals' needs. • Improve and maintain ongoing communication between MCB VR counselors and all other state, federal, contracted and private agencies providing technology, vocational training and employment services to MCB consumers, including those individuals with other disabilities in addition to blindness.

Report of Progress: • The agency has an automated case management system that is used in seventeen other state VR agencies. This system has the capacity to generate statistical reports to help counselors, management, and Rehabilitation Council members to evaluate the agency's effectiveness. MCB continues to work with the vendor to develop specific statistical reports for both the MCB management and the Rehabilitation Council, including those required for the new WIOA performance measurements. • The MCB RC members currently annually review the agency's performance on RSA standards and indicators, and on other statistical measures of effectiveness as well as the agency's consumer satisfaction studies. The agency's performance on RSA standards and indicators has at all times met the minimum level of overall performance established by RSA. • MCB has addressed the priority to facilitate services to consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate unit within MCB by developing a comprehensive assessment form for children's workers to complete. The agency holds several College Nights each year throughout the state for students who are considering attending

college. Their families are also invited. The purpose is to orient the students to MCB services, college disability services, etc. and to answer their questions. MCB also holds a half-day orientation session each spring in Greater Boston for those consumers who intend to begin college in the fall. • A transition form has been developed to improve services to adolescents and their transition to adult services and to improve communication among the involved staff when the child turns 14. MCB Children's Workers and the Vocational Rehabilitation Counselors have begun to make joint visits to the adolescent and parents to help the family to develop a roadmap for the child's services going forward. Consultations with agency rehabilitation teachers, mobility specialists, and technology specialists are also offered to the consumer and family. • MCB has committed in the statewide Memorandum of Understanding in Appendix C to participate in teams to be established comprised of individuals who are empowered to represent the core partner agency for the purpose of developing and executing local MOUs, modeled on the state MOU.

MCB RC Evaluation: In FY 2013, members rated the agency's progress as Good/Very Good (3.4 out of 5). In FY 2014, members rated the agency's progress as Good/Very Good (3.4 out of 5). An updated evaluation will be made in 2016.

As noted and described in the assurance on Goals and Plans for Distribution of Title VI, Part B Funds, supported employment goals for FY 2015 have been met.

MCB has reviewed its performance on the national Standards and Indicators each year since the implementation of these standards and indicators. Analysis of the indicators has identified areas for improvement in the agency's performance. The agency is pleased to note that its rehabilitants earn one of the highest average wage levels of all the state vocational rehabilitation programs. The agency has attained one of the highest average wage levels since the current Standards and Indicators were implemented some years ago.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Long-standing problems and factors that impede the achievement of the goals and priorities include: • public transportation systems and pedestrian safety issues which limit access to employment and some vocational rehabilitation services • students' access to accessible textbooks • accessibility of documents and internet sites needed to obtain and retain employment • employer attitudes toward blindness

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.

As stated in a previous section:

• Monitor annually the allocation of funds for the Deaf-Blind Extended Supports Program and the Supported Employment Program. A measure for evaluation is the amount of state funds

appropriated by the Massachusetts Legislature for the agency's state-funded Deaf-Blind Extended Supports Program. Some of these funds are used for on-going supported employment services after VR services are completed.

Report of Progress: The agency has had sufficient resources to serve all eligible individuals during FY 2015 and 2016. The Massachusetts Legislature has continued to fund the agency's VR program sufficient to match federal funds. The Rehabilitation Council has been very active in advocating for increased vocational rehabilitation funding at the state level. In fact, the Massachusetts Legislature has appropriated approximately the same amount of state vocational rehabilitation funds each year as were appropriated in SFY 2009. The SFY 2016 state appropriation for vocational rehabilitation services is about 1% higher than SFY 2015. The SFY 2016 state appropriation for the state-funded Deaf-Blind Extended Supports Program is enough to cover the need for more residential and supported services for those consumers who are turning age 22. This program provides residential and day services, including on-going supported employment services to individuals with the most significant disabilities.

In addition, as also stated in previous sections: The Massachusetts Department of Developmental Services (DDS) and the Massachusetts Department of Mental Health (DMH) have over the years worked cooperatively with MCB and provided extended services to a number of legally blind persons that have been provided supported employment services by MCB. During 2015 and 2016, MCB has collaborated with the DDS on plans to expand services to mutual consumers that includes an initiative to better identify consumers who could benefit from supported employment services and are not receiving them at this time. A new Memorandum of Agreement that includes provisions for use of joint agency resources to ensure quality service delivery and long term supports for supported employment was executed in November, 2015. This includes a formal commitment of funding from MCB for appropriate supported employment services and a commitment from DDS for funding of the long-term, ongoing employment support services when needed. The agreement also provides for cross-training of staff. In accordance with the requirements of the Rehabilitation Act, MCB executed a WIOA Cooperative Agreement with MassHealth in January, 2016. In addition, discussions this year with the Massachusetts Rehabilitation Commission (MRC) have clarified that MCB consumers who have been rehabilitated into competitive integrated supported employment will be eligible to receive funding for on-going supports under its state-funded Extended Ongoing Supports Program. MCB is very appreciative of the help and advice that the MRC Extended Ongoing Supports Program provided and expects that the availability of this resource will increase the opportunities for supported employment for legally blind consumers who have significant secondary disabilities but do not qualify for on-going supports from another state or private agency. Over the years, the Massachusetts Department of Mental Health (DMH) has worked cooperatively with MCB by providing extended services and other services to some legally blind persons that have received supported employment services and other services from MCB.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Long-standing problems and factors that impede the achievement of the supported employment goals and priorities include: • public transportation systems and pedestrian safety issues which limit access to employment and some vocational rehabilitation services • lack funding for extended

supports for consumers who are not eligible for funding from the Department of Developmental Services or the Department of Mental Health

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

The agency and the Rehabilitation Council look forward to using the performance accountability measures of section 116 of WIOA once final regulations are published and the baseline measurements are developed in conjunction with RSA. WIOA and its state plan requirements have been discussed at each quarterly meeting of the Rehabilitation Council since its enactment. The agency and the council have developed new goals and priorities and plans for innovation and expansion based on the new law.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

During FFY 2015 and 2016, the Massachusetts Commission for the Blind worked with the Rehabilitation Council on the mutually-agreed upon goals and the use of Title I funds for innovation and expansion activities.

Specific innovation and expansion (I&E) activities and initiatives include: • The development of increased training opportunities for transition-age consumers who are not going to college continues to be a major focus area. During FFY 2015, MCB worked with Project SEARCH, an initiative that began in Cincinnati, Ohio to develop a program tailored for MCB consumers in Massachusetts. Project Search is a nine-month school-to-work program that takes place entirely at the workplace. MCB has chosen two providers: the Carroll Center for the Blind and the Polus Center for Social and Economic Development. The agency was able to recruit two large hospitals as worksites. Nine MCB consumers just completed working at the work sites with the goal of identifying career objectives and gaining work experience. There was a job coach at each work site to provide hands-on training and support to the participants. Project Search has had a 70% job placement rate in its programs in Ohio and other states. At least five participants have been hired, although some are still per diems. MCB intends to continue to expand Project Search to meet the needs of consumers who choose to participate in this kind of program. A new program is beginning this spring at the same worksites. MCB will consider other types of worksites such as hotels in the future if there is consumer interest. • The agency continues to explore ways to increase its use of on-the-job training (OJT) and unpaid work experiences for all consumers. The OJT services pay part of the wages of a legally blind employee during a training period of one or two months. During FFY 2015, the agency has been able to arrange two OJT positions. Several recent OJT trainees have obtained permanent jobs with other employers after completing the OJT experience. • MCB has two job clubs for consumers in the Greater Boston area who are actively seeking employment. • For the past several years, agency staff has regularly conducted a two-session course of soft skills training for prospective student interns and job-ready consumers. Soft skills are those interpersonal skills such as cooperativeness, politeness, and friendliness that enhance an individual's on-the-job interactions, job performance and career prospects. For the third year, all of those participating in the intern program this summer attended this course. This year, MCB was able to offer the training in each of its offices, making attendance more convenient for consumers. In addition, courses are held for other job-ready consumers. MCB also provides a one-day Essential Skills Training? for

transition-age youth. This training covers soft skills and other career development skills for younger consumers. Based on feedback from consumers and counselors, this training will be expanded this year to offer consumers more opportunities to interact with employers and to include other pre-employment transition components such as occupational information and career exploration. • Recognizing that many employers are now using telephone interviews to screen applicants, the agency for several years has contracted with Phone Interview Pro, a company that provides consumers with a thirty-minute interview that simulates an actual interview with an experienced corporate evaluator. The consumer and the counselor are then provided with a detailed, personalized report of the interview that identifies strengths and areas that need improvement. A second interview is then arranged to give the consumer the opportunity to practice what he or she has learned from the first interview. MCB counselors have referred approximately 45 consumers to undergo this evaluation during FY 2015. The majority of the consumers find the experience to be very beneficial. • In the fall of 2014, the agency once again co-sponsored a Job Fair for Individuals with Visual Impairments in partnership with the Carroll Center for the Blind, Perkins, Massachusetts Department of Developmental Disabilities Services, MAB Community Services, and the National Braille Press. Approximately 100 blind and visually-impaired consumers attended. Approximately thirty Massachusetts employers participated, a 50% increase from 2013. The employers accepted resumes and explained job opportunities at their companies. The agencies held a similar job fair in October, 2015. • The agency's internship program continues to grow. In the summer of 2015, 93 students (a 20% increase over the previous year), including some high school students, participated. Approximately 400 consumers will have completed one or more internships since the program began in 2004. An agency study conducted in FY 2012 showed that 93% of the interns have had successful outcomes from the internship experience; that is, the intern has either finished school and obtained a job or is on track with his or her individual plan for employment. • The agency has been able to increase consumers' access to both adaptive equipment and accessible textbooks during FY 2014 and 2015. The agency's Technology for the Blind Unit will serve approximately 1,200 VR consumers during FFY 2016. The staff of the unit includes two new technology specialists who are able to provide extended training in Word, Outlook, and basic navigation and eight rehabilitation engineers. • The agency has been able to continue to enhance the independence and educational and vocational potential of blind children by providing adaptive equipment and software on a limited basis to elementary and middle-school aged children under its state-funded social services program. These services enable these young consumers to transition to pre-transition employment and vocational rehabilitation services at age 14 with the same level of technical skill as their sighted peers. In addition, MCB intends to revise its policies under the vocational rehabilitation program to provide more adaptive equipment and training to pre-employment transition consumers to allow them to improve their work readiness, vocational, and independent living skills when they are not in school. • MCB has been working with providers to develop new options for pre-employment transition services. The Carroll Center for the Blind has developed a work readiness program to address several needs. One that is frequently mentioned by counselors and other professionals is for students, who may be expert in the use of telephones and tablets, to become proficient in the use of Microsoft Office products and educational and job-search applications. Another need is for students to use technology to enhance independent living skills needed for employment by using GPS applications, etc. The work readiness program will be held one Saturday each month during the school year and will address a variety of independent living, computer, and social skills. • MCB, in conjunction with the Massachusetts Rehabilitation Commission, issued a Request for Response (RFR) to solicit other providers to develop new pre-employment transition programs. Six of the respondents have developed programs for legally blind

students. In general, the programs meet 2-3 days a week after school and cover topics such as soft skills, resumes, interviewing, career development, and occupational information. • MCB has addressed the priority to facilitate services to consumers who have reached their fourteenth birthday and to identify on a case by case basis the most appropriate unit within MCB by developing a comprehensive assessment form for children's workers to complete. The agency holds several College Nights each year throughout the state for students who are considering attending college. Their families are also invited. The purpose is to orient the students to MCB services, college disability services, etc. and to answer their questions. MCB also holds a half-day orientation session each spring in Greater Boston for those consumers who intend to begin college in the fall. • A transition form has been developed to improve services to adolescents and their transition to adult services and to improve communication among the involved staff when the child turns 14. MCB Children's Workers and the Vocational Rehabilitation Counselors have begun to make joint visits to the adolescent and parents to help the family to develop a roadmap for the child's services going forward. Consultations with agency rehabilitation teachers, mobility specialists, and technology specialists are also offered to the consumer and family. • MCB has committed in the statewide Memorandum of Understanding in Appendix C to participate in teams to be established comprised of individuals who are empowered to represent the core partner agency for the purpose of developing and executing local MOUs, modeled on the state MOU

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The purpose of the Massachusetts Commission for the Blind's Supported Employment Program is to create and provide paid employment opportunities for legally blind persons with significant secondary disabilities within integrated work settings. Services include: an individual evaluation of rehabilitation potential via supported employment, provision of job development services (including job analysis and appropriate engineering accommodation); intensive on-the-job training and job coaching, and provision or coordination of support services such as counseling or transportation. Services are provided within federal guidelines until the employment is secure and appropriate extended (non-VR) services are in place.

The Massachusetts Commission for the Blind remains committed to increasing the quality, scope and extent of Supported Employment Services to eligible consumers. There are a sufficient number of service providers who deliver supported employment in the state on a fee for service basis. The Commission for the Blind is fortunate that the Massachusetts Department of Developmental Services provides on-going extended services to many consumers who are both intellectually disabled and legally blind. The agency is also fortunate to have some state funding available to provide extended services to consumers who are both deaf and legally blind.

During 2015, the agency collaborated with the DDS on plans to expand services to consumers including an initiative to better identify mutual consumers who could benefit from supported employment services and are not receiving them. In late 2015, MCB and DDS executed a new Memorandum of Agreement that includes provisions for use of joint agency resources to ensure quality service delivery and long term supports for supported employment. All work programs will be in integrated settings paying the minimum wage. The agreement includes a formal commitment of funding from MCB for appropriate supported employment services and a commitment from DDS for funding of the long-term, ongoing employment support services when needed. The agreement also provides for cross-training of staff.

In January 2016, MCB executed a WIOA Cooperative Agreement with MassHealth in accordance with the requirements of the Rehabilitation Act.

In addition, in 2015, discussions with the Massachusetts Rehabilitation Commission (MRC) clarified that MCB consumers who have been rehabilitated into competitive integrated supported employment will be eligible to receive funding for on-going supports under its state-funded Extended Ongoing Supports Program. MCB is very appreciative of the help and advice that the MRC Extended Ongoing Supports Program has provided and expects that the availability of this resource will increase the opportunities for supported employment for legally blind consumers who have significant secondary disabilities but do not qualify for on-going supports from another state or private agency.

MCB looks forward to being allowed under the forthcoming WIOA regulations to extend the time that consumers may receive needed supported employment services before transition to extended services. There are some consumers who may need extra time, particularly pre-employment transition consumers.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Once the individual has maintained stability on the job for an appropriate period of time, the funding for and provision of extended services transitions to an extended services provider. The rehabilitation counselor continues to track the individual's progress and job stability during the transition period. If the individual maintains stabilization for 60 days or more after transition to extended services, the case is closed successfully. If needed, post-employment services may be provided at any time after closure.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Massachusetts Commission for the Blind**

Name of designated State agency **Massachusetts Commission for the Blind**

Full Name of Authorized Representative: **Paul Saner**

Title of Authorized Representative: **Commissioner, Massachusetts Commission for the Blind**

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

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 **Massachusetts Commission for the Blind**

Full Name of Authorized Representative: **Paul Saner**

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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Applicant's Organization **Massachusetts Commission for the Blind**

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(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES, STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A)(15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO EXPAND AND IMPROVE THE

PROVISION OF VR SERVICES TO INDIVIDUALS WITH DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.

M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

The designated State agency, or designated State unit, as appropriate, assures that it will:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above

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.

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(A) CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT).

TAFDC is the state's cash assistance program for families with dependent children (including pregnant teens, at any time during the teen's pregnancy, and women in their third trimester with limited assets and income. Eligible family members are defined in 106 CMR 204.305. Massachusetts' goal is to help these families achieve economic self-sufficiency through meaningful employment. The Department's Employment Services Program (ESP) offers a variety of work activities including education and skills training, job readiness and employment opportunities to clients delivered by the Department, community based agencies or Workforce Development Boards (WDBs).

(B) REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

The Department continuously determines when an applicant/recipient is required to participate in the work program. Individuals who are determined to be nonexempt and whose children are aged 2 or older must comply with the work program provisions required by 106 CMR 203.400(A)(2),(3),(5) in order to maintain eligibility. The Department's regulations regarding the work program can be found at 106 CMR 203.400 and the regulations regarding exemptions can be found at 106 CMR 203.100.

Moreover, DTA is committed to working with the WIOA core partners to develop a more seamless customer flow/ referral model so that clients who are often the individuals with the highest barriers to employment are well served not just by DTA, but by all of the appropriate parts of the workforce development system. The Commonwealth partners are committed to developing this partnership to support DTA clients and to address the WIOA priority of service for individuals who face barriers to employment.

Exemptions from the Work Program include certain single custodial parents caring for children under the age of two (which encompasses the federal option to exempt parents with children under the age of one). In addition, if a single custodial parent caring for a child under six is required to work under TAFDC regulations, and such parent has demonstrated an inability to locate child care for the reasons specified in Section 407(e)(2) of the Social Security Act, such parent will not be sanctioned for failing to participate in the work program.

(C) ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT)

The Employment Services Program (ESP) is an integral part of DTA's efforts to move recipients from welfare to work and self-sufficiency. Each year, the state legislature allocates funding for employment services for TAFDC (TANF) clients through the ESP line item. The primary goal of ESP is to assist TAFDC clients in finding jobs, resolving barriers to employment and providing a means to self-sufficiency. DTA case managers assist TAFDC clients to meet their work program requirements by referring them to the most appropriate activity for their skill level and goals. In addition to employment education and training, ESP also funds transportation reimbursement for clients enrolled in an eligible activity, learning disability assessments, and HiSET testing. A vital support for caregivers and parents who are participating in an approved ESP activity is access to childcare referrals at no cost to them.

Competitive Integrated Employment Services (CIES), the DTA-funded ESP, is focused upon client outcomes. Service providers are reimbursed as clients pass through a recognized combination of milestones in order to successfully obtain and maintain employment. The CIES model organizes these milestones into a service continuum marked by outcome benchmarks such as obtaining a job or achieving 90 days of employment along the path to permanent employment. These benchmarks are organized into service components. In FY15 clients who participated in a state-funded CIES programs had an overall employment retention rate of 72.4%. Clients who participated in FY16, thus far, have an employment retention rate of 88.3%.

Clients who are work program required, and fail to cooperate and do not have good cause are subject to sanctioning. DTA's eligibility system ensures that clients who are not cooperating or who have not provided verification of their compliance, are sanctioned timely.

Nonexempt parents/caretakers who fail to meet work program requirements under 106 CMR 203.400(A) are mandated to participate in community service. Once mandated, a nonexempt parent/caretaker who fails to work, participate in education and/or training or perform community service for the required minimum number of hours per week or the maximum hours allowed under the Fair Labor Standards Act (FLSA), is ineligible for TAFDC. Repeated failure to work or participate in education and/or training, or community service once mandated to do so, results in termination of assistance for the entire household. Recipients must verify their compliance with the work program requirement on a regular basis, and their participation status is tracked on the Department's eligibility system. Regulations pertaining to work program sanctions and good cause for failure to comply with such requirements can be found at 106 CMR 207.200, et seq.

The state's workforce development activities for parents and caretakers receiving assistance described above are based on current resources available state appropriated resources through the Employment Services Program. The WIOA Steering Committee, policy makers and leadership at DTA regularly discuss the need to increase the available resources for education and training programs - focused on career pathways - that can help move the skill set of individuals receiving assistance into the range of employment that provides self-supporting wages. Successfully strategies typically require multi-year education and training that leads to a credential along with family support (public assistance, day care, transportation), coaching at the education and training

provider, on-the-job experience (subsidized or internships), and intensive job placement (unsubsidized) support upon completion (potentially through the One-Stop Career Centers). There is more to do in the Commonwealth, however we intend to consider ways to utilize the TANF block grant to expand education, training, employment and workforce activities to build more robust pathways for parents and caretakers receiving assistance.

(D) TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

The State restricts the use/disclosure of confidential information. Current regulations regarding these restrictions can be found at 106 CMR 100.000 through 106 CMR 108.020: Fair Information Practices. Furthermore, Governor Patrick issued Executive Order 504 on September 19, 2008, which added additional safeguards regarding the security and confidentiality of personal information.

(E) ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

Massachusetts historically has had one of the lowest teen birth rates in the country. In 1996, there were 5,758 births in Massachusetts to women between the ages of 15 through 19, representing 28.5 per 1,000 females in that age range. In 2013, the most recent available data, there were 2,732 births among women ages 15-19 years for a rate of 12.0 births per 1,000 females ages 15-19 years, which was the lowest teen birth rate ever recorded in Massachusetts.

The Massachusetts teen birth rate in 2013 was 55% below the 2013 US teen birth rate of 26.6 births per 1,000 female ages 15-19 year.

In order to reduce the incidence of out-of-wedlock births, DTA works with the state Department of Public Health (DPH). DPH coordinates family planning and teen pregnancy prevention efforts throughout the Commonwealth. In addition, DPH works with local schools (K-12) to develop sex and health education curricula that incorporate pregnancy prevention efforts.

Additionally, DTA supports the Father Readiness for Adolescents program through referrals from our Young Parents Programs. This innovative program for adolescent boys and girls is a unique combination of teen pregnancy prevention, future life planning, and healthy relationship skill-building. Easily integrated into existing health curricula, the Father Readiness program introduces students to the challenges and risk factors associated with teen fatherhood, as well as The 5 Essentials of Father Readiness. Using a variety of interactive content, students:

- Explore the practical, psychological, economic and social demands of becoming a future father.
- Discuss the role of fathers and mothers in family life and the presence and absence of mentors and their own fathers in their lives.
- Practice self-reflection, decision-making, planning, and problem solving.
- Identify strengths, skills and qualities they can develop today.

This program is a contribution toward young boys and men avoiding fatherhood before they understand and feel prepared for the responsibilities and personal demands of the role.

To ensure that these young families remain healthy, DTA also supports the Fatherhood Project

Dads Matter in Pediatrics- which designs and delivers programs at Massachusetts General Hospital, in Massachusetts, and nationally, focusing on underserved, at-risk populations.

(F) CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

The Governor's Council to Address Sexual and Domestic Violence (GCASDV) is an interdisciplinary council consisting of approximately 30 community–based experts appointed by the Governor, and representatives of various state agencies responsible for sexual and domestic violence service provision throughout the Commonwealth. DTA is represented on the council by Crystal Jackson the Director of the Department's Domestic Violence Unit. The GCASDV's mission and scope are found in Executive Order 563. The Council is charged with considering "policy initiatives to assure the effective, uniform, and collaborative response by law enforcement, judicial, health and human service agencies, including but not limited to the enhancement of interagency communication and cooperation, as well as the timely and accurate sharing of information between law enforcement, judicial personnel, the private bar, and other victim service providers." The GCASDV has identified the continuation of the work of its Teen Sexual and Domestic Violence Prevention Working Group, focusing on sexual and domestic violence prevention and services for school districts.

In addition, the Department's Domestic Violence Unit, comprised of staff with expertise in domestic violence, is represented on the State's Roundtables on Domestic Violence and Sexual Assault, which operate through the state's District Attorneys and on local High–Risk Assessment Teams, which are comprised of public and domestic violence service providers, law enforcement, district attorneys' staff, probation staff, batterers' intervention programs and other stakeholders to better identify and respond to domestic violence cases that pose the highest risk of lethality.

The Department's Domestic Violence Specialists serve anyone who identifies as a survivor of domestic violence and/or sexual assault, by referring them to services in the community, including counseling and law enforcement, as appropriate.

Finally, as stated earlier, the Father Readiness program introduces students to the challenges and risk factors associated with teen fatherhood.

(G) IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

The provisions of Section 408(a)(12) of the Social Security Act require States to maintain policies and practices as necessary to prevent assistance provided under the State program funded under this part from being used in any electronic benefit transfer transaction in any liquor store; any casino, gambling casino, or gaming establishment; or any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

The Commonwealth has enacted a state law to prohibit the use of cash assistance, including TAFDC, in electronic benefit transfer (EBT) transactions at liquor stores, casinos, gambling casinos or gaming establishments, and retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment, as well as other establishments not identified in Section 408(a)(12). Retailers face fines from $500 for a first offense, $500 to $2500 for a second offense and not less than $2500 for a third offense. See M.G.L. c. 18, § J. In addition, the Commonwealth has prohibited the use of cash assistance held on EBT cards to purchase alcoholic beverages, lottery tickets, gambling, adult oriented material or performances and other items and services (See M.G.L. c. 18, § I). Clients who violate the purchasing provisions must pay the Commonwealth back for the prohibited purchase. For a second offense, the client is disqualified from benefits for two months and must pay the Commonwealth back for the prohibited purchase. For a third offense, the client is disqualified from benefits permanently and must pay the Commonwealth back for the prohibited purchase.

All TAFDC clients were mailed letters about the new state law prohibiting the use of cash assistance in specified establishments and for specified items/services. Posters are displayed in all local offices informing clients of the prohibited establishments and purchasing restrictions. The application for TAFDC benefits includes a penalty warning informing clients of prohibited items and services as well as the penalties for violations. At application and redetermination, all TAFDC clients are provided a brochure that includes information on prohibited establishments, prohibited purchases and penalties. Retailers are notified about the law and its penalties. Local law enforcement agencies are notified about retailers who are found to have violated such law. In addition, the Department offers posters and training for retailers on the new restrictions.

In an ongoing effort, the Department continues to work with its EBT vendor on blocking the use of EBT cards in prohibited establishments. The Department and its vendor are jointly researching potential prohibited establishments. The Commonwealth provides its EBT vendor with a final list of prohibited establishments monthly; the EBT vendor blocks the designated establishments' Point of Service (POS) device and ATMs on site. This process will be incorporated into the Department's business operations.

The Commonwealth remains committed to ensuring that clients have adequate access to their cash assistance. While most clients access their benefits via EBT card, clients have the option to receive TAFDC through direct deposit to checking or savings accounts or direct vendor payments for rent, utilities, etc. The Department affords all clients the right to designate an authorized payee to act on their behalf in accessing TAFDC when the client is unable to do so for him or herself.

The Department provides all TAFDC clients with information about free and no-cost benefit access options.

Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act).

All TAFDC clients who receive benefits on an Electronic Benefit Transfer (EBT) card receive a brochure that advises clients about surcharge-free cash transactions and how to identify surcharge-free ATMs and POS devices. In addition, the brochure advises clients that they are entitled to two free ATM withdrawals in a calendar month, but that additional withdrawals are $0.75 per transaction. This brochure, along with the EBT card itself, provide clients with a toll free customer service line that is available 24-hours a day, 7-days a week regarding any questions they have about accessing their benefits.

The Department has also created an EBT cash withdrawal information sheet that is given to applicants and clients in all local offices. This information sheet identifies Massachusetts banks that provide EBT cash withdrawals without surcharges. The Department continues to pursue the expansion of its current surcharge-free options and the availability of low- and no-cost banking options.

In addition, the Commonwealth has partnered with a nonprofit, full-service credit-counseling agency, funded through a large banking institution's nonprofit foundation, to offer financial literacy and credit counseling workshops. These workshops are available to clients at no cost, statewide, to assist in their development of short and long-term financial planning. The workshop curriculum encompasses how clients reduce or eliminate fees associated with using their EBT cards or otherwise utilize their TAFDC benefits through direct deposit or direct vendor payments for rent, utilities, etc. While clients are instructed on how to better budget their TAFDC funds, they are also reminded of the prohibited items, services and establishments, identified under State law and the associated penalties.

(H) ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

All TAFDC clients who receive benefits on an Electronic Benefit Transfer (EBT) card receive a brochure that advises clients about surcharge-free cash transactions and how to identify surcharge-free ATMs and POS devices. In addition, the brochure advises clients that they are entitled to two free ATM withdrawals in a calendar month, but that additional withdrawals are $0.75 per transaction. This brochure, along with the EBT card itself, provide clients with a toll free customer service line that is available 24-hours a day, 7-days a week regarding any questions they have about accessing their benefits.

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(I) INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

At this time, the State does not intend to treat families moving into the State from another State differently than other families under the program.

(J) INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Only non-citizens who are eligible under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) are eligible to receive TAFDC benefits.

(K) SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Benefits are provided to eligible applicants and recipients on a statewide basis. The standards for determining eligibility and the amount of assistance are established on an objective and equitable basis in accordance with the Department's regulations. These standards are based on an individual's income, assets, family size and circumstances. All Department activities are conducted in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended, the Age Discrimination Act of 1975, as amended, and the Massachusetts Constitution. The Department does not discriminate on the basis of race, color, national origin, age, disability, religion, political beliefs, sexual orientation, gender, gender identity or expression, creed, ancestry or Veteran's status in admission or access to, or treatment or employment in its programs or activities. An applicant/recipient has a right to a fair hearing as set forth in the Department's regulations at 106 CMR 343.000, et seq.

All benefits to which recipients are eligible are provided with reasonable promptness in accordance with timeliness standards that are included in the Department's regulations. The Department's timeliness standards can be found at 106 CMR 701.500 - 701.530 and 106 CMR 702.160 - 702.180.

(L) INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

The Department currently enrolls individuals in programs to train for, gain and retain employment in the eldercare workforce. DTA Employment Services Program providers have developed training programs for the long-term care and elder care fields. Programs currently cover certifications for home health aides, certified nursing assistants/aides, pharmacy technicians and medical assistants as well as Alzheimer's Care Assistant, Phlebotomy Technician and CPR certifications. Because of the growing elderly population, the need for individuals trained to deliver such services has become a critically important factor in terms of meeting the health and social service needs of elders. Growth in the demographic has the potential to lead to increased employment opportunities for individuals who enter this field. The Department encourages its workforce providers to develop programs with a clear career path for clients entering these professions.

(M) PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICECS ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

The breakdown of funding sources (either TANF or MOE) for these programs appears on the following reports: (1) the ACF196 for quarterly claims and the ACF204 for the annual supplemental report on MOE.

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act) Yes

Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under The Unified or Combined State Plan under title XIX. (section 402(a)(3) of the Social Security Act) Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have had at least 45 days to submit comments on the plan and the design of such services Yes

Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act) Yes

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act) Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— refer such individuals to counseling and supportive services; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are

or have been victimized by such violence, or individuals who are at risk of further domestic violence Yes

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)))

A. GENERAL REQUIREMENTS

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

1. THE NATURE OF THE E&T COMPONENTS THE STATE AGENCY PLANS TO OFFER AND THE REASONS FOR SUCH COMPONENTS, INCLUDING COST INFORMATION. THE METHODOLOGY FOR STATE AGENCY REIMBURSEMENT FOR EDUCATION COMPONENTS MUST BE SPECIFICALLY ADDRESSED;

In FFY 2016, Massachusetts operat a voluntary SNAP E&T Program that serves all SNAP eligible participants throughout the state in partnership with the University of Massachusetts Medical School (UMass) and contracted E&T Providers. The SNAP E&T Plan allocates funds to program components that provide meaningful opportunities to enhance the employability of individual SNAP participants. DTA monitors the successful operation of this component in coordination with UMass.

DTA contract out the components of the SNAP E&T Program during the period covered by this plan. DTA work with contracted E&T Providers and other agencies responsible for education and training programs to identify and increase qualifying opportunities (activities that have a direct link to employment) to assist SNAP participants achiev self–sufficiency. DTA is committed to assisting SNAP participants with education and skills training necessary to increase their ability to obtain unsubsidized employment.

Below is a detailed description of the SNAP E&T Program components for FFY 2016. In addition, DTA is reaching out to community colleges, the WIOA Steering Committee and key providers to develop future strategies to increase investments of additional SNAP E&T resources in the long–term skill and credentialing acquisition of low–skills, low–income individuals, especially families receiving SNAP. To this end, we will explore ways to increase SNAP E&T reimbursements through community colleges utilizing the outreach and support that the Community College Navigators offer through One–Stop Career Centers, direct outreach and coordination between Community Colleges and the DTA SNAP Director to grow the number of SNAP clients enrolling in post–secondary allowing the for higher degree attainment and employment prospects. In addition, it becomes a vital resource for community colleges on reimbursements through E&T resources.

Assessment

Description of component: SNAP E&T Providers perform a comprehensive assessment of each interested SNAP participant using Educational, Skills, and Career assessment tools to determine appropriateness for the particular E&T component and service needs. The assessment includes occupational interests, vocational skills and aptitudes, educational attainment levels, English

proficiency; basic literacy skills, prior work experience, barriers to employment, and need for support services.

Assessment Tools include but are not limited to: TABE Tests, HiSET, Pre–test, ESL Placement Test, Testing of Applied Mathematics, SOLOM (Student Oral Language Observation Matrix), Skills Inventory and Myers–Briggs.

All completed assessment results shared with Central Office SNAP E&T Staff on a form prescribed by DTA. After review of the assessment information, the SNAP participant will be enrolled in the component on the BEACON eligibility system.

Total cost of the assessment component:

It is estimated that E&T Providers will conduct an in–depth assessment of 4,318 SNAP participants. The total estimated cost is $175 each for a total of $755,650.

Job Search

Description of component: SNAP participants may enroll in job search programs available through contracted E&T Providers. Employment counselors will assist SNAP participants with writing/updating resumes, drafting cover letters, completing job applications and preparing for interviews. SNAP participants can also join Job Clubs or other networking groups. All E&T Providers have resources available such as computers, printers and scanners/faxes. SNAP participants can work independently or in close coordination with E&T Provider staff.

Type of component: Non–work component.

Geographic service areas covered: This component offered Statewide.

Anticipated number of voluntary participants: It is estimated that 1,292 voluntary participants will enter this component as a result of the new partnership initiatives.

Level of participant effort or number of hours: Participants will, on the average, spend 8 weeks in job search and must make at least 12 employer contacts or 12 hours per month.

Organizational responsibilities: DTA monitors the successful operation of this component in coordination with UMass.

Total cost of the component and cost per participant: Component cost is $883,840 and total cost per participant is $684.

Job Readiness

Description of component: Job Readiness Training includes support activities such as skill assessments, job finding clubs, training in techniques for employability counseling, information on available jobs, occupational exploration, including information on local emerging and demand occupations, job fairs, life skills, guidance and motivation for development of positive work

behaviors necessary for the labor market, or job placement services. The activity are intensive and will teach participants the discrete behaviors associated with job seeking success, i.e. identification of skills/interests, obtaining interviews, updating resumes and developing good work habits.

Type of component: Non–work component.

Geographic service areas covered: This component is offered statewide.

Anticipated number of voluntary participants: It is estimated that 632 voluntary participants will enter this component.

Level of participant effort or number of hours*:

SNAP Participant hours are tracked/logged by contracted E&T Provider staff.

- Part–time participants will participate in this component for a minimum of 7 hours per week; or
- Full–time participants will participate in this component for a minimum of 15 hours per week.

*Minimum hour requirements adapted from the current Massachusetts Department of Early and Secondary Education standards for HiSET and Adult Basic Education.

Total cost of the component and cost per participant: Component cost is $1,126,837 and total cost per participant is $1,783.

Education

Description of component: SNAP E&T participants will be enrolled in educational programs based on individual need and assessment. Non–vocational education components include literacy training, High School Equivalency Test (HiSET), remedial education, and alternative education, English as a Second or Other Language (ESOL) and Adult Basic Education (ABE) program. These educational activities the increase employability and employment advancement of SNAP participants. SNAP E&T funds are often used to pay test and certification fees.

Type of component: Non–work component.

Type of education activities: Educational programs to which SNAP participants may be enrolled include: ABE, ESOL, HiSET, vocational education and post–secondary education.

Link to Employment: Enrollment into an educational component will be based on an assessment that a lack of education is the primary barrier to employment or job advancement. At the completion of the component, the participant may be assigned to job search to facilitate immediate job entry or advanced job placement. Participants who do not find employment during the job search period will be reassessed and possibly assigned to another activity that will assist in moving the participant into employment.

Geographic Service Areas covered: This component offered statewide.

Anticipated number of volunteers: It is estimated that 2,141 voluntary participants will enter this component.

Level of participant effort or number of hours*

SNAP Participant hours are tracked/logged by contracted E&T Provider staff.

- Part–time participants will participate in this component for a minimum of 7 hours per week; or Full–time participants will participate in this component for a minimum of 15 hours per week.

*Minimum hour requirements adapted from the current Massachusetts Department of Early and Secondary Education standards for HiSET and Adult Basic Education.

Duration: Participation in education programs for non–ABAWDs will be limited to the amount of time generally allowed for the completion of the curriculum. Due to funding limitations, local agencies generally limit the duration to 1 year or less.

Total cost of the component and cost per participant: Component cost is $3,147,188 and total cost per participant is $1,470.

Skills/Vocational Training

Description of component: Vocational Training includes various occupational, remedial and entry–level job skills training, customized training, institutional skills training; upgrade training, and vocational education.

Type of component: Non–work component.

Geographic service areas covered: This component is offered statewide.

Anticipated number of volunteers: It is estimated that 2,054 voluntary participants will enter this component.

Level of participant effort or number of hours*

SNAP Participant hours are tracked/logged by contracted E&T Provider staff.

- Part–time participants will participate in this component for a minimum of 7 hours per week; or
- Full–time participants will participate in this component for a minimum of 15 hours per week.

*Minimum hour requirements adapted from the current Massachusetts Department of Early and Secondary Education standards for HiSET and Adult Basic Education.

Duration

Participation in education programs for non–ABAWDs will be limited to the amount of time generally allowed for the completion of the curriculum. Due to funding limitations, local agencies generally limit the duration to one year or less.

Total cost of the component and cost per participant: Component cost is $4,841,143 and total cost per participant is $2,357.

Participant Reimbursements

To best meet the SNAP participant needs several E&T Providers offer participant reimbursement for transportation costs. The E&T providers address participant reimbursement on a case–by–case basis to ensure they are reasonable, necessary, and directly related to participation in the E&T program. Itis estimated that 608 participants will receiveup to $124 per person per month for a total of $75,574 in participant reimbursement based on availability of funds.

Other Activities

To best meet participant and social services needs and promote creative program design, SNAP E&T Program providers are given authority to establish additional activities to those already specified in this plan. Such programs shall be described in contracts and agreements and shall conform with the federal requirement that they be designed to move individuals to self–sufficiency. Contracts specifying such alternative activities will be available for USDA review. Massachusetts will report such activity information as required.

In addition to the required activities, each component, at a minimum includes:

Orientation – Orientation is considered the entry point for the receipt of E&T services.

It is intended to support and facilitate each participant's utilization of the E&T program. Orientation may be provided in groups or on an individual basis, either at the DTA offices or at other mutually agreed upon sites, at regularly scheduled times. At a minimum, the orientation provides an overview of the program services, regulations, requirements and benefits of utilizing SNAP E&T services.

Case Management – The ultimate goal for all SNAP participants is to progress from dependency on SNAP to self–sufficiency, gaining the skills and abilities needed to sustain independence from the welfare system. To reach this goal it is necessary to identify and overcome the barriers that prevent participants from becoming self–sufficient. Individuals enrolled in an activity may also receive as an allowable activity within each component case management services, including participant assessments and assistance with transportation. As a result of these assessments, various program services may be offered including work–based education and training and job placement. The services offered will vary based on individual situations and needs.

Job Placement Services – Job placement services such as job referrals to specific employers and monitoring (post referral verification) may also be offered to SNAP participants enrolled in the SNAP E&T Program.

FFY2017 Summary of the SNAP E&T Program: The mission of the Massachusetts Department of Transitional Assistance (DTA) is to assist low-income individuals and families to meet their basic needs, increase their incomes and improve their quality of life. Located within the Executive Office of Health and Human Services, the Department ensures that the emergency and transitional needs of the individuals and families of the Commonwealth are met through a combination of federal- and state-funded programs.

DTA is the single state agency responsible for administering the Supplemental Nutrition Assistance Program (SNAP). As the designated SNAP agency, DTA manages the SNAP Employment and Training (E&T) Program, here forward known as SNAP Path to Work. SNAP Path to Work operates statewide in 14 counties served by 23 DTA Local Offices. SNAP recipients not participating in the State's Temporary Assistance for Needy Families (TANF) work program can access important employment services and work supports through the program.

Since 2006, DTA has partnered with the University of Massachusetts (UMass) to offer SNAP-only participants meaningful opportunities to enhance employability through SNAP Path to Work participation. UMass assists DTA by recruiting, subcontracting with and monitoring SNAP Path to Work Providers and with the design and printing of SNAP Path to Work promotional material. UMass also assists SNAP Path to Work Providers with claiming reimbursement for services rendered under the 50/50 Reimbursement Project.

Massachusetts SNAP Path to Work is a voluntary program that

serves all SNAP eligible participants throughout the state in partnership with the University of Massachusetts Medical School (UMass) and contracted SNAP Path to Work Providers. Regardless of whether or not they are subject to SNAP work requirements described in CMR 362.300-362.340, DTA clients are not penalized for failure to participate in the SNAP Path to Work Program.

42 contracted SNAP Path to Work Providers, 9 currently in an inactive status, located across the state will help approximately 5340 low-income individuals gain valuable skills and increase employability through engagement in the following components:

• Assessments

• Job Search

• Job Readiness Training

• Job Placement and Retention

• Education; and

• Vocational Skills Training.

Non-exempt Able Bodied Adults without Dependents (ABAWDs) will have the opportunity to meet the ABAWD Work Program requirement by participating in one of 34 qualifying components offered through the SNAP Path to Work program, as well as comparable community based education and training programs, including WIOA job search, education and training activity, or self-initiated workfare placements.

Program Changes: In FFY 2017, the Massachusetts E&T program will be renamed SNAP Path to Work. The new name and logo will be printed on all newly created and revised notices, flyers, brochures and other marketing materials.

Job Placement and Retention components will be offered by five SNAP Path to Work Providers beginning 10/1/16.

Massachusetts hopes to increase voluntary participation in the SNAP Path to Work program in FFY 2017 by:

• mailing informational brochures to NPA SNAP households;

• offering an easy to use search tool on the SNAP Path to Work website that potential participants may use to locate Providers by name, geographic area, or component type;

• increasing central office SNAP Path to Work specialist presence in DTA local offices to educate potential participants and DTA staff about the availability of SNAP Path to Work components; and

• making brochures available to clients in local DTA office waiting areas;

• providing contracted SNAP Path to Work Providers with the names and contact information of potential participants living in their service area for the purpose of targeted outreach.

In an effort to expand the reach of SNAP Path to Work services and provide an opportunity for contracted SNAP Path to Work Providers to maximize access federal funds, the following changes will be implemented beginning in FFY 2017:

• a simplified referral and enrollment process;

• the removal of participant and component cost caps;

• reimbursement of contracted SNAP Path to Work Providers based on 50% of the actual allowed component cost, rather than a predetermined participant rate;

• monthly matches of participant lists against DTA data to more quickly identify potential claims issues;

• providing information about becoming a SNAP Path to Work Provider on the new SNAP Path to Work website; and

• holding mid-year SNAP Path to Work Provider recruitment sessions.

To expedite the process of validating workfare hours reported by ABAWDs as a means of meeting the ABAWD Work Program requirement, approved community service sites that agree to host ABAWD volunteers will be provided with a self-inking 'SNAP Path to Work approved community service site" stamp. When verifying the number of hours that an ABAWD volunteered, workfare site staff will be asked to stamp the ABAWD Work Program Participation report (or other proof of hours) and to write the participation month in the designated space within the stamp. The design of the stamped image will make it apparent if a client attempts to tamper with the image (i.e. use white out to alter the participation month and reuse the signed form), thus confirming that the form was filed out at the workfare site, eliminating the need for a confirmation call.

DTA has set aside $1,775.86 and is requesting additional 100% funds in the amount of $248,224 to support the purchase or development of a stand-alone SNAP Path to Work eligibility system, which will streamline the SNAP Path to Work referral process and allow for better coordination of services and communication between SNAP Path the Work Providers and Central Office staff.

Workforce Development System: As described in the Workforce Innovation and Opportunity Act (WIOA) Massachusetts Combined State Plan (for the period of July 1, 2016 through June 30, 2020, Effective: July 1, 2016), pages 8-10:

"The Massachusetts 2012 to 2022 Long-Term Employment Projections by Industry and Occupation provide model based estimates for annual job openings by occupation. This data source and other sources indicate that by industry Health Care and Social Assistance and Professional, Scientific and Technical Services are projected to have the most job openings. By 2022, these two industries will account for over 40 percent of the Commonwealth's job growth, in addition to large number of workers needed to replace current workers who may have retired or taken other jobs. The projections further indicate that Health Care and Science, Technology, Engineering, and Mathematical (STEM) occupations represent 70 percent of the top 50 most in demand occupations.

Statewide, the most in demand occupations will be in Health Care, Food Services, and Computer Related occupations like Software Developers of System Software, and Software Developers of Applications.

Massachusetts' single most in-demand occupation ? now and projected ? is Registered Nurses with Personal Care Aides, Home Health Aides, and Nursing Assistants also figuring strongly."

The Commonwealth of Massachusetts provides a comprehensive array of services to meet the needs of employers and job seekers through a statewide workforce development system. There are currently 16 Service Delivery Areas (SDAs); these are the Commonwealth's workforce designated areas under the Workforce Investment Act (WIOA) and 32 One-Stop Career Centers operating in 5 regions in Massachusetts.

An overview of the resources, services, and credentials available to Massachusetts job seekers through this system can be found in the Workforce Innovation and Opportunity Act (WIOA) Massachusetts Combined State Plan: http://www.mass.gov/massworkforce/state-plan/wioa-2020/ma-wioa-state-plan-final-4-7-16.pdf

Serving the needs of low-income individuals, families, and employers, the SNAP Path to Work program is an important part of the workforce development system. Through this program, eligible SNAP recipients gain skills, training and/or experience that improve their employment prospects and reduce reliance on SNAP benefits.

In the event that a SNAP client's needs cannot be met through participation in the SNAP Path to Work program due to lack of available or appropriate components in the client's area, Central Office SNAP Path to Work staff will refer the client to a Career Centers in their local area.

DTA seeks to identify opportunities to coordinate and integrate services currently provided by other Massachusetts state agencies responsible for workforce development.

Other Employment Programs: The SNAP Path to Work program is part of the Massachusetts comprehensive workforce development system. Many of the Providers, who are contracted to provide services to SNAP clients through the SNAP Path to Work program, also provide services to low income clients using WIOA voucher and other funds and to TANF recipients through Pathways to Self-Sufficiency contracts.

ABAWDs subject to time limited benefits may meet the work requirement by participating in certain education or training components either through the SNAP Path to Work program or comparable programs in the community, including WIOA job search, education and training activities.

As part of its ongoing effort to enhance the SNAP Path to Work program, DTA will reach out to other workforce agencies and E&T networks across the Commonwealth to improve awareness of the SNAP Path to Work program services. Other training providers will be encouraged to inform SNAP participants of services available through the program.

To ensure that SNAP Path to Work funds are not spent on SNAP recipients who also receive title IV-A assistance, contracted SNAP Path to Work Providers must receive written approval for component enrollment (accepted referral form signed by a DTA SNAP Path to Work specialist) prior to providing services through the SNAP Path to Work program. Enrollment is prohibited for SNAP recipients who also receive title IV-A assistance and those not receiving TANF due to sanction status for failure to comply with the program's work requirement.

Each month, SNAP Path to Work Providers will submit a list of program participants served during the prior calendar month. The client list will be matched against DTA data to ensure that a referral was made and that the client remained an eligible SNAP only participant during the service month. Quarterly Provider reimbursement will be approved only for costs associated with serving eligible SNAP recipients.

Special Populations: Referral for participation in the SNAP Path to Work program is available to SNAP applicants and SNAP recipients, including members of categorically eligible, zero benefit households. SNAP participants in receipt of title IV-A assistance are not eligible to participate in the SNAP Path to Work program.

Screening Process: As Massachusetts operates a voluntary E&T program, all SNAP Path to Work participants, including those subject to the ABAWD Work Program requirement, participate in the program on a voluntary basis.

SNAP recipients register for work by signing the SNAP application or recertification. SNAP case managers determine exempt or nonexempt status and explain the general SNAP work requirements and ABAWD Work Program rules as part of the interview process. Additionally, information about voluntary SNAP Path to Work program participation is provided to both exempt and nonexempt participants. ABAWDs subject to time limited benefits are advised that participation in qualifying SNAP Path to Work or other E&T activity meets the ABAWD Work Program requirement.

Potential volunteers may also learn of SNAP Path to Work opportunities through:

• DTA notices that direct interested parties to the SNAP Work Requirements Line (a toll free phone number staffed by Central Office SNAP Path to Work staff);

• SNAP Path to Work brochure;

• SNAP Path to Work website; or

• directly from a SNAP Path to Work Provider.

SNAP participants may voluntarily access SNAP Path to Work services in a variety of ways:

• contacting the Central Office SNAP Path to Work staff to request a referral to a program;

• directly contacting a SNAP Path to Work Provider, attending an orientation, and completing the application process for enrollment. The SNAP Path to Work Provider staff will then provide assessment information to Central Office SNAP Path to Work staff and request approval to enroll the participant into the component.

• responding to outreach from a SNAP Path to Work Provider, attending an orientation, and completing the application process for enrollment. The SNAP Path to Work Provider staff will then provide assessment information to Central Office SNAP Path to Work staff and request approval to enroll the participant into the component.

Contracted SNAP Path to Work Providers conduct an assessment of each SNAP participant before enrollment into a component. Work experience, education history, job skills, potential barriers and necessary support services are reviewed. The assessment process provides the basis for developing an individual employment plan for each SNAP participant.

The Central Office SNAP Path to Work staff enroll SNAP participants into SNAP Path to Work Provider components only after reviewing the assessment form and checking BEACON eligibility information.

An ABAWD may elect to meet the work requirement by volunteering at a non-profit, public, or quasi-public organization for a number of hours equal to the ABAWDs portion of the household's monthly SNAP grant divided by Massachusetts' minimum wage (which is currently $10.00 per hour, but will be $11.00 per hour starting 1/1/2017). ABAWDs are encouraged to contact Central Office SNAP Path to Work staff prior to starting volunteer work to confirm that the selected organization qualifies as a workfare site. Volunteers must submit proof of completed volunteer hours each month. Volunteer work that is completed without prior approval must be validated before ABAWD Work Program compliance is recorded.

DTA has established relationships with 82 non-profit, public, or quasi-public organizations that have agreed to host ABAWD volunteers. These organizations are located statewide and can accommodate at least 450 ABAWDs. ABAWDs seeking volunteer opportunities may contact Central Office SNAP Path to Work staff via the SNAP Work Requirements Line for assistance. Workfare placements recommendations are made based on the client's location, language, experience, transportation needs, and Criminal Offender Record Information (CORI) status.

Conciliation Process: N/A

Disqualification Policy: As Massachusetts operates a voluntary E&T program, all SNAP Path to Work participants participate in the program on a voluntary basis. Since the program is voluntary, clients are not penalized for failure to participate in the SNAP Path to Work program.

Participant Reimbursements: To best meet SNAP participant needs, SNAP Path to Work Providers are encouraged to offer participant reimbursements.

In FFY'17:

• Eleven Providers will offer transportation reimbursement. It is estimated that 427 participants will receive an average reimbursement of $140 for a total of $59,795 in participant reimbursement based on availability of funds.

• Three Providers will offer reimbursement for childcare. It is estimated that 31 participants will receive an average reimbursement of $54 for a total of $1,670 in participant reimbursement based on availability of funds.

• Four Providers will offer reimbursement for educational/credential test fees. It is estimated that 150 participants will receive an average reimbursement of $33.00 for a total of $4,970 in participant reimbursement based on availability of funds.

• Three Providers will offer reimbursement for clothing/uniforms. It is estimated that 150 participants will receive an average reimbursement of $146 for a total of $ 21,929 in participant reimbursement based on availability of funds.

• Seven Providers will offer reimbursement for books and supplies. It is estimated that 250 participants will receive an average reimbursement of $38.00 for a total of $9,463 in participant reimbursement based on availability of funds.

The SNAP Path to Work Providers address participant needs on a case-by-case basis to ensure that supports are reasonable, necessary, and directly related to participation in the program component. DTA does not impose a limit on client reimbursement costs, but must approve Provider budgets and plans for issuing transportation.

DTA recognizes the importance of providing participant reimbursements and continues to seek allowable funding sources and partners necessary to make transportation and other reimbursements available to a greater number of participants.

Work Registrant Data: The work registrant count is extracted from the BEACON eligibility system based on individual SNAP recipient coding.

To determine the unduplicated count of work registrants in Massachusetts during the federal fiscal year:

1. The total number of work registrants on the first day of the federal fiscal year are identified by:

• determining the total population of SNAP participants (applicants and recipients) between the ages of 16 and 59 (including 16 and 59), excluding those who meets exemption criteria identified at 7 CFR 273.7(b)(1).

2. On the last day of each month thereafter the total number of new work registrants for the month is determined by:

• determining the total population of SNAP participants (applicants and recipients) between the ages of 16 and 59 (including 16 and 59), excluding those who meets exemption criteria identified at 7 CFR 273.7(b)(1); and

• comparing to the resulting list to the previous lists for the fiscal year, filtering out anyone who appeared previously, to ensure that individuals who register more than once during the program year are counted only once.

DTA provides an unduplicated count of new SNAP work registrants on the FNS-583 Quarterly Program Activity Report form.

Outcome Reporting Data Source and Methodology:

National Reporting Measures:

DTA plans to collect information that will be needed to produce the mandatory SNAP Path to Work Annual Outcome Data Report, due on the first of each year, starting in 2018, as follows:

Reporting Measure Collection Method

The number and percentage of SNAP Path to Work participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP Path to Work Match against Department of Revenue (DOR) quarterly wage record (QWR)

The number and percentage of SNAP Path to Work participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in SNAP Path to Work Match against Department of Revenue (DOR) quarterly wage record (QWR)

The median quarterly earnings of all the SNAP Path to Work participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP Path to Work Match against Department of Revenue (DOR) quarterly wage record (QWR)

The number and percentage of participants that completed a training,

educational, work experience or an on-the-job training component. Data collected from SNAP Path to Work Providers

The number of all SNAP Path to Work participants who:

(at the time of enrollment)

a. Are voluntary vs. mandatory participants Massachusetts operates a voluntary SNAP Path to Work program. 100% of participants are voluntary.

b. Have received a high school degree (or GED) prior to being provided with SNAP Path to Work services Question is asked as part of the assessment completed by SNAP Path to Work Provider and recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

Information will be collected for each participant and added to a database quarterly.

c. Are able- bodied adults without dependents (ABAWDs) DTA Central Office SNAP Path to Work specialist will record the participant's ABAWD status at the time of enrollment on the program referral form.

Information will be collected for each participant and added to a database quarterly.

d. Speak English as a second language Question is asked as part of the assessment completed by SNAP Path to Work Provider and recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

Information will be collected for each participant and added to a database quarterly.

e. Are male or female Information will be recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

Information will be collected for each participant and added to a database quarterly.

f. Are within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older. Information will be recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

Information will be collected for each participant and added to a database quarterly.

A cumulative list of SNAP Path to Work participants will be maintained, including:

• participant name;

• participant Social Security Number (SSN);

• SNAP Path to Work Provider name;

• component name;

• component type;

• component start date;

• the federal fiscal quarter in which the start date falls;

• component end date;

• the federal fiscal quarter in which the end date falls;

• participant voluntary/mandatory SNAP Path to Work status;

• participant High School Diploma/GED/HiSet status (at the time of enrollment);

• participant ABAWD status (at the time of enrollment);

• participant ESOL status;

• participant gender; and

• participant age range (at the time of enrollment).

By April 2017, DTA will begin sending a file to the Department of Revenue (DOR) on a monthly basis. The file will contain the names and SSNs of SNAP Path to Work participants who completed an SNAP Path to Work component within the most recent 15 month period and will be checked against DOR's quarterly wage records (QWR) for employment status and quarterly earnings.

The data returned by DOR will populate a monthly report and data warehouse table for storage. DOR data and demographic data collected at the time of SNAP Path to Work component enrollment will be combined, analyzed, and used to generate the SNAP Path to Work Annual Outcome Data Report.

Workfare Outcomes Reporting:

ABAWDs may elect to meet the ABAWD Work program requirement by participating in self-initiated workfare. While workfare placements must be approved by DTA, ABAWDs may participate in workfare for as few or as many months as they choose.

For reporting purposes, in FFY'2017, Central Office SNAP Path to Work specialists will approve vetted self-initiated workfare placements for six months at a time, after which the client will need to reenroll in workfare should s/he elect to continue volunteering. Using the method described above, the participant's employment status and wages will be established two and four quarters after each workfare component end date.

While workfare participation offers ABAWDs an opportunity to gain valuable work experience while benefiting the community, DTA encourages ABAWDs to meet the work requirement through employment or qualifying SNAP Path to Work activity whenever possible, as these activities are generally more direct routes to self-sufficiency. Ideally, an ABAWD will meet the work requirement through workfare only until s/he secures steady employment or is enrolled in a qualifying SNAP Path to Work component.

Additionally, while those participating in other SNAP Path to Work components are likely to continue participating should they become exempt from the ABAWD Work Program requirement; this is not generally true of workfare participants. For these reasons, DTA will not include workfare participation when reporting SNAP Path to Work component completion rates.

Component Outcome Reporting:

On an annual basis, UMass collects and analyzes outcome data from all contracted SNAP Path to Work Providers.

A report summarizing the outcome data by provider, by individual components, and by component type is generated and shared with DTA. Outcomes are reported for all component participants and for SNAP Path to Work participants only.

National Reporting Measures:

DTA plans to collect information that will be needed to produce the mandatory SNAP Path to Work Annual Outcome Data Report, due on the first of each year, starting in 2018, as follows:

Reporting Measures:

The number and percentage of SNAP Path to Work participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP

Path to Work. Collection Method: Match against Department of Revenue (DOR) quarterly wage record (QWR)

The number and percentage of SNAP Path to Work participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in SNAP Path to Work. Collection Method: Match against Department of Revenue (DOR) quarterly wage record (QWR)

The median quarterly earnings of all the SNAP Path to Work participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP Path to Work. Collection Methood: Match against Department of Revenue (DOR) quarterly wage record (QWR)

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educational, work experience or an on-the-job training component. Collection Method: Data collected from SNAP Path to Work Providers

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(at the time of enrollment)

a. Are voluntary vs. mandatory participants. Collection Method: Massachusetts operates a voluntary SNAP Path to Work program. 100% of participants are voluntary.

b. Have received a high school degree (or GED) prior to being provided with SNAP Path to Work services. Collection Method: Question is asked as part of the assessment completed by SNAP Path to Work Provider and recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

Information will be collected for each participant and added to a database quarterly.

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Information will be collected for each participant and added to a database quarterly.

d. Speak English as a second language. Collection Method: Question is asked as part of the assessment completed by SNAP Path to Work Provider and recorded on the program referral form prior to component start (for participants in components other than workfare). Central Office SNAP Path to Work specialists will collect this data for workfare participants when a self-initiated workfare placement is approved.

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• SNAP Path to Work Provider name;

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• component type;

• component start date;

• the federal fiscal quarter in which the start date falls;

• component end date;

• the federal fiscal quarter in which the end date falls;

• participant voluntary/mandatory SNAP Path to Work status;

• participant High School Diploma/GED/HiSet status (at the time of enrollment);

• participant ABAWD status (at the time of enrollment);

• participant ESOL status;

• participant gender; and

• participant age range (at the time of enrollment).

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Component Outcome Reporting:

On an annual basis, UMass collects and analyzes outcome data from all contracted SNAP Path to Work Providers.

A report summarizing the outcome data by provider, by individual components, and by component type is generated and shared with DTA. Outcomes are reported for all component participants and for SNAP Path to Work participants only.

Below is a summary of FFY 2015 outcome information:

ALL PARTICIPANTS

Job search: 945 participants served, 73% completion rate, 65% job placement rate, average salary $ 12.92

Job Readiness Training: 342 participants served, 60% completion rate, 82% job placement rate, Average Salary $ 12.57

Education: 1323 participants served, 57% Completion Rate, 49% Job Placement Rate, average salary $ 10.88

Skills Training: 2022 participants served, 83% Completion Rate, 63% Job Placement Rate, Average Salary $ 14.12

SNAP PATH TO WORK PARTICIPANTS

Job Search: 212 Participants Served, 78% Completion Rate, 79% Job Placement Rate, Avarage Salary $ 13.33

Job Readiness Training: 90 Participants Served, 62% Completion Rate, 71% Job PLacement Rate, Average Salary $ 12.35

Education: 292 Participants Served, 60% Completion Rate, 69% Job Placement Rate, Average Salary $ 10.35

Skills Training: 371 Participants Served, 83% Completion Rate, 70% Job Placement Rate, Average Salary $ 13.65

The following have been submitted tot he appropriate FNS Regional Office:

Part E - Table 2: E&T Component Detail

PArt F - Table 3: Estimated Participant Levels

Part G - Table 4: Partners/Contracts

Part H: Contractor Detail Addendum

Part I - Table 5: Operating Budget

Part J - Table 6: Budget Narrative and Justification Table

Part K - Table 7: Summary of Federal Fiscal Year Costs

Plan Attachments

Assurance Statements

1. The State agency is accountable for the content of the State E&T plan and will provide oversight of any sub-grantees.

2. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs.

3. State education costs will not be supplanted with Federal E&T funds.

4. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program.

5. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.

6. Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit.

7. Contracts are procured through competitive bid procedures governed by State procurement regulations.

8. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.

9. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness.

10. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.

11. The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of State Plan which affect them; submit for comment all portions of the State Plan that affect the ITO; if appropriate and the extent practicable, include ITO suggestions in State plan. (For States with Indian Reservations only)

Primary Contacts:

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2. AN OPERATING BUDGET FOR THE FEDERAL FISCAL YEAR WITH AN ESTIMATE OF THE COST OF OPERATION FOR EACH FEDERAL FISCAL YEAR COVERED BY THE COMBINED PLAN. ANY STATE AGENCY THAT REQUESTS 50 PERCENT FEDERAL REIMBURSEMENT FOR STATE AGENCY E&T ADMINISTRATIVE COSTS, OTHER THAN FOR PARTICIPANT REIMBURSEMENTS, MUST INCLUDE IN ITS PLAN, OR AMENDMENTS TO ITS PLAN, AN

ITEMIZED LIST OF ALL ACTIVITIES AND COSTS FOR WHICH THOSE FEDERAL FUNDS WILL BE CLAIMED, INCLUDING THE COSTS FOR CASE MANAGEMENT AND CASEWORK TO FACILITATE THE TRANSITION FROM ECONOMIC DEPENDENCY TO SELF-SUFFICIENCY THROUGH WORK. COSTS IN EXCESS OF THE FEDERAL GRANT WILL BE ALLOWED ONLY WITH THE PRIOR APPROVAL OF FNS AND MUST BE ADEQUATELY DOCUMENTED TO ASSURE THAT THEY ARE NECESSARY, REASONABLE AND PROPERLY ALLOCATED. A STATE MUST SUBMIT A PLAN AMENDMENT TO REQUEST BUDGET ADJUSTMENTS AT LEAST 30 DAYS PRIOR TO PLANNED IMPLEMENTATION;

The Operating Budget is contained in a graphic file under Chart 38 in tables 4 & 5. The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state-plan/ in tables 4 & 5.

3. THE CATEGORIES AND TYPES OF INDIVIDUALS THE STATE AGENCY INTENDS TO EXEMPT FROM E&T PARTICIPATION, THE ESTIMATED PERCENTAGE OF WORK REGISTRANTS THE STATE AGENCY PLANS TO EXEMPT, AND THE FREQUENCY WITH WHICH THE STATE AGENCY PLANS TO REEVALUATE THE VALIDITY OF ITS EXEMPTIONS;

The state agency applies exemptions criteria for SNAP work registration according to federal statutory requirements to SNAP recipients who are:

- Younger than 16 or older than 59 years of age;
- Enrolled in secondary school at least half-time;
- Certified by aas being physically or mentally unfit for employment;
- Receiving or is an applicant of Unemployment Compensation;
- Participating in a federally subsidized drug or alcohol treatment program;
- Working 30 or more hours each week or earning the equivalent of the federal minimum wage times 30 hours;
- Subject to and participating in TAFDC/EAEDC Work Requirements;
- Caring for an incapacitated person or a dependent child younger than 6; or
- Pregnant omen.

All Work Registrants will be exempt from the SNAP E&T Program, but may elect to participate on a voluntary basis.

4. THE CHARACTERISTICS OF THE POPULATION THE STATE AGENCY INTENDS TO PLACE IN E&T;

Massachusetts is operating a voluntary SNAP E&T Program in FFY 2016. SNAP E&T services will be available to all SNAP participants and will continue to help as many low-income individuals and families as possible to achieve self-sufficiency through employment.

5. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

DTA estimates there will 6,119 SNAP E&T Program volunteers given current caseload composition.

6. THE GEOGRAPHIC AREAS COVERED AND NOT COVERED BY THE E&T PLAN AND WHY, AND THE TYPE AND LOCATION OF SERVICES TO BE OFFERED

To meet the needs of all SNAP participants, DTA contracts with E&T vendors statewide.

7. THE METHOD THE STATE AGENCY USES TO COUNT ALL WORK REGISTRANTS AS OF THE FIRST DAY OF THE NEW FISCAL YEAR;

The anticipated number of work registrants expected to be in the state on the first day of is projected based on past years' participation numbers and actual numbers from the current fiscal year.

8. THE METHOD THE STATE AGENCY USES TO REPORT WORK REGISTRANT INFORMATION ON THE QUARTERLY FORM FNS–583

DTA provides an unduplicated count of SNAP work registrants on the FNS–583 Quarterly Program Activity Report form. The work registrant count is extracted from the BEACON eligibility system based on individual SNAP work registration coding and identification numbers, excluding any individual from the count who registers more than once during the program year.

9. THE METHOD THE STATE AGENCY USES TO PREVENT WORK REGISTRANTS FROM BEING COUNTED TWICE WITHIN A FEDERAL FISCAL YEAR. IF THE STATE AGENCY UNIVERSALLY WORK REGISTERS ALL SNAP APPLICANTS, THIS METHOD MUST SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE EXEMPT FROM WORK REGISTRATION UNDER 7 C.F.R. §273.7(B)(1). IF THE STATE AGENCY WORK REGISTERS NONEXEMPT PARTICIPANTS WHENEVER A NEW APPLICATION IS SUBMITTED, THIS METHOD MUST ALSO SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE PARTICIPANTS WHO MAY HAVE ALREADY BEEN REGISTERED WITHIN THE PAST 12 MONTHS AS SPECIFIED UNDER 7 C.F.R. §273.7(A)(1)(I);

See response to item 8.

10. THE ORGANIZATIONAL RELATIONSHIP BETWEEN THE UNITS RESPONSIBLE FOR CERTIFICATION AND THE UNITS OPERATING THE E&T COMPONENTS, INCLUDING UNITS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. FNS IS SPECIFICALLY CONCERNED THAT THE LINES OF COMMUNICATION BE EFFICIENT AND THAT NONCOMPLIANCE BY THE PARTICIPANT BE REPORTED TO THE CERTIFICATION UNIT WITHIN 10 WORKING DAYS AFTER THE NONCOMPLIANCE OCCURS;

DTA case managers determine the work status of each SNAP registrant. Exempt SNAP registrants will be able to access SNAP E&T services as volunteers. This includes exempt ABAWDs who will be encouraged to volunteer to participate in certain SNAP E&T activities as a means of meeting ABAWD work program requirements.

SNAP participants may voluntarily access SNAP E&T services in a variety of ways.

- Contacting the Central Office SNAP E&T staff to request a referral to a particular program.
- Directly contacting a SNAP E&T Provider, attending an orientation, and completing the application process for enrollment. The SNAP E&T Provider staff will then provide assessment information to Central Office SNAP E&T staff and request approval to enroll the participant into the E&T component.
- Responding to outreach from a SNAP E&T Provider, attending an orientation, and completing the application process for enrollment. The SNAP E&T Provider staff will then provide assessment information to Central Office SNAP E&T staff and request approval to enroll the participant into the E&T component.

Central office E&T Specialists verify participation eligibility and refer volunteers to E&T components. All contracted SNAP E&T Providers conduct an assessment of each SNAP participant before enrollment into a component. Work experience, education history, job skills, potential barriers and necessary support services are reviewed. The assessment process provides the basis for developing an individual employment plan for each SNAP participant.

Nonexempt ABAWDs will be able to participate in certain components offered by contracted ABAWD Service Providers and ABAWD Community Service sites to meet work program requirements.

DTA has contracted and works closely with the University of Massachusetts to ensure SNAP E&T Program services, expenditure and claiming is in accordance with federal regulations and guidelines. UMass also assists DTA with participation monitoring and tracking outcomes associated with SNAP client participation in the E&T program. SNAP E&T Providers submit billing claims to UMass, where the claims are compiled before being sent to DTA for final review and payment authorization.

Since the program is voluntary there will be no adverse action for failure to comply with SNAP E&T component requirements.

11. THE RELATIONSHIP BETWEEN THE STATE AGENCY AND OTHER ORGANIZATIONS IT PLANS TO COORDINATE WITH FOR THE PROVISION OF SERVICES, INCLUDING ORGANIZATIONS IN THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. COPIES OF CONTRACTS MUST BE AVAILABLE FOR INSPECTION;

DTA has an ISA with UMass, which governs the SNAP E&T Provider Reimbursement Project. UMass in accordance with the ISA contracts directly with 40 SNAP E&T Providers. These contracts are funded with private grants, DESE monies and Community Development Block Grants. Copies of the agreements are available to FNS.

Agreements are negotiated and UMass is not required to put E&T agreements out to public bid. DTA in coordination with UMass monitors the agreements annually to assure compliance with agreement conditions.

Budget staff at DTA, UMass and EOHHS reviews quarterly bills to assure compliance with state cost-accounting procedures. E&T Providers send a statement to UMass each quarter through a secure

portal requesting funds based on the specifications of the agreement and denoting actual costs for the provision of E&T services. DTA transfers funds to E&T Providers.

12. THE AVAILABILITY, IF APPROPRIATE, OF E&T PROGRAMS FOR INDIANS LIVING ON RESERVATIONS AFTER THE STATE AGENCY HAS CONSULTED IN GOOD FAITH WITH APPROPRIATE TRIBAL ORGANIZATIONS;

Per USDA guidance, DTA, in coordination with the University of Massachusetts, will consult with the tribal organization of an Indian reservation to ensure that the Department's E&T plan is responsive to the special needs of American Indians on reservations *no later than December 15, 2015.*

13. IF A CONCILIATION PROCESS IS PLANNED, THE PROCEDURES THAT WILL BE USED WHEN AN INDIVIDUAL FAILS TO COMPLY WITH AN E&T PROGRAM REQUIREMENT. INCLUDE THE LENGTH OF THE CONCILIATION PERIOD

Not applicable

14. THE PAYMENT RATES FOR CHILD CARE ESTABLISHED IN ACCORDANCE WITH THE CHILD CARE AND DEVELOPMENT BLOCK GRANT PROVISIONS OF 45 CFR 98.43, AND BASED ON LOCAL MARKET RATE SURVEYS.

Not applicable

15. THE COMBINED (FEDERAL/STATE) STATE AGENCY REIMBURSEMENT RATE FOR TRANSPORTATION COSTS AND OTHER EXPENSES REASONABLY NECESSARY AND DIRECTLY RELATED TO PARTICIPATION INCURRED BY E&T PARTICIPANTS. IF THE STATE AGENCY PROPOSES TO PROVIDE DIFFERENT REIMBURSEMENT AMOUNTS TO ACCOUNT FOR VARYING LEVELS OF EXPENSES, FOR INSTANCE FOR GREATER OR LESSER COSTS OF TRANSPORTATION IN DIFFERENT AREAS OF THE STATE, IT MUST INCLUDE THEM HERE.

To best meet the SNAP participant needs several E&T Providers will offer participant reimbursement for transportation costs. The E&T providers address participant reimbursement on a case-by-case basis to ensure they are reasonable, necessary, and directly related to participation in the E&T program. It is estimated that 608 participants will receive up to $124 per person per month for a total of $75,574 in participant reimbursement based on availability of funds.

As part of the approved SNAP E&T service most participants receive uniforms, tools, books, supplies or testing fees directly from the E&T Provider so reimbursement is not necessary.

16. INFORMATION ABOUT EXPENSES THE STATE AGENCY PROPOSES TO REIMBURSE. FNS MUST BE AFFORDED THE OPPORTUNITY TO REVIEW AND COMMENT ON THE PROPOSED REIMBURSEMENTS BEFORE THEY ARE IMPLEMENTED.

See Sections 2 and 15.

(B) ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD)

A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs)* subject to the 3-month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:
*7 CFR § 273.7(c)(7)

1. ITS PLEDGE TO OFFER A QUALIFYING ACTIVITY TO ALL AT-RISK ABAWD APPLICANTS AND RECIPIENTS

Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;

- DTA estimates the cost of serving at–risk ABAWDs will be approximately $1,000,000.
- DTA plans to administer the ABAWD Work Program centrally in coordination with the University of Massachusetts Medical School.
- The SNAP Director, Assistant Director for SNAP Program Development and Contract Management, and four E&T Specialists will manage the ABAWD population including referrals to components, monitoring participation, tracking 15% allowances, offering services to At–Risk ABAWDs, and, disqualifying ABAWDs for noncompliance.
- A toll–free Employment and Training Information line is staffed by Central Office E&T specialists to answer questions about E&T participation and ABAWD work requirements, and facilitate referrals to E&T and Community Service sites.
- Prior to the expiration of the statewide waiver, DTA has conducted targeted outreach to potential ABAWDs, including educational mailings and robo–calls, to inform these SNAP clients of ABAWD work requirements, time–limited benefits and exemption reasons. DTA has also conducted a series informational sessions for stakeholders and community partners to raise awareness of the ABAWD work program. DTA continues to work closely with stakeholders regarding the ABAWD work program requirement.
- DTA staff at Central office has experience managing the SNAP E&T Program. They currently coordinate referrals, serve as DTA local office liaisons, monitor E&T Providers and process E&T Provider claims.
- There are approximately 23,000 SNAP clients subject to the ABAWD work requirements and time limited benefits. The ABAWD population includes clients who are long–term unemployed and have low education levels.
- Upon expiration of Waiver number 2150057, DTA has offered qualifying E&T components and community service opportunities for ABAWDs including at–risk ABAWDs. DTA is in the process of expanding E&T services to increase the availability of ABAWD qualifying activities and recruiting Community Service sites. Recruitment efforts will target ABAWD services and volunteer opportunities based on zip codes of potential ABAWDs.

Note: DTA operates a SNAP E&T workfare program under which non–exempt ABAWDs can meet ABAWD work program requirements by conducting community service at public, non–profit organizations. To meet work program requirements through community service, an ABAWD must perform volunteer work for a number of hours equal to their SNAP allotment divided by the state minimum wage.

Massachusetts Department of Transitional Assistance pledges to serve all at-risk ABAWDs living in Greater Boston during FFY 2017.

For the purposes of this project, Greater Boston is defined as: Arlington, Belmont, Boston*, Braintree, Brookline, Cambridge, Chelsea, Cohasset, Dedham, Everett, Hingham, Holbrook, Hull, Malden, Medford, Melrose, Milton, Needham, Newton, Quincy, Randolph, Revere, Somerville, Waltham, Watertown, Wellesley, Weston, Weymouth, Winchester, and Winthrop.

*Boston includes the following communities: Allston/Brighton, Back Bay, Beacon Hill/West End, Charlestown, Chinatown, Dorchester, East Boston, Fenway/Kenmore, Financial District, Hyde Park, Jamaica Plain, Mattapan, Mission Hill, North End, Roslindale, Roxbury, South Boston, and South End/Bay Village.

Approximately half of the ABAWDs in Massachusetts reside in Greater Boston.

DTA anticipates that pledged services will be offered to approximately 6750 ABAWDs living in Greater Boston during FFY' 2017.

Approximately 6,750 ABAWDs living elsewhere in the state will be offered and potentially placed in qualifying SNAP Path to Work activity (including assistance securing workfare) based on the availability of funding and component availability in the ABAWDs local area.

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE

FFY2017 DTA estimates the cost to fulfill the pledge is $1,428,915.00

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS

See response to question 1.

Close coordination is maintained between DTA, UMass and JVS to ensure that:

• all at-risk ABAWDs in Greater Boston are offered the opportunity to participate in qualifying activity timely;

• participating ABAWDs are credited with meting the requirement promptly to avoid erroneous SNAP case closure;

• ABAWD noncompliance is reported promptly; and

• that monies earmarked for SNAP Path to Work activity for at-risk ABAWDs is used for goods and services that are reasonable and necessary, and allowable under federal guidelines.

Site visits are conducted by UMass and DTA staff at least annually. DTA, UMass and JVS staff meets (in person or via conference call) monthly or more frequently as needed, to troubleshoot and improve upon processes and procedures to capitalize on the positive impact of this pilot program.

4. A DISCUSSION OF ITS CAPACITY AND ABILITY TO SERVE AT-RISK ABAWDS.

See response to question 1.

Following the automated monthly recording of ABAWD Work Program compliance/noncompliance, two reports are generated listing the names, addresses, and phone numbers of all at-risk ABAWDs living in and outside of Greater Boston.

On a monthly basis, DTA provides Jewish Vocational Services (JVS) with the names and contact information of all at risk ABAWDS living in Greater Boston.

JVS reaches out to these ABAWDs via phone and/or mail to invite them to participate in the SNAP Works Program, a qualifying component specifically designed to quickly engage at-risk ABAWDs in activity that meets the ABAWD Work Program requirement.

At-risk ABAWDs in Greater Boston may also be connected to JVS through flyers available in DTA local office waiting rooms, Central Office SNAP Path to Work staff referral, or other JVS marketing.

Central Office SNAP Path to Work staff validates potential participants' ABAWD status and eligibility for SNAP Path to Work enrollment before approving an individual's enrollment in the program.

ABAWDs living in or outside of Greater Boston may also be referred to one of 34 qualifying SNAP Path to Work components offered statewide. An ABAWD may also elect to fulfil the work requirement by participating in self-initiated workfare.

ABAWDs can reach Central Office SNAP Path to Work staff toll free via the SNAP Work Requirements Line for a referral to SNAP Path to Work Provider, for assistance locating a workfare placement, or to confirm that a self-identified workfare site is acceptable.

5. INFORMATION ABOUT THE SIZE AND SPECIAL NEEDS OF ITS ABAWD POPULATION

See response to question 1.

6. INFORMATION ABOUT THE EDUCATION, TRAINING, AND WORKFARE COMPONENTS IT WILL OFFER TO MEET THE ABAWD WORK REQUIREMENT.

See response to question 1.

FFY2017 - At-risk ABAWDs need to start a program to fulfil their work requirement immediately, to avoid loss of SNAP benefits. But effective job training models do not offer this flexibility — the process of locating, applying to, and being accepted by an appropriate job training program may take several weeks or longer, and most programs have only 2-4 start dates per year.

While JVS has a variety of immediately-available resources for job search activities and workshops, these activities alone do not meet the ABAWD work requirement (more than half of the required 80 monthly hours of activity must be education and training activities, if not a WIOA program).

The SNAP Works Program begins with rapid engagement and individual assessment with a Career Navigator, followed by immediate enrollment into a compliant program track. An at-risk ABAWD's plan components may initially include the Career Readiness Initiative (CRI),* computer literacy, adult education, workshops on resume & interviewing, and exploration of job training programs.

Participants can then transition to their chosen training program at the next start date (with an approved SNAP Path to Work or WIOA training provider), or continue in CRI to test and earn the National Career Readiness Certificate and begin job search.

Program funding for subsequent job training includes WIOA-like training vouchers for ABAWDs, who can also be supported in training by WIOA vouchers, by SNAP Path to Work 50/50 funds, or through other funding sources.

* CRI utilizes Career Ready 101 training and WorkKeys testing to gain the National Career Readiness Certificate, building job seekers' skills and providing a credential. This customizable, online training solution meets the ABAWD work requirement and can be started at any time.

(C) PLAN MODIFICATION

If FNS determines that the performance of a State agency with respect to employment and training outcomes is inadequate, FNS may require the State agency to make modifications to the State E&T plan to improve the outcomes.*

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*7 U.S.C. 2025(h)(5)(E) as amended by Agricultural Act of 2014 .

FUNDING DISCLAIMER

Funds may not be available when SNAP E&T portions of a Combined State Plan under WIOA are approved. FNS's obligation after approving a SNAP E&T plan submitted as part of a Combined State Plan is contingent upon the availability of an appropriation from which payment can be made. Any FNS funding resulting from an approval of a SNAP E&T plan submitted as part of a Combined State Plan is subject to FNS receiving sufficient funds (in the Program Financial Control System for FNS) to fund this and all prior approved SNAP E&T plans submitted as part of a Combined State Plan in their entirety in the time and date order received. Federal reimbursement to States for 50 percent of State administrative expenditures and for participant reimbursements is subject to the above conditions.

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Massachusetts has incorporated TAA into the sections indicated.

Has the state incorporated TAA into the sections indicated above? No

JOBS FOR VETERANS' STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(A) HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

All customers who appear for services at the Career Center are asked if they are a Veteran. If the customer identifies as a Veteran they are immediately informed of their Priority of Service status. Career Center staff first offer the Veteran a spot in the next Career Center Seminar (orientation) the main portal into the Massachusetts Workforce Development and Career Center System.

This orientation provides all customers including Veterans information on, and access to, the full array of services, programs and activities available at or accessible from the Career Center. As part of the orientation the Veteran will complete a self– assessment of their work search strategies, if appropriate, complete the Career Readiness 101 assessment, complete a job profile and with a career counselor and establish the next appropriate step in their Career Plan. If appropriate due to determination that the Veteran customer has significant barriers to employment the Veteran will be referred to the DVOP.

If the Veteran customer prefers not to attend a CCS they are provided with information on the full array of services available and scheduled for the next appropriate service. If they asked to speak with a Veteran representative they will be referred to that Veteran representative.

(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;

The primary role of the DVOP staff is to serve those Veterans assessed to face significant barriers to achieving their employment goals and deemed most in need of individualized services, in accordance with VPL 03–14 Change 2, VPL 04–14, and for the LVER to explore employment opportunities for them. For those Veteran customers who do not face significant employment barriers, the Commonwealth relies heavily on its WIOA partners (particularly Wagner–Peyser) to provide the services typically sought by such "job ready" individuals.

All eligible Veterans are case managed by and receive individualized services from DVOP or Career Center staff. This approach is consistent with NVTI's Individualized Service (IS) training. Recognizing that, in accordance with the Jobs for Veterans Act and VPL 03–14 Change 2, the responsibility of serving these "most in need" Veterans falls primarily on grant–funded DVOP staff, Massachusetts will continue to case manage Veterans from the above categories by a DVOP whenever possible (based on the state staffing plan and taking into consideration the best interests of the individual Veteran). According to the Massachusetts Once Stop Career Center Activity Report (OSCCAR) for PY15, 43% of the Veterans receiving an approved service at the One–Stop Career Centers either had a service–connected disability or were economically or educationally disadvantaged. Prioritizing services to these targeted Veteran categories is facilitated by specifically "flagging" such "at risk" Veteran customers within the Massachusetts One–Stop Employment System (MOSES) database.

LVER staff advocate for employment and training opportunities with business, industry and community–based organizations in order to secure gainful employment for Veteran customers. The Commonwealth LVERs will work closely with efforts of the Governor's Workforce Skills Cabinet, MassBizWorks and Core Partners to advocate for employment and training opportunities with business, industry and community–based organizations in order to secure gainful employment for Veteran customers. The LVER will outreach to federal contractors and training providers. LVERs will also coordinate with the Office of Federal Contracting Compliance (OFCCP), to ensure that Veterans are receiving priority in employment opportunities by federal contractors.

(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;

The Commonwealth's Career Centers are fully and seamlessly integrated with the full array of WIOA Title I, Wagner–Peyser and other key workforce partner services co–located under one roof. The goal is to as quickly as possible deliver the desired and appropriate services. Integration also means that initial services provided to eligible Veterans are primarily provided by staff other than DVOPs.

The initial assessment identifies the individual's "job readiness". If the Veteran is not disadvantaged, (SBE) services are provided on a priority basis by Career Center staff. If individualized services are appropriate, a case plan is developed and the Veteran is assisted directly by the DVOP or referred to supportive services as appropriate.

As an example of integration, a Veteran in need of additional training/schooling to be more employable is "fast tracked" through the eligibility determination and enrollment process. In such a situation, the Veteran's primary case manager may well be another Career Center staff member that will provide case management rather than the DVOP.

This integration applies to other Career Center partners as well, including Massachusetts Rehabilitation Commission, state colleges and universities. At the state level, and working throughout the system, key partnerships exist with Veterans Administration hospitals and counseling centers. The VA is represented at local Career Center Veteran events (job fairs, information sessions). DVOP staff also outreach to VA hospitals and centers on a regular basis. The Commonwealth has designated a DVOP as the Individualized Services Coordinator for the Vocational and Rehabilitation Program (VR & E). This individual is co–located with VA's state level VR&E coordinator. The VR&E/ISC team conducts regional training sessions for all DVOP staff and additional training for regional VA counselors on the VR&E regulations and reporting requirements, as needed.

A second key partnership exists with the Commonwealth Department of Veterans' Services (DVS). Through this agency, each Commonwealth town and municipality has an assigned Veterans' Services Officer to provide a wide range of benefits and services to Veterans. Cross training and relationship building at the state and local level have enhanced our ability to quickly address the needs of Veterans.

Both the VA and the DVS regularly participate in local, regional and statewide Veterans' programs, events and training sessions.

Outreach and linkage to those Veterans most in need of individualized services is an ongoing top priority. Local DVOPs have direct contact and coordination with homeless Veteran shelters (HVRP grantees) to provide direct services and training program opportunities leading to gainful employment and self–sufficiency. Included in these outreach efforts are broad–based marketing and promotion of Veteran–oriented events, job fairs and education/training programs.

Linkage to employers occurs in a number of ways. LVERs will be regionally aligned with Career Center business services teams to address Veterans' employment opportunities in an integrated, full–service manner. Utilizing available tools such as Work Opportunity Tax Credit and state training grants, the teams promote the benefits of hiring Veterans. There is a direct focus on federal contractors as well, assisting them with posting their openings through the Career Center system.

Massachusetts makes a concerted effort at the regional and local level to link training vendors, employers and Veterans. Programs in in demand careers such as "bio–medical" and advanced manufacturing are being designed and run specifically for Veterans.

(D) THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Massachusetts will utilize the 1% set–aside Performance Incentive Award funding for this four year period. The incentive will be used to reward One–Stop Career Centers that lead the state in demonstrated services to Veterans. Application for the nominations for the incentive awards begins in August of each year. Nominations are reviewed and winners are selected in September. All funds are obligated by September 30, of each year and funds are expended by December 31 of each year. Incentive Award report is submitted in 4th quarter each year.

The award recognizes the entire staff of a Massachusetts One–Stop Career Center, not just a Veterans' unit or Veterans' staff, which demonstrates excellence and dedication in the provision of quality employment, training and placement services to U.S. Veterans and other eligible persons.

The award recognizes a Career Center that has made a substantial contribution or effort to:

a. Improve and modernize employment and placement services, as well as training opportunities for Veterans and other eligible persons.

b. Reward and celebrate excellence in the provision of "Priority of Service" and integration of services to Veterans and other eligible persons at the Career Center.

c. Improve performance outcomes for Veterans and other eligible persons.

d. Establish strong working partnerships with other Veteran organizations and/or the community at large to improve services to Veterans and other eligible persons and;

e. Design and develop innovations, approaches, and supportive services etc., in short, best practices that demonstrate the Career Centers commitment to excellence in provision of quality employment and training services to Veterans and other eligible persons.

Completed nominations are reviewed and ranked by Veteran Employment, Training, and Central Program Units. Monetary Incentive Awards are made annually to the highest scoring Career Centers that made a concerted, measurable effort to attain high standards in the provision of services to Veterans most in need. The individual amounts may be divided as in the following example:

GOLD: $10,000

SILVER: $8,000

BRONZE: $6,000

RISING STAR: $4,000

Funds are awarded to the lead operators of the recognized One–Stop Career Centers for specific center needs such as computer hardware/software; resource room or library materials; transfer to training accounts; or other office–wide uses.

(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);

Under this plan, service priority for JVSG staff will be targeted to:

• Veterans with service–connected disabilities;

• Veterans Between the Ages of 18–24;

• Veterans who Exited Military Service within the last 36 months and have not worked for the last 27 weeks

• Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));

• An offender, as defined by WIA Section 101(27), who is incarcerated or has been released from incarceration;

• Lacking a high school diploma or equivalent certificate;

• Low–income (as defined by WIA at Sec. 101(25)(B)).

• Transitioning service members in need of individualized services or Involuntarily Separated by a Reduction in Force;

• Wounded Warriors in military treatment facilities and their family caregivers,

(F) HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

The Commonwealth issued MassWorkforce Issuance 12–67 Implementing Veterans' Priority of Service, on January 13, 2012.

"Local Boards, One–Stop Career Center Operators, Core Partners and other local providers of Federally–funded employment and training programs/services will assure the provision of Veterans' priority of service for all "covered persons" in a manner consistent with the requirements of the Jobs for Veterans Act..."

The policy also requires that local workforce areas assure that:

"Veterans' priority of service will be implemented and provided at the point of entry for each federally–funded employment and training program."

Massachusetts provides training on the implementation of Veterans' Priority of Service. Training is provided to DVOPs, LVERs, One–Stop Career Center Directors and Operations Managers, Local Workforce Boards, Career Center Staff, Core Partners and other workforce partner personnel to further assure full and effective implementation of Veterans' priority of service requirements at the local level.

The training emphasizes:

• Identifying "the point of entry" of federal employment and training programs in order for covered persons to take full advantage of priority of services. • That staff must assure that at the initial contact point (point of entry) covered persons are made aware of: o their entitlement to priority of service; o the full array of employment, training, and placement services; and o any applicable eligibility requirements for those programs or services. • That local policies and procedures must ensure: o monitoring and evaluation of priority of service will be incorporated within monitoring policies and procedures; and o all reporting requirements will be met.

Furthermore, Priority of Service is also included as part of the agenda of every technical assistance visit conducted in the field; part of the annual plan submitted by each local workforce investment area and is a key component of our proposed incentive awards program.

Every Veteran (covered person) job seeker is immediately notified by Career Center staff of their potential eligibility and rights through Priority of Service. Every customer entering a Massachusetts Career Center is asked if they are a Veteran. After Veteran status is determined and documented on their membership form in our MOSES database, the Veteran is informed of their entitlement to priority of service. A Priority of Service indicator is shown in Moses for consistent documentation methodology for the required notification of POS entitlement. The Massachusetts Department of Career Services and Career Center websites has an electronic notification about Priority of Service as well as contact information for state workforce agency staff.

(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,

Massachusetts uses its Massachusetts One–Stop Employment Services (MOSES) job seeker and employer database to track and report the progress of Veteran customers' journey through the Massachusetts Workforce Development System.

MOSES tracks all service provision both basic career services and individualized services provided to all customers across all Core Partner programming. Services tracked include assessment, case management, employment and training services; and other direct and support services available from local government and/or community–based organizations in order to assure that Veterans who have a service connected disability and/or are economically or educationally disadvantaged will receive the services they need (i.e. occupational/educational training, financial assistance, job development opportunities) to find suitable employment. MOSES has a robust reporting mechanism to breakdown and report out on all measures.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Please refer to section g.1., above, for response.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

Please refer to section g.1., above, for response.

(H) THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

A copy of the VETS 501 listing DVOP and LVER staff and vacancies including mandatory training completion dates.is in an attachment to the MA Combined State Plan.

(I) SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

The Commonwealth is prepared to provide any information requested and to work with all Veteran populations that may be designated by the Secretary as a targeted population.

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.

U.S. Department of Labor

SQSP SIGNATURE PAGE

OMB Approval No. 1205-0 132 Expires 12/31/2017

U.S. DEPARTMENT OF LABOR Employment and Training Administration FEDERAL FISCAL YEAR 2017 STATE MA

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

MASSACHUSETTS (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 Robert T. Cunningham Director. Dept. of Unemployment Assistance /2772016

DOL APPROVING OFFICIAL Holly C. O'Brien Regional Administrator

DOL APPROVING OFFICIAL

A signed copy of the Transmittal Letter is maintained with DUA and the ETA 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.

Please refer to Appendix 2, Attachment M. The federal portal does not provide the ability to include this document in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Signed copies of the SF 424 and other appropriate budget-related forms are maintained with DUA and the ETA Regional Office.

Please refer to Appendix 2, Attachment O for Updated Budget Worksheets/Forms in the MA WIOA Combined State Plan. The federal portal does not provide the ability to include this document in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Signed copies of the SF 424 and other appropriate budget-related forms are maintained with DUA and the ETA 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).

SQSP STATE PLAN NARRATIVE

MASSACHUSETTS STATE QUALITY SERVICE PLAN OCTOBER 1, 2015 – SEPTEMBER 30, 2016

A. OVERVIEW

In July of 2013, Massachusetts launched the benefits portion of UI Online, our web–based, self–service system. Claimants can now file an initial, continued, or additional claim online, complete fact finding and other requests for information, update contact information, review payment history, file an appeal, and much more. For the first time, our tax, benefits, and appeals systems are fully integrated. DUA had been operating with a 29 year old COBOL based system that was inflexible and unable to keep up with significant law and policy changes. DUA greatly struggled with its workload during the recession, as evidenced by our “At Risk” status and substandard performance measures. A dramatic change was not optional.

Therefore, 2013 was DUA's year for change. Staff, claimants, employers, and TPAs all had to become accustomed to a new system and a new way of conducting business. As with any large system implementation, there were many challenges: user familiarity was a large one, and in addition, design shortcomings and conversion complications resulting from the conversion of over 2 million claims. The DUA team rallied together, and customers worked with us to identify issues. Claimants responded overwhelmingly well to the ability to use self–service options that were not available to them before.

DUA's goal for 2014 was to stabilize. The massive changes were over, but the Agency was still recovering from the extensive backlog from the legacy system and settling into the new business processes. In addition, we restructured some departments and hired new staff where needed. We focused on reducing the backlog, fixing any outstanding defects, and stabilizing the infrastructure. We focused on the performance standards and are driving business decisions to meet these goals. As expected, due to the excessive backlog and the fact that the system is designed to work oldest claims and issues first, we saw a downturn in many of our metrics initially. However, we saw some positive trajectory in timely first payment and issue timeliness numbers. This occurred as we continued to improve our business processes, staff became more accustomed to the new system, and calls coming into the call center drastically declined.

Our theme for 2015 was to optimize. In 2015, we continued to improve the system by enhancing the customer service experience and implementing required law and policy changes. As in the past few years, we focused on Program Integrity to stay abreast of new fraud schemes to protect the trust fund. Although staff has adjusted to the new system, there was a continued need for significant training, as a large majority of our adjusters were new. Lastly, agency–wide, there was a renewed focus on internal auditing and quality control in order to catch issues early and tailor training where it was needed most.

In FY2016, agency–wide focus will be on the improvement of performance metrics. Across all levels, staff performance is being measured against state scores for the UI Core Measures and the Secretary's Standards. Every manager is managing to and being measured against a group of measures that are consolidated into our Customer Service Metrics. The measures included are First Payment Promptness, Nonmonetary Determination Timeliness, Nonmonetary Determination Quality and Lower and Higher Appeals Aging. They are also managing to and being measured against our Employer Service Metrics that include: New Employer Time Lapse, Tax Quality and Effective Audit Measures. Both the Customer Service Metrics and the Employer Service Metrics are in line with the DOL priorities for FY2016. In all of our "at risk" areas, we are focusing on process improvements, system fixes and staff training that will directly impact our ability to meet the acceptable levels of performance.

Already, we have seen significant improvement in our backlog of ready to work issues due to system improvements that consolidate issues into singular fact–finding and enhancements that ease the online filing process for claimants. These changes significantly improved our Timely First Payment metric along with our Lower Authority Appeals Timeliness. In FY2016, we hope to meet the acceptable levels of performance for both of these standards. National Priorities: Improving State Capacity to Administer and Operate the UI Program Effectively:

Administering and operating the UI program effectively is a main concern for Massachusetts. Since April of 2010, MA has been rated at risk by the US Department of Labor due to its consistent and significant failure to meet first payment timeliness standards. The fact that this designation was the result of many years of declining performance along with beginning the process of implementing a new and automated UI system forms the basis for future program enhancement. Although only being in the position for four months, unemployment insurance director Rob Cunningham is committed to returning Massachusetts to a national top performer.

In recent years our inability to effectively process UI claims in a timely manner has been the result of circumstances relating to the great recession, staff turnover and training capabilities, decreased funding opportunities, and implementation of a new UI system. In effect, since 2008 MA has administered the program using a 30–year–old legacy system while trying to implement new technologies that rise to the level of required performance and expectations. In the past MDUA has used many strategies to correct our lack of performance in this area. These efforts include an independent business analysis by Coffey Associates, internal program workgroups, engaging stakeholders, and partnering with other state UI Agencies. Moving forward in the FY16 SQSP cycle, MA would like to take the results of these experiences and the retirement of the legacy system to turn it into actionable program goals.

The first and most important change for the upcoming year will result in MDUA realigning its resources to ensure program goals are achieved. The first step was to develop a matrix of performance standards and assigning responsibility to the individual business units. The matrix will be monitored at the highest level in the organization to ensure that it consistently is a top priority. To date the matrix includes all USDOL secretary standards and UI Core measures. To drive success, DUA has realigned staff to focus on these measures. In addition, MDUA will be centralizing the monitoring of the matrix while keeping the responsibility of performance within the individual business units.

Improving Prevention, Detection and Recovery of UI Improper Payments

Massachusetts has embarked on an aggressive plan to lower the states improper payment rate for the UI program. This plan includes bringing in new experienced leadership at the highest level to coordinate our systems approach to improving prevention, detection, and recovery of improper payments. According to our analysis, the top three reasons of improper payments in MA are benefit year earnings at 43%, worksearch 25%, and separation issues are 10% of total overpayments. 78% of all improper payments are attributable to these three causes. Massachusetts continues to investigate any area that potentially creates an improper payment; however, keeping in mind that a large percentage of the improper payments are from three causes, analysis has focused on making system and business process enhancements that will drive our improper payment rate down. For example, our analysis of benefit year earnings shows that enhancements to the continued claims process can simplify the process for claimants to self–certify that they worked and earned wages. This enhancement will dramatically increase a claimant's ability to self–report earnings accurately. The Benefit Payment Accuracy unit has taken an aggressive action in use of the NDNH cross match program. MDUA has also been working on the implementation of the treasury offset program which will start on 8–03–2015. MA will continue to engage stakeholders, USDOL, partner states, and the UI Center for Excellence in its endeavors to reduce, detect, and recover improper payments. The NDNH cross–match is being improved in FY16 to make it more efficient and a more effective tool to

reduce BYE improper payments. The current process, while an improvement over prior years, remains highly manual and less effective than initially intended.

Improving Program Performance

Since the implementation of UI Online two years ago DUA has delivered ongoing staff development to promote the familiarization of the new system for system users. Some of the newest training strategies implemented include:

• Expanding the initial claims process to include a full day of hands on system training where staff file and adjudicate claims in a test environment, in addition to another day of classroom training. This expanded training was delivered to approximately 100 staff in 10 sessions with an additional 11 days spent delivering individualized training to 9 staff • Provided Initial Adjudication Training to 120 managers, adjudicators and review examiners in four three week training sessions • Provided Refresher Training to over 300 staff in 12 sessions for adjudicators and adjudication managers, in multiple office locations • Provided UI Online User Training to over 300 DUA/DCS personnel • Provided Customer Service Training to over 300 DUA personnel in 84 half day sessions covering 6 targeted topics designed to assist customers with navigation of the new system • Secured BTQ Certification Training that was delivered to 25 adjudication staff by regional DOL staff

DUA continues to identify system inefficiencies in its UI Online system, which is a web–based, self–service system that allows claimants to file an initial, continued or additional claim online. The system was designed to send fact finding and other requests for information to claimants and employers to streamline and allow more automation to the UI process. At the request of DOL we have modified the use of fact finding questionnaires so only questionnaires pertaining to interested party employers are sent to claimants; all base period employers continue to receive fact finding questionnaires to ensure proper charging and to reduce improper payment of benefits. We have also implemented a system enhancement to bundle all ready to work issues for individual claimants to insure the prompt resolution of outstanding issues by one adjudicator.

DUA has contracted with a readability vendor to review and revise over 500 fact finding questionnaires to improve user comprehension. Prior to vendor submission, we solicited feedback from employers, claimant advocates and DUA staff to ensure a comprehensive review process. Currently, over 100 of the revised questionnaires have been put into production. In FY16 we will complete this project, although DUA expects ongoing review of readability throughout the system.

DUA has made great strides in improving accessibility to UI Online for the Limited English Proficiency customers. We have provided designated customer service lines in Spanish and Portuguese, translated non–monetary determinations for Spanish speaking claimants, developed fact finding coversheets which direct LEP customers to service in 11 languages if needed in the completion of fact finding questionnaires and provide assistance in the completion of fact finding questionnaires in 11 different languages.

Workforce Innovation and Opportunity Act (WIOA)

Under the WIOA Act, the Unemployment Insurance (UI) program and the related other federal workforce functions are expanded and enhanced. The integration of programs that provide services

to those likely to exhaust unemployment insurance and return them to suitable employment mandate changes in roles of the DUA.

Working under the leadership and direction of the Executive Office of Labor and Workforce Development (EOLWD) in conjunction with other secretariats and their agencies, DUA will develop and build the wage matching systems that require the use of confidential UI employment and wage information to supply ETA with the WIOA reporting requirements on the full range of reemployment programs. To identify those receiving a first payment for UI and likely to exhaust during FY2016, DUA will utilize a model that incorporates historical and current information on those who received UI and related services. The outcomes and characteristics of those who participated in Profiling, Reemployment Assistance, and other mandatory employment and training referral services will be evaluated to better identify demographic information that is now available from the UI Online system. We will utilize information related to coordinated programs that provide employment and training services to better identify the likelihood of reemployment than the current screening mechanism.

DUA has partnered with the department of Career Services (DCS) to implement the Reemployment Services and Eligibility Assessment (RESEA) program. Step one of this expanded services program was implemented this year and step two will occur in January 2016. By developing and using a re–employment model that closely monitors program outcomes, changes in demographics, and industry structures, DUA will improve the referral rates of UI claimants. Our goal is to develop a more streamlined delivery of services and information to employers, training providers and those seeking work in Massachusetts.

DUA continues to partner with the DCS Rapid Response team on WorkShare (DUA's short term compensation program) education to employers. DUA will further develop this partnership through training sessions for Rapid Response staff who, in turn, will provide one on one and group WorkShare training sessions with Massachusetts employers. DUA will emphasize WorkShare as a way to keep skilled workers employed by companies during slow periods as well as a potential temporary increase to cash flow. To streamline the application process employers have the ability to submit their WorkShare application through the UI Online system.

Massachusetts is unique in that there is still a strong UI presence in the Career Centers and walk–in sites. Customers are provided with direct access to UI customer assistance as DUA provides funding to DCS for staff in most of the state's twenty seven Career Centers.

Reemployment of UI Claimants

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision

of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

DUA management and staff have been fully engaged in the development, planning, administration, and oversight of the RESEA Program since its inception. Periodic meetings have been held with DCS and DUA staff to plan, adjust and address issues through the year. Some of the major changes agreed to in this year's grant include:

• inclusion of UCX claimants, • the elimination of the RESEA control and WPRS group from the sampling process, • those selected for WPRS will be absorbed into the RESEA enrollment group, • broader use of technology to induce program participation, • and the strengthening of participation requirements. DCS continues to work on two on–going projects to enhance resources and support staff and claimants participating in RESEA. The first project is a real–time triage process for new UI claimants and the second is strengthening skills for job matching through the effective use of Labor Market Information (LMI).

The use of Labor Market Information is geared towards identifying and targeting demand driven job opportunities, which is consistent with the direction outlined in the Workforce Innovation and Opportunity Act (WIOA). In fact, starting on August 24, 2015, Assistant Secretary for Policy and Planning, Greg Bunn, will be charged with the responsibility of building the best LMI system in the country. LMI specialists continue to work with Career Center staff through training and use of projected and real–time LMI data. Staff incorporates this information when assisting UI claimants in their job search efforts. Continued emphasis will be placed on the use of LMI for resume preparation and review of work search logs to ensure that RESEA participants are conducting a focused work search informed by labor market information.

The RESEA grant is an integral part of Massachusetts reemployment services strategy for UI claimants. By continuing to integrate RES with activities such as UI eligibility assessments and work search reviews, DCS ensures that each RESEA participant has access to the full menu of individualized services offered by the One–Stop Career Centers. This decreases the amount of time it takes for the RESEA customer to return to work.

It is the goal of DCS to complete 59,500 on–site, one–on–one Reemployment Services and Eligibility Assessments on a nine (9) month basis. All RESEA customers will receive specific mandated reemployment services, which are to be provided by Career Center staff (funded through this RESEA grant) in addition to an initial one–on–one reemployment and UI eligibility assessment. During this meeting, the RESEA customer will be scheduled for a subsequent RESEA one–on–one reemployment and UI eligibility status review. This status review will also be conducted by a Career Center (RESEA funded) RESEA Specialist.

If either review uncovers a potential UI eligibility issue such as failure to report or to fully participate in all components of RESEA the customer will be referred to a UI RESEA Specialist to complete additional fact finding. The UI RESEA specialist will conduct the follow–up fact–finding interview and if necessary refer to UI adjudication for a final determination.

Addressing Worker Misclassification

The Massachusetts Department of Unemployment Assistance (DUA) has taken worker misclassification very seriously. A majority of DUA audits are based on employers in which we expect to find misclassification. From 2012 to 2014 DUA has averaged a total of 5,100 newly discovered workers per year; which is an average of 5.34 misclassified workers per audit. DUA uses a fraud detection database, AWARE, (Aggregate Workforce Analytics Reporting Engine) which allows us to perform cross–matches against other participating state or federal agencies information including the IRS' 1099 information. DUA also gets direct referrals from the IRS regarding employer misclassification (SS–8's.) These referrals are reviewed by audit management and assigned to staff for follow up audits if they believe there is a reasonable chance misclassification will be uncovered. DUA also reviews outside agency information outside of AWARE, including liquor license transfers, Lottery winners and, hopefully soon, Registry of Motor Vehicle renewals.

DUA regularly attends monthly meetings as a member of the Council on the Underground Economy (CUE). The group's sole purpose is to uncover and address employee misclassification throughout the state. During these meetings DUA gets referrals of possible misclassification from other agencies including the Alcohol Beverage and Control Commission (ABCC), Insurance Fraud Bureau, OSHA, and Labor Standards. As part of these monthly meetings, the DUA participates in surprise site visits, usually to new construction projects, to uncover and educate employers and general contractors regarding misclassification. DUA continues to audit cases where businesses have claimants who file unemployment claims with 1099 wages. DUA keeps tabs on past employer audits for noticeable changes in their Employment and Wage filing for possible follow–up audits.

In FY16, we expect to continue the good work DUA has done, and become more efficient in uncovering these misclassifications.

B. FEDERAL EMPHASIS (GPRA GOALS)

Make timely benefit payments (Strategic Goal 4)

Target: 87.5 percent of intrastate first payments for full weeks of unemployment compensation will be made within 21 days from the week ending date of the first compensable week.

The high claims volume from a protracted winter resulted in the redeployment of Call Center Adjudication staff in order to provide acceptable service levels to customers filing claims through the end of the first calendar Quarter of 2015. This procedure was minimized during the second quarter when the clear realization that the continued deployment of Adjudication staff severely impacted the timely first payment of claims. In April we were able to begin to reduce the backlog and work with a focus on minimizing call volume. Backlog of ready to work issues was over 50,000 in March and plummeted to 4,778 during the last week of June. The first week in July saw a slight increase and, currently (7/16/2015) the ready to work count is at 6857. We are now focusing on the improvement of timely first payments and hope to be current (under 4,000 consistently) by the end of the current quarter of the September 30, 2015. This should enable us to achieve our CAP projection for the period ending September 30, 2015. Recent weeks have seen nearly two thirds of our customers filing new claims using the web–based application. Two years into the new system,

ease of filing for claimants, employers and TPA's has begun to take hold and positively impact our ability to improve in the area of first payments, and multiple surveys of users demonstrate both claimants and employers are largely satisfied with UI Online. DUA remains committed to ensuring adjudication staff spends their time addressing fact finding questions and adjudicating issues, rather than answering claims filing calls except in unusual circumstances.

DUA has embarked upon a Call Volume Reduction Project to further enhance the usability of the web–based system and identify those areas where the customer service aspects of UI Online need enhancement. This project, with a completion goal of early 2016, is focusing on some updates including a better online FAQ section, an enhanced monetary screen, simplified User password setup and an overall homepage review to further depress call volume by ensuring the best service possible online.

Expansion of access to assistance for fact–finding for Limited English Proficiency is intended to avoid delays in first payments for those claimants. Coupling this service in 11 languages with the readability project reviewing and updating hundreds of questionnaires, DUA continues to remain committed to achieving our timely first payment goals.

While the 21 Day Timely First Payment report for the current quarter ending was finalized at 62.37% , significant gains have been made with aforementioned backlog reduction effort as evidenced by the last four weekly TFP rates at 84.7 (w–e 7–11), 81.4% (w–e 7–4), 77.57% (w–e 6–27) and 76.24% (w–e 6–20). These weekly rates are clearly 20 percentage points higher than one year ago at this time. This is related to the dramatic reduction of ready to work issues during the past quarter. Ready–to–work issue backlog stood at 4778 for COB on 6–26–15. This was the culmination of the issue reduction effort which kept adjudicators off the phones for 90% of the preceding workweeks. The chart below demonstrates the reduction in our total number of issues (workload credit and non–workload credit issues):

Ready–to Work Queue Trending Date All Ready Workflow Queue 5/28/2014 81,923 7/3/2014 80,028 7/14/2014 41,691 2/27/2015 47,486 3/3/2015 50,452 3/20/2015 43,154 4/4/2015 35,874 4/18/2015 30,122 5/13/2015 21,598 5/30/2015 15,704 6/11/2015 9,755 6/19/2015 6,180 7/9/2015 7,130 7/16/2015 6,857

Significant gains have been made within the last the last four months relative to Issue Time Lapse. Current Time Lapse (resolved within 21 days of detection) for the final week reported for the quarter (6–27–15) was 42.55 % for Separation Determinations and 67.17% for Non–Separation Determinations. This is a major improvement over the quarter where these rates began at 5.18% for Separations and 21.73% for Non–Separation time Lapse. This is a 300% + improvement in these rates over the quarter.

a. SHORT–TERM MEASURES (45 to 90 days)

As staff develop more familiarity with UI Online due to usage and training, the productivity data becomes more relevant. As such, DUA continues to monitor adjudication productivity to leverage in staffing standards. We expect the productivity to continue to improve as we continue to enhance the system and business processes, focused on achieving our timeliness and accuracy goals.

? Adjudication staff have been instructed to immediately make phone calls on all additional/rebuttal fact–finding in order to expedite the issue resolution process. This will be coupled with additional refresher training for staff in the area of rebuttals in order to improve both quality and timeliness.

? DUA is reviewing the current predate process from both a customer and staff viewpoint with a clear focus on policy adherence and the identification of system/process modifications that will positively impact our ability to improve timely first payments for predated claims, as well as minimize Customer Assistance calls.

? DUA has made the Fact–Finding queue an option from the main telephone menu so claimants can access adjudication staff to assist them in the completion of outstanding fact finding. In addition, accessibility has been further enhanced for Limited English Proficiency customers with Fact–finding cover sheets which direct LEP customers to Fact–Finding assistance in11 languages if needed in the completion of the questionnaires. This process was implemented for the current quarter (July 2015) and potential enhancements will be analyzed. Issues with completed fact finding will then be assigned for resolution in a more timely manner.

Detect Benefit Overpayments (Strategic Goal 4)

Target: Overpayments established will be at least 55.3 percent of the estimated detectable, recoverable overpayments.

Massachusetts currently falls below acceptable levels of performance in the percentage of detectable/recoverable overpayments established for recovery. UI Online has been very helpful in improving the detection and prevention of overpayments. Some of our business processes that are showing equal improvement are:

• the OnPoint Technology AWARE system to prevent and detect fraud claims and fraud schemes. Some of the cross matches DUA uses through AWARE include: Out–of–country cross–match to identify online weekly certifications from IP addresses outside of the U.S and its territories, and • the Identification of Commonalities cross–match that checks bank accounts, home addresses, email addresses and security questions and answers, and • known fraudulent banking methods

DUA has used SBR funding to supplement our existing cross–match menu with new fraud preventative cross–matches, including cross–matches for deceased claimants and business owners/officers who receive UI benefits while the corporate entity is still in operation. We have also added scripts designed specifically to prevent fraud schemes, based on identifying characteristics we have gleaned from prior fraud attempts. This has proven to be very effective and we continue to evaluate for more potential prevention efforts.

As part of the DUA–wide realignment, Program Integrity has recently been moved to report to the Chief of Staff to increase its visibility within the agency, and ensure a renewed focus on PI for DUA. The unit continues to take a proactive role in the Massachusetts Joint Task Force in the Underground Economy which identifies improperly classified workers and unregistered employers conducting business on a cash basis. The Task Force allows Program Integrity staff to work in conjunction with other state agencies on possible fraudulent unemployment claims. A recent SBR

request resulted in additional funding to increase staffing and our ability to run queries to detect overpaid benefits, review cases and prosecute fraudsters.

We have gained access to the CJIS system (Criminal Justice Information System) which has allowed DUA Program Integrity Investigators the ability to crosscheck identification documents provided by criminals to establish fraudulent claims. We also access the data base at the Massachusetts Registry of Motor Vehicles but the CJIS system has provided DUA faster access to identity information, allowing for more effective investigations.

After skipping a year due to the implementation of UI Online, DUA resumed state tax intercept in 2015, which brought in more than $3M to the DUA UI Trust Fund in the first quarter of 2015.

Massachusetts is scheduled to launch the Treasury Offset Program (TOP) August 3, 2015. By expanding our overpayment recovery capacity to include the intercept of federal tax returns, we anticipate increasing the recovery of overpayments via tax offset by 300%.

Establish Tax Accounts Promptly (Strategic Goal 4)

Target: 89.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Massachusetts has failed to reach the target of 89% of new employer status determinations resolved within 90 days of the first quarter in which liability occurred largely due to employers failing to register in a timely manner. We have implemented several strategies designed to prompt employers to register with DUA and begin paying contributions when they are due. DUA is currently at 84%, and passed the recent TPS review for "New Employers" for the first time since 2009. DUA has begun assessing penalties on employers who fail to file timely quarterly contributions. These penalties range from $25 dollars to $2,500 dollars depending on the number of employees:

Year – Quarter Number of Employers Penalty Amount 2015–1 22,282 $740,852.37 2014–4 20,739 $666,112.39 2014–3 22,960 $705,906.88

In addition DUA utilizes the following cross–matches with other state agencies to obtain information on possible employers subject to registration:

• Newly registered corporations (and LLC's) from the Secretary of State's office • All new and transferred liquor licenses issued by the Alcoholic Beverage Control Commission • Corporations with active licenses from the Department of Licensure • Quarterly reviews to identify employers that have filed withholding tax with the Department of Revenue, but are not registered with DUA • DUA has an agreement with the Massachusetts Lottery Commission to cross reference the list of current lottery vendors to verify registration as an active employer if subjectivity applies DUA is currently in the final steps of an agreement with the Massachusetts Registry of Motor Vehicles to begin cross–referencing the list of current businesses holding commercial license plates to verify registration of an active employer if subjectivity applies. A new law in Massachusetts effective in 2016 requires businesses to present a certificate of good standing from DUA if an employer who wants to engage in business with any other MA state entity for goods or services over $5,000 which

we believe with increase employer registration. We continue to work with the business community to raise employer awareness of the obligation to register with DUA as subject employer through mailing campaigns to area Chambers of Commerce, Workforce Investment Boards and employer union groups. We believe these efforts will increase employer awareness and prompt employer registrations.

i. FACILITATE CLAIMANT REEMPLOYMENT (STRATEGIC GOAL 4) Target: TBD

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

The Career Center Seminar (CCS) is a comprehensive introduction to the services available at the Commonwealth's 27 Career Centers and is mandatory for all REA and Profiled UI claimants. UI claimants not selected for enrollment in REA or Profiling are still required to attend a Career Center Seminar. All REA customers receive specific mandated reemployment services including a skills assessment and completion of a Career Action Plan (CAP), participation in workshops on resume preparation and interviewing, and introduction to on–line resources for job search. Job counselors at the Career Centers review work search logs to guide UI claimants and to ensure compliance with benefit requirements.

As you know, no target goals have been set for FY 2016. The Department suspended the GPRA target for FY 2015 to develop a measure that integrates UI more closely with the larger workforce system. Under WIOA, MA follows common measures, which includes common exit for WIOA Title I, Wagner–Peyser and TAA participants. This means customers are exited from all programs 90 days after their last reportable service. RESEA follows the same action. This differs from the programmatic processes that track individualized services while enrolled in a specific program.

C. Program Deficiencies

i. EFFECTIVE AUDIT MEASURES

One of the major reasons that the effective audit measure did not pass in 2013 was due to inadequate staffing. DUA failed the Effective Audit Measure by not reaching the 1% penetration rate as required by DOL, completing 867 of the required 1,900 audits. In addition, DUA also failed to meet the overall amount of wages required for audit purposes, this is a direct correlation to failing to complete the required amount of audits. Due to aggressive measures to increase staffing levels

since 2013, audit staff levels have gone from 13 field auditors in August of 2013 to 22 full time auditors. Management of the unit also has had excessive turnover in the past, but has now had the same management team in place for over a year.

In addition to having an expanded Performs unit DUA recently requested and was approved additional funding to begin the process of streamlining the audit package which would allow audit staff to close cases quicker and would help drive the effort to meet the 1% penetration rate. Staff has had to complete manual duplicative processes to ensure the integrity of the data in our system. Streamlining this package will allow staff to complete audits in less time, and should increase their overall production to help DUA meet the required penetration rate.

For 2015 DUA will be required to complete 2,010 audits for the entire year. Through June of 2015, DUA has already completed 50.2% of that goal (1,010 audits) which is approximately the total number of audits completed for the entire year of 2014. With the increased audits DUA is still finding 3.5 misclassified workers per audit. DUA is on pace to pass all Effective Audit Measures as required by the DOL for 2015 and will likely continue to pass in FY2016 also.

ii. DETECTION DATE AND DETERMINATION DATE ACCURACY

Invalid Recording of Issue Detection Date and Determination Date In the last four completed BTQ quarters MDUA reported average valid detection dates for 90.83 percent of separations and 85.12 percent of non–separation issues Massachusetts remains committed to achieving a 95 percent accuracy rate in establishing correct issue detection dates. Initial analysis showed that the system was the cause of incorrect recording of a significant number of detection dates. Enhancements were made to the system to resolve these issues; however, it has had minimal impact in increasing the Agency's accuracy. DUA will engage in additional analysis to determine cause, responsibility, and additional trends that affect the Agency's ability to meet correct issue detection date goal in order to take additional action remedying errors. In the last four completed BTQ quarters, MDUA reported average valid determination dates for 90.83 percent of non–separation determinations and 85.12 percent for separation determinations. This is slightly higher than a 20 percent increase in accuracy of determination dates. This increase is attributable to enhancements to the system to ensure accuracy of the data. As with issue detection dates, MA is committed to achieving a determination date accuracy rate of at least 95 percent of the evaluated nonmonetary determinations in each quarterly review. To work to this goal, MDUA will begin additional analysis of determination date errors to identify cause, responsibility, and additional trends that affect the Agency's ability to meet the correct the issue determination date goal and to take additional action remedying errors.

iii. BENEFIT ACCURACY MEASUREMENT (BAM) DEFICIENCIES

The Benefits Accuracy Measurement deficiencies identified by the Regional Office include wide variances between the sum of Monetary Denied Claims Accuracy (DCA) weekly universe counts and reporting of Monetary Denied claims on ETA reports. BAM also was deficient in meeting the ninety–day Paid Claims Accuracy (PCA) federal requirement of ninety–five percent. Federal BAM program guidance requires the sample universes to be selected from the same data that is later reported through monthly and quarterly ETA reports. Comparison of the BAM Universe and ETA report is expected to result in a discrepancy of no more than ±15 %; however, comparison of Massachusetts

CY2014 data shows a discrepancy rate of 45.1%. Investigation into the discrepancy showed there were systemic and synchronicity issues in the processing of UI claims for EUC extension eligibility that resulted in monetary denials for new claims to be included in the BAM universe but excluded from the UIRR report(s). The discrepancy was further impacted by programming necessary to accommodate Massachusetts policy that allows a set of claimants to elect to move back and forth from regular UI to EUC Tiers and to decline a new monetarily eligible claim and return to the extension on a prior claim. Investigation as to other causes that may have affected the discrepancy percentage continues; however, it is expected more recent data will reflect a decline in the discrepancy. The Benefits Accuracy Measurement (BAM) program was placed on a CAP for the 2014 SQSP year due to the failure to complete 95% of Paid Claim Accuracy (PCA) cases within the 90–day threshold; the Massachusetts 90– day completion rate was 93.4%. Because the 2015 SQSP was written prior to completion of the 2014 SQSP year, this goal was continued on the 2015 SQSP. BAM actually met the goal for the 2014 SQSP year with a 96.03% completion rate and the 2014 BAM year with a 95.98% completion rate. The BAM unit has complied with the 95% completion rate, beginning third quarter 2013 and has maintained this rate in all but one subsequent quarter. To achieve this, the Massachusetts BAM Operational Handbook was rewritten and continues to be updated to reflect MA legislative and Agency policy change, form changes, and new protocols for working with business units, claimants, and employers. Staff receives continuous training on best practices and computer skills that will add to their success in meeting timely completions. Staff is encouraged to self–monitor the timeliness of their casework. Management stays attentive of BAM cases considered at risk for not meeting the 90–day completion date in order to take action in a timely manner and work with investigators to meet their goals. Management reviews the status of PCA timeliness for all core measures three times per week and will meet with individual investigators to aid in completion. iv. DATA VALIDATION DEFICIENCIES The Benefits Data Validation (BDV) deficiency identified by the Regional Office was a failure to implement the BDV program and failure to submit populations and modules as required of the program into the SUN system. DUA failed to complete required reporting for Benefits Data Validation while transitioning into the new UI Online system. Further delay occurred due to the MA DUA initiative to build a Data Warehouse for reporting purposes. The two–year SQSP milestones for BDV were to develop Module 3, develop the files necessary to perform DV of populations and modules, and analysis of data to ensure error resolution within the files. File development was completed for all modules and populations. Analysis was completed; however, this is an iterative process. It requires analysis to identify file errors, loading files into SUN to identify additional errors, and coding fixes to the files in the Data Warehouse repetitively until all errors are identified and removed.

In FFY15 Benefits Module 3 was rewritten and published in the SUN; however, MADUA staff failed to return to the SUN to certify the module during the window of opportunity that ETA makes the certification screen available. Milestones for the development of population and module files were accomplished. The population and module files were created and analyzed for accuracy as well as loaded into the SUN for the system to identify file errors. MA DUA was able to successfully develop files, test files, test files in the SUN, resolve file errors, and complete Data Validation for modules and 14 out of 16 populations. Populations 14 and 15 were not submitted due to the significant number of errors within the population files that caused the SUN to reject the files. These population files will be addressed during the continuation of analysis of all population files for error identification and error resolution.

MA DUA failed a significant number of populations. This is indicative of errors within the population files and potentially ETA reports. In FFY16 MA DUA will devote resources to the continuation of analyzing file errors and file fixes to ensure accuracy of population and module files. The outcome of file accuracy should be representative in BDV 2016 through an increase in passing populations.

It has been known that the check marks on the milestone grid are placed erroneously, as well as the fact there is a typing error in identification of populations. MA DUA submitted a document with milestones correctly placed for this CAP. Upon return to DUA, the checkmarks were not in the same array. It is unclear how or when this occurred. It was determined that no changes would be made to ensure the integrity of the document but understood that DUA would work towards the milestone deadlines as prescribed originally. Inasmuch as MA DUA made progress in resolving this CAP on a quarterly basis and in fact, has met or exceeded milestones, MA DUA has modified the milestone checkmarks in the CAP. In addition, it was understood that population "31" represented population "3a" and was a typographical error. This has been corrected.

TAX DATA VALIDATION DEFICIENCIES All Tax Data Validation (TDV) populations and required modules were submitted in the 2015 DV year. To make this happen, a staff member with strong technical skills was utilized to assist with the process of manually manipulating the Tax DV extract files to allow submission into the system. Tax DV substantially failed in the 2015 TDV year. Defects in UI Online have been identified that when corrected, will reduce the failure rate in populations. Errors within the population and module files, while identified, will not be fixed. Instead, TDV population and module files are being rebuilt inside the MA DUA Data Warehouse that drives the source for all MADUA reporting. TDV Data Warehouse development began in August 2015 and is expected to be ready for implementation in May 2016. Because the DV year ends June 10th each year it will not be possible to implement files generated from the Data Warehouse for the 2016 TDV year. MA DUA will address UI Online defects and enhancements and manually modify module and population files for SUN usability to ensure 2016 TDV submission.

D. Reporting Requirements

i. REPORTING DEFICIENCIES MA DUA's timely reporting of UI required weekly, monthly and quarterly reports has improved significantly and the Agency continues to work toward 100% timely submission. In FFY14, the Agency maintained an average of 19 late report filings per month. The average has now been reduced to 2 late filings per month. The Massachusetts Data Warehouse has greatly improved the Agency's ability to report in a timely fashion; data is now compiled through queries that are run on a prescribed schedule and data is accessible to business owners for validation prior to transmission. This accessibility grants business owners greater knowledge of their units(s) performance levels and the ability to manage from valid statistical information. DUA has continued its internal procedure of reviewing requests for changes and additions to reports through its Change Control Board to work towards 100% timely submission of UIRR. It is expected that the Agency will meet 100% timeliness submission before the end of this biennial SQSP. The following graphs illustrate the number of "Late Sent" reports on a monthly basis and demonstrate the drastic improvements that have been made in the agency's timely reporting during the last two years.

F. ASSURANCES

The State Administrator, by signing the SQSP Signature Page, certifies that the state will comply with assurances as outlined in ET Handbook 336, 18th Edition: Unemployment Insurance (UI) State Quality Service Plan (SQSP) Planning and Reporting Guidelines, Chapter 1, Part VII: Assurances.

i. Assurance of Contingency Planning In 2012 an independent consultant was engaged to modify the IT Contingency Plan. This modification took into account the changes to contingency planning with the new system architecture. This work was completed in June of 2012. This plan is reviewed and updated to reflect system modifications and personnel changes; the most recent update was in July 2015.

ii. Assurance of Automated Information Systems Security

In 2011, an independent consultant was engaged by DUA to perform a risk assessment. This assessment was completed in July 2012 and consisted of an assessment of the UI Benefits system, an assessment of the UI Online Revenue system, an assessment of the EOWLD Telephony system, and an assessment of the UI Fraud Prevention and Detection System involving National Directory of New Hires.

DUA also reviews and updates as necessary the SSP annually. The review and plan were updated in 2014 and remain current.

F. CUSTOMER SERVICES

N/A

G. OTHER N/A

INTEGRITY ACTION PLAN Massachusetts Federal Fiscal Year: 2016

Accountable Agency Official(s): David Martin DUA Director of Program Integrity

Summary: DUA has specific plans to make the Program Integrity Unit even more robust in the upcoming years. DUA has four key strategies in its Integrity Action Plan: cross–matches, new staff, new collection strategies and technology. After UI Online went live July 1, 2013, DUA launched AWARE (Aggregate Workforce Analytics Reporting Engine) in November 2013. DUA has put this software to full use and will continue to analyze new ways to prevent fraud through this software tool. The Program Integrity Unit has seen a shift in leadership which DUA hopes will revamp, create and strengthen how the Unit pursues and recovers fraud. DUA is in the process of developing new processes to collect debt and make claimants aware of an existing overpayment. DUA is also reviewing its current technology to pursue and identify fraud before it occurs; we plan on targeting some improvements in our access in FY 2016.

AWARE and Cross–matches: DUA has used data from AWARE to develop cross–matches which were not available prior to the implementation of UI Online and AWARE. Since AWARE has been put into place, DUA has been able to prevent the payment of more than $25m of fraudulent benefits in one scheme alone. DUA continues to work with other State and Federal Agencies to have new

data from other sources loaded into the AWARE package to create additional cross–matches. Below are new cross–matches DUA has started in AWARE.

• Out of Country Claims: DUA runs a weekly cross–match to determine which claimants are certifying their weekly benefits from outside the United States; bringing their availability into question. AWARE provides a list of all IP addresses and those claims are reviewed weekly within Program Integrity. • Multiple Bank Accounts: DUA runs a weekly cross–match to look for bank accounts used for more than one claimant. This has been helpful in finding possible fraud cases. • Suspicious Bank Accounts: DUA has been able to identify certain criteria high in fraud pertaining to specific banks. DUA uses this query to review for possible fraud. • Multiple Claims to One Address: This cross–match shows when multiple checks for different claimants are being sent to a one address. This query has also been helpful in identifying fraud, often before it occurs. • Multiple Email Addresses: This query looks for different claimants using a common email address. • Secret Question and Answer: DUA has also found a commonality pertaining to fraud in which similar secret questions and passwords are used. This report is also run weekly. • Owner/Officer: This will give DUA the ability to cross–match to ensure that business owners and/or officers are not fraudulently filing unemployment benefits. • Timed Cross–match: DUA has identified that fraudsters have developed computer programs that run a script to try and set up bogus DUA claims using stolen ID's. DUA has recognized that these initial claims are filed much faster than if someone had to manually enter an initial claim themselves. We currently work with our IT department to get this list, but believe it would be better housed in the AWARE program. • Fraudulent Employers: DUA has found an influx of fraudulent employers that are set up with the sole intention to file fraudulent unemployment benefits. DUA has found that these fraudulent employers are set up with subject dates older than a year and immediately start to have unemployment claims filed against them. • NDNH (National Directory of New Hires) Cross–match: The DUA is reviewing its process to detect and set up overpayments based upon NDNH cross matching as the current process has a lower than expected overpayment set–up rate. It is anticipated that when complete this cross match will be more effective in detecting and preventing current fraudulent benefit year earnings collectors from obtaining future benefits. • Similarly, DUA Program Integrity is beginning a review of all of its current cross matches to determine their effectiveness and to search for potential improvements and/or automation. This review of all Program Integrity cross matches will take some time but should result in a more effective use of Program Integrity staff and resources and reduce benefit year earnings overpayments.

New Staff: DUA has made several staff changes within the Program Integrity Unit. In May 2015 the Program Integrity Unit was shifted under the Chief of Staff. This shift allows BAM and Program Integrity to work together more closely. These are DUA's units focused on combating claimant fraud and the determining of the agency's success in combatting claimant fraud. Program Integrity continues to share fraud referrals with Revenue Audit and have worked together on multiple investigations. When Audit discovers employee misclassification, a referral is made to the Program Integrity Unit to make sure that the individuals are not collecting unemployment benefits. The Program Integrity Unit will also refer cases of working and collecting directly to Revenue Audit to ensure employers pay delinquent unemployment taxes. Program Integrity has become more involved in the Massachusetts Joint Task Force on Underground Economy, allowing Program Integrity to work with other Massachusetts Agencies to discuss, discover and report new or current fraud schemes seen throughout the State.

DUA hired a new Program Integrity Director in January 2015 and moved the unit in June from the Revenue Department to the Office of the Chief of Staff. We believe this change in leadership and operational escalation of the unit will lead to improved pursuit and detection of fraud and recovery of overpayments.

DUA also used SBR funds to hire new staff. Five Compliance Officer II's were hired to pursue fraud both internally through cross matches and externally through business site visits. A Program Coordinator III was added to assist with the collecting of data through various cross–matches, analyzing trends and new fraud queries.

New Collection Strategies: DUA has sought to bolster collection activities for claimants who have been overpaid. The DUA made robo calls through funds granted by an SBR to thousands of claimants with past due overpayments. DUA is considering using this platform going forward.

DUA also began participating in IRORA (Interstate Reciprocal Overpayment Recovery Arrangement) in 2013. IRORA is an agreement among states to collect overpayments of unemployment benefits for each other. States can enter into separate agreements among themselves, but the IRORA gives states a standardized approach to recovering overpayments for each other on a cooperative basis. This program has been live since May 2014 and fully operational since June 2014. More than $100,000 has been recovered in total between dollars collected by other states for DUA and dollars collected by DUA and sent to other states to satisfy the other states' overpayment.

DUA is also ready to participate in the Treasury Offset Program (TOP) for IRS tax intercept. Recent changes to Massachusetts law allow the Agency to participate in this program. So far in 2015 DUA has intercepted more than $4.5M in state tax intercepts. DUA believes that the TOP intercept should at a minimum double that amount for the next full tax year and will generate some tax intercepts for the DUA Trust Fund in 2016 as well.

DUA has also begun an open and ongoing dialogue and regular meetings with Special Agents from the US Department of Labor, Office of the Inspector General (OIG). DUA has stepped up its prosecution of cases both through the Attorney General's office as well as the OIG and expects an increase in restitution agreements as a result.

DUA is also exploring the possibility of garnishing wages in order to pay off aging UI debts. Wage garnishment would bring a substantial amount of money into the DUA UI Trust Fund.

Technology: DUA has identified certain technology based areas in need of improvement. DUA has gained access to CJIS (Criminal Justice Information System). DUA recently detected a large volume of falsified claims using a refined query. By identifying these at the initial claim stage, DUA successfully avoided making payments. The fraudsters have begun to respond to identity verification fact–finding with falsified documents (driver's licenses, passports, social security cards) in an attempt to have the identity verification issue overturned. CJIS has allowed Program Integrity investigators the ability to crosscheck driver's licenses to ensure the claimant is whom they claim. Program Integrity management also has access to Accurint, a data mining tool offered by Lexis Nexis. Accurint provides access to a significant amount of identity information and is sometimes necessary when dealing with questionable claimant identity information.

DUA has also worked with our IT department to track and block phone numbers coming into the weekly certification line from outside the country. Program Integrity is also setting up availability issues for claims which are later determined to have been generated for or by an out of country claimant. This has allowed DUA to identify possible claimants whom are not available or not looking for work. DUA has also started working with the Registry of Motor Vehicles to start a cross match against claimants addresses to look for inconsistencies.

DUA has also implemented a new Investigations phone line for all CO II's. Previously if a fraud tipster contacted a unit other than the investigators in Program Integrity, they would have been told to hang up and call the Fraud Hotline, an (800) number. With the new phone line internal callers can transfer these calls to investigations without any problem.

Despite these successes, DUA recognizes that we still have improvements to make related to BYE issues/overpayments. DUA is working with OnPoint and their AWARE technology to detect and prevent more benefit year earning overpayments by improving and expanding use of the National Directory of New Hires (NDNH) and our State Directory of New Hires. The NDNH cross match system has less than a 20% success rate in detecting potential overpayments. To address this issue, DUA requested and received SBR funding to contract with OnPoint to refine the parameters and incorporate NDNH into the existing AWARE process. DUA expects that this effort will result in increased detection and prevent more benefit year earning overpayments.

Program Integrity Milestones Target Dates 3rd qtr. 2015 4th qtr. 2015 1rst qtr. 2016 2nd qtr. 2016

Cross Match Evaluation • NDNH • Report of Hire • Prisoner Cross Match X X

X

X X X Collections Process • Civil Actions • Treasury Offset • IRORA (fixing small defects)

X X X

SQSP STATE PLAN NARRATIVE

MASSACHUSETTS STATE QUALITY SERVICE PLAN OCTOBER 1, 2015 – SEPTEMBER 30, 2016

A. OVERVIEW

In July of 2013, Massachusetts launched the benefits portion of UI Online, our web–based, self–service system. Claimants can now file an initial, continued, or additional claim online, complete fact finding and other requests for information, update contact information, review payment history, file an appeal, and much more. For the first time, our tax, benefits, and appeals systems are fully integrated. DUA had been operating with a 29 year old COBOL based system that was inflexible and unable to keep up with significant law and policy changes. DUA greatly struggled with its workload during the recession, as evidenced by our "At Risk" status and substandard performance measures. A dramatic change was not optional.

Therefore, 2013 was DUA's year for change. Staff, claimants, employers, and TPAs all had to become accustomed to a new system and a new way of conducting business. As with any large system implementation, there were many challenges: user familiarity was a large one, and in addition, design shortcomings and conversion complications resulting from the conversion of over 2 million claims. The DUA team rallied together, and customers worked with us to identify issues. Claimants responded overwhelmingly well to the ability to use self–service options that were not available to them before.

DUA's goal for 2014 was to stabilize. The massive changes were over, but the Agency was still recovering from the extensive backlog from the legacy system and settling into the new business processes. In addition, we restructured some departments and hired new staff where needed. We focused on reducing the backlog, fixing any outstanding defects, and stabilizing the infrastructure. We focused on the performance standards and are driving business decisions to meet these goals. As expected, due to the excessive backlog and the fact that the system is designed to work oldest claims and issues first, we saw a downturn in many of our metrics initially. However, we saw some positive trajectory in timely first payment and issue timeliness numbers. This occurred as we continued to improve our business processes, staff became more accustomed to the new system, and calls coming into the call center drastically declined.

Our theme for 2015 was to optimize. In 2015, we continued to improve the system by enhancing the customer service experience and implementing required law and policy changes. As in the past few years, we focused on Program Integrity to stay abreast of new fraud schemes to protect the trust fund. Although staff has adjusted to the new system, there was a continued need for significant training, as a large majority of our adjusters were new. Lastly, agency–wide, there was a renewed focus on internal auditing and quality control in order to catch issues early and tailor training where it was needed most.

In FY2016, agency–wide focus will be on the improvement of performance metrics. Across all levels, staff performance is being measured against state scores for the UI Core Measures and the Secretary's Standards. Every manager is managing to and being measured against a group of measures that are consolidated into our Customer Service Metrics. The measures included are First Payment Promptness, Nonmonetary Determination Timeliness, Nonmonetary Determination Quality and Lower and Higher Appeals Aging. They are also managing to and being measured against our Employer Service Metrics that include: New Employer Time Lapse, Tax Quality and Effective Audit Measures. Both the Customer Service Metrics and the Employer Service Metrics are in line with the DOL priorities for FY2016. In all of our "at risk" areas, we are focusing on process improvements, system fixes and staff training that will directly impact our ability to meet the acceptable levels of performance.

Already, we have seen significant improvement in our backlog of ready to work issues due to system improvements that consolidate issues into singular fact–finding and enhancements that ease the online filing process for claimants. These changes significantly improved our Timely First Payment metric along with our Lower Authority Appeals Timeliness. In FY2016, we hope to meet the acceptable levels of performance for both of these standards. National Priorities: Improving State Capacity to Administer and Operate the UI Program Effectively:

Administering and operating the UI program effectively is a main concern for Massachusetts. Since April of 2010, MA has been rated at risk by the US Department of Labor due to its consistent and significant failure to meet first payment timeliness standards. The fact that this designation was the result of many years of declining performance along with beginning the process of implementing a new and automated UI system forms the basis for future program enhancement. Although only being in the position for four months, unemployment insurance director Rob Cunningham is committed to returning Massachusetts to a national top performer.

In recent years our inability to effectively process UI claims in a timely manner has been the result of circumstances relating to the great recession, staff turnover and training capabilities, decreased funding opportunities, and implementation of a new UI system. In effect, since 2008 MA has administered the program using a 30–year–old legacy system while trying to implement new technologies that rise to the level of required performance and expectations. In the past MDUA has used many strategies to correct our lack of performance in this area. These efforts include an independent business analysis by Coffey Associates, internal program workgroups, engaging stakeholders, and partnering with other state UI Agencies. Moving forward in the FY16 SQSP cycle, MA would like to take the results of these experiences and the retirement of the legacy system to turn it into actionable program goals.

The first and most important change for the upcoming year will result in MDUA realigning its resources to ensure program goals are achieved. The first step was to develop a matrix of performance standards and assigning responsibility to the individual business units. The matrix will be monitored at the highest level in the organization to ensure that it consistently is a top priority. To date the matrix includes all USDOL secretary standards and UI Core measures. To drive success, DUA has realigned staff to focus on these measures. In addition, MDUA will be centralizing the monitoring of the matrix while keeping the responsibility of performance within the individual business units.

Improving Prevention, Detection and Recovery of UI Improper Payments

Massachusetts has embarked on an aggressive plan to lower the states improper payment rate for the UI program. This plan includes bringing in new experienced leadership at the highest level to coordinate our systems approach to improving prevention, detection, and recovery of improper payments. According to our analysis, the top three reasons of improper payments in MA are benefit year earnings at 43%, worksearch 25%, and separation issues are 10% of total overpayments. 78% of all improper payments are attributable to these three causes. Massachusetts continues to investigate any area that potentially creates an improper payment; however, keeping in mind that a large percentage of the improper payments are from three causes, analysis has focused on making system and business process enhancements that will drive our improper payment rate down. For example, our analysis of benefit year earnings shows that enhancements to the continued claims process can simplify the process for claimants to self–certify that they worked and earned wages. This enhancement will dramatically increase a claimant's ability to self–report earnings accurately. The Benefit Payment Accuracy unit has taken an aggressive action in use of the NDNH cross match program. MDUA has also been working on the implementation of the treasury offset program which will start on 8–03–2015. MA will continue to engage stakeholders, USDOL, partner states, and the UI Center for Excellence in its endeavors to reduce, detect, and recover improper payments. The NDNH cross–match is being improved in FY16 to make it more efficient and a more effective tool to

reduce BYE improper payments. The current process, while an improvement over prior years, remains highly manual and less effective than initially intended.

Improving Program Performance

Since the implementation of UI Online two years ago DUA has delivered ongoing staff development to promote the familiarization of the new system for system users. Some of the newest training strategies implemented include:

• Expanding the initial claims process to include a full day of hands on system training where staff file and adjudicate claims in a test environment, in addition to another day of classroom training. This expanded training was delivered to approximately 100 staff in 10 sessions with an additional 11 days spent delivering individualized training to 9 staff • Provided Initial Adjudication Training to 120 managers, adjudicators and review examiners in four three week training sessions • Provided Refresher Training to over 300 staff in 12 sessions for adjudicators and adjudication managers, in multiple office locations • Provided UI Online User Training to over 300 DUA/DCS personnel • Provided Customer Service Training to over 300 DUA personnel in 84 half day sessions covering 6 targeted topics designed to assist customers with navigation of the new system • Secured BTQ Certification Training that was delivered to 25 adjudication staff by regional DOL staff

DUA continues to identify system inefficiencies in its UI Online system, which is a web–based, self–service system that allows claimants to file an initial, continued or additional claim online. The system was designed to send fact finding and other requests for information to claimants and employers to streamline and allow more automation to the UI process. At the request of DOL we have modified the use of fact finding questionnaires so only questionnaires pertaining to interested party employers are sent to claimants; all base period employers continue to receive fact finding questionnaires to ensure proper charging and to reduce improper payment of benefits. We have also implemented a system enhancement to bundle all ready to work issues for individual claimants to insure the prompt resolution of outstanding issues by one adjudicator.

DUA has contracted with a readability vendor to review and revise over 500 fact finding questionnaires to improve user comprehension. Prior to vendor submission, we solicited feedback from employers, claimant advocates and DUA staff to ensure a comprehensive review process. Currently, over 100 of the revised questionnaires have been put into production. In FY16 we will complete this project, although DUA expects ongoing review of readability throughout the system.

DUA has made great strides in improving accessibility to UI Online for the Limited English Proficiency customers. We have provided designated customer service lines in Spanish and Portuguese, translated non–monetary determinations for Spanish speaking claimants, developed fact finding coversheets which direct LEP customers to service in 11 languages if needed in the completion of fact finding questionnaires and provide assistance in the completion of fact finding questionnaires in 11 different languages.

Workforce Innovation and Opportunity Act (WIOA)

Under the WIOA Act, the Unemployment Insurance (UI) program and the related other federal workforce functions are expanded and enhanced. The integration of programs that provide services

to those likely to exhaust unemployment insurance and return them to suitable employment mandate changes in roles of the DUA.

Working under the leadership and direction of the Executive Office of Labor and Workforce Development (EOLWD) in conjunction with other secretariats and their agencies, DUA will develop and build the wage matching systems that require the use of confidential UI employment and wage information to supply ETA with the WIOA reporting requirements on the full range of reemployment programs. To identify those receiving a first payment for UI and likely to exhaust during FY2016, DUA will utilize a model that incorporates historical and current information on those who received UI and related services. The outcomes and characteristics of those who participated in Profiling, Reemployment Assistance, and other mandatory employment and training referral services will be evaluated to better identify demographic information that is now available from the UI Online system. We will utilize information related to coordinated programs that provide employment and training services to better identify the likelihood of reemployment than the current screening mechanism.

DUA has partnered with the department of Career Services (DCS) to implement the Reemployment Services and Eligibility Assessment (RESEA) program. Step one of this expanded services program was implemented this year and step two will occur in January 2016. By developing and using a re–employment model that closely monitors program outcomes, changes in demographics, and industry structures, DUA will improve the referral rates of UI claimants. Our goal is to develop a more streamlined delivery of services and information to employers, training providers and those seeking work in Massachusetts.

DUA continues to partner with the DCS Rapid Response team on WorkShare (DUA's short term compensation program) education to employers. DUA will further develop this partnership through training sessions for Rapid Response staff who, in turn, will provide one on one and group WorkShare training sessions with Massachusetts employers. DUA will emphasize WorkShare as a way to keep skilled workers employed by companies during slow periods as well as a potential temporary increase to cash flow. To streamline the application process employers have the ability to submit their WorkShare application through the UI Online system.

Massachusetts is unique in that there is still a strong UI presence in the Career Centers and walk–in sites. Customers are provided with direct access to UI customer assistance as DUA provides funding to DCS for staff in most of the state's twenty seven Career Centers.

Reemployment of UI Claimants

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision

of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

DUA management and staff have been fully engaged in the development, planning, administration, and oversight of the RESEA Program since its inception. Periodic meetings have been held with DCS and DUA staff to plan, adjust and address issues through the year. Some of the major changes agreed to in this year's grant include:

• inclusion of UCX claimants, • the elimination of the RESEA control and WPRS group from the sampling process, • those selected for WPRS will be absorbed into the RESEA enrollment group, • broader use of technology to induce program participation, • and the strengthening of participation requirements. DCS continues to work on two on–going projects to enhance resources and support staff and claimants participating in RESEA. The first project is a real–time triage process for new UI claimants and the second is strengthening skills for job matching through the effective use of Labor Market Information (LMI).

The use of Labor Market Information is geared towards identifying and targeting demand driven job opportunities, which is consistent with the direction outlined in the Workforce Innovation and Opportunity Act (WIOA). In fact, starting on August 24, 2015, Assistant Secretary for Policy and Planning, Greg Bunn, will be charged with the responsibility of building the best LMI system in the country. LMI specialists continue to work with Career Center staff through training and use of projected and real–time LMI data. Staff incorporates this information when assisting UI claimants in their job search efforts. Continued emphasis will be placed on the use of LMI for resume preparation and review of work search logs to ensure that RESEA participants are conducting a focused work search informed by labor market information.

The RESEA grant is an integral part of Massachusetts reemployment services strategy for UI claimants. By continuing to integrate RES with activities such as UI eligibility assessments and work search reviews, DCS ensures that each RESEA participant has access to the full menu of individualized services offered by the One–Stop Career Centers. This decreases the amount of time it takes for the RESEA customer to return to work.

It is the goal of DCS to complete 59,500 on–site, one–on–one Reemployment Services and Eligibility Assessments on a nine (9) month basis. All RESEA customers will receive specific mandated reemployment services, which are to be provided by Career Center staff (funded through this RESEA grant) in addition to an initial one–on–one reemployment and UI eligibility assessment. During this meeting, the RESEA customer will be scheduled for a subsequent RESEA one–on–one reemployment and UI eligibility status review. This status review will also be conducted by a Career Center (RESEA funded) RESEA Specialist.

If either review uncovers a potential UI eligibility issue such as failure to report or to fully participate in all components of RESEA the customer will be referred to a UI RESEA Specialist to complete additional fact finding. The UI RESEA specialist will conduct the follow–up fact–finding interview and if necessary refer to UI adjudication for a final determination.

Addressing Worker Misclassification

The Massachusetts Department of Unemployment Assistance (DUA) has taken worker misclassification very seriously. A majority of DUA audits are based on employers in which we expect to find misclassification. From 2012 to 2014 DUA has averaged a total of 5,100 newly discovered workers per year; which is an average of 5.34 misclassified workers per audit. DUA uses a fraud detection database, AWARE, (Aggregate Workforce Analytics Reporting Engine) which allows us to perform cross–matches against other participating state or federal agencies information including the IRS' 1099 information. DUA also gets direct referrals from the IRS regarding employer misclassification (SS–8's.) These referrals are reviewed by audit management and assigned to staff for follow up audits if they believe there is a reasonable chance misclassification will be uncovered. DUA also reviews outside agency information outside of AWARE, including liquor license transfers, Lottery winners and, hopefully soon, Registry of Motor Vehicle renewals.

DUA regularly attends monthly meetings as a member of the Council on the Underground Economy (CUE). The group's sole purpose is to uncover and address employee misclassification throughout the state. During these meetings DUA gets referrals of possible misclassification from other agencies including the Alcohol Beverage and Control Commission (ABCC), Insurance Fraud Bureau, OSHA, and Labor Standards. As part of these monthly meetings, the DUA participates in surprise site visits, usually to new construction projects, to uncover and educate employers and general contractors regarding misclassification. DUA continues to audit cases where businesses have claimants who file unemployment claims with 1099 wages. DUA keeps tabs on past employer audits for noticeable changes in their Employment and Wage filing for possible follow–up audits.

In FY16, we expect to continue the good work DUA has done, and become more efficient in uncovering these misclassifications.

B. FEDERAL EMPHASIS (GPRA GOALS)

Make timely benefit payments (Strategic Goal 4)

Target: 87.5 percent of intrastate first payments for full weeks of unemployment compensation will be made within 21 days from the week ending date of the first compensable week.

The high claims volume from a protracted winter resulted in the redeployment of Call Center Adjudication staff in order to provide acceptable service levels to customers filing claims through the end of the first calendar Quarter of 2015. This procedure was minimized during the second quarter when the clear realization that the continued deployment of Adjudication staff severely impacted the timely first payment of claims. In April we were able to begin to reduce the backlog and work with a focus on minimizing call volume. Backlog of ready to work issues was over 50,000 in March and plummeted to 4,778 during the last week of June. The first week in July saw a slight increase and, currently (7/16/2015) the ready to work count is at 6857. We are now focusing on the improvement of timely first payments and hope to be current (under 4,000 consistently) by the end of the current quarter of the September 30, 2015. This should enable us to achieve our CAP projection for the period ending September 30, 2015. Recent weeks have seen nearly two thirds of our customers filing new claims using the web–based application. Two years into the new system,

ease of filing for claimants, employers and TPA's has begun to take hold and positively impact our ability to improve in the area of first payments, and multiple surveys of users demonstrate both claimants and employers are largely satisfied with UI Online. DUA remains committed to ensuring adjudication staff spends their time addressing fact finding questions and adjudicating issues, rather than answering claims filing calls except in unusual circumstances.

DUA has embarked upon a Call Volume Reduction Project to further enhance the usability of the web–based system and identify those areas where the customer service aspects of UI Online need enhancement. This project, with a completion goal of early 2016, is focusing on some updates including a better online FAQ section, an enhanced monetary screen, simplified User password setup and an overall homepage review to further depress call volume by ensuring the best service possible online.

Expansion of access to assistance for fact–finding for Limited English Proficiency is intended to avoid delays in first payments for those claimants. Coupling this service in 11 languages with the readability project reviewing and updating hundreds of questionnaires, DUA continues to remain committed to achieving our timely first payment goals.

While the 21 Day Timely First Payment report for the current quarter ending was finalized at 62.37% , significant gains have been made with aforementioned backlog reduction effort as evidenced by the last four weekly TFP rates at 84.7 (w–e 7–11), 81.4% (w–e 7–4), 77.57% (w–e 6–27) and 76.24% (w–e 6–20). These weekly rates are clearly 20 percentage points higher than one year ago at this time. This is related to the dramatic reduction of ready to work issues during the past quarter. Ready–to–work issue backlog stood at 4778 for COB on 6–26–15. This was the culmination of the issue reduction effort which kept adjudicators off the phones for 90% of the preceding workweeks. The chart below demonstrates the reduction in our total number of issues (workload credit and non–workload credit issues):

Ready–to Work Queue Trending Date All Ready Workflow Queue 5/28/2014 81,923 7/3/2014 80,028 7/14/2014 41,691 2/27/2015 47,486 3/3/2015 50,452 3/20/2015 43,154 4/4/2015 35,874 4/18/2015 30,122 5/13/2015 21,598 5/30/2015 15,704 6/11/2015 9,755 6/19/2015 6,180 7/9/2015 7,130 7/16/2015 6,857

Significant gains have been made within the last the last four months relative to Issue Time Lapse. Current Time Lapse (resolved within 21 days of detection) for the final week reported for the quarter (6–27–15) was 42.55 % for Separation Determinations and 67.17% for Non–Separation Determinations. This is a major improvement over the quarter where these rates began at 5.18% for Separations and 21.73% for Non–Separation time Lapse. This is a 300% + improvement in these rates over the quarter.

a. SHORT–TERM MEASURES (45 to 90 days)

As staff develop more familiarity with UI Online due to usage and training, the productivity data becomes more relevant. As such, DUA continues to monitor adjudication productivity to leverage in staffing standards. We expect the productivity to continue to improve as we continue to enhance the system and business processes, focused on achieving our timeliness and accuracy goals.

? Adjudication staff have been instructed to immediately make phone calls on all additional/rebuttal fact–finding in order to expedite the issue resolution process. This will be coupled with additional refresher training for staff in the area of rebuttals in order to improve both quality and timeliness.

? DUA is reviewing the current predate process from both a customer and staff viewpoint with a clear focus on policy adherence and the identification of system/process modifications that will positively impact our ability to improve timely first payments for predated claims, as well as minimize Customer Assistance calls.

? DUA has made the Fact–Finding queue an option from the main telephone menu so claimants can access adjudication staff to assist them in the completion of outstanding fact finding. In addition, accessibility has been further enhanced for Limited English Proficiency customers with Fact–finding cover sheets which direct LEP customers to Fact–Finding assistance in11 languages if needed in the completion of the questionnaires. This process was implemented for the current quarter (July 2015) and potential enhancements will be analyzed. Issues with completed fact finding will then be assigned for resolution in a more timely manner.

Detect Benefit Overpayments (Strategic Goal 4)

Target: Overpayments established will be at least 55.3 percent of the estimated detectable, recoverable overpayments.

Massachusetts currently falls below acceptable levels of performance in the percentage of detectable/recoverable overpayments established for recovery. UI Online has been very helpful in improving the detection and prevention of overpayments. Some of our business processes that are showing equal improvement are:

• the OnPoint Technology AWARE system to prevent and detect fraud claims and fraud schemes. Some of the cross matches DUA uses through AWARE include: Out–of–country cross–match to identify online weekly certifications from IP addresses outside of the U.S and its territories, and • the Identification of Commonalities cross–match that checks bank accounts, home addresses, email addresses and security questions and answers, and • known fraudulent banking methods

DUA has used SBR funding to supplement our existing cross–match menu with new fraud preventative cross–matches, including cross–matches for deceased claimants and business owners/officers who receive UI benefits while the corporate entity is still in operation. We have also added scripts designed specifically to prevent fraud schemes, based on identifying characteristics we have gleaned from prior fraud attempts. This has proven to be very effective and we continue to evaluate for more potential prevention efforts.

As part of the DUA–wide realignment, Program Integrity has recently been moved to report to the Chief of Staff to increase its visibility within the agency, and ensure a renewed focus on PI for DUA. The unit continues to take a proactive role in the Massachusetts Joint Task Force in the Underground Economy which identifies improperly classified workers and unregistered employers conducting business on a cash basis. The Task Force allows Program Integrity staff to work in conjunction with other state agencies on possible fraudulent unemployment claims. A recent SBR

request resulted in additional funding to increase staffing and our ability to run queries to detect overpaid benefits, review cases and prosecute fraudsters.

We have gained access to the CJIS system (Criminal Justice Information System) which has allowed DUA Program Integrity Investigators the ability to crosscheck identification documents provided by criminals to establish fraudulent claims. We also access the data base at the Massachusetts Registry of Motor Vehicles but the CJIS system has provided DUA faster access to identity information, allowing for more effective investigations.

After skipping a year due to the implementation of UI Online, DUA resumed state tax intercept in 2015, which brought in more than $3M to the DUA UI Trust Fund in the first quarter of 2015.

Massachusetts is scheduled to launch the Treasury Offset Program (TOP) August 3, 2015. By expanding our overpayment recovery capacity to include the intercept of federal tax returns, we anticipate increasing the recovery of overpayments via tax offset by 300%.

Establish Tax Accounts Promptly (Strategic Goal 4)

Target: 89.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Massachusetts has failed to reach the target of 89% of new employer status determinations resolved within 90 days of the first quarter in which liability occurred largely due to employers failing to register in a timely manner. We have implemented several strategies designed to prompt employers to register with DUA and begin paying contributions when they are due. DUA is currently at 84%, and passed the recent TPS review for "New Employers" for the first time since 2009. DUA has begun assessing penalties on employers who fail to file timely quarterly contributions. These penalties range from $25 dollars to $2,500 dollars depending on the number of employees:

Year – Quarter Number of Employers Penalty Amount 2015–1 22,282 $740,852.37 2014–4 20,739 $666,112.39 2014–3 22,960 $705,906.88

In addition DUA utilizes the following cross–matches with other state agencies to obtain information on possible employers subject to registration:

• Newly registered corporations (and LLC's) from the Secretary of State's office • All new and transferred liquor licenses issued by the Alcoholic Beverage Control Commission • Corporations with active licenses from the Department of Licensure • Quarterly reviews to identify employers that have filed withholding tax with the Department of Revenue, but are not registered with DUA • DUA has an agreement with the Massachusetts Lottery Commission to cross reference the list of current lottery vendors to verify registration as an active employer if subjectivity applies DUA is currently in the final steps of an agreement with the Massachusetts Registry of Motor Vehicles to begin cross–referencing the list of current businesses holding commercial license plates to verify registration of an active employer if subjectivity applies. A new law in Massachusetts effective in 2016 requires businesses to present a certificate of good standing from DUA if an employer who wants to engage in business with any other MA state entity for goods or services over $5,000 which

we believe with increase employer registration. We continue to work with the business community to raise employer awareness of the obligation to register with DUA as subject employer through mailing campaigns to area Chambers of Commerce, Workforce Investment Boards and employer union groups. We believe these efforts will increase employer awareness and prompt employer registrations.

i. FACILITATE CLAIMANT REEMPLOYMENT (STRATEGIC GOAL 4) Target: TBD

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

The Career Center Seminar (CCS) is a comprehensive introduction to the services available at the Commonwealth's 27 Career Centers and is mandatory for all REA and Profiled UI claimants. UI claimants not selected for enrollment in REA or Profiling are still required to attend a Career Center Seminar. All REA customers receive specific mandated reemployment services including a skills assessment and completion of a Career Action Plan (CAP), participation in workshops on resume preparation and interviewing, and introduction to on–line resources for job search. Job counselors at the Career Centers review work search logs to guide UI claimants and to ensure compliance with benefit requirements.

As you know, no target goals have been set for FY 2016. The Department suspended the GPRA target for FY 2015 to develop a measure that integrates UI more closely with the larger workforce system. Under WIOA, MA follows common measures, which includes common exit for WIOA Title I, Wagner–Peyser and TAA participants. This means customers are exited from all programs 90 days after their last reportable service. RESEA follows the same action. This differs from the programmatic processes that track individualized services while enrolled in a specific program.

C. Program Deficiencies

i. EFFECTIVE AUDIT MEASURES

One of the major reasons that the effective audit measure did not pass in 2013 was due to inadequate staffing. DUA failed the Effective Audit Measure by not reaching the 1% penetration rate as required by DOL, completing 867 of the required 1,900 audits. In addition, DUA also failed to meet the overall amount of wages required for audit purposes, this is a direct correlation to failing to complete the required amount of audits. Due to aggressive measures to increase staffing levels

since 2013, audit staff levels have gone from 13 field auditors in August of 2013 to 22 full time auditors. Management of the unit also has had excessive turnover in the past, but has now had the same management team in place for over a year.

In addition to having an expanded Performs unit DUA recently requested and was approved additional funding to begin the process of streamlining the audit package which would allow audit staff to close cases quicker and would help drive the effort to meet the 1% penetration rate. Staff has had to complete manual duplicative processes to ensure the integrity of the data in our system. Streamlining this package will allow staff to complete audits in less time, and should increase their overall production to help DUA meet the required penetration rate.

For 2015 DUA will be required to complete 2,010 audits for the entire year. Through June of 2015, DUA has already completed 50.2% of that goal (1,010 audits) which is approximately the total number of audits completed for the entire year of 2014. With the increased audits DUA is still finding 3.5 misclassified workers per audit. DUA is on pace to pass all Effective Audit Measures as required by the DOL for 2015 and will likely continue to pass in FY2016 also.

ii. DETECTION DATE AND DETERMINATION DATE ACCURACY

Invalid Recording of Issue Detection Date and Determination Date In the last four completed BTQ quarters MDUA reported average valid detection dates for 90.83 percent of separations and 85.12 percent of non–separation issues Massachusetts remains committed to achieving a 95 percent accuracy rate in establishing correct issue detection dates. Initial analysis showed that the system was the cause of incorrect recording of a significant number of detection dates. Enhancements were made to the system to resolve these issues; however, it has had minimal impact in increasing the Agency's accuracy. DUA will engage in additional analysis to determine cause, responsibility, and additional trends that affect the Agency's ability to meet correct issue detection date goal in order to take additional action remedying errors. In the last four completed BTQ quarters, MDUA reported average valid determination dates for 90.83 percent of non–separation determinations and 85.12 percent for separation determinations. This is slightly higher than a 20 percent increase in accuracy of determination dates. This increase is attributable to enhancements to the system to ensure accuracy of the data. As with issue detection dates, MA is committed to achieving a determination date accuracy rate of at least 95 percent of the evaluated nonmonetary determinations in each quarterly review. To work to this goal, MDUA will begin additional analysis of determination date errors to identify cause, responsibility, and additional trends that affect the Agency's ability to meet the correct the issue determination date goal and to take additional action remedying errors.

iii. BENEFIT ACCURACY MEASUREMENT (BAM) DEFICIENCIES

The Benefits Accuracy Measurement deficiencies identified by the Regional Office include wide variances between the sum of Monetary Denied Claims Accuracy (DCA) weekly universe counts and reporting of Monetary Denied claims on ETA reports. BAM also was deficient in meeting the ninety–day Paid Claims Accuracy (PCA) federal requirement of ninety–five percent. Federal BAM program guidance requires the sample universes to be selected from the same data that is later reported through monthly and quarterly ETA reports. Comparison of the BAM Universe and ETA report is expected to result in a discrepancy of no more than ±15 %; however, comparison of Massachusetts

CY2014 data shows a discrepancy rate of 45.1%. Investigation into the discrepancy showed there were systemic and synchronicity issues in the processing of UI claims for EUC extension eligibility that resulted in monetary denials for new claims to be included in the BAM universe but excluded from the UIRR report(s). The discrepancy was further impacted by programming necessary to accommodate Massachusetts policy that allows a set of claimants to elect to move back and forth from regular UI to EUC Tiers and to decline a new monetarily eligible claim and return to the extension on a prior claim. Investigation as to other causes that may have affected the discrepancy percentage continues; however, it is expected more recent data will reflect a decline in the discrepancy. The Benefits Accuracy Measurement (BAM) program was placed on a CAP for the 2014 SQSP year due to the failure to complete 95% of Paid Claim Accuracy (PCA) cases within the 90–day threshold; the Massachusetts 90– day completion rate was 93.4%. Because the 2015 SQSP was written prior to completion of the 2014 SQSP year, this goal was continued on the 2015 SQSP. BAM actually met the goal for the 2014 SQSP year with a 96.03% completion rate and the 2014 BAM year with a 95.98% completion rate. The BAM unit has complied with the 95% completion rate, beginning third quarter 2013 and has maintained this rate in all but one subsequent quarter. To achieve this, the Massachusetts BAM Operational Handbook was rewritten and continues to be updated to reflect MA legislative and Agency policy change, form changes, and new protocols for working with business units, claimants, and employers. Staff receives continuous training on best practices and computer skills that will add to their success in meeting timely completions. Staff is encouraged to self–monitor the timeliness of their casework. Management stays attentive of BAM cases considered at risk for not meeting the 90–day completion date in order to take action in a timely manner and work with investigators to meet their goals. Management reviews the status of PCA timeliness for all core measures three times per week and will meet with individual investigators to aid in completion. iv. DATA VALIDATION DEFICIENCIES The Benefits Data Validation (BDV) deficiency identified by the Regional Office was a failure to implement the BDV program and failure to submit populations and modules as required of the program into the SUN system. DUA failed to complete required reporting for Benefits Data Validation while transitioning into the new UI Online system. Further delay occurred due to the MA DUA initiative to build a Data Warehouse for reporting purposes. The two–year SQSP milestones for BDV were to develop Module 3, develop the files necessary to perform DV of populations and modules, and analysis of data to ensure error resolution within the files. File development was completed for all modules and populations. Analysis was completed; however, this is an iterative process. It requires analysis to identify file errors, loading files into SUN to identify additional errors, and coding fixes to the files in the Data Warehouse repetitively until all errors are identified and removed.

In FFY15 Benefits Module 3 was rewritten and published in the SUN; however, MADUA staff failed to return to the SUN to certify the module during the window of opportunity that ETA makes the certification screen available. Milestones for the development of population and module files were accomplished. The population and module files were created and analyzed for accuracy as well as loaded into the SUN for the system to identify file errors. MA DUA was able to successfully develop files, test files, test files in the SUN, resolve file errors, and complete Data Validation for modules and 14 out of 16 populations. Populations 14 and 15 were not submitted due to the significant number of errors within the population files that caused the SUN to reject the files. These population files will be addressed during the continuation of analysis of all population files for error identification and error resolution.

MA DUA failed a significant number of populations. This is indicative of errors within the population files and potentially ETA reports. In FFY16 MA DUA will devote resources to the continuation of analyzing file errors and file fixes to ensure accuracy of population and module files. The outcome of file accuracy should be representative in BDV 2016 through an increase in passing populations.

It has been known that the check marks on the milestone grid are placed erroneously, as well as the fact there is a typing error in identification of populations. MA DUA submitted a document with milestones correctly placed for this CAP. Upon return to DUA, the checkmarks were not in the same array. It is unclear how or when this occurred. It was determined that no changes would be made to ensure the integrity of the document but understood that DUA would work towards the milestone deadlines as prescribed originally. Inasmuch as MA DUA made progress in resolving this CAP on a quarterly basis and in fact, has met or exceeded milestones, MA DUA has modified the milestone checkmarks in the CAP. In addition, it was understood that population "31" represented population "3a" and was a typographical error. This has been corrected.

TAX DATA VALIDATION DEFICIENCIES All Tax Data Validation (TDV) populations and required modules were submitted in the 2015 DV year. To make this happen, a staff member with strong technical skills was utilized to assist with the process of manually manipulating the Tax DV extract files to allow submission into the system. Tax DV substantially failed in the 2015 TDV year. Defects in UI Online have been identified that when corrected, will reduce the failure rate in populations. Errors within the population and module files, while identified, will not be fixed. Instead, TDV population and module files are being rebuilt inside the MA DUA Data Warehouse that drives the source for all MADUA reporting. TDV Data Warehouse development began in August 2015 and is expected to be ready for implementation in May 2016. Because the DV year ends June 10th each year it will not be possible to implement files generated from the Data Warehouse for the 2016 TDV year. MA DUA will address UI Online defects and enhancements and manually modify module and population files for SUN usability to ensure 2016 TDV submission.

D. Reporting Requirements

i. REPORTING DEFICIENCIES MA DUA's timely reporting of UI required weekly, monthly and quarterly reports has improved significantly and the Agency continues to work toward 100% timely submission. In FFY14, the Agency maintained an average of 19 late report filings per month. The average has now been reduced to 2 late filings per month. The Massachusetts Data Warehouse has greatly improved the Agency's ability to report in a timely fashion; data is now compiled through queries that are run on a prescribed schedule and data is accessible to business owners for validation prior to transmission. This accessibility grants business owners greater knowledge of their units(s) performance levels and the ability to manage from valid statistical information. DUA has continued its internal procedure of reviewing requests for changes and additions to reports through its Change Control Board to work towards 100% timely submission of UIRR. It is expected that the Agency will meet 100% timeliness submission before the end of this biennial SQSP. The following graphs illustrate the number of "Late Sent" reports on a monthly basis and demonstrate the drastic improvements that have been made in the agency's timely reporting during the last two years.

F. ASSURANCES

The State Administrator, by signing the SQSP Signature Page, certifies that the state will comply with assurances as outlined in ET Handbook 336, 18th Edition: Unemployment Insurance (UI) State Quality Service Plan (SQSP) Planning and Reporting Guidelines, Chapter 1, Part VII: Assurances.

i. Assurance of Contingency Planning In 2012 an independent consultant was engaged to modify the IT Contingency Plan. This modification took into account the changes to contingency planning with the new system architecture. This work was completed in June of 2012. This plan is reviewed and updated to reflect system modifications and personnel changes; the most recent update was in July 2015.

ii. Assurance of Automated Information Systems Security

In 2011, an independent consultant was engaged by DUA to perform a risk assessment. This assessment was completed in July 2012 and consisted of an assessment of the UI Benefits system, an assessment of the UI Online Revenue system, an assessment of the EOWLD Telephony system, and an assessment of the UI Fraud Prevention and Detection System involving National Directory of New Hires.

DUA also reviews and updates as necessary the SSP annually. The review and plan were updated in 2014 and remain current.

F. CUSTOMER SERVICES

N/A

G. OTHER N/A

INTEGRITY ACTION PLAN Massachusetts Federal Fiscal Year: 2016

Accountable Agency Official(s): David Martin DUA Director of Program Integrity

Summary: DUA has specific plans to make the Program Integrity Unit even more robust in the upcoming years. DUA has four key strategies in its Integrity Action Plan: cross–matches, new staff, new collection strategies and technology. After UI Online went live July 1, 2013, DUA launched AWARE (Aggregate Workforce Analytics Reporting Engine) in November 2013. DUA has put this software to full use and will continue to analyze new ways to prevent fraud through this software tool. The Program Integrity Unit has seen a shift in leadership which DUA hopes will revamp, create and strengthen how the Unit pursues and recovers fraud. DUA is in the process of developing new processes to collect debt and make claimants aware of an existing overpayment. DUA is also reviewing its current technology to pursue and identify fraud before it occurs; we plan on targeting some improvements in our access in FY 2016.

AWARE and Cross–matches: DUA has used data from AWARE to develop cross–matches which were not available prior to the implementation of UI Online and AWARE. Since AWARE has been put into place, DUA has been able to prevent the payment of more than $25m of fraudulent benefits in one scheme alone. DUA continues to work with other State and Federal Agencies to have new

data from other sources loaded into the AWARE package to create additional cross–matches. Below are new cross–matches DUA has started in AWARE.

• Out of Country Claims: DUA runs a weekly cross–match to determine which claimants are certifying their weekly benefits from outside the United States; bringing their availability into question. AWARE provides a list of all IP addresses and those claims are reviewed weekly within Program Integrity. • Multiple Bank Accounts: DUA runs a weekly cross–match to look for bank accounts used for more than one claimant. This has been helpful in finding possible fraud cases. • Suspicious Bank Accounts: DUA has been able to identify certain criteria high in fraud pertaining to specific banks. DUA uses this query to review for possible fraud. • Multiple Claims to One Address: This cross–match shows when multiple checks for different claimants are being sent to a one address. This query has also been helpful in identifying fraud, often before it occurs. • Multiple Email Addresses: This query looks for different claimants using a common email address. • Secret Question and Answer: DUA has also found a commonality pertaining to fraud in which similar secret questions and passwords are used. This report is also run weekly. • Owner/Officer: This will give DUA the ability to cross–match to ensure that business owners and/or officers are not fraudulently filing unemployment benefits. • Timed Cross–match: DUA has identified that fraudsters have developed computer programs that run a script to try and set up bogus DUA claims using stolen ID's. DUA has recognized that these initial claims are filed much faster than if someone had to manually enter an initial claim themselves. We currently work with our IT department to get this list, but believe it would be better housed in the AWARE program. • Fraudulent Employers: DUA has found an influx of fraudulent employers that are set up with the sole intention to file fraudulent unemployment benefits. DUA has found that these fraudulent employers are set up with subject dates older than a year and immediately start to have unemployment claims filed against them. • NDNH (National Directory of New Hires) Cross–match: The DUA is reviewing its process to detect and set up overpayments based upon NDNH cross matching as the current process has a lower than expected overpayment set–up rate. It is anticipated that when complete this cross match will be more effective in detecting and preventing current fraudulent benefit year earnings collectors from obtaining future benefits. • Similarly, DUA Program Integrity is beginning a review of all of its current cross matches to determine their effectiveness and to search for potential improvements and/or automation. This review of all Program Integrity cross matches will take some time but should result in a more effective use of Program Integrity staff and resources and reduce benefit year earnings overpayments.

New Staff: DUA has made several staff changes within the Program Integrity Unit. In May 2015 the Program Integrity Unit was shifted under the Chief of Staff. This shift allows BAM and Program Integrity to work together more closely. These are DUA's units focused on combating claimant fraud and the determining of the agency's success in combatting claimant fraud. Program Integrity continues to share fraud referrals with Revenue Audit and have worked together on multiple investigations. When Audit discovers employee misclassification, a referral is made to the Program Integrity Unit to make sure that the individuals are not collecting unemployment benefits. The Program Integrity Unit will also refer cases of working and collecting directly to Revenue Audit to ensure employers pay delinquent unemployment taxes. Program Integrity has become more involved in the Massachusetts Joint Task Force on Underground Economy, allowing Program Integrity to work with other Massachusetts Agencies to discuss, discover and report new or current fraud schemes seen throughout the State.

DUA hired a new Program Integrity Director in January 2015 and moved the unit in June from the Revenue Department to the Office of the Chief of Staff. We believe this change in leadership and operational escalation of the unit will lead to improved pursuit and detection of fraud and recovery of overpayments.

DUA also used SBR funds to hire new staff. Five Compliance Officer II's were hired to pursue fraud both internally through cross matches and externally through business site visits. A Program Coordinator III was added to assist with the collecting of data through various cross–matches, analyzing trends and new fraud queries.

New Collection Strategies: DUA has sought to bolster collection activities for claimants who have been overpaid. The DUA made robo calls through funds granted by an SBR to thousands of claimants with past due overpayments. DUA is considering using this platform going forward.

DUA also began participating in IRORA (Interstate Reciprocal Overpayment Recovery Arrangement) in 2013. IRORA is an agreement among states to collect overpayments of unemployment benefits for each other. States can enter into separate agreements among themselves, but the IRORA gives states a standardized approach to recovering overpayments for each other on a cooperative basis. This program has been live since May 2014 and fully operational since June 2014. More than $100,000 has been recovered in total between dollars collected by other states for DUA and dollars collected by DUA and sent to other states to satisfy the other states' overpayment.

DUA is also ready to participate in the Treasury Offset Program (TOP) for IRS tax intercept. Recent changes to Massachusetts law allow the Agency to participate in this program. So far in 2015 DUA has intercepted more than $4.5M in state tax intercepts. DUA believes that the TOP intercept should at a minimum double that amount for the next full tax year and will generate some tax intercepts for the DUA Trust Fund in 2016 as well.

DUA has also begun an open and ongoing dialogue and regular meetings with Special Agents from the US Department of Labor, Office of the Inspector General (OIG). DUA has stepped up its prosecution of cases both through the Attorney General's office as well as the OIG and expects an increase in restitution agreements as a result.

DUA is also exploring the possibility of garnishing wages in order to pay off aging UI debts. Wage garnishment would bring a substantial amount of money into the DUA UI Trust Fund.

Technology: DUA has identified certain technology based areas in need of improvement. DUA has gained access to CJIS (Criminal Justice Information System). DUA recently detected a large volume of falsified claims using a refined query. By identifying these at the initial claim stage, DUA successfully avoided making payments. The fraudsters have begun to respond to identity verification fact–finding with falsified documents (driver's licenses, passports, social security cards) in an attempt to have the identity verification issue overturned. CJIS has allowed Program Integrity investigators the ability to crosscheck driver's licenses to ensure the claimant is whom they claim. Program Integrity management also has access to Accurint, a data mining tool offered by Lexis Nexis. Accurint provides access to a significant amount of identity information and is sometimes necessary when dealing with questionable claimant identity information.

DUA has also worked with our IT department to track and block phone numbers coming into the weekly certification line from outside the country. Program Integrity is also setting up availability issues for claims which are later determined to have been generated for or by an out of country claimant. This has allowed DUA to identify possible claimants whom are not available or not looking for work. DUA has also started working with the Registry of Motor Vehicles to start a cross match against claimants addresses to look for inconsistencies.

DUA has also implemented a new Investigations phone line for all CO II's. Previously if a fraud tipster contacted a unit other than the investigators in Program Integrity, they would have been told to hang up and call the Fraud Hotline, an (800) number. With the new phone line internal callers can transfer these calls to investigations without any problem.

Despite these successes, DUA recognizes that we still have improvements to make related to BYE issues/overpayments. DUA is working with OnPoint and their AWARE technology to detect and prevent more benefit year earning overpayments by improving and expanding use of the National Directory of New Hires (NDNH) and our State Directory of New Hires. The NDNH cross match system has less than a 20% success rate in detecting potential overpayments. To address this issue, DUA requested and received SBR funding to contract with OnPoint to refine the parameters and incorporate NDNH into the existing AWARE process. DUA expects that this effort will result in increased detection and prevent more benefit year earning overpayments.

Program Integrity Milestones Target Dates 3rd qtr. 2015 4th qtr. 2015 1rst qtr. 2016 2nd qtr. 2016

Cross Match Evaluation • NDNH • Report of Hire • Prisoner Cross Match X X

X

X X X Collections Process • Civil Actions • Treasury Offset • IRORA (fixing small defects)

X X X

SQSP STATE PLAN NARRATIVE

MASSACHUSETTS STATE QUALITY SERVICE PLAN OCTOBER 1, 2015 – SEPTEMBER 30, 2016

A. OVERVIEW

In July of 2013, Massachusetts launched the benefits portion of UI Online, our web–based, self–service system. Claimants can now file an initial, continued, or additional claim online, complete fact finding and other requests for information, update contact information, review payment history, file an appeal, and much more. For the first time, our tax, benefits, and appeals systems are fully integrated. DUA had been operating with a 29 year old COBOL based system that was inflexible and unable to keep up with significant law and policy changes. DUA greatly struggled with its workload during the recession, as evidenced by our "At Risk" status and substandard performance measures. A dramatic change was not optional.

Therefore, 2013 was DUA's year for change. Staff, claimants, employers, and TPAs all had to become accustomed to a new system and a new way of conducting business. As with any large system implementation, there were many challenges: user familiarity was a large one, and in addition, design shortcomings and conversion complications resulting from the conversion of over 2 million claims. The DUA team rallied together, and customers worked with us to identify issues. Claimants responded overwhelmingly well to the ability to use self–service options that were not available to them before.

DUA's goal for 2014 was to stabilize. The massive changes were over, but the Agency was still recovering from the extensive backlog from the legacy system and settling into the new business processes. In addition, we restructured some departments and hired new staff where needed. We focused on reducing the backlog, fixing any outstanding defects, and stabilizing the infrastructure. We focused on the performance standards and are driving business decisions to meet these goals. As expected, due to the excessive backlog and the fact that the system is designed to work oldest claims and issues first, we saw a downturn in many of our metrics initially. However, we saw some positive trajectory in timely first payment and issue timeliness numbers. This occurred as we continued to improve our business processes, staff became more accustomed to the new system, and calls coming into the call center drastically declined.

Our theme for 2015 was to optimize. In 2015, we continued to improve the system by enhancing the customer service experience and implementing required law and policy changes. As in the past few years, we focused on Program Integrity to stay abreast of new fraud schemes to protect the trust fund. Although staff has adjusted to the new system, there was a continued need for significant training, as a large majority of our adjusters were new. Lastly, agency–wide, there was a renewed focus on internal auditing and quality control in order to catch issues early and tailor training where it was needed most.

In FY2016, agency–wide focus will be on the improvement of performance metrics. Across all levels, staff performance is being measured against state scores for the UI Core Measures and the Secretary's Standards. Every manager is managing to and being measured against a group of measures that are consolidated into our Customer Service Metrics. The measures included are First Payment Promptness, Nonmonetary Determination Timeliness, Nonmonetary Determination Quality and Lower and Higher Appeals Aging. They are also managing to and being measured against our Employer Service Metrics that include: New Employer Time Lapse, Tax Quality and Effective Audit Measures. Both the Customer Service Metrics and the Employer Service Metrics are in line with the DOL priorities for FY2016. In all of our "at risk" areas, we are focusing on process improvements, system fixes and staff training that will directly impact our ability to meet the acceptable levels of performance.

Already, we have seen significant improvement in our backlog of ready to work issues due to system improvements that consolidate issues into singular fact–finding and enhancements that ease the online filing process for claimants. These changes significantly improved our Timely First Payment metric along with our Lower Authority Appeals Timeliness. In FY2016, we hope to meet the acceptable levels of performance for both of these standards. National Priorities: Improving State Capacity to Administer and Operate the UI Program Effectively:

Administering and operating the UI program effectively is a main concern for Massachusetts. Since April of 2010, MA has been rated at risk by the US Department of Labor due to its consistent and significant failure to meet first payment timeliness standards. The fact that this designation was the result of many years of declining performance along with beginning the process of implementing a new and automated UI system forms the basis for future program enhancement. Although only being in the position for four months, unemployment insurance director Rob Cunningham is committed to returning Massachusetts to a national top performer.

In recent years our inability to effectively process UI claims in a timely manner has been the result of circumstances relating to the great recession, staff turnover and training capabilities, decreased funding opportunities, and implementation of a new UI system. In effect, since 2008 MA has administered the program using a 30–year–old legacy system while trying to implement new technologies that rise to the level of required performance and expectations. In the past MDUA has used many strategies to correct our lack of performance in this area. These efforts include an independent business analysis by Coffey Associates, internal program workgroups, engaging stakeholders, and partnering with other state UI Agencies. Moving forward in the FY16 SQSP cycle, MA would like to take the results of these experiences and the retirement of the legacy system to turn it into actionable program goals.

The first and most important change for the upcoming year will result in MDUA realigning its resources to ensure program goals are achieved. The first step was to develop a matrix of performance standards and assigning responsibility to the individual business units. The matrix will be monitored at the highest level in the organization to ensure that it consistently is a top priority. To date the matrix includes all USDOL secretary standards and UI Core measures. To drive success, DUA has realigned staff to focus on these measures. In addition, MDUA will be centralizing the monitoring of the matrix while keeping the responsibility of performance within the individual business units.

Improving Prevention, Detection and Recovery of UI Improper Payments

Massachusetts has embarked on an aggressive plan to lower the states improper payment rate for the UI program. This plan includes bringing in new experienced leadership at the highest level to coordinate our systems approach to improving prevention, detection, and recovery of improper payments. According to our analysis, the top three reasons of improper payments in MA are benefit year earnings at 43%, worksearch 25%, and separation issues are 10% of total overpayments. 78% of all improper payments are attributable to these three causes. Massachusetts continues to investigate any area that potentially creates an improper payment; however, keeping in mind that a large percentage of the improper payments are from three causes, analysis has focused on making system and business process enhancements that will drive our improper payment rate down. For example, our analysis of benefit year earnings shows that enhancements to the continued claims process can simplify the process for claimants to self–certify that they worked and earned wages. This enhancement will dramatically increase a claimant's ability to self–report earnings accurately. The Benefit Payment Accuracy unit has taken an aggressive action in use of the NDNH cross match program. MDUA has also been working on the implementation of the treasury offset program which will start on 8–03–2015. MA will continue to engage stakeholders, USDOL, partner states, and the UI Center for Excellence in its endeavors to reduce, detect, and recover improper payments. The NDNH cross–match is being improved in FY16 to make it more efficient and a more effective tool to

reduce BYE improper payments. The current process, while an improvement over prior years, remains highly manual and less effective than initially intended.

Improving Program Performance

Since the implementation of UI Online two years ago DUA has delivered ongoing staff development to promote the familiarization of the new system for system users. Some of the newest training strategies implemented include:

• Expanding the initial claims process to include a full day of hands on system training where staff file and adjudicate claims in a test environment, in addition to another day of classroom training. This expanded training was delivered to approximately 100 staff in 10 sessions with an additional 11 days spent delivering individualized training to 9 staff • Provided Initial Adjudication Training to 120 managers, adjudicators and review examiners in four three week training sessions • Provided Refresher Training to over 300 staff in 12 sessions for adjudicators and adjudication managers, in multiple office locations • Provided UI Online User Training to over 300 DUA/DCS personnel • Provided Customer Service Training to over 300 DUA personnel in 84 half day sessions covering 6 targeted topics designed to assist customers with navigation of the new system • Secured BTQ Certification Training that was delivered to 25 adjudication staff by regional DOL staff

DUA continues to identify system inefficiencies in its UI Online system, which is a web–based, self–service system that allows claimants to file an initial, continued or additional claim online. The system was designed to send fact finding and other requests for information to claimants and employers to streamline and allow more automation to the UI process. At the request of DOL we have modified the use of fact finding questionnaires so only questionnaires pertaining to interested party employers are sent to claimants; all base period employers continue to receive fact finding questionnaires to ensure proper charging and to reduce improper payment of benefits. We have also implemented a system enhancement to bundle all ready to work issues for individual claimants to insure the prompt resolution of outstanding issues by one adjudicator.

DUA has contracted with a readability vendor to review and revise over 500 fact finding questionnaires to improve user comprehension. Prior to vendor submission, we solicited feedback from employers, claimant advocates and DUA staff to ensure a comprehensive review process. Currently, over 100 of the revised questionnaires have been put into production. In FY16 we will complete this project, although DUA expects ongoing review of readability throughout the system.

DUA has made great strides in improving accessibility to UI Online for the Limited English Proficiency customers. We have provided designated customer service lines in Spanish and Portuguese, translated non–monetary determinations for Spanish speaking claimants, developed fact finding coversheets which direct LEP customers to service in 11 languages if needed in the completion of fact finding questionnaires and provide assistance in the completion of fact finding questionnaires in 11 different languages.

Workforce Innovation and Opportunity Act (WIOA)

Under the WIOA Act, the Unemployment Insurance (UI) program and the related other federal workforce functions are expanded and enhanced. The integration of programs that provide services

to those likely to exhaust unemployment insurance and return them to suitable employment mandate changes in roles of the DUA.

Working under the leadership and direction of the Executive Office of Labor and Workforce Development (EOLWD) in conjunction with other secretariats and their agencies, DUA will develop and build the wage matching systems that require the use of confidential UI employment and wage information to supply ETA with the WIOA reporting requirements on the full range of reemployment programs. To identify those receiving a first payment for UI and likely to exhaust during FY2016, DUA will utilize a model that incorporates historical and current information on those who received UI and related services. The outcomes and characteristics of those who participated in Profiling, Reemployment Assistance, and other mandatory employment and training referral services will be evaluated to better identify demographic information that is now available from the UI Online system. We will utilize information related to coordinated programs that provide employment and training services to better identify the likelihood of reemployment than the current screening mechanism.

DUA has partnered with the department of Career Services (DCS) to implement the Reemployment Services and Eligibility Assessment (RESEA) program. Step one of this expanded services program was implemented this year and step two will occur in January 2016. By developing and using a re–employment model that closely monitors program outcomes, changes in demographics, and industry structures, DUA will improve the referral rates of UI claimants. Our goal is to develop a more streamlined delivery of services and information to employers, training providers and those seeking work in Massachusetts.

DUA continues to partner with the DCS Rapid Response team on WorkShare (DUA's short term compensation program) education to employers. DUA will further develop this partnership through training sessions for Rapid Response staff who, in turn, will provide one on one and group WorkShare training sessions with Massachusetts employers. DUA will emphasize WorkShare as a way to keep skilled workers employed by companies during slow periods as well as a potential temporary increase to cash flow. To streamline the application process employers have the ability to submit their WorkShare application through the UI Online system.

Massachusetts is unique in that there is still a strong UI presence in the Career Centers and walk–in sites. Customers are provided with direct access to UI customer assistance as DUA provides funding to DCS for staff in most of the state's twenty seven Career Centers.

Reemployment of UI Claimants

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision

of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

DUA management and staff have been fully engaged in the development, planning, administration, and oversight of the RESEA Program since its inception. Periodic meetings have been held with DCS and DUA staff to plan, adjust and address issues through the year. Some of the major changes agreed to in this year's grant include:

• inclusion of UCX claimants, • the elimination of the RESEA control and WPRS group from the sampling process, • those selected for WPRS will be absorbed into the RESEA enrollment group, • broader use of technology to induce program participation, • and the strengthening of participation requirements. DCS continues to work on two on–going projects to enhance resources and support staff and claimants participating in RESEA. The first project is a real–time triage process for new UI claimants and the second is strengthening skills for job matching through the effective use of Labor Market Information (LMI).

The use of Labor Market Information is geared towards identifying and targeting demand driven job opportunities, which is consistent with the direction outlined in the Workforce Innovation and Opportunity Act (WIOA). In fact, starting on August 24, 2015, Assistant Secretary for Policy and Planning, Greg Bunn, will be charged with the responsibility of building the best LMI system in the country. LMI specialists continue to work with Career Center staff through training and use of projected and real–time LMI data. Staff incorporates this information when assisting UI claimants in their job search efforts. Continued emphasis will be placed on the use of LMI for resume preparation and review of work search logs to ensure that RESEA participants are conducting a focused work search informed by labor market information.

The RESEA grant is an integral part of Massachusetts reemployment services strategy for UI claimants. By continuing to integrate RES with activities such as UI eligibility assessments and work search reviews, DCS ensures that each RESEA participant has access to the full menu of individualized services offered by the One–Stop Career Centers. This decreases the amount of time it takes for the RESEA customer to return to work.

It is the goal of DCS to complete 59,500 on–site, one–on–one Reemployment Services and Eligibility Assessments on a nine (9) month basis. All RESEA customers will receive specific mandated reemployment services, which are to be provided by Career Center staff (funded through this RESEA grant) in addition to an initial one–on–one reemployment and UI eligibility assessment. During this meeting, the RESEA customer will be scheduled for a subsequent RESEA one–on–one reemployment and UI eligibility status review. This status review will also be conducted by a Career Center (RESEA funded) RESEA Specialist.

If either review uncovers a potential UI eligibility issue such as failure to report or to fully participate in all components of RESEA the customer will be referred to a UI RESEA Specialist to complete additional fact finding. The UI RESEA specialist will conduct the follow–up fact–finding interview and if necessary refer to UI adjudication for a final determination.

Addressing Worker Misclassification

The Massachusetts Department of Unemployment Assistance (DUA) has taken worker misclassification very seriously. A majority of DUA audits are based on employers in which we expect to find misclassification. From 2012 to 2014 DUA has averaged a total of 5,100 newly discovered workers per year; which is an average of 5.34 misclassified workers per audit. DUA uses a fraud detection database, AWARE, (Aggregate Workforce Analytics Reporting Engine) which allows us to perform cross–matches against other participating state or federal agencies information including the IRS' 1099 information. DUA also gets direct referrals from the IRS regarding employer misclassification (SS–8's.) These referrals are reviewed by audit management and assigned to staff for follow up audits if they believe there is a reasonable chance misclassification will be uncovered. DUA also reviews outside agency information outside of AWARE, including liquor license transfers, Lottery winners and, hopefully soon, Registry of Motor Vehicle renewals.

DUA regularly attends monthly meetings as a member of the Council on the Underground Economy (CUE). The group's sole purpose is to uncover and address employee misclassification throughout the state. During these meetings DUA gets referrals of possible misclassification from other agencies including the Alcohol Beverage and Control Commission (ABCC), Insurance Fraud Bureau, OSHA, and Labor Standards. As part of these monthly meetings, the DUA participates in surprise site visits, usually to new construction projects, to uncover and educate employers and general contractors regarding misclassification. DUA continues to audit cases where businesses have claimants who file unemployment claims with 1099 wages. DUA keeps tabs on past employer audits for noticeable changes in their Employment and Wage filing for possible follow–up audits.

In FY16, we expect to continue the good work DUA has done, and become more efficient in uncovering these misclassifications.

B. FEDERAL EMPHASIS (GPRA GOALS)

Make timely benefit payments (Strategic Goal 4)

Target: 87.5 percent of intrastate first payments for full weeks of unemployment compensation will be made within 21 days from the week ending date of the first compensable week.

The high claims volume from a protracted winter resulted in the redeployment of Call Center Adjudication staff in order to provide acceptable service levels to customers filing claims through the end of the first calendar Quarter of 2015. This procedure was minimized during the second quarter when the clear realization that the continued deployment of Adjudication staff severely impacted the timely first payment of claims. In April we were able to begin to reduce the backlog and work with a focus on minimizing call volume. Backlog of ready to work issues was over 50,000 in March and plummeted to 4,778 during the last week of June. The first week in July saw a slight increase and, currently (7/16/2015) the ready to work count is at 6857. We are now focusing on the improvement of timely first payments and hope to be current (under 4,000 consistently) by the end of the current quarter of the September 30, 2015. This should enable us to achieve our CAP projection for the period ending September 30, 2015. Recent weeks have seen nearly two thirds of our customers filing new claims using the web–based application. Two years into the new system,

ease of filing for claimants, employers and TPA's has begun to take hold and positively impact our ability to improve in the area of first payments, and multiple surveys of users demonstrate both claimants and employers are largely satisfied with UI Online. DUA remains committed to ensuring adjudication staff spends their time addressing fact finding questions and adjudicating issues, rather than answering claims filing calls except in unusual circumstances.

DUA has embarked upon a Call Volume Reduction Project to further enhance the usability of the web–based system and identify those areas where the customer service aspects of UI Online need enhancement. This project, with a completion goal of early 2016, is focusing on some updates including a better online FAQ section, an enhanced monetary screen, simplified User password setup and an overall homepage review to further depress call volume by ensuring the best service possible online.

Expansion of access to assistance for fact–finding for Limited English Proficiency is intended to avoid delays in first payments for those claimants. Coupling this service in 11 languages with the readability project reviewing and updating hundreds of questionnaires, DUA continues to remain committed to achieving our timely first payment goals.

While the 21 Day Timely First Payment report for the current quarter ending was finalized at 62.37% , significant gains have been made with aforementioned backlog reduction effort as evidenced by the last four weekly TFP rates at 84.7 (w–e 7–11), 81.4% (w–e 7–4), 77.57% (w–e 6–27) and 76.24% (w–e 6–20). These weekly rates are clearly 20 percentage points higher than one year ago at this time. This is related to the dramatic reduction of ready to work issues during the past quarter. Ready–to–work issue backlog stood at 4778 for COB on 6–26–15. This was the culmination of the issue reduction effort which kept adjudicators off the phones for 90% of the preceding workweeks. The chart below demonstrates the reduction in our total number of issues (workload credit and non–workload credit issues):. The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Significant gains have been made within the last the last four months relative to Issue Time Lapse. Current Time Lapse (resolved within 21 days of detection) for the final week reported for the quarter (6–27–15) was 42.55 % for Separation Determinations and 67.17% for Non–Separation Determinations. This is a major improvement over the quarter where these rates began at 5.18% for Separations and 21.73% for Non–Separation time Lapse. This is a 300% + improvement in these rates over the quarter.

a. SHORT–TERM MEASURES (45 to 90 days)

As staff develop more familiarity with UI Online due to usage and training, the productivity data becomes more relevant. As such, DUA continues to monitor adjudication productivity to leverage in staffing standards. We expect the productivity to continue to improve as we continue to enhance the system and business processes, focused on achieving our timeliness and accuracy goals.

? Adjudication staff have been instructed to immediately make phone calls on all additional/rebuttal fact–finding in order to expedite the issue resolution process. This will be

coupled with additional refresher training for staff in the area of rebuttals in order to improve both quality and timeliness.

? DUA is reviewing the current predate process from both a customer and staff viewpoint with a clear focus on policy adherence and the identification of system/process modifications that will positively impact our ability to improve timely first payments for predated claims, as well as minimize Customer Assistance calls.

? DUA has made the Fact–Finding queue an option from the main telephone menu so claimants can access adjudication staff to assist them in the completion of outstanding fact finding. In addition, accessibility has been further enhanced for Limited English Proficiency customers with Fact–finding cover sheets which direct LEP customers to Fact–Finding assistance in11 languages if needed in the completion of the questionnaires. This process was implemented for the current quarter (July 2015) and potential enhancements will be analyzed. Issues with completed fact finding will then be assigned for resolution in a more timely manner.

Detect Benefit Overpayments (Strategic Goal 4)

Target: Overpayments established will be at least 55.3 percent of the estimated detectable, recoverable overpayments.

Massachusetts currently falls below acceptable levels of performance in the percentage of detectable/recoverable overpayments established for recovery. UI Online has been very helpful in improving the detection and prevention of overpayments. Some of our business processes that are showing equal improvement are:

• the OnPoint Technology AWARE system to prevent and detect fraud claims and fraud schemes. Some of the cross matches DUA uses through AWARE include: Out–of–country cross–match to identify online weekly certifications from IP addresses outside of the U.S and its territories, and

• the Identification of Commonalities cross–match that checks bank accounts, home addresses, email addresses and security questions and answers, and

• known fraudulent banking methods

DUA has used SBR funding to supplement our existing cross–match menu with new fraud preventative cross–matches, including cross–matches for deceased claimants and business owners/officers who receive UI benefits while the corporate entity is still in operation. We have also added scripts designed specifically to prevent fraud schemes, based on identifying characteristics we have gleaned from prior fraud attempts. This has proven to be very effective and we continue to evaluate for more potential prevention efforts.

As part of the DUA–wide realignment, Program Integrity has recently been moved to report to the Chief of Staff to increase its visibility within the agency, and ensure a renewed focus on PI for DUA. The unit continues to take a proactive role in the Massachusetts Joint Task Force in the Underground Economy which identifies improperly classified workers and unregistered employers conducting business on a cash basis. The Task Force allows Program Integrity staff to work in

conjunction with other state agencies on possible fraudulent unemployment claims. A recent SBR request resulted in additional funding to increase staffing and our ability to run queries to detect overpaid benefits, review cases and prosecute fraudsters.

We have gained access to the CJIS system (Criminal Justice Information System) which has allowed DUA Program Integrity Investigators the ability to crosscheck identification documents provided by criminals to establish fraudulent claims. We also access the data base at the Massachusetts Registry of Motor Vehicles but the CJIS system has provided DUA faster access to identity information, allowing for more effective investigations.

After skipping a year due to the implementation of UI Online, DUA resumed state tax intercept in 2015, which brought in more than $3M to the DUA UI Trust Fund in the first quarter of 2015.

Massachusetts is scheduled to launch the Treasury Offset Program (TOP) August 3, 2015. By expanding our overpayment recovery capacity to include the intercept of federal tax returns, we anticipate increasing the recovery of overpayments via tax offset by 300%.

Establish Tax Accounts Promptly (Strategic Goal 4)

Target: 89.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Massachusetts has failed to reach the target of 89% of new employer status determinations resolved within 90 days of the first quarter in which liability occurred largely due to employers failing to register in a timely manner. We have implemented several strategies designed to prompt employers to register with DUA and begin paying contributions when they are due. DUA is currently at 84%, and passed the recent TPS review for "New Employers" for the first time since 2009. DUA has begun assessing penalties on employers who fail to file timely quarterly contributions. These penalties range from $25 dollars to $2,500 dollars depending on the number of employees:

Year – Quarter Number of Employers Penalty Amount

2015–1 22,282 $740,852.37

2014–4 20,739 $666,112.39

2014–3 22,960 $705,906.88

In addition DUA utilizes the following cross–matches with other state agencies to obtain information on possible employers subject to registration:

• Newly registered corporations (and LLC's) from the Secretary of State's office

• All new and transferred liquor licenses issued by the Alcoholic Beverage Control Commission

• Corporations with active licenses from the Department of Licensure

• Quarterly reviews to identify employers that have filed withholding tax with the Department of Revenue, but are not registered with DUA

• DUA has an agreement with the Massachusetts Lottery Commission to cross reference the list of current lottery vendors to verify registration as an active employer if subjectivity applies

DUA is currently in the final steps of an agreement with the Massachusetts Registry of Motor Vehicles to begin cross–referencing the list of current businesses holding commercial license plates to verify registration of an active employer if subjectivity applies. A new law in Massachusetts effective in 2016 requires businesses to present a certificate of good standing from DUA if an employer who wants to engage in business with any other MA state entity for goods or services over $5,000 which we believe with increase employer registration. We continue to work with the business community to raise employer awareness of the obligation to register with DUA as subject employer through mailing campaigns to area Chambers of Commerce, Workforce Investment Boards and employer union groups. We believe these efforts will increase employer awareness and prompt employer registrations.

i. FACILITATE CLAIMANT REEMPLOYMENT (STRATEGIC GOAL 4)

Target: TBD

Massachusetts transitioned from a REA to a RESEA state beginning in April 2015. DCS will continue to implement our program model for UI claimants which has always leveraged RES with Reemployment Eligibility Assessment (REA) components as part of the mandatory program requirements.

The MA Workforce System comprises 16 Workforce Investment Areas with 27 One–Stop Career Center (American Job Center – AJC) locations. DCS will continue to implement the Reemployment Services and Eligibility Assessment (RESEA) Grant (formerly Reemployment Eligibility Assessment – REA) as a statewide program. Operating the grant as a statewide effort reinforces the ETA's vision of a fully integrated and interconnected workforce system. DUA and DCS will continue to partner on the operation and management of this program. We have elected to transition to a multiple RESEA model and changes have been made with respect to the selection of the participant and comparison groups, sanctions for non–participation, and mandatory activities for RESEA participants.

The Career Center Seminar (CCS) is a comprehensive introduction to the services available at the Commonwealth's 27 Career Centers and is mandatory for all REA and Profiled UI claimants. UI claimants not selected for enrollment in REA or Profiling are still required to attend a Career Center Seminar. All REA customers receive specific mandated reemployment services including a skills assessment and completion of a Career Action Plan (CAP), participation in workshops on resume preparation and interviewing, and introduction to on–line resources for job search. Job counselors at the Career Centers review work search logs to guide UI claimants and to ensure compliance with benefit requirements.

As you know, no target goals have been set for FY 2016. The Department suspended the GPRA target for FY 2015 to develop a measure that integrates UI more closely with the larger workforce system. Under WIOA, MA follows common measures, which includes common exit for WIOA Title I,

Wagner–Peyser and TAA participants. This means customers are exited from all programs 90 days after their last reportable service. RESEA follows the same action. This differs from the programmatic processes that track individualized services while enrolled in a specific program.

C. Program Deficiencies

i. EFFECTIVE AUDIT MEASURES

One of the major reasons that the effective audit measure did not pass in 2013 was due to inadequate staffing. DUA failed the Effective Audit Measure by not reaching the 1% penetration rate as required by DOL, completing 867 of the required 1,900 audits. In addition, DUA also failed to meet the overall amount of wages required for audit purposes, this is a direct correlation to failing to complete the required amount of audits. Due to aggressive measures to increase staffing levels since 2013, audit staff levels have gone from 13 field auditors in August of 2013 to 22 full time auditors. Management of the unit also has had excessive turnover in the past, but has now had the same management team in place for over a year.

In addition to having an expanded Performs unit DUA recently requested and was approved additional funding to begin the process of streamlining the audit package which would allow audit staff to close cases quicker and would help drive the effort to meet the 1% penetration rate. Staff has had to complete manual duplicative processes to ensure the integrity of the data in our system. Streamlining this package will allow staff to complete audits in less time, and should increase their overall production to help DUA meet the required penetration rate.

For 2015 DUA will be required to complete 2,010 audits for the entire year. Through June of 2015, DUA has already completed 50.2% of that goal (1,010 audits) which is approximately the total number of audits completed for the entire year of 2014. With the increased audits DUA is still finding 3.5 misclassified workers per audit. DUA is on pace to pass all Effective Audit Measures as required by the DOL for 2015 and will likely continue to pass in FY2016 also.

ii. DETECTION DATE AND DETERMINATION DATE ACCURACY

Invalid Recording of Issue Detection Date and Determination Date

In the last four completed BTQ quarters MDUA reported average valid detection dates for 90.83 percent of separations and 85.12 percent of non–separation issues Massachusetts remains committed to achieving a 95 percent accuracy rate in establishing correct issue detection dates. Initial analysis showed that the system was the cause of incorrect recording of a significant number of detection dates. Enhancements were made to the system to resolve these issues; however, it has had minimal impact in increasing the Agency's accuracy. DUA will engage in additional analysis to determine cause, responsibility, and additional trends that affect the Agency's ability to meet correct issue detection date goal in order to take additional action remedying errors.

In the last four completed BTQ quarters, MDUA reported average valid determination dates for 90.83 percent of non–separation determinations and 85.12 percent for separation determinations. This is slightly higher than a 20 percent increase in accuracy of determination dates. This increase is attributable to enhancements to the system to ensure accuracy of the data. As with issue

detection dates, MA is committed to achieving a determination date accuracy rate of at least 95 percent of the evaluated nonmonetary determinations in each quarterly review. To work to this goal, MDUA will begin additional analysis of determination date errors to identify cause, responsibility, and additional trends that affect the Agency's ability to meet the correct the issue determination date goal and to take additional action remedying errors.

iii. BENEFIT ACCURACY MEASUREMENT (BAM) DEFICIENCIES

The Benefits Accuracy Measurement deficiencies identified by the Regional Office include wide variances between the sum of Monetary Denied Claims Accuracy (DCA) weekly universe counts and reporting of Monetary Denied claims on ETA reports. BAM also was deficient in meeting the ninety–day Paid Claims Accuracy (PCA) federal requirement of ninety–five percent.

Federal BAM program guidance requires the sample universes to be selected from the same data that is later reported through monthly and quarterly ETA reports. Comparison of the BAM Universe and ETA report is expected to result in a discrepancy of no more than ±15 %; however, comparison of Massachusetts CY2014 data shows a discrepancy rate of 45.1%. Investigation into the discrepancy showed there were systemic and synchronicity issues in the processing of UI claims for EUC extension eligibility that resulted in monetary denials for new claims to be included in the BAM universe but excluded from the UIRR report(s). The discrepancy was further impacted by programming necessary to accommodate Massachusetts policy that allows a set of claimants to elect to move back and forth from regular UI to EUC Tiers and to decline a new monetarily eligible claim and return to the extension on a prior claim. Investigation as to other causes that may have affected the discrepancy percentage continues; however, it is expected more recent data will reflect a decline in the discrepancy.

The Benefits Accuracy Measurement (BAM) program was placed on a CAP for the 2014 SQSP year due to the failure to complete 95% of Paid Claim Accuracy (PCA) cases within the 90–day threshold; the Massachusetts 90– day completion rate was 93.4%. Because the 2015 SQSP was written prior to completion of the 2014 SQSP year, this goal was continued on the 2015 SQSP. BAM actually met the goal for the 2014 SQSP year with a 96.03% completion rate and the 2014 BAM year with a 95.98% completion rate. The BAM unit has complied with the 95% completion rate, beginning third quarter 2013 and has maintained this rate in all but one subsequent quarter. To achieve this, the Massachusetts BAM Operational Handbook was rewritten and continues to be updated to reflect MA legislative and Agency policy change, form changes, and new protocols for working with business units, claimants, and employers. Staff receives continuous training on best practices and computer skills that will add to their success in meeting timely completions. Staff is encouraged to self–monitor the timeliness of their casework. Management stays attentive of BAM cases considered at risk for not meeting the 90–day completion date in order to take action in a timely manner and work with investigators to meet their goals. Management reviews the status of PCA timeliness for all core measures three times per week and will meet with individual investigators to aid in completion.

iv. DATA VALIDATION DEFICIENCIES

The Benefits Data Validation (BDV) deficiency identified by the Regional Office was a failure to implement the BDV program and failure to submit populations and modules as required of the

program into the SUN system. DUA failed to complete required reporting for Benefits Data Validation while transitioning into the new UI Online system. Further delay occurred due to the MA DUA initiative to build a Data Warehouse for reporting purposes. The two–year SQSP milestones for BDV were to develop Module 3, develop the files necessary to perform DV of populations and modules, and analysis of data to ensure error resolution within the files. File development was completed for all modules and populations. Analysis was completed; however, this is an iterative process. It requires analysis to identify file errors, loading files into SUN to identify additional errors, and coding fixes to the files in the Data Warehouse repetitively until all errors are identified and removed.

In FFY15 Benefits Module 3 was rewritten and published in the SUN; however, MADUA staff failed to return to the SUN to certify the module during the window of opportunity that ETA makes the certification screen available. Milestones for the development of population and module files were accomplished. The population and module files were created and analyzed for accuracy as well as loaded into the SUN for the system to identify file errors. MA DUA was able to successfully develop files, test files, test files in the SUN, resolve file errors, and complete Data Validation for modules and 14 out of 16 populations. Populations 14 and 15 were not submitted due to the significant number of errors within the population files that caused the SUN to reject the files. These population files will be addressed during the continuation of analysis of all population files for error identification and error resolution.

MA DUA failed a significant number of populations. This is indicative of errors within the population files and potentially ETA reports. In FFY16 MA DUA will devote resources to the continuation of analyzing file errors and file fixes to ensure accuracy of population and module files. The outcome of file accuracy should be representative in BDV 2016 through an increase in passing populations.

It has been known that the check marks on the milestone grid are placed erroneously, as well as the fact there is a typing error in identification of populations. MA DUA submitted a document with milestones correctly placed for this CAP. Upon return to DUA, the checkmarks were not in the same array. It is unclear how or when this occurred. It was determined that no changes would be made to ensure the integrity of the document but understood that DUA would work towards the milestone deadlines as prescribed originally. Inasmuch as MA DUA made progress in resolving this CAP on a quarterly basis and in fact, has met or exceeded milestones, MA DUA has modified the milestone checkmarks in the CAP. In addition, it was understood that population “31” represented population “3a” and was a typographical error. This has been corrected.

TAX DATA VALIDATION DEFICIENCIES

All Tax Data Validation (TDV) populations and required modules were submitted in the 2015 DV year. To make this happen, a staff member with strong technical skills was utilized to assist with the process of manually manipulating the Tax DV extract files to allow submission into the system. Tax DV substantially failed in the 2015 TDV year. Defects in UI Online have been identified that when corrected, will reduce the failure rate in populations. Errors within the population and module files, while identified, will not be fixed. Instead, TDV population and module files are being rebuilt inside the MA DUA Data Warehouse that drives the source for all MADUA reporting. TDV Data Warehouse development began in August 2015 and is expected to be ready for implementation in May 2016.

Because the DV year ends June 10th each year it will not be possible to implement files generated from the Data Warehouse for the 2016 TDV year. MA DUA will address UI Online defects and enhancements and manually modify module and population files for SUN usability to ensure 2016 TDV submission.

D. Reporting Requirements

i. REPORTING DEFICIENCIES

MA DUA's timely reporting of UI required weekly, monthly and quarterly reports has improved significantly and the Agency continues to work toward 100% timely submission. In FFY14, the Agency maintained an average of 19 late report filings per month. The average has now been reduced to 2 late filings per month. The Massachusetts Data Warehouse has greatly improved the Agency's ability to report in a timely fashion; data is now compiled through queries that are run on a prescribed schedule and data is accessible to business owners for validation prior to transmission. This accessibility grants business owners greater knowledge of their units(s) performance levels and the ability to manage from valid statistical information. DUA has continued its internal procedure of reviewing requests for changes and additions to reports through its Change Control Board to work towards 100% timely submission of UIRR. It is expected that the Agency will meet 100% timeliness submission before the end of this biennial SQSP.

The following graphs (MA DUA FFY14 and FFY15 "Late Sent" Reports) illustrate the number of "Late Sent" reports on a monthly basis and demonstrate the drastic improvements that have been made in the agency's timely reporting during the last two years.

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

A copy of the signed charts and graphs are available in the Massachusetts State Plan document and are maintained with DUA and the ETA Regional Office

** FY 2017 SQSP Submittal **

MASSACHUSETTS STATE QUALITY SERVICE PLAN

OCTOBER 1, 2016 – SEPTEMBER 30, 2018

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STATE PLAN NARRATIVE

A. OVERVIEW

Massachusetts has spent the better part of three years building on a new baseline beginning in July, 2013, with the launch of UI Online, our web-based, self-service system. Much of the improvement we have seen is attributable to both more effective incorporation of the system into our business processes and improvement in the functioning of the system. We have also benefitted from the staff becoming more accustomed to these changes and better communication with our claimants, including in their primary language.

This Plan focuses on:

• Improving the Measurement and Management of our CAPS;

• Getting better at our Core first;

• Maintaining the progress we have made; and

• Targeted, prioritized plans to get better

Mass DUA has adopted a Mission Statement:

Our job is to get it right the first time, and to do so timely, while:

? Delivering friendly and professional service to all of our customers;

? Protecting the UI Trust Fund, and combating fraud in all forms;

? Reliably assisting claimants with temporary income replacement and re-employment efforts;

? Helping businesses grow and prosper in Massachusetts; and

? Equipping our team with tools and training to empower our staff and challenge them to be the best.

While we are of course faced with reduced resources due to the improving economy, the financial situation hit a wall in March 2016, with our announced reduction in force and closure of two of our call center offices. The timing of this reduction made improvement difficult during the change, but provides DUA with the opportunity to review all of its processes for efficiency. To that end, we engaged Accenture to assist in the review of our call center operations, tax processes and UI system operations. Their work has helped quantify needed remedies, advocate for service delivery changes and given the agency a roadmap for ongoing improvement and planning for a more flexible workforce.

We have had some real successes in the past year, including the work done in Lower Authority Appeals (hearings) and Tax Audit. Both of these areas adhered to strict management goals and met their ALPS after years of being unable to do so. The Hearings Department cut their average case aging from more than 60 days to under 20 days in a matter of months, despite the loss of nearly 20% of their hearings officers. Today, they are passing all three timeliness metrics and are doing so with even more staffing reductions, without sacrificing quality which they continue to meet.

We are knocking on the door of other successes and feel strongly we will achieve ALPS in areas including Tax Quality, Separation Quality and Facilitation of Re-employment, and we have brushed close to success with Timely First Payments but not sustained. Others may be more of a challenge, but we are dedicated to ensuring we move Massachusetts ahead, and showing we can be a high performing state, not a high priority state.

Business process redesigns to make timely first payments and timely non-monetary determinations have been tested and changes are imminent. We are also improving the manner in which we identify BYE issues and finding better ways to recover overpayments.

We are incredibly optimistic about what we can achieve and we have a plan to not only get there, but sustain success. It is outlined herein.

B. FEDERAL EMPHASIS (GPRA GOALS)

Improving State Capacity to Administer and Operate the UI Program Effectively

We have introduced a mission statement for DUA which is the key to our priorities. Timely First Pay, Timely Hearings, Employer Registration, Overpayment Detection and Collections Metrics are a few of the many agency-wide standards for success included in the Management Goal and Performance Reviews for every manager at DUA. They are all being measured based on the success of the whole, as well as their individual contributions.

We worked with Accenture to develop a capacity model of claims-taking and adjudication, so we can use flexible staffing in the future, to better deal with seasonal needs. For example, where we may have hired a seasonal claims taker to work on the phones Monday through Friday, our data shows we would be better served hiring 2 people to work Monday and Friday, since those are the days we get the most calls.

We have worked with others in Minnesota, Connecticut, Rhode Island, Florida, Texas and Utah in the past year and we will continue to collaborate with peers to find best practices across our organization. This led to better use of scheduled call-back for calls, better reporting, improved fraud reduction practices, and processes to properly identify areas where auto-adjudication is most effective and accepted. We also shared some of our work in the area of services for claimants with limited English proficiency. These collaborations are often in partnership with NASWA, UWC or the Regional Office and they are invaluable and DUA will continue to be engaged in these opportunities.

We learned this year how important ongoing training is for the organization. We had hundreds of staff change jobs or leave the agency between April and June as part of our reduction in force. The lost time in transition hurt productivity, and is difficult to dig out of with reduced staff, but we are exploring different ways to be successful.

As part of our Accenture project, we piloted a service delivery model change where we focused a handful of adjusters on just TFP claims – and allowed them to assign issues to themselves. 87% of the pilot group were paid timely versus 73% of the control group. That has prompted us to take two steps: 1. Allow all adjudicators to self-assign issues when working on a claim and 2. Move forward a change which will create teams of adjudicators working exclusively on timely separation and non-sep issues to maximize our results.

While our training department was reduced significantly, we are expanding their role from working only with Claim adjudication, to developing training for Tax, BPC, and other areas. Fortunately, we have a lot of material used locally in each group to train in our recent re-organization, so the charge

of the training department is primarily to organize those better and ensure they are maintained, and use strong training principles.

Improving Prevention, Detection and Recovery of UI Improper Payments

The focus in this area is threefold:

1. Incorporate online work-search logs which retain the information week to week. This will put a focus on work-search compliance and ensure easier analysis and retention of key data elements that can cause worksearch failure;

2. Secure court judgements in claimant overpayments. This will allow us to seek wage garnishment and bank account levies against those capable of repayment who fail to pay and avoid tax intercept or UI offset; and

3. Improve the NDNH and other crossmatches, including those using the AWARE tool. Just recently we finalized a major overhaul of the way NDNH is used and we are already seeing the results. We want to continue to review and improve crossmatches to use analytics as a tool to point our adjudicators in the right direction and leverage best their valuable time. We also partnered recently with county sheriffs to test how we can best use their data to prevent fraud, and we will be using that work to develop further tools.

Improving Program Performance

Mass DUA believes in accountability and we share our results routinely with the Regional Office, as well as the Mass Secretary of Labor, to show where we are in our metrics. We report these metrics to our team often, including some on a daily basis in stand-up meetings across the claim centers.

Mass DUA is also a dedicated proponent of the UI Performs programs, and we invest in those programs. Last year we reported Benefit Data Validation for the first time in the new system, knowing we would not pass. We were however, committed to being measured so we knew how to get better.

Importantly, we incorporate learning from the BAM and BTQ programs, as well as TPS and DV, into our operations. BTQ is linked to our Policy, Training and Call Monitoring programs, to ensure a full picture to best learn and train. In fact, I was at a stand-up meeting this morning in the Boston Call Center where supervisors were talking to staff about rebuttals and workload credit, on a random Wednesday, reminding them of issues arising from BTQ – and ensuring each had the most recent version of the workload credit guide. While anecdotal, it is symptomatic of the integration of these programs into our work.

Workforce Innovation and Opportunity Act (WIOA)

DUA is party to every local workforce MOU on WIOA and has signed onto the Combined Plan for Massachusetts. While admittedly challenging to participate actively in all of the planning sessions of the 16 WIBs working this year to create 16 different plans for upcoming years, DUA is working to

ensure both our voice is heard and our concerns are met in these discussions. We are dedicated to the program, and will continue to be a primary partner in all of the one-stops.

We are working with our partners to ensure we meet the requirements of wage matching for their WIOA reporting, in accordance with Federal and Massachusetts law and regulation, as well as the recent joint guidance we received. DUA sought a state law change to allow sharing with WIOA partners for WIOA mandate reporting, and in early 2016 that change was made. DUA has signed MOUs with WIOA partners for data sharing as part of the preliminary performance measure stage in 2016. DUA will ensure we provide the data needed for our partners to comply with WIOA reporting requirements.

DUA has a long history and a current continued commitment to provide walk-in service across the Commonwealth, within one-stop centers. Beyond the requirements of WIOA, UI services are available at 27 one-stops plus one UI-only walk-in center in Boston.

The past two years we have had more than 230,000 visitors per year come in for UI services. This year, we reduced the amount DUA funded to those one-stops, as part of our RIF, but we also changed the delivery model. Now 11, not 5, of the one-stops have a DUA employee providing those services rather than a DUA-trained staff person. Perhaps more significantly, the DUA staff person now in 9 of those locations is able to adjudicate issues on the spot, rather than being limited to claims taking and navigation. Previously only the Boston UI Walk-In offered that service.

We are also working with the Department of Career Services (DCS) and other WIOA partners in reviewing potential common intake systems, which will allow registration for work along with the beginning of the claims process. With nearly 80% of our initial claimants using UI Online, we are prime candidates to integrate our claimants with DCS for an electronic registration and assessment system.

A law change in 2016 also allows DUA to more freely share information with DCS, to help them achieve their goals. While confidentiality rules apply, this strengthens our partnership with our sister agency, and makes collaboration with DCS for WIOA much smoother.

Other places we have and will continue to partner with DCS in the spirit of many of our joint programs include: Workshare, RESEA, TRA/TAA, Rapid Response, and the Training Opportunities Program (Section 30) that provides extended UI benefits in conjunction with DCS approved trainers.

Reemployment of UI Claimants

Massachusetts has a strong RESEA program and we are expanding our efforts in this area, as referenced above. Our work in a common intake system, while available for WIOA, is inspired by our desire to get job seekers connected with DCS immediately, as part of an integrated benefit process.

A recent law change in Massachusetts extended the application period for Section 30, to 20 weeks from 15. This highlights a work-around which we want to remedy.

Claimants should not wait 15 or 20 weeks to understand if they need training to close a skills gap, but the best way to get them into training or back to work fast is to reduce the amount of time it takes to move from DUA to DCS and into the training or job market. Online skills assessments, integrated resume development, and immediate LMI are just a few of the ways we are looking to expand services for UI job seekers. WIOA gives us a great opportunity to move this swiftly.

Addressing Worker Misclassification

Massachusetts participates in CUE (Council on the Underground Economy) activities, with a sole focus on uncovering and remedying worker misclassification. DUA works on referrals from a number of sources, including the IRS, OSHA and RMV. Further, our focus on this over the years has yielded excellent results in our tax audits, finding nearly 5 workers per audit over the past 5 years.

We have improved the efficiency of our audits, which gives us more opportunity to visit more sites. That contributed to passing the tax audit ALP this year, in all categories. We expect to sustain that success in the future, and through the use of SBR funds we plan to streamline the collection of funds for those uncovered employees, which will better show the employers the consequence and reduce manual work our auditors perform today.

Strategic Goal – Make Timely Benefit Payments

Target: 87.5 percent of intrastate first payments for full weeks of unemployment compensation will be made within 21 days from the week ending date of the first compensable week.

This is a cornerstone of UI, and at the Core of our focus to improve. Frankly, as we focus on our Core first, we expect to succeed here faster than some other areas and we are willing to lose ground in some areas while we prioritize where we get better fastest. This is the top of the list.

Like other areas, our plan is to get better and maintain our ground, so we want to make this happen in a sustainable manner, without giving back gains in timeliness of hearings and employer registration, or tax audit improvement.

A service delivery model, TFP teams, adjudicators empowered to work all the issues on the claim – these we have tested and we know they work. While not going back to the prior method, where a staffer owned the claimant forever, we are maintaining the integrity of the new system of next-up, but using it in a way that limits the productivity loss of multiple people learning the details of a particular issue or claim.

While we focus on timeliness, we are committed to preserving our improvements in quality. While we plan further quality improvements as part of a CAP, those are largely expected to come after we implement our timeliness plan. A sustainable process to ensure timeliness must also ensure quality standards are met.

The next-up FIFO approach to issues puts a 3 week old, non-time lapse dependency allowance issue ahead of a separation issue with 3 days to pay. When a backlog develops, it makes it nearly impossible to make timely payments, which is where we are right now. By turning the process

around a bit, we can meet timely standards. By leveraging flexible staffing plans like those we have developed for the future, we can avoid the growth of those backlogs.

We have made some changes to pre-date processes which were the top cause of delay at one point last year. We also implemented robo-calls reminding claimants to certify for weekly benefits, as we found at one point that more than 10% of timely failures were attributable to people not claiming the weeks. While some of those have helped, there is more to do.

More specifics of our Plan can be found in the Corrective Action Plan and Narrative for First Payment Promptness.

Strategic Goal - Detect Benefit Overpayments

Target: Overpayments established will be at least 61.4 percent of the estimated detectable, recoverable overpayments.

Like most states, detectable overpayment failures are most frequently worksearch failures, and as such Massachusetts is taking steps to remedy this problem. The cornerstone of this plan is adoption of an online work search log attached to a claimant's account. Nearly 80% of claimants use UI Online to file claims. Most also use UI Online to claim benefits each week. By adding a log which captures required data elements and is retained for future claimant use, the log should serve as a tool to assist not only the claimant in their re-employment efforts, but also the DUA in preventing overpayments.

As more and more of our efforts to prevent overpayments rely on effective use of data, our lack of information on worksearch is astounding and needs remedy. Data capture will allow us to analytically review information, better target activities more susceptible to overpayment, and not only increase our detection, but more importantly, reduce our total improper payment rate.

Just a year ago, claimants informing DUA of their failure to actively seek employment did not impact them – it did not even create an issue to be reviewed. Today that is no longer the case. Now thousands of issues a month are being created and adjudicated. While this is a great improvement, it is not sustainable in its current form. We are in the process of reviewing the way we review these issues, and how best to combine the Able, Available, and Actively Seeking requirements into consolidated fact-finding. We expect to have a new process and new questionnaires in place in 2017.

Strategic Goal - Establish Tax Accounts Promptly

Target: 88.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Massachusetts has failed to reach the target of 88% of new employer status determinations resolved within 90 days of the first quarter in which liability occurred largely due to employers failing to register in a timely manner. We have implemented several strategies designed to prompt employers to register with DUA and begin paying contributions when they are due. DUA is currently at 85.7%.

DUA utilizes the following cross-matches with other state agencies to obtain information on possible employers subject to registration:

• Newly registered corporations (and LLC's) from the Secretary of State's office

• All new and transferred liquor licenses issued by the Alcoholic Beverage Control Commission

• Corporations with active licenses from the Department of Licensure

• Quarterly reviews to identify employers that have filed withholding tax with the Department of Revenue, but are not registered with DUA• DUA has an agreement with the Massachusetts Lottery Commission to cross reference the list of current lottery vendors to verify registration as an active employer if subjectivity applies • DUA is working towards an agreement with the Massachusetts Registry of Motor Vehicles to cross-reference the list of current businesses holding commercial license plates to verify registration of an active employer if subjectivity applies. A new law in Massachusetts requires employers to obtain a certificate of good standing from DUA prior to engaging an employer in a contract for goods or services over $5,000. We believe this requirement will steadily increase employer registration. While not incorporated in our plan, there are legislative proposals to increase the requirement for the use of certificates of good standing well beyond state contracts, and still others that would provide DUA with the ability to issue stop work orders in cases of non-compliance. Certainly punitive measures are tools to assist, but our work relies largely on thorough use of data from the benefit area, as well as collaboration with other states and other state and federal agencies, to best ensure compliance and drive success in this area. DUA is also working on improvements to the Employer Registration process to reduce downstream manual work in Research and Finance, and to ensure these are accurately and efficiently handled by DUA, given that processing delays can also contribute to any failures in this area. Strategic Goal – Employment Rate at 2nd Quarter After Exit Target: TBD Massachusetts DUA and DCS agencies are working together to maximize success in this area. Directionally we are aligned, and DUA is committed to helping drive some practices and policies which encourage the robust interaction of our claimants with DCS and their nearly 30 one-stops, as early as possible in the claim. Further, we want to see technology leveraged to make that interaction efficient and focused for both the staff and the claimant – to minimize paperwork and maximize re-employment assistance. Our long partnership in the Reemployment Services and Eligibility Assessment (RESEA) program and REA programs have demonstrated the commitment we share in getting job seekers back to work. DUA has taken a larger role in that, helping ensure the program is truly owned by both agencies, and sanctions for failure are meaningful. We are working together on a common electronic front door, allowing and encouraging claimants to get registered for work immediately. With nearly 80% of claimants filing online, we feel strongly that large segments of our population can be well-served by a more rigorous electronic system, not just for registration, but for assessment, work search logs, resume development, labor market information and job matching. Much of this can and is done today, but a common intake between DCS and DUA will ensure ease of access for those able to leverage the technology. We are exploring stronger regulations on registration for work as part of the initial claims process. We are also working to strengthen the rules for training exceptions in UI, to ensure the hallmark of that program is a clear, tangible skills gap assessment within the first few days of their claim, not the first few weeks. We know that faster and more efficient integration of the job seeker and the one-stops will lead to the best results as we seek to meet the goals ETA will set in this area in the future. C. PROGRAM REVIEW DEFICIENCIES

N/A D. Program Deficiencies N/A E. I. REPORTING DEFICIENCIES There are currently two (2) reports which have not been filed: 1. 227 – The 227 report has for some time not tied perfectly, and has benefited from acceptance of these reports with marginal discrepancies. In July, ETA began requiring this report tie perfectly, but the DUA 227 report is not there yet. In order to remedy this, extensive programming is required which may not be realistically completed in 2016. The expectation is to ensure this report is correct and submitted no later than June, 2017, although we are working to make that happen much faster. This is expected to be a long delay. 2. 9129 – The 9129 is delayed as ETA information is causing our submission to error. ETA is required to update their information. This is expected to be a very short-term delay. F. CUSTOMER SERVICES N/A G. OTHER N/A ASSURANCES The State Administrator, by signing the SQSP Signature Page, certifies that the state will comply with assurances as outlined in ET Handbook 336, 18th Edition: Unemployment Insurance (UI) State Quality Service Plan (SQSP) Planning and Reporting Guidelines, Chapter 1, Part VII: Assurances. Assurance of Contingency Planning In 2012 an independent consultant was engaged to modify the IT Contingency Plan. This modification took into account the changes to contingency planning with the new system architecture. This work was completed in June of 2012. This plan is reviewed and updated to reflect system modifications and personnel changes; the most recent update was in May, 2016. Assurance of Automated Information Systems Security In 2011, an independent consultant was engaged by DUA to perform a risk assessment. This assessment was completed in July 2012 and consisted of an assessment of the UI Benefits system, an assessment of the UI Online Revenue system, an assessment of the EOWLD Telephony system, and an assessment of the UI Fraud Prevention and Detection System involving National Directory of New Hires. DUA also reviews the SSP and updates accordingly. The review and plan, last modified in 2014, is currently under review and will be updated in 2016. PROGRAM INTEGRITY ACTION PLAN Massachusetts Federal Fiscal Year: 2017 Accountable Agency Official(s): Brian O'Connell DUA Director of Program Integrity Summary: Over the last year, DUA has made several changes to improve the scope and direction of the Program Integrity Department. During the second quarter of 2016, DUA went through a reorganization. As a result, DUA has developed and implemented several key strategies aimed toward improving performance in the detection and prevention of overpayments. DUA has four key strategies in our Integrity Action Plan. These strategies are centered around staff improvements, a crossmatch focus, enhanced technology, and new collection processes. The plan for improvement is an ongoing process. In August of this year, DUA implemented a much anticipated and improved National Directory of New Hire (NDNH) crossmatch. This crossmatch, coupled with a revision of the AWARE Fraud Detection system already in place, is expected to lead to significant improvements in the reduction of improper payments in Massachusetts. DUA is also reviewing its current technology to pursue and identify fraud before it occurs. We plan on targeting the improvements listed below during the 2017 and 2018 Federal fiscal years. Staff Improvements In February of 2016, the DUA hired a new Director of Program Integrity. Upon hire, the new Director initiated a thorough review of the business processes in place. This process, which is still ongoing, lead to the implementation of new policies and procedures, which has improved performance in a number of areas. The Director participates in the Council on the Underground Economy, which is a beneficial networking group with investigators from other Massachusetts agencies brought together to discuss, discover, and report new fraud schemes seen across the Commonwealth. In June of 2016, the DUA added seven Job Service Representatives to the Program Integrity Department as part of a reorganization process. The additional staff will provide the department with the ability to adjudicate issues timely, leading to a rise in the number of recoverable overpayments. Training classes are planned with the goal of streamlining the adjudication process, which will improve the overall performance of the team. In

September of 2016, the Director began the process of identifying and soliciting new team members to participate in a cross-functional Integrity Task force. The Director will facilitate a monthly task force meeting where team members will develop and implement a strategic plan to improve the UI improper payment rate. Technology Improvements DUA continues to work with On Point Technology LLC to implement an improved NDNH crossmatch. Crossmatch hits do not suspend payment. Rather, NDNH crossmatch hits trigger our UI Online system to send fact-finding questionnaires to the claimant and the employer. The responses to the questionnaires are reviewed by Integrity Department staff members and eligibility determinations are issued by trained adjudicators. Crossmatch hits will be tracked for several months to determine the quality of leads, with the potential for additional enhancements to the crossmatch algorithm. At present, DUA does not require individuals to report to the state agency as a result of an NDNH crossmatch hit as the quality of the hits are still under evaluation. It is anticipated that the AWARE solution will produce a high number of quality leads where claimants are collecting unemployment benefits during weeks in which they began new employment. DUA is also planning to work with our IT Department to automate crossmatches, including an expanded prisoner crossmatch. Through an outreach effort, a number of Massachusetts county correctional facilities have begun providing the DUA with inmate lists, which are crosschecked against UI records by staff manually. The number of county facilities providing information is expected to grow in the near term. Automating the prisoner crossmatch program, where the hits are generated by the system, will greatly increase staff production and streamline the process. Staff members will spend less time manually crosschecking lists and more time investigating hits and issuing determinations. In addition, our IT Department currently provides us with an initial claims crossmatch that identifies claims potentially filed by a software program. This crossmatch has provided several successful leads and has helped prevent fraudulent claims from being processed. AWARE Fraud Detection Solution The Program Integrity Department is in the process of evaluating all of the systems available in the AWARE software package in order to get maximum results from the product. While much of the focus has been on the new NDNH system that has the potential to improve the performance of the department, additional review of the cross-match data currently in place is required. The initial review found that many of the cross matches in place did not have enough data to provide results. At present, the most impactful crossmatch our staff utilize in the AWARE system is the quarterly wage cross match. The system matches claims against quarterly wages submitted by employers to determine if claimants have been working while collecting UI simultaneously. This cross match has provided significant results. The vendor conducted an online training in March of 2016, which led to more detailed queries and improved results. DUA will work with OnPoint Technology LLC to enhance the crossmatches in place and set up new “One-Click” tools where staff can run preloaded queries with one click in the system. Some examples of potential improvements are the completion of the Death Master File crossmatch, where the system will find high-jacked claims after crossmatching the Massachusetts vital statistics death records against continued claims. This query looks for claims that have been taken over by a third party after the claimant’s death. Program Integrity staff members will investigate crossmatch hits and issue eligibility determinations. DUA will explore the possibility of enhancing and automating the Incarcerated Claimant Crossmatch as inmates drawing benefits while they are incarcerated appears to be a growing trend. DUA runs an internal query with our IT department as mentioned above but the content and scope of the data had been difficult to determine. Many facilities now provide monthly lists of inmates which Program Integrity staff reviews against current claims by hand. This is time consuming and a relatively new process. DUA is looking into automating the process through an AWARE one-click where inmate reports from all of the prison facilities in Massachusetts could be crosschecked. Program Integrity staff members

will investigate crossmatch hits and issue eligibility determinations. DUA will continue to communicate with On Point to explore other products that may be more useful than the one-clicks in place that are no longer functioning to find the products that will provide the best results for our Agency. New Collection Strategies One of DUA's goals is to enhance collection activities for claimants who have been overpaid UI benefits. We are currently reorganizing the Collections Unit staff to streamline and expedite some of the enforcement processes. A review of past practices and programs is being conducted in order to focus resources on the areas with the largest return on investment. We will be reorganizing staff and focusing more resources on the process. As part of the staff reorganization, we will also be reinforcing our bankruptcy unit to ensure that all possible dollars available for recovery are being pursued. The DUA has seen very large returns with our participation in the TOP (Treasury Offset Program) in 2015. Recent changes to the Massachusetts statute allow the Agency to participate in this program. For many years DUA participated in a "State only" tax intercept, which provided modest recovery of overpaid benefits. The TOP intercept program, in collaboration with the state tax intercept program, has become our largest source of collection recovery. We are looking to strengthen these programs and ensure that all technical issues are corrected by the first of the year (2017) to ensure the maximum amount of collections in the upcoming tax return season. The DUA has also continued an ongoing dialogue and regular meetings with Special Agents from the US Department of Labor, Office of the Inspector General in conjunction with the Massachusetts Attorney General's Office to discuss possible prosecution of some of the larger out of state fraud rings we have encountered. The DUA is in the process of updating our regulations and will be embarking on a state wide listening tour to solicit feedback from our constituents. We have discussed possible changes with both the overpayment recovery procedures and the waiver process in order to ensure the efficiency of the collections process. The DUA is initiating a garnishment program. DUA will work with the Massachusetts Attorney General's office to identify overpayments and file civil suits seeking to garnish wages or attach property owned by a claimant. We anticipate this program will provide an increase in collections activity as any claimant who has been overpaid can potentially be brought into court with a judgment issued if the case if successful. Program Integrity Milestones Target Dates 4th qtr. 2016 1st qtr. 2017 2nd qtr. 2017 3rd qtr. 2017 Improved AWARE Queries • Deceased Claimant • Owner Officer • Prisoner Cross Match • Fraudulent Employers X X X X Collections Process • Completion of Robo Calls • Treasury Offset • Court Actions X X X

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.

Please Refer to Appendix 2 Attachment M.

The federal portal does not provide the ability to include this section in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

F. ASSURANCES

The State Administrator, by signing the SQSP Signature Page, certifies that the state will comply with assurances as outlined in ET Handbook 336, 18th Edition: Unemployment Insurance (UI) State Quality Service Plan (SQSP) Planning and Reporting Guidelines, Chapter 1, Part VII: Assurances.

i. Assurance of Contingency Planning

In 2012 an independent consultant was engaged to modify the IT Contingency Plan. This modification took into account the changes to contingency planning with the new system architecture. This work was completed in June of 2012. This plan is reviewed and updated to reflect system modifications and personnel changes; the most recent update was in July 2015.

ii. Assurance of Automated Information Systems Security

In 2011, an independent consultant was engaged by DUA to perform a risk assessment. This assessment was completed in July 2012 and consisted of an assessment of the UI Benefits system, an assessment of the UI Online Revenue system, an assessment of the EOWLD Telephony system, and an assessment of the UI Fraud Prevention and Detection System involving National Directory of New Hires.

DUA also reviews and updates as necessary the SSP annually. The review and plan were updated in 2014 and remain current.

F. CUSTOMER SERVICES

N/A

G. OTHER

N/A

Signed copies of Corrective Action Plans are maintained with DUA and the ETA Regional Office.

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.

INTEGRITY ACTION PLAN Massachusetts Federal Fiscal Year: 2016

Accountable Agency Official(s): David Martin DUA Director of Program Integrity

Summary: DUA has specific plans to make the Program Integrity Unit even more robust in the upcoming years. DUA has four key strategies in its Integrity Action Plan: cross–matches, new staff, new collection strategies and technology. After UI Online went live July 1, 2013, DUA launched AWARE (Aggregate Workforce Analytics Reporting Engine) in November 2013. DUA has put this software to full use and will continue to analyze new ways to prevent fraud through this software tool. The Program Integrity Unit has seen a shift in leadership which DUA hopes will revamp, create

and strengthen how the Unit pursues and recovers fraud. DUA is in the process of developing new processes to collect debt and make claimants aware of an existing overpayment. DUA is also reviewing its current technology to pursue and identify fraud before it occurs; we plan on targeting some improvements in our access in FY 2016.

AWARE and Cross–matches: DUA has used data from AWARE to develop cross–matches which were not available prior to the implementation of UI Online and AWARE. Since AWARE has been put into place, DUA has been able to prevent the payment of more than $25m of fraudulent benefits in one scheme alone. DUA continues to work with other State and Federal Agencies to have new data from other sources loaded into the AWARE package to create additional cross–matches. Below are new cross–matches DUA has started in AWARE.

• Out of Country Claims: DUA runs a weekly cross–match to determine which claimants are certifying their weekly benefits from outside the United States; bringing their availability into question. AWARE provides a list of all IP addresses and those claims are reviewed weekly within Program Integrity. • Multiple Bank Accounts: DUA runs a weekly cross–match to look for bank accounts used for more than one claimant. This has been helpful in finding possible fraud cases. • Suspicious Bank Accounts: DUA has been able to identify certain criteria high in fraud pertaining to specific banks. DUA uses this query to review for possible fraud. • Multiple Claims to One Address: This cross–match shows when multiple checks for different claimants are being sent to a one address. This query has also been helpful in identifying fraud, often before it occurs. • Multiple Email Addresses: This query looks for different claimants using a common email address. • Secret Question and Answer: DUA has also found a commonality pertaining to fraud in which similar secret questions and passwords are used. This report is also run weekly. • Owner/Officer: This will give DUA the ability to cross–match to ensure that business owners and/or officers are not fraudulently filing unemployment benefits. • Timed Cross–match: DUA has identified that fraudsters have developed computer programs that run a script to try and set up bogus DUA claims using stolen ID's. DUA has recognized that these initial claims are filed much faster than if someone had to manually enter an initial claim themselves. We currently work with our IT department to get this list, but believe it would be better housed in the AWARE program. • Fraudulent Employers: DUA has found an influx of fraudulent employers that are set up with the sole intention to file fraudulent unemployment benefits. DUA has found that these fraudulent employers are set up with subject dates older than a year and immediately start to have unemployment claims filed against them. • NDNH (National Directory of New Hires) Cross–match: The DUA is reviewing its process to detect and set up overpayments based upon NDNH cross matching as the current process has a lower than expected overpayment set–up rate. It is anticipated that when complete this cross match will be more effective in detecting and preventing current fraudulent benefit year earnings collectors from obtaining future benefits. • Similarly, DUA Program Integrity is beginning a review of all of its current cross matches to determine their effectiveness and to search for potential improvements and/or automation. This review of all Program Integrity cross matches will take some time but should result in a more effective use of Program Integrity staff and resources and reduce benefit year earnings overpayments.

New Staff: DUA has made several staff changes within the Program Integrity Unit. In May 2015 the Program Integrity Unit was shifted under the Chief of Staff. This shift allows BAM and Program Integrity to work together more closely. These are DUA's units focused on combating claimant fraud and the determining of the agency's success in combatting claimant fraud. Program Integrity

continues to share fraud referrals with Revenue Audit and have worked together on multiple investigations. When Audit discovers employee misclassification, a referral is made to the Program Integrity Unit to make sure that the individuals are not collecting unemployment benefits. The Program Integrity Unit will also refer cases of working and collecting directly to Revenue Audit to ensure employers pay delinquent unemployment taxes. Program Integrity has become more involved in the Massachusetts Joint Task Force on Underground Economy, allowing Program Integrity to work with other Massachusetts Agencies to discuss, discover and report new or current fraud schemes seen throughout the State.

DUA hired a new Program Integrity Director in January 2015 and moved the unit in June from the Revenue Department to the Office of the Chief of Staff. We believe this change in leadership and operational escalation of the unit will lead to improved pursuit and detection of fraud and recovery of overpayments.

DUA also used SBR funds to hire new staff. Five Compliance Officer II's were hired to pursue fraud both internally through cross matches and externally through business site visits. A Program Coordinator III was added to assist with the collecting of data through various cross–matches, analyzing trends and new fraud queries.

New Collection Strategies: DUA has sought to bolster collection activities for claimants who have been overpaid. The DUA made robo calls through funds granted by an SBR to thousands of claimants with past due overpayments. DUA is considering using this platform going forward.

DUA also began participating in IRORA (Interstate Reciprocal Overpayment Recovery Arrangement) in 2013. IRORA is an agreement among states to collect overpayments of unemployment benefits for each other. States can enter into separate agreements among themselves, but the IRORA gives states a standardized approach to recovering overpayments for each other on a cooperative basis. This program has been live since May 2014 and fully operational since June 2014. More than $100,000 has been recovered in total between dollars collected by other states for DUA and dollars collected by DUA and sent to other states to satisfy the other states' overpayment.

DUA is also ready to participate in the Treasury Offset Program (TOP) for IRS tax intercept. Recent changes to Massachusetts law allow the Agency to participate in this program. So far in 2015 DUA has intercepted more than $4.5M in state tax intercepts. DUA believes that the TOP intercept should at a minimum double that amount for the next full tax year and will generate some tax intercepts for the DUA Trust Fund in 2016 as well.

DUA has also begun an open and ongoing dialogue and regular meetings with Special Agents from the US Department of Labor, Office of the Inspector General (OIG). DUA has stepped up its prosecution of cases both through the Attorney General's office as well as the OIG and expects an increase in restitution agreements as a result.

DUA is also exploring the possibility of garnishing wages in order to pay off aging UI debts. Wage garnishment would bring a substantial amount of money into the DUA UI Trust Fund.

Technology: DUA has identified certain technology based areas in need of improvement. DUA has gained access to CJIS (Criminal Justice Information System). DUA recently detected a large volume of falsified claims using a refined query. By identifying these at the initial claim stage, DUA successfully avoided making payments. The fraudsters have begun to respond to identity verification fact–finding with falsified documents (driver's licenses, passports, social security cards) in an attempt to have the identity verification issue overturned. CJIS has allowed Program Integrity investigators the ability to crosscheck driver's licenses to ensure the claimant is whom they claim. Program Integrity management also has access to Accurint, a data mining tool offered by Lexis Nexis. Accurint provides access to a significant amount of identity information and is sometimes necessary when dealing with questionable claimant identity information.

DUA has also worked with our IT department to track and block phone numbers coming into the weekly certification line from outside the country. Program Integrity is also setting up availability issues for claims which are later determined to have been generated for or by an out of country claimant. This has allowed DUA to identify possible claimants whom are not available or not looking for work. DUA has also started working with the Registry of Motor Vehicles to start a cross match against claimants addresses to look for inconsistencies.

DUA has also implemented a new Investigations phone line for all CO II's. Previously if a fraud tipster contacted a unit other than the investigators in Program Integrity, they would have been told to hang up and call the Fraud Hotline, an (800) number. With the new phone line internal callers can transfer these calls to investigations without any problem.

Despite these successes, DUA recognizes that we still have improvements to make related to BYE issues/overpayments. DUA is working with OnPoint and their AWARE technology to detect and prevent more benefit year earning overpayments by improving and expanding use of the National Directory of New Hires (NDNH) and our State Directory of New Hires. The NDNH cross match system has less than a 20% success rate in detecting potential overpayments. To address this issue, DUA requested and received SBR funding to contract with OnPoint to refine the parameters and incorporate NDNH into the existing AWARE process. DUA expects that this effort will result in increased detection and prevent more benefit year earning overpayments.

Program Integrity Milestones Target Dates 3rd qtr. 2015 4th qtr. 2015 1rst qtr. 2016 2nd qtr. 2016

Cross Match Evaluation • NDNH • Report of Hire • Prisoner Cross Match X X

X

X X X Collections Process • Civil Actions • Treasury Offset • IRORA (fixing small defects)

X X X

INTEGRITY ACTION PLAN MASSACHUSETTS FEDERAL FISCAL YEAR 2016

Accountable Agency Official(s): David Martin DUA Director of Program Integrity

Summary: DUA has specific plans to make the Program Integrity Unit even more robust in the upcoming years. DUA has four key strategies in its Integrity Action Plan: cross–matches, new staff, new collection strategies and technology. After UI Online went live July 1, 2013, DUA launched AWARE (Aggregate Workforce Analytics Reporting Engine) in November 2013. DUA has put this software to full use and will continue to analyze new ways to prevent fraud through this software tool. The Program Integrity Unit has seen a shift in leadership which DUA hopes will revamp, create and strengthen how the Unit pursues and recovers fraud. DUA is in the process of developing new processes to collect debt and make claimants aware of an existing overpayment. DUA is also reviewing its current technology to pursue and identify fraud before it occurs; we plan on targeting some improvements in our access in FY 2016.

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GRAPHIC: PROGRAM INTEGRITY MILESTONES AND TARGET DATES The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Signed copies of all charts/graphics related to the IAP are maintained with DUA and the ETA Regional Office.

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.

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

A signed copy of the Organizational Chart is maintained with DUA and the ETA Regional Office.

7. SQSP SIGNATURE PAGE

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

A signed copy of the SQSP Signature Page is maintained with DUA and the ETA 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:

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

(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.

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

(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.

INSERT SQSP PACKAGE? or Reference to Attachment XXX?

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

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.

See Appenix 2, Attachment M.

Please refer to Appendic 2, Attachment M

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

(A) ECONOMIC PROJECTIONS AND IMPACT

States must:

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D))(MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

Massachusetts Unemployment Rate and Job Growth

As discussed in the economic analysis Section I. Strategic Elements of the Massachusetts WIOA Combined State Plan, Massachusetts's positive economic impact on the regional and the national economy is a result of the state's performance and job growth in the Professional, Scientific, and Technical Services sector. The fastest growing occupations tend to be those with education-intensive fields such as IT, life sciences and management.

While Massachusetts's current unemployment rate of 4.6% is below the national average of 5.1%, the long-term unemployment however remains high. The long-term unemployed are people who have been looking for work for 27 weeks or longer.According to a 2015 Bureau of Labor Statistics analysis of unemployment data, in Massachusetts the long-term unemployment is 34.7%.[1] According to the same study of unemployment data, "the incidence of long-term unemployment increases with age. In 2014, for example, 22.1% of the unemployed under age 25 had looked for work for 27 weeks or longer, compared with 44.6% of those 55 years and older."

Older Workers and MA-SCSEP Participants profiles

Older Workers (55-64) make up the third largest population share at 16.9% of Massachusetts workforce. The largest percentage (70%) of MA-SCSEP participants is very low-income individuals at or below the Federal Poverty Rate. The majority of these workers (75%) are ages 55-64 and relies on public assistance. In recent Program Year 14 (July 1, 2014-June 30, 2015) MA-SCSEP served 321 individuals. Most participants were female 65% (209) and 35% (113) male.

Based on the recent *New England Community Outlook Survey Report August 2015* by the Federal Reserve Bank of Boston individuals with an education level below a Bachelor's degree experience the highest percent of unemployment.

As discussed in the economic analysis section, One-Stop Career Center customers reflect these data trends of individuals with less education were unemployed and in need of services. In FY14 nearly 50% of the customer base had a high school diploma or less. Most MA-SCSEP participants have less than a Bachelor's degree. In PY14 the majority (73%) of MA-SCSEP participants had low employment prospects[1] and 26% failed to find employment after using WIA Title I.

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[1]Low employment prospects means the likelihood that an individual will not obtain employment without the assistance of the SCSEP or another workforce development program. Persons with low

employment prospects have a significant barrier to employment. Significant barriers to employment may include but are not limited to: lacking a substantial employment history, basic skills, and/or English-language proficiency; lacking a high school diploma or the equivalent; having a disability; being homeless; or residing in socially and economically isolated rural or urban areas where employment opportunities are limited.

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[1] Kosanovich, K., & Theodossiou Sherman, E. (2015). Trends In long-term unemployment. Washington, DC: Bureau of Labor Statistics.

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

Most participants are working to overcome multiple barriers to employment while seeking jobs in a highly competitive labor market. The long-term job projections in the Massachusetts economy and job market present a significant challenge to MA-SCSEP. As outlined in Section I, along with Professional, Scientific, and Business Services, Massachusetts' leading job-creating industries are Education and Health Services; and Leisure and Hospitality.

The majority of MA-SCSEP participants seeks and obtains entry-level part-time jobs with a flexible schedule. Therefore, realistic expectations for this population is in creating career pathways that will enable these individuals to obtain entry-level positions and perhaps to move into higher skilled occupations with time. It is expected that entry-level positions in the service sector such as Home Care and Food Service will offer the most suitable jobs for MA-SCSEP participants.

EOEA will continue to work with MA-SCSEP sub grantees to provide effective training and employment pathways for the participants. These will include the following major efforts:

• Identify local employers that have workforce needs and are interested in hiring mature workers.

• Identify most likely jobs and training or certificate needed for job placements.

• Identify low-cost training providers.

• Identify interested participants and place them into the relevant training.

• Provide employer incentives, such as on-the-job training.

3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))

MA-SCSEP participants often have gaps in their work histories for the two to three years prior to their enrollment; many have outdated job skills. Other participants have some job skills yet have been unable to find employment due to barriers such as assumed age discrimination, physical limitations, and lack of reliable transportation.

Given the educational and work experience of MA-SCSEP participants, and the projected occupational growth, the most likely unsubsidized jobs will be entry-level positions in the service sector. Most job openings in Massachusetts for entry-level jobs requiring a High School diploma or less from 2012 to 2022 are projected to be in those positions in the service sector that require a low level of computer literacy, mostly soft skills, i.e. punctuality, reliability, verbal communications, and basic customer service skills. Many of these jobs do not provide benefits and do not require a full-time schedule. While for some workers these may be important considerations, for the majority of MA-SCSEP participants these are not barriers to employment. In fact, most MA-SCSEP participants are looking for part-time employment with a flexible schedule.

Most participants reside in subsidized housing and rely on Medicare and/or Medicaid for medical insurance needs. They are looking for positions that will not result in the reduction of these important benefits. It is a well-known phenomenon frequently called the “cliff effect.” When individual relying on public assistance increase his/her earnings so they rise above the official poverty level, they then begin to lose eligibility for earned income tax credit, childcare subsidies, healthcare coverage, SNAP etc. even though they are not yet self-sufficient. Many SCSEP participants refuse higher earnings to avoid losing these public benefits.

(B) SERVICE DELIVERY AND COORDINATION

States must:

1. PROVIDE A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS

This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

MA-SCSEP works closely with the Executive Office of Labor and Workforce Development (EOLWD) to help promote and coordinate SCSEP and WIOA title I programs and the One-Stop Delivery system. State strategies of this plan outline specific steps in pursuit of the goals to achieve the vision for the workforce system. To that end, EOEA will work with EOLWD to enhance the services to customers of the One-Stop Career Centers by:

- Training Career Centers staff on the needs of people 55 and over
- Offering more training classes geared to people 55 and over
- Helping Business Service Representatives (BSRs) establish more effective employer pipelines to hire older workers

(B) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))

EOEA coordinates multiple program and services for elders in the Commonwealth. The MA-SCSEP State Director works with other program directors on coordination of services. Additionally, MA-SCSEP sub grantees work closely with the elder network that include Meals on Wheels programs, Councils on Aging, and other long-term care services providers. Many participants are providing community service at the agencies serving elders in their communities. For example, in PY2014 104 participants provided 44,504 hours of community service in the elder community.

Area Agencies on Aging (AAA) and Aging Services Access Points (ASAP)

EOEA will continue to work with the AAAs, ASAPs and other service providers to coordinate access to the full array of social services. MA-SCSEP sub-grantees refer participants to the local AAA and ASAP Information & Referral specialist and/or caregiver specialist, SHIP Program, and other services in order to make sure they are aware of all the ways they can stretch their limited pre-employment income and also use other supports as needed to remove barriers to employment.

Family Caregiver Support Program

According to the recent report by the Bureau of Labor and Statistics[1] 16% (40.4 million) of the civilian non-institutional population age 15 and older provided unpaid eldercare over the 2013-14 period. Eldercare providers are defined as people who provide unpaid care to someone age 65 or older who needs help because of a condition related to aging. People ages 45 to 64 were the most likely to provide eldercare (23%), followed by those age 65 and older (17%).

The Family Caregiver Support Program administered by the EOEA provides one-on-one counseling, support groups, workshops, and respite, and can help to support family caregivers in SCSEP.

As many participants provide care for their family members, caregivers support is needed on many levels, including peer support and respite. MA-SCSEP will develop a better system of referrals of the interested SCSEP participants to the Family Caregiver support program.

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[1] Bureau of Labor Statistics, U.S. Department of Labor, http://www.bls.gov/opub/ted/2015/40-million-people-provided-eldercare-in-2013-14.htm

(C) ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH-BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

The State Health Insurance Assistance Program (SHIP)

SHIP (SHINE) volunteers are available to assist MA-SCSEP participants in understanding the basics of the Medicare health insurance program, Prescription Advantage Program, coverage gaps, supplemental insurance and prescription drug coverage options. This is important for the MA-SCSEP participants for their financial and healthcare planning.

MA-SCSEP will continue to refer SCSEP participants to SHINE for counseling at local Councils on Aging.

· Councils On Aging (COA)

COAs are invaluable partners in MA-SCSEP. In recent years more and more seniors are referred to the program through the local COAs. EOEA will continue to coordinate services for mature job seekers with the local COAs. COAs often offer meeting and training space, assist with SCSEP outreach and recruitment, and refer eligible individuals to the program.

· Options Counseling

Options Counseling is a gateway for many Massachusetts elders and people with disabilities to receive community supports and services. Options Counseling provides residents across the Commonwealth with objective information about long-term services and supports that can make the difference between people remaining in their homes -- or other preferred residential setting -- or placement in a nursing facility.

The program ensures that elders and people with disabilities have the opportunity to consider long-term support options at a variety of points in the planning process, not just prior to nursing facility admission. The timing and the number of counseling sessions provided depend on a consumer's individual need for information and decision-making support.

Options Counseling service is accessible through the Commonwealth's Aging and Disability Resources Consortia (ADRCs). The counselors are located at ASAPs and ILCs. ADRCs are a local collaboration between Aging Service Access Points, Area Agencies on Aging and Independent Living Centers throughout the state.

EOEA will continue to develop closer working relationships with the local ADRCs and ILCs to provide information about the SCSEP to their network, while ensuring that program participants are aware of the long-term services available in their community.

· National SCSEP Grantees

EOEA shall continue to work with the National Grantee partners that include National ABLE, Senior Service America Inc. and the National Urban League. As the state SCSEP administrator, the Executive Office of Elder Affairs continues to:

- Negotiate the slot exchanges in selected counties as needed;
- Develop the annual Equitable Distribution and the State Coordination Plan;
- Promote collaboration with the One-Stop Delivery System and the recognition and promotion of mature workers state-wide;
- Coordinate the management of the respective SCSEP resources to the maximum benefit of participants, including participant transfer when approved by the Department of Labor;
- Work together to increase efficiency and efficacy of the mutual sub-recipients;
- Refer SCSEP applicants for aging and employment services to local providers;
- Continue partnering on special projects such as job fairs, training, workshops and conferences benefiting older workers especially where sub-recipients are shared;
- Share "best practices" and enhance a coordinated approach to serving all SCSEP participants in the Commonwealth.

(D) ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

EOEA continues to coordinate SCSEP with various state job training initiatives. In recent years, 2013-2015 EOEA piloted a Direct Care Workers training pipeline that provided job training and job placement opportunities for jobs like Personal Care Aide and Home Health Aide. It provided Direct Care Workers with training on the core competencies necessary for this career pathway. During the pilot participants received skill training and obtained direct care jobs in the health care and community care industry.

EOEA will continue to work on this and similar labor market -driven training initiatives.

(E) ACTIONS THE STATE WILL TAKE TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO

ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)

EOEA is an active partner on the both, local and state level. On the state level, EOEA and EOWLD will be working on the umbrella Memorandum of Understanding over the course of 2016.

On the local level, MA-SCSEP sub grantees have established strong connections at the local One-Stop Career Centers. Typically, One-Stops provide resources and space for SCSEP outreach and recruitment specialists. Additionally, One-Stops assist with providing meeting space, program marketing and outreach. Many One-Stops offer mature worker workshops and resume writing workshops.

(F) EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

The Executive Office of Elder Affairs, through its elder network and partner agencies, serves all residents of the Commonwealth, reaching out to local economic development offices in partnership with Workforce Investment Boards and One–Stop Career Centers that regularly engage economic development partners.

While Massachusetts is not predominately a rural state, there are rural communities, especially in central and western Massachusetts. EOEA will identify all economic development offices in these regions and conduct outreach efforts regarding SCSEP and the value of older workers. As the Massachusetts population is aging and the demographics of the state's workforce changes, it is important these discussions include the needs and availability of mature workers. MA-SCSEP will reach out to the Regional Economic Development Organizations. These organizations represent a partnership with the Massachusetts Office of Business Development that will establish a strategic plan for economic development, which supports regionally based efforts to help existing businesses grow to scale and attract new business to the state. MA-SCSEP will work with the Regional Economic Development organization to promote the value of older workers in Massachusetts and their inclusion in the state's economic strategies.

2. DESCRIBE THE LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)

EOEA has been working with the Business Service Representatives (BSRs) at One Stop Career Centers (OSCCs). BSRs work with employers to find qualified new hires through the OSCC system. In collaboration with the Executive Office of Labor and Workforce Development, EOEA will continue to work closely with the BSRs to:

- Raise their awareness about the needs of mature workers
- Educate them on goals and capacity of MA–SCSEP
- Coordinate employer outreach and recruitment

- Develop a marketing plan to better promote and market mature workers to the local employers

3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))

The Executive Office of Elder Affairs, through its elder network and partner agencies, serves all residents of the Commonwealth, reaching out to minority communities through local community service agencies, minority newspapers, and churches.

The state's long-term strategy for serving minority older individuals is to use SPARQ data and the Minority Report, released by the Charter Oak Group to continuously monitor the service level of minority populations and to the extent feasible, increase efforts to recruit and enroll additional eligible minorities. MA-SCSEP has been effective in serving minority groups through the program and we will continue to make this a priority.

The new immigrant and refugee populations in the Commonwealth in 2014 were mainly from the Near East and South Asia (53%), with the majority being Iraqis, followed by African refugees (33%), primarily from Somalia and the Democratic Republic of Congo.

Key Strategies that MA-SCSEP has used to increase culturally competent service to linguistic and cultural minorities is a combination of:

- Ensuring culturally competent and linguistically diverse staff that can provide outreach and recruitment within the new immigrant communities,
- Identifying and recruiting Host Agencies that serve minority populations;
- Intensified efforts in reaching out to minority-owned businesses that would provide unsubsidized placements for the participants.

4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

The following data based on the current unemployment rates for Massachusetts, identifies those localities for which projects of the type authorized by Title V are most needed (20 CFR 641.325 (d).) These areas are where the unemployment rate is above the state average.

A map of unemployment rates is included in Chart 42 along with a list of counties ranked by unemployment rate. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

Map title: Unemployment rates by county, not seasonally adjusted Map Type: Massachusetts county Map Month/Year: August/ 2015	

Map title: Unemployment rates by county, not seasonally adjusted Map Type: Massachusetts county Map Month/Year: August/ 2015	
County	August 2015
Barnstable County	4.2
Berkshire County	4.7
Bristol County	5.6
Dukes County	3.6
Essex County	4.7
Franklin County	4.0
Hampden County	6.2
Hampshire County	4.1
Middlesex County	3.7
Nantucket County	2.3
Norfolk County	3.9
Plymouth County	4.7
Suffolk County	4.3
Worcester County	4.8

MA– SCSEP will focus efforts in the areas of greatest needs based on the unemployment rate. The highest unemployment rates for August 2015 were in Hampden and Worcester Counties.

To better serve individuals with a priority for service, the State Director works with other state agencies including the Mass Rehab Commission, Veterans Services, Department of Transitional Assistance, Department of Mental Health.

The state will focus efforts to the regions with the highest unemployment rates, which are primarily in the western and central parts of Massachusetts. There are numerous social service agencies across Massachusetts to help residents address issues of poverty and homeless or risk of homelessness. An important social services provider is the local community action agency (CAP). Services at these agencies include but are not limited to, housing assistance, food programs, emergency shelters, and energy assistance. MA-SCSEP has long history of working with the CAP network. One of MA-SCSEP sub grantees is a CAP agency.

The Community Action Agencies in MA-SCSEP service area are:

1. Action for Boston Community Development, Inc. (ABCD) Designated Service Area: Boston, Brookline, Everett, Malden and Medford

2. Action, Inc. (Action) Designated Service Area: Essex, Gloucester, Ipswich, Manchester, and Rockport

3. Berkshire Community Action Council, Inc. (BCAC) Designated Service Area: Berkshires County

4. Cambridge Economic Opportunity Committee, Inc. (CEOC) Designated Service Area : Cambridge, Middlesex County

5. Citizens for Citizens, Inc. (CFC) – MA-SCSEP sub grantee Designated Service Area: Fall River, Freetown, Somerset, Swansea, Taunton, and Westport

6. Community Action Agency of Somerville, Inc. (CAAS) Designated Service Area: Somerville

7. Community Action, Inc. (CAI) Designated Service Area: Amesbury, Groveland, Haverhill, Merrimac, and Newburyport

8. Community Action Programs Inter-City, Inc. (CAPIC) Designated Service Area: Chelsea, Revere, and Winthrop

9. Community Teamwork, Inc. (CTI) Designated Service Area: Billerica, Chelmsford, Dracut, Dunstable, Lowell, Tewksbury, Tyngsborough, and Westford

10. Greater Lawrence Community Action Council, Inc. (GLCAC) Designated Service Area: Andover, Lawrence, Methuen, and North Andover

11. Lynn Economic Opportunity, Inc. (LEO) Designated Service Area: Lynn

12. Montachusett Opportunity Council, Inc. (MOC) Designated Service Area: Ashburnham, Athol, Berlin, Bolton, Clinton, Fitchburg, Gardner, Lancaster, Leominster, Phillipston, Royalston, Sterling, Templeton, Westminster, Winchendon

13. North Shore Community Action Programs, Inc. (NSCAP) Designated Service Area: Beverly, Danvers, Peabody, and Salem

14. People Acting in Community Endeavors, Inc. (PACE) Designated Service Area: New Bedford, Plymouth County

15. Quincy Community Action Programs, Inc. (QCAP) Designated Service Area: Quincy, Norfolk County

16. Self Help, Inc. (SHI) Designated Service Area: Abington, Attleboro, Avon, Bridgewater, Brockton, Canton, East Bridgewater, Easton, Hanson, Holbrook, Mansfield, North Attleboro, Norton, Plainville, Randolph, Rockland, Sharon, Stoughton, West Bridgewater, and Whitman

17. South Middlesex Opportunity Council, Inc. (SMOC) Designated Service Area: Ashland, Bellingham, Framingham, Holliston, Hopkinton, Marlborough, Natick, Southborough, and Wayland

18. South Shore Community Action Council, Inc. (SSCAC) Designated Service Area: Carver, Duxbury, Hanover, Hull, Kingston, Marshfield, Norwell, Pembroke, Plymouth, Plympton, and Scituate

19. Springfield Partners for Community Action, Inc. (SPCA) Designated Service Area: Springfield

20. Valley Opportunity Council, Inc. (VOC) Designated Service Area: Chicopee, and Holyoke

21. Worcester Community Action Council, Inc. (WCAC) Designated Service Area: Worcester

Typical community needs prevalent for SCSEP participants include Limited English Proficiency and illiteracy or low reading abilities. These services can be made available through local Community Colleges and Adult Basic Education (ABE) providers. MA-SCSEP will work with the Community Colleges and the ABE system to provide improved referral system for low-cost training opportunities.

Beyond the most-in-need elements determined by Title V, other barriers may exist for participants seeking unsubsidized employment as lack of reliable transportation. MA-SCSEP will continue to work with local Area Agencies on Aging (AAAs) and Councils on Aging (COAs) to coordinate transportation resources. Each region in the state has a transportation coalition that MA-SCSEP can utilize. For example in Berkshires County, MA-SCSEP has advocated for the expansion of support services in transportation to specifically connect older workers residing in rural areas with local employment and training opportunities. Similar strategies will be used in other parts of the state.

Many SCSEP participants are caregivers for their aging parents and grandchildren. Their responsibilities frequently become barriers to unsubsidized employment. MA-SCSEP will develop a better system of referrals of the interested SCSEP participants to the Family Caregiver support program. MA-SCSEP will provide participant resource guides for the local caregiver support groups.

5. DESCRIBE THE LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

EOEA strongly believes that a labor market driven approach is the most effective tool for program operations. Identifying local employers' particular workforce needs, and aligning these with the classroom–based and on–the–job training, provides the most expeditious and cost–effective pathway into unsubsidized employment for mature workers with multiple barriers to employment. To that end, the operation of the MA–SCSEP program is under continuing evaluation to determine whether it is being operated in a manner that will achieve optimum programmatic and financial outcomes and that participants are receiving required services.

While there are no major long–term changes planned for the program, new program models are studied and additional partners are encouraged to bring new and innovative ideas that could potentially enhance performance and increase operational efficiency. EOEA's strategy is to improve continuously the program's level of performance, so that SCSEP participants enter into unsubsidized employment and achieve self–sufficiency.

MA-SCSEP has always collaborated with the national grantees on long-term program design and integration services with the WIOA system. MA-SCSEP will engage with any new national grantees that will begin to provide services in Massachusetts during FY2017.

6. DESCRIBE A STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

EOEA strongly believes that a labor market driven approach is the most effective tool for program operations. Identifying local employers' particular workforce needs, and aligning these with the classroom–based and on–the–job training, provides the most expeditious and cost–effective pathway into unsubsidized employment for mature workers with multiple barriers to employment.

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While there are no major long–term changes planned for the program, new program models are studied and additional partners are encouraged to bring new and innovative ideas that could potentially enhance performance and increase operational efficiency. EOEA's strategy is to improve continuously the program's level of performance, so that SCSEP participants enter into unsubsidized employment and achieve self–sufficiency.

MA-SCSEP works closely with the national grantees on developing best practices for participants' placements into unsubsidized employment. MA-SCSEP shares resources and information about current job openings, job fairs, and low-cost skill-based training services available in the state. MA-SCSEP will engage in job placement strategies with any new national grantees.

(C) LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

States must:

1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

MA–SCSEP serves eight counties in the Commonwealth. The population that the program serves are mature (55+) unemployed low–income income (125% of the Federal Poverty rate) residents of Massachusetts.

Below are the demographics for this population:

S0102: POPULATION 60 YEARS AND OVER IN THE UNITED STATES 2014 American Community Survey 1-Year Estimates Subject Bristol County, Massachusetts Essex County, Massachusetts Middlesex County, Massachusetts Norfolk County, Massachusetts Plymouth County, Massachusetts Suffolk County, Massachusetts Worcester County, Massachusetts Total 60 years and over Total 60 years and over Total 60 years and over Total 60 years and over Total 60 years and over Total 60 years and over Total 60 years and over Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Estimate Total population 554,194 122,312 769,091 167,183 1,570,315 306,679 692,254 151,565 507,022 117,900 767,254 121,608 813,475 164,498 SEX AND AGE Male 48.3% 43.7% 48.2% 43.6% 48.8% 44.0% 47.9% 43.7% 48.6% 44.5% 48.4% 41.7% 49.2% 44.6% Female 51.7% 56.3% 51.8% 56.4% 51.2% 56.0% 52.1% 56.3% 51.4% 55.5% 51.6% 58.3% 50.8% 55.4% Median age (years) 41.0 70.0 40.5 69.5 38.4 69.7 40.9 69.5 42.6 69.1 32.4 69.4 40.0 69.2 RACE AND HISPANIC OR LATINO ORIGIN One race 97.3% 99.1% 97.5% 99.3% 96.9% 99.3% 97.5% 99.5% 97.1% 99.0% 93.8% 96.9% 96.9% 99.2% White 85.7% 93.6% 78.6% 91.5% 78.6% 89.6% 80.4% 89.5% 84.6% 91.3% 56.1% 61.5% 85.3% 93.1% Black or African American 4.0% 2.3% 3.4% 1.6% 4.9% 3.0% 6.2% 3.6% 9.3% 5.4% 21.8% 22.8% 4.7% 2.5% American Indian and Alaska Native 0.2% 0.1% 0.4% 0.0% 0.2% 0.1% 0.1% 0.1% 0.1% 0.0% 0.3% 0.5% 0.2% 0.3% Asian 2.1% 1.0% 3.6% 1.9% 10.9% 5.9% 9.9% 6.0% 1.1% 1.1% 8.7% 8.6% 4.5% 2.5% Native Hawaiian and Other Pacific Islander 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.1% 0.0% 0.0% 0.0% 0.0% 0.0% Some other race 5.3% 2.0% 11.4% 4.3% 2.4% 0.6% 0.9% 0.3% 1.9% 1.3% 6.9% 3.6% 2.1% 0.8% Two or more races 2.7% 0.9% 2.5% 0.7% 3.1% 0.7% 2.5% 0.5% 2.9% 1.0% 6.2% 3.1% 3.1% 0.8% Hispanic or Latino origin (of any race) 6.9% 2.0% 18.6% 7.7% 7.5% 2.7% 4.0% 1.5% 3.6% 1.6% 21.8% 11.9% 10.5% 3.6% White alone, not Hispanic or Latino 83.5% 92.4% 72.9% 88.8% 74.2% 88.0% 77.7% 88.4% 82.6% 90.7% 46.2% 56.2% 78.5% 91.0% RELATIONSHIP Population in households 537,988 117,950 752,156 162,436 1,510,779 297,178 674,237 146,068 495,404 114,379 718,486 116,614 785,352 157,724 Householder or spouse 58.4% 89.2% 57.0% 87.4% 58.2% 88.4% 58.6% 87.7% 56.7% 88.0% 52.3% 83.1% 57.3% 89.8% Parent 1.6% 5.3% 1.3% 5.0% 1.0% 4.3% 1.3% 5.2% 1.5% 5.3% 1.8% 7.1% 1.1% 4.2% Other relatives 34.9% 2.8% 36.8% 5.0% 33.2% 4.8% 35.0% 4.8% 37.1% 3.9% 32.4% 5.7% 35.8% 3.6% Nonrelatives 5.1% 2.7% 4.9% 2.6% 7.6% 2.6% 5.1% 2.3% 4.6% 2.8% 13.5% 4.2% 5.7% 2.5% Unmarried partner 2.9% 1.1% 2.4% 1.4% 2.4% 1.2% 1.8% 1.1% 2.1% 1.0% 3.2% 1.4% 2.3% 1.0% HOUSEHOLDS BY TYPE Households 212,901 74,004 287,808 99,848 585,634 185,624 260,058 91,052 183,251 69,008 295,187 76,049 299,841 97,517 Family households 67.2% 55.5% 66.9% 54.2% 63.1% 54.0% 65.5% 55.2% 70.9% 58.5% 48.9% 42.9% 67.2% 56.0% Married-couple family 47.7% 44.6% 49.0% 44.3% 50.0% 44.2% 51.9% 44.2% 53.3%

48.8% 27.4% 28.4% 50.2% 46.9% Female householder, no husband present, family 14.9% 8.5% 13.5% 7.7% 9.7% 7.4% 10.2% 9.0% 13.3% 7.7% 16.5% 11.8% 12.2% 6.7% Nonfamily households 32.8% 44.5% 33.1% 45.8% 36.9% 46.0% 34.5% 44.8% 29.1% 41.5% 51.1% 57.1% 32.8% 44.0% Householder living alone 26.7% 40.7% 27.4% 43.0% 27.9% 42.4% 27.8% 41.8% 24.1% 38.3% 36.4% 52.6% 26.5% 41.7% EDUCATIONAL ATTAINMENT Population 25 years and over 383,521 122,312 527,425 167,183 1,094,885 306,679 481,301 151,565 349,464 117,900 523,125 121,608 554,043 164,498 Less than high school graduate 17.5% 26.5% 10.9% 15.4% 7.7% 12.5% 5.9% 10.5% 7.8% 10.2% 16.1% 26.5% 9.9% 14.4% High school graduate, GED, or alternative 30.9% 32.2% 24.9% 27.6% 20.8% 27.7% 20.5% 27.7% 28.7% 32.1% 23.0% 28.6% 30.0% 35.9% Some college or associate's degree 25.8% 21.7% 25.3% 24.8% 19.1% 20.2% 21.8% 21.9% 29.5% 27.7% 18.6% 17.6% 25.5% 23.3% Bachelor's degree or higher 25.7% 19.6% 38.9% 32.2% 52.3% 39.5% 51.9% 40.0% 34.1% 30.1% 42.3% 27.2% 34.6% 26.4% RESPONSIBILITY FOR GRANDCHILDREN UNDER 18 YEARS Population 30 years and over 349,369 122,312 481,925 167,183 973,593 306,679 439,241 151,565 322,719 117,900 423,558 121,608 503,215 164,498 Living with grandchild(ren) 3.8% 6.2% 3.6% 5.4% 2.6% 5.3% 3.3% 6.3% 3.2% 5.6% 2.8% 5.4% 3.0% 5.2% Responsible for grandchild(ren) 1.3% 1.3% 1.2% 0.9% 0.6% 0.8% 0.7% 0.8% 0.8% 0.7% 0.8% 0.8% 1.0% 1.4% VETERAN STATUS Civilian population 18 years and over 436,923 122,312 599,538 167,183 1,245,481 306,679 542,651 151,565 392,683 117,900 633,969 121,608 634,548 164,498 Civilian veteran 7.2% 15.6% 6.3% 15.2% 5.2% 14.3% 6.0% 14.8% 8.4% 18.1% 3.1% 8.7% 7.0% 16.4% DISABILITY STATUS Civilian noninstitutionalized population 547,681 118,097 762,431 162,875 1,553,995 298,888 683,970 146,336 500,000 114,853 760,133 118,110 800,921 159,086 With any disability 14.1% 31.1% 11.8% 28.6% 9.0% 25.8% 9.9% 25.8% 11.5% 25.1% 13.0% 37.6% 11.8% 28.5% No disability 85.9% 68.9% 88.2% 71.4% 91.0% 74.2% 90.1% 74.2% 88.5% 74.9% 87.0% 62.4% 88.2% 71.5% RESIDENCE 1 YEAR AGO Population 1 year and over 549,005 122,312 760,379 167,183 1,552,189 306,679 685,045 151,565 502,153 117,900 758,029 121,608 805,213 164,498 Same house 87.9% 94.2% 88.9% 94.7% 85.9% 95.0% 89.2% 95.3% 88.0% 91.1% 81.1% 93.0% 88.2% 93.5% Different house in the United States 11.4% 5.4% 10.5% 4.9% 12.6% 4.5% 9.8% 4.5% 11.1% 8.5% 16.7% 6.1% 11.1% 6.2% Same county 7.7% 3.7% 7.1% 3.6% 7.4% 3.3% 4.0% 2.4% 6.1% 4.0% 9.4% 4.2% 7.6% 4.2% Different county 3.7% 1.6% 3.4% 1.4% 5.3% 1.3% 5.8% 2.1% 5.0% 4.5% 7.3% 1.9% 3.5% 2.0% Same state 2.4% 0.9% 1.8% 0.5% 2.5% 0.8% 3.8% 1.1% 3.5% 2.0% 3.4% 1.2% 2.1% 1.2% Different state 1.3% 0.7% 1.6% 0.8% 2.7% 0.4% 2.0% 1.0% 1.4% 2.5% 3.9% 0.8% 1.4% 0.8% Abroad 0.7% 0.5% 0.6% 0.3% 1.4% 0.5% 1.0% 0.2% 0.9% 0.3% 2.2% 0.9% 0.6% 0.3% PLACE OF BIRTH, NATIVITY AND CITIZENSHIP STATUS, AND YEAR OF ENTRY Total population 554,194 122,312 769,091 167,183 1,570,315 306,679 692,254 151,565 507,022 117,900 767,254 121,608 813,475 164,498 Native 482,888 99,266 645,347 142,495 1,263,101 251,745 578,661 126,110 461,411 107,812 546,814 80,570 715,120 146,808 Foreign born 71,306 23,046 123,744 24,688 307,214 54,934 113,593 25,455 45,611 10,088 220,440 41,038 98,355 17,690 Entered 2010 or later 6.8% 2.0% 12.7% 6.2% 18.3% 4.8% 15.8% 4.8% 19.1% 13.8% 20.6% 9.1% 15.6% 6.3% Entered 2000 to 2009 15.7% 1.9% 33.8% 14.5% 30.8% 9.4% 23.6% 9.6% 24.1% 10.7% 29.4% 12.2% 34.7% 8.9% Entered before 2000 77.5% 96.1% 53.6% 79.4% 50.9% 85.8% 60.6% 85.6% 56.8% 75.5% 50.1% 78.7% 49.6% 84.8% Naturalized U.S. citizen 64.9% 77.5% 51.6% 66.0% 48.4% 73.3% 60.6% 79.1% 56.0% 69.3% 47.2% 68.8% 52.0% 73.2% Not a U.S. citizen 35.1% 22.5% 48.4% 34.0% 51.6% 26.7% 39.4% 20.9% 44.0% 30.7% 52.8% 31.2% 48.0% 26.8% LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH Population 5 years and over 525,139 122,312 725,492 167,183 1,482,130 306,679 654,674 151,565 480,104 117,900 723,635 121,608 768,159 164,498 English only 78.7% 77.6% 74.6% 82.7% 74.9% 82.0% 79.6% 83.2% 88.1% 91.4% 60.7% 66.2% 81.5% 87.3% Language other

than English 21.3% 22.4% 25.4% 17.3% 25.1% 18.0% 20.4% 16.8% 11.9% 8.6% 39.3% 33.8% 18.5% 12.7% Speak English less than "very well" 8.5% 14.1% 10.5% 11.6% 9.3% 10.6% 6.6% 8.9% 5.3% 4.9% 18.3% 26.2% 7.2% 6.3% EMPLOYMENT STATUS Population 16 years and over 450,380 122,312 621,243 167,183 1,284,446 306,679 559,654 151,565 407,935 117,900 648,139 121,608 656,925 164,498 In labor force 66.1% 28.4% 67.1% 33.5% 69.6% 36.1% 69.9% 37.5% 67.9% 34.3% 67.4% 28.6% 67.5% 33.9% Civilian labor force 66.1% 28.4% 67.1% 33.5% 69.5% 36.1% 69.9% 37.5% 67.9% 34.3% 67.3% 28.6% 67.5% 33.9% Employed 61.6% 27.6% 62.6% 31.6% 65.9% 34.4% 65.2% 35.7% 63.4% 32.3% 61.7% 26.5% 62.8% 32.3% Unemployed 4.5% 0.8% 4.5% 1.9% 3.5% 1.7% 4.6% 1.8% 4.5% 2.0% 5.6% 2.1% 4.7% 1.5% Percent of civilian labor force 6.8% 2.9% 6.8% 5.8% 5.1% 4.6% 6.6% 4.8% 6.6% 5.9% 8.3% 7.3% 6.9% 4.5% Armed forces 0.0% 0.0% 0.0% 0.0% 0.1% 0.0% 0.0% 0.0% 0.0% 0.0% 0.1% 0.0% 0.0% 0.0% Not in labor force 33.9% 71.6% 32.9% 66.5% 30.4% 63.9% 30.1% 62.5% 32.1% 65.7% 32.6% 71.4% 32.5% 66.1% INCOME IN THE PAST 12 MONTHS (IN 2014 INFLATION-ADJUSTED DOLLARS) Households 212,901 74,004 287,808 99,848 585,634 185,624 260,058 91,052 183,251 69,008 295,187 76,049 299,841 97,517 With earnings 76.1% 47.5% 78.2% 49.4% 81.7% 53.7% 82.3% 56.8% 79.5% 55.0% 78.4% 46.2% 79.6% 51.1% Mean earnings (dollars) 79,146 63,706 103,464 85,155 119,428 99,274 125,956 92,282 98,715 76,717 92,417 79,904 90,950 72,597 With Social Security income 33.0% 74.5% 30.4% 71.1% 26.0% 69.3% 28.5% 69.6% 32.9% 70.7% 21.0% 65.0% 30.2% 75.1% Mean Social Security income (dollars) 16,325 17,422 17,101 18,017 18,541 19,425 18,356 19,293 18,599 19,556 14,704 15,696 17,313 18,547 With Supplemental Security Income 8.6% 9.8% 7.1% 8.0% 4.1% 5.5% 3.8% 5.4% 5.1% 6.6% 8.8% 14.4% 6.2% 6.9% Mean Supplemental Security Income (dollars) 9,395 9,710 10,297 9,107 9,852 9,547 9,936 9,438 9,957 9,531 9,655 8,846 9,916 8,281 With cash public assistance income 3.6% 2.3% 3.7% 2.7% 2.1% 2.1% 1.7% 1.6% 2.4% 1.8% 3.7% 4.3% 2.6% 2.2% Mean cash public assistance income (dollars) 3,457 3,816 4,331 4,345 3,711 2,121 3,031 2,394 3,902 4,692 3,712 3,516 3,541 3,519 With retirement income 16.6% 38.4% 16.7% 40.0% 14.4% 38.8% 17.1% 41.7% 20.8% 44.6% 9.5% 29.5% 15.0% 37.8% Mean retirement income (dollars) 23,025 23,873 25,573 26,648 26,592 27,768 25,820 27,104 29,638 29,212 23,336 24,199 24,612 22,998 With Food Stamp/SNAP benefits 16.6% 15.6% 14.6% 12.8% 7.6% 8.8% 7.6% 8.6% 11.9% 10.0% 20.3% 26.3% 13.4% 12.1% POVERTY STATUS IN THE PAST 12 MONTHS Population for whom poverty status is determined 538,758 118,097 753,212 162,875 1,513,368 298,888 674,818 146,336 495,220 114,853 723,337 118,107 786,625 159,086 Below 100 percent of the poverty level 12.3% 10.4% 10.6% 10.0% 9.0% 7.8% 6.3% 6.9% 8.0% 6.0% 21.7% 18.5% 11.5% 9.6% 100 to 149 percent of the poverty level 7.6% 11.1% 7.4% 8.8% 4.9% 6.3% 4.1% 4.6% 5.7% 6.8% 10.3% 14.1% 6.5% 8.7% At or above 150 percent of the poverty level 80.1% 78.5% 82.1% 81.2% 86.2% 85.9% 89.6% 88.5% 86.2% 87.2% 68.0% 67.5% 81.9% 81.6% SELECTED CHARACTERISTICS No telephone service available 2.4% 2.0% 1.5% 1.3% 1.7% 1.1% 1.3% 1.2% 1.8% 1.9% 1.8% 1.8% 1.7% 1.2% 1.01 or more occupants per room 1.4% 0.5% 2.2% 0.2% 1.8% 0.6% 1.1% 0.4% 1.1% N 4.1% 1.6% 3.1% 0.8% Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling

2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

MA–SCSEP serves the following counties: Berkshires, Essex, Hampden, Middlesex, Norfolk, Plymouth, Suffolk, and Worcester.

County	All Grantees	State Grantee	National Grantees
Barnstable	35	0	35
Berkshire	25	25	0
Bristol	92	0	92
Dukes	3	0	3
Essex	112	23	89
Franklin	12	0	12
Hampden	87	28	59
Hampshire	18	0	18
Middlesex	173	51	122
Nantucket	1	0	1
Norfolk	69	17	52
Plymouth	54	14	40
Suffolk	146	14	132
Worcester	104	23	81
Statewide Total	931	194	737

3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

There are no current slot imbalances. Provided above is the PY15 Equitable distribution.

4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

The MA-SCSEP State Director works with National Grantees to identify and allocate positions from over-served to underserved locations within the state. The data is analyzed and shared so that the program serves equitably rural and urban areas. Currently Massachusetts has equitable distribution of SCSEP positions.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

EOEA will continue to work with the National Grantees, that include the National ABLE, Senior Service America Inc. and the National Urban League, to analyze the LMI data, SCSEP population needs, underserved locations in the state, rural and urban area populations and their specific challenges to obtain and retain the unsubsidized employment.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

EOEA will work with the National Grantees to ensure equitable distribution of slots in all counties of the Commonwealth. EOEA will take the steps necessary to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365.

5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

Table below shows a profile of Massachusetts General Population with the distribution of eligible individuals who are afforded priority service as provided under the Older Americans' Act, section 518(b): (i) eligible individuals who are individuals with greatest economic need; (ii) eligible individuals who are minority individuals; and (iii) eligible individuals who are individuals with greatest social need;

MASSACHUSETTS: THE RELATIVE DISTRIBUTION OF SCSEP ELIGIBLE INDIVIDUALS

County	Total Population	SCSEP eligible
Barnstable	215,769	7,220
Berkshire	129,288	5,380
Bristol	548,922	17,960
Dukes	16,766	655
Essex	748,930	23,360
Franklin	71,599	2,445
Hampden	463,783	17,995
Hampshire	157,822	3,860
Middlesex	1,518,171	35,120
Nantucket	10,142	405
Norfolk	675,436	14,360
Plymouth	497,579	11,315
Suffolk	730,932	32,225
Worcester	801,227	21,935
Statewide Total	6,586,366	194,235

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report. Last Revised: Thursday, 07–Jun–2012

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

County	Total Urban	Total Rural	Percent Urban	Percent Rural
Barnstable	199,733	16,155	92.5	7.5
Berkshire	89,762	41,457	68.4	31.6
Bristol	494,365	53,920	90.2	9.8
Dukes	10,082	6,453	61.0	39.0
Essex	711,619	31,540	95.8	4.2
Franklin	32,523	38,849	45.6	54.4
Hampden	423,765	39,725	91.4	8.6
Hampshire	114,697	43,383	72.6	27.4
Middlesex	1,457,576	45,509	97.0	3.0
Nantucket	8,250	1,922	81.1	18.9
Norfolk	662,529	8,321	98.8	1.2
Plymouth	443,904	51,015	89.7	10.3
Suffolk	721,488	535	99.9	.01
Worcester	651,696	146,856	81.6	18.4
Total	6,021,989	525,640	92.0	8.0

B. HAVE THE GREATEST ECONOMIC NEED

Minority Individuals	Poverty Rate[1]
Population, 2014 estimate	11.6%
Black or African	21.8%
American Indian and Alaska Native	23.6%
Asian	14.0%
Native Hawaiian and Other Pacific Islander	n/a
Hispanic or Latino	30.6%

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[1] Percentage of people in the state who had incomes below the Federal Poverty Rate

C. ARE MINORITIES

Minority Individuals	Massachusetts
Population, 2014 estimate	6,745,408
Black or African	8.3%
American Indian and Alaska Native	0.5%
Asian	6.3%
Native Hawaiian and Other Pacific Islander	0.1%
Hispanic or Latino	10.8%

D. ARE LIMITED ENGLISH PROFICIENT.

County	Total LEP Population
Barnstable	5,000
Berkshire	2,800
Bristol	43,200
Dukes	300
Essex	70,000
Franklin	1,300
Hampden	42,900
Hampshire	4,700
Middlesex	126,700
Nantucket	200
Norfolk	40,800
Plymouth	19,700
Suffolk	124,100
Worcester	57,100

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Greatest social need means the need caused by non–economic factors, which include: Physical and mental disabilities; language barriers; and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently.

According to the 2014 American Community Survey 1–Year Estimates for Massachusetts the following data is available for the selected characteristics.

Subject	Estimate
TOTAL NUMBER OF RACES REPORTED	
Total population	6,745,408
One race	96.9%
Two races	2.9%
Three races	0.2%
Four or more races	0.0%

Subject	Estimate
AGE	
Total population	6,745,408
55 to 64 years	13.1%
65 to 74 years	8.4%
75 years and over	6.7%
DISABILITY STATUS	
Total civilian noninstitutionalized population	6,668,348
With a disability	11.6%
Civilian noninstitutionalized population 18 to 64 years	4,303,921
Civilian noninstitutionalized population 65 years and older	977,029
With a disability	32.6%
PLACE OF BIRTH, CITIZENSHIP STATUS AND YEAR OF ENTRY	
Native	5,685,127
Male	48.4%
Female	51.6%
Foreign born	1,060,281
Male	48.7%
Female	51.3%
Foreign born; naturalized U.S. citizen	554,211
Male	46.9%
Female	53.1%
Foreign born; not a U.S. citizen	506,070
Male	50.7%
Female	49.3%
Population born outside the United States	1,060,281
Entered 2010 or later	16.6%
Entered 2000 to 2009	28.9%
Entered before 2000	54.4%
WORLD REGION OF BIRTH OF FOREIGN BORN	
Foreign–born population excluding population born at sea	1,060,281
Europe	21.7%
Asia	30.5%
Africa	9.7%
Oceania	0.4%
Latin America	34.9%
Northern America	2.8%
LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH	
Population 5 years and over	6,379,441
English only	77.4%
Language other than English	22.6%
Speak English less than "very well"	8.9%

The following table depicts Massachusetts SCSEP grantee data of those participants who have been assessed as possessing characteristics of selected demographic data sets.

Participant Characteristics	MA–SCSEP	NAN	NAPCA	ULI	SSAI
Total number served	324	251	62	181	466

Participant Characteristics	MA–SCSEP	NAN	NAPCA	ULI	SSAI
Limited English proficiency	10 %	20%	74%	34%	12%
Disability	14%	27%	8%	36%	24%
Homeless, or at risk of	16%	24%	24%	23%	33%
Rural residents	4%	0%	0%	0%	7%
Low Literacy	5%	2%	0%	55%	7%

Source: SCSEP Quarterly Progress Report , Final PY14

7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR PARTICIPANTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

In the case of any transition of positions, EOEA will ensure clear communication and coordination with participants, host agencies, other grantees, and USDOL. The Federal Project Officer will be consulted with and will subsequently approve any movements of positions. EOEA will not initiate any movement or transfer of positions until all stakeholders are notified. Through any transition process, EOEA will ensure that participants are paid and that where possible, shifts will be gradual and ensure minimum disruption to the participants.

SCSEP ASSURANCES

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

STATE COMMENTS ON SCSEP ASSURANCES

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	83.00	83.00	86.00	86.00
Dislocated Workers	84.00	84.00	86.00	86.00
Youth	74.00	80.00	75.00	80.50
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	60.00	60.00	64.00	64.00
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	75.00	75.00	78.00	78.00
Dislocated Workers	83.00	83.00	85.00	85.00
Youth	72.00	72.00	73.00	73.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	60.00	60.00	62.00	62.00
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	4,900.00	4,900.00	5,200.00	5,200.00
Dislocated Workers	7,000.00	7,500.00	7,500.00	7,600.00
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,100.00	5,400.00	5,500.00	5,500.00
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	66.00	66.00	69.00	69.00
Dislocated Workers	50.00	50.00	55.00	55.00
Youth	65.00	70.00	67.00	70.50
Adult Education	Baseline	Baseline	Baseline	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	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	38.00	41.00	38.00	42.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	Baseline	Baseline	Baseline	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)

ATTACHMENTS

Attachment A	Workforce Skills Cabinet Agenda
Attachment B	Task Force on Persons Facing Chronically High Rates of Unemployment: Summary of
Attachment C–1	State Agency MOU
Attachment C–2	Youth Career Pathways Map
Attachment C–3	Unemployment Insurance Service Flow for Reemployment Services and Eligibility Ass Grant
Attachment C–4	Customer–centered service design flowchart for low–skilled, low–income individuals
Attachment C–5	Customer–centered service design flowcharts for adult individuals with disabilities
Attachment C–6	Case Studies of career pathway to support long–term, credential attainment for indivi
Attachment C–7	Customer–centered service design flowcharts for Veterans
Attachment C–8	Customer–centered service design flowcharts for businesses
Attachment D	Statewide Model for Customer Flow in One–Stop Career Centers and integrated WIOA
Attachment E	List of Workforce Area Regions and Career Centers
Attachment F	Statewide One–Stop Career Center Performance Standards
Attachment G	Workforce Development Board Certification Standards
Attachment H	Wagner–Peyser Exemption Letter
Attachment I	Veterans 501 Form
Attachment J	SCSEP Durational Limit Policy
Attachment K	SCSEP Termination and Resignation Policy
Attachment L	SCSEP Complaint/Grievance Policies

ATTACHMENT A: Workforce Skills Cabinet

The Workforce Skills Cabinet was created by Governor Baker to align and coordinate Executive Offices of Labor and Workforce Development (EOLWD), Housing and Economic Development (EOHED), and Education (EOE) to address skill needs in regional economies.

1. Create Governor's BizWorks Team

- Identify a team of leaders representing each Secretariat to work with businesses on both short and long–term hiring needs
- Cross–train state and regional staff working with business
- Standardize One–Stop Career Center practices with business across system (Demand–Driven 2.0 Strategy)
- Design and implement data system to track business leads, follow up, and placement results across MOBD, Career Centers, Community Colleges

2. Align State Strategy, Resources and Results

A. Align silo–ed, Economic Development, Workforce and Higher Education Strategic Plans at state level

- Submit Statewide Economic Development Plan to Legislature –2015
- Submit Statewide Strategic Plan for Workforce Development to U.S. Department of Labor utilizing Economic Development Plan as foundation – March 2016
- Launch strategic planning process for Higher Education campuses (EOE) framed by needs documented in Economic and Workforce Development Plans – Spring 2016

B. Create a new cross–secretariat Regional Planning process driven by aligned state plans

- Align geographic boundaries for Planning Regions across Secretariats
- Create new regional planning process (building on Workforce Investment and Opportunity Act (WIOA) requirement) to align investments across economic development, workforce and education to address skill needs in regions.

C. Review and integrate related funding streams across Secretariats

- Design and Launch Skills Capital Grant Program
- On–going budget line–item reorganization projects

D. Align and share data across Secretariats

- Link and analyze longitudinal data from early education to employment using $1.7M grant award from U.S. Department of Education
- State legislative changes to statute to expand capacity to share employment data
- Legal negotiation to wage match across Secretariats

3. Expand Career Pathway for Youth and Adults in STEM and manufacturing with a focus on underserved youth and adult populations

- New Career Vocational Technical Education Initiatives (January 2016)
- STEM Council Alignment and Grants
- Expand Manufacturing Pipeline Programs

ATTACHMENT B: Task Force on Persons Facing Chronically High Rates of Unemployment: Summary of Barriers

Task Force on Individuals Facing Chronic Unemployment: Barriers

1. Lack of workforce skills and/or experience (including employment references)

o Lack of specific/required job skills

o Lack of access to job matching / job development resources / hiring events

o Lack of adequate work ready skills (i.e. – soft skills, interviews skills, etc.)

2. Lack of access to supportive services (child care, transportation, housing, wrap–around services, etc.)

3. Lack of education (Educational Attainment)

4. Lack of knowledge regarding job market / employer recruitment / screening processes

o On–line job application systems that screen–out applicants prematurely

o Lack of awareness and skills associated with navigating online and in–person employment application processes

o Lack of access to job matching / job development resources / hiring events

5. Issues relative to Criminal Offender Record Information (CORI)

6. Issues relative to poor credit

7. Issues relative to Limited–English Proficiency

8. Substance Abuse / Mental Health Issues

9. Discrimination

10. Lack of understanding about how working can impact public benefits and the understanding of work incentives to offset these concerns through benefits counseling.

Transition Age Youth with disabilities

1. Inaccessible work sites, stations, including lack of access to assistive technology

5. Implementation of IDEA is unequal in the schools

6. Parents/students need additional education as to what they

7. Stigma of persons with a disability

8. Low expectations–low self–esteem

9. Understanding benefits and how they may change for both the participant and the family member

10. Insufficient collaboration with other community partners

11. Lack of access to job tours, job shadowing, mock interviews, mentors, paid work/internship experiences, etc.

Barriers to employment for Adults with disabilities

1. Low expectations–low self–esteem

2. Isolation

3. Lack of information regarding resources availability

4. Inaccessible work sites, stations, including lack of access to assistive technology (including needs and costs of)

5. Benefits–lack of understanding about return to work benefits under SSA

6. Multiple issues requiring coordination/case management (i.e. benefits, housing, health, medical appointments)

7. Chronic health problems

ATTACHMENT C –1: Statewide Partner Memorandum of Understanding (MOU)

Introduction to MOU

The President signed the Workforce Innovation and Opportunity Act (WIOA) into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner–Peyser Act, and the Rehabilitation Act of 1973. In general, the Act took effect on July 1, 2015.

A. Principles for the Workforce Innovation and Opportunity Act 2014 (WIOA)

The Workforce Innovation and Opportunity (WIOA) Act amends the Workforce Investment Act of 1998 to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs, and to promote individual and national economic growth. WIOA reauthorization stresses three areas of change:

1. Program Alignment

a) Unifies strategic planning across a wide range of partners and programs (defined in Section III A & B of this MOU)

b) Enhances the role of State and Local Workforce Development Boards in developing and implementing a WIOA State Plan

2. Enhanced Service Delivery

a) Promotes engagement of businesses and alignment of education and training activities through career pathways

b) Strengthens partnerships and investments in the One–Stop Career Center delivery system

3. Increased Accountability

a) Establishes common, federally designed WIOA measures across WIOA title I, II, III, IV as identified by the federal government

b) Requires states to create standard, state–designed performance measures to evaluate the effectiveness of education and workforce programs

c) Increases accountability and transparency through reporting and evaluations

B. Vision for the Massachusetts Workforce System – An Integrated System

All Massachusetts residents will benefit from a seamless system of education and workforce services that supports *career pathways* for individuals and leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy.

To achieve this vision, Massachusetts will engage businesses to understand their needs and develop an integrated education and workforce system that supports career pathways to prepare residents with foundation, technical, professional skills and information and connections to postsecondary education and training. *WIOA partners will work to:*

• Design career pathways aligned with business demand across federal, state and community based partners

• Improve foundation skills *and* transition to postsecondary education and training for individuals with barriers to employment including undereducated and limited English proficiency adults

• Assist low–income individuals and families to achieve economic self–sufficiency through support services, education, labor–market driven credentialing, and employment

• Meet the needs of both job seekers and businesses who engage in the public workforce system

II. Purpose of Memorandum of Understanding (MOU)

The Purpose of the MOU is to:

1. **Articulate a coordinated vision for organizing the Massachusetts public workforce system** to produce the best possible outcomes for shared customers – youth, job seekers and businesses.

2. **Establish agreement at the state level to design partnerships and coordinate service delivery systems through the MOU partners** (both WIOA required partners and non–WIOA

partners identified in Section III A & B of this MOU) to ensure that Massachusetts businesses and job seekers, including those individuals with disabilities, low–income status, Veteran status, education or language barriers, and other individuals "shared" by the MOU partners, achieve/demonstrate measurable and better access and outcomes in the areas of education, training, job placement, and wages.

3. **Establish a definition and set of shared infrastructure costs as provided in MOU sections VI. D–G,** to support newly designed partnerships and service delivery between the required WIOA partners (identified in Section III. A of this MOU), specialized centers such as Massachusetts Rehabilitation Commission (MRC) Area Offices, and/or affiliated centers, and the local Workforce Development Boards/One–Stop Career Centers in local areas as authorized by WIOA.

4. **Guide the establishment of local area partnerships and local MOU agreements** (as required by WIOA Section121(b) / WIOA Regulations 20 CFR Part 678.500) on how services can be connected, integrated or enhanced by sharing staffing, resources or jointly designed services in ways that improve outcomes for "shared" customers – youth, job seekers and businesses.

a) This MOU specifies required elements of local MOUs and establishes a "floor" set of expectations upon which local areas can add elements.

b) If local WIOA required partners cannot execute an MOU that meets the statewide expectations outlined in the statewide MOU, the state WIOA required partners will finalize the agreement for the local area through an approved dispute resolution process as provided for by the Massachusetts Workforce Development Board (MWDB) and the Governor. Departments administering WIOA funding and departments administering programs that are required One–Stop Career Center partners (listed in Section III. A of this MOU) shall have input into the development of the dispute resolution process.

III. Massachusetts Workforce Development Partners (MOU Partners)

A. The WIOA required partners are defined by WIOA in SECTION 121 (b)/WIOA Regulations 20 CFR Part 678.400 as mandatory partners in the One–Stop Career Centers and are included in the State Combined Plan including:

1. **The Adult Program (Title I of WIOA),** as part of the Department of Career Services (DCS), Executive Office of Labor and Workforce Development (EOLWD);

2. **The Dislocated Worker Program (Title I),** as part of the Department of Career Services (DCS), EOLWD;

3. **The Youth Program (Title I),** as part of the Department of Career Services (DCS), EOLWD;

4. **The Adult Education and Family Literacy Act Program** (Title II), as part of Adult and Community Learning Services (ACLS), Department of Elementary and Secondary Education (DESE) Executive Office of Education (EOE);

5. **The Wagner–Peyser Act Program** (Wagner–Peyser Act, as amended by Title III), as part of DCS, EOLWD; and

6. **The Vocational Rehabilitation Program** (Title I of the Rehabilitation Act of 1973, as amended by Title IV), as part of the Massachusetts Rehabilitation Commission (MRC) and Massachusetts Commission for the Blind (MCB), Executive Office of Health and Human Services (EOHHS).

7. **Federal–state unemployment compensation program**, as part of the Department of Unemployment Assistance (DUA), EOLWD;

8. **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.)), as part of DCS, EOLWD;

9. **Jobs for Veterans State Grants Program** (Programs authorized under 38, U.S.C. 4100 et. seq.) as part of DCS, EOLWD;

10. **Temporary Assistance for Needy Families Program** (42 U.S.C. 601 et seq.) as part of Department of Transitional Assistance (DTA), EOHHS; and

11. **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)), as part of DTA, EOHHS.

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

B.Additional non–WIOA partners included in state team and suggested for local area consideration in the development of their MOU.

1. Non–profits

2. Massachusetts Office of Business Development

3. Department of Higher Education

4. Massachusetts Department of Veterans' Services

5. Commonwealth Corporation

6. Business associations

7. Philanthropy

C. Role of MOU Partners and the Statewide MOU

The State MOU was developed by the Massachusetts Workforce Development Board's WIOA Steering Committee with input from all MOU Partners (defined above), stakeholders and the general public.

Massachusetts intends to fully implement the key tenets of WIOA to develop robust partnerships across programs and services. Key changes from WIA to WIOA focus on improving outcomes by organizing resources, services, and structures through a "customer" lens rather than the bureaucratic administration of federal or state resources. The State MOU was designed to outline areas of agreement that help the Commonwealth implement the significant changes in WIOA including:

- Focus on Demand–Driven Services
- Priority on Business Customer
- Priority on Individuals with Barriers
- Streamlining Workforce Structures (Workforce Boards, Service Delivery, etc.)
- Increased Expectation to Create Partnerships Across Programs
- Requirement for Regional Planning
- Performance Metrics Across All Partners (including new Business Measures)
- Credentialing and Career Pathways

The development of the state MOU will help define the ways partners can work together on all of these changes. In particular, a renewed commitment to state–level partnerships will assist state and local partners in meeting the needs of both business customers and the workforce.

The Workforce Development Boards and One–Stop Career Centers will convene the various local WIOA partners to leverage relationships with the business community and to develop a coordinated approach to outreach and service delivery. Most importantly, connecting outreach activities to actual job placement of job seekers across the partners is a significant task for a truly "integrated" system.

In addition, the new law created enhanced "priority of service" requirements to ensure that individuals with barriers (including individuals who are low–income, have limited education or technical skills, limited English proficiency, veterans, ex–offenders, recipients of public assistance or face other barriers to employment such as disabilities, homelessness, etc.) are able to access critical employment and training services through the One–Stop Career Center system. In order to shift One–Stop Career Center practices to develop a priority of service, all MOU Partners (listed in section III. A & B of this MOU) must work together with One–Stop Career Centers to:

- Define "shared" customers between MOU Partners to create a clear understanding of how multiple providers, services and resources should support an individual person or business;
- Redesign the One–Stop Career Center Customer Flow and service practices across partner agencies, including ensuring the accessibility and availability of services to "shared customers;"
- Utilize robust technology tools to scale–up practices and provide more significant supports for individuals with barriers to employment, including basic skill assessment, remediation, and career development tools; and,
- Track and evaluate the outcomes for individuals who face barriers to employment.

Section IV outlines agreements between state–level partners with concrete steps to move toward an integrated and world–class system that includes all of the partners.

IV. MOU Agreements: State Partners and Guidance for Local Areas

A. All of the state–level MOU Partners agree to the following activities at a STATEWIDE level:

1. **Participate in the process to develop a Combined State Plan** and subsequent updates to the plan, including reviewing, commenting, and approving the appropriate operational planning elements of the Combined State Plan that impact programs and funding that serve shared customers;

2. **Commit to develop a shared understanding of partner systems and policies** and to identify and remove barriers for participation (state and local level) in the One–Stop System.. Define and share information on:

a) Populations served by partner systems

b) Eligibility criteria of partner systems

c) Resources available to businesses

3. **Identify individuals to serve on local Workforce Development Boards** best representing each of the Core WIOA Program partners (defined as including Title I, II, III, IV, TANF/SNAP and other partners)

a) The local Chief Elected Official (CEO) designated by the Governor consults with the Adult Basic Education (ABE) state director to ensure ABE is properly represented on the local Board. If there are multiple ABE programs in a region, the CEO develops a process for ABE program directors to nominate a representative to serve on the local Board with input from the state ABE Director.

4. Identify individuals that best represent the MOU Partners (listed in Section III. A & B) to participate in state's certification process of local Workforce Development Boards to ensure local WDBs properly consider and serve their interests.

5. **Identify individuals that best represent their WIOA required partner(s)** (listed in Section III. A) to serve on the local area Lead Operator competitive selection process to ensure local OSCCs properly consider and serve their interests.

6. Commit to the development of joint, statewide policies that connect services to promote career pathways for individuals and youth through Core WIOA Program and workforce partner collaborations and strategies to align education, training, and other services. The U.S. Departments of Labor, Education, Health and Human Services have agreed that Career Pathways are:

A series of connected education and training strategies and support services that enable individuals to secure industry relevant certification and obtain employment within an occupational area and to advance to higher levels of future education and employment in that area.

7. **Participate in business initiatives and strategies** that are coordinated across the system (including the work of MassBizWorks and the Massachusetts Workforce Skills Cabinet, MRC employer partnerships, the Workforce Training Fund, the Workforce Competitiveness Trust Funds and others).

8. **Develop an online, common intake and referral portal to work** across the data systems of MOU partners (defined in Section III. A & B as appropriate) to facilitate referrals, registration, assessment, career planning and data reporting for "shared" customers. The MOU Partners will form a committee and work together to design the business requirements for an online tool.

a) MOU partners will develop policies regarding referrals among agencies for prioritizing enrollments (e.g., when there is a waitlist).

9. Design state and regional training for front–line staff who are delivering services for each WIOA program partner. Critical training areas include:

a) Program eligibility criteria for services and referral processes for the WIOA Core Program (Section III. A & B)

b) Business services offered by each MOU partner

c) Labor market information on high–demand industry and careers produced by the Department of Career Services and Department of Unemployment Assistance

d) Best practices for serving WIOA priority populations, including but not limited to disconnected youth, youth with disabilities, low–income individuals, individuals with limited education, limited English language skills, older workers, Veterans, etc.

e) Evidence–based models for integrated education and training, career pathways, wrap–around/college and career readiness support services to the list of cross–training topics

10. **Implement a uniform methodology for calculating infrastructure costs and shared resources within local MOUs**, including in–kind staff contributions such as MRC vocational rehabilitation counseling staff time or ABE out–stationing. Each partner will negotiate with the local area on the type of activity and the type of support provided.

a) See Section VII A and B for detail on calculations for state and local area cost–sharing mechanisms.

B. All MOU Partners (Section III. A & B) agree to establish and support local MOU Planning Teams led by the Workforce Development Board and CEO. Teams are comprised of individuals who are empowered to represent the MOU partner agency or organization for the purpose of developing and executing local MOUs, modeled on the state MOU, that minimally include content listed in Section VI .B.

Local area MOUs <u>must</u> outline steps to address, at minimum, the following items and be reviewed annually and revised as needed.

1. **Agreement to participate on a local MOU Planning Team,** including representation fromCore WIOA Program and non–WIOA partners (Title I, II, III, IV, TANF/SNAP, Unemployment Insurance, SCEP, Veterans and other locally identified partners such as higher education, community–based organizations serving special populations etc.) The local Workforce Development Board consults with the ABE state director to ensure the regional Title II adult education program is appropriately represented on the local MOU Planning Teams.

2. **A strategy and process to share information on the labor market** analyzed by the Workforce Development Board between the local MOU partners to align education and training programs with high–demand career pathways (lead by local Workforce Development Boards);

3. **The development of career pathway maps or service flowcharts for youth 16–24** across WIOA Youth programs, local One–Stop Career Centers, adult education (Title II)/DESE, TANF/DTA, MRC/MCB, YouthWorks, and other key partners in the local area. Local MOU partners can customize the template for a **Youth Career Pathway** developed by the WIOA Steering Committee's Youth Committee (ATTACHMENT C–2). The "flowchart" will **identify the roles for each partner** in supporting career pathway development specifically for youth.

In order to implement the elements of a career pathway model in the region that require shared program design, service delivery, staffing or infrastructure costs, local areas could consider the following areas for shared resources:

a) **The development of a WIOA youth procurement process to include how services** will be aligned (*minimum WIOA required partners in Section III.A of MOU***)** as a method to leverage resources and to provide a continuum of services for out–of–school youth.

b) Identify and implement strategies for referrals and co–enrollment of youth 16–24 across Core WIOA Programs.

- Operationalize the new, statewide policy outlining referral process between **Title I Youth Program and Title II Adult Basic Education Program** for youth 16–24 to acquire literacy skills and secondary credential attainment.
- Operationalize the new, statewide policy outlining referral process **between Title I Youth Program and youth (in families) receiving benefits TANF recipients** age 16–24 to access workforce activities provided by youth services providers in the workforce system.
- Operationalize the new, statewide policy outlining referral process between **Title I Youth Program and Title IV Vocational** Rehabilitation to ensure youth receive the benefits of both programs including support services and accommodations, and pre–employment transitions services as required under WIOA.

c) **Leveraging resources collaboratively** for the purpose of expanding access to credentials and work–based learning for low–skilled individuals and out–of–school youth 16–24(local partners can pursue joint applications for "sector" initiatives, expanded use of federal On–the–Job Training funding, expand "pathways" funding on specific populations and career pathways, align programming with YouthWorks, etc.)

4. Develop or refine service flowcharts for unemployment insurance claimants through the Reemployment Services and Eligibility Assessment (RESEA) program (C–3). The Workforce Development Boards, One–Stop Career Centers and the Department of Unemployment Assistance will continue to develop a service flow for individuals receiving unemployment insurance who are required to participate in the RESEA Program.

5. Develop career pathway maps or service flowcharts for low–skilled, low–income individuals for "shared customers" between service providers. This could include the local One–Stop Career Centers, adult education (Title II)/DESE, immigrants, and TANF/DTA and other key partners such as community–based organizations serving immigrants, refugees or homeless individuals.

In order to implement the elements of a career pathway model in the region that require shared program design, service delivery, staffing or infrastructure costs, local areas could consider the following areas for shared resources to:

a) Leverage resources collaboratively for the purpose of expanding access to credentials and work–based learning for low–skilled individuals (local partners can pursue joint applications for "sector" initiatives such as the Workforce Competitiveness Trust Fund or Workforce Training Fund, expanded use of federal On–the–Job Training funding, expand the ABE Career Pathway models piloted in regions, "pathways" funding on specific populations and career pathways, etc.)

b) Align and map out the supports for individuals from different programs along a career pathway to support long–term, credential attainment.

- **Staff across agencies work on a cross–agency, "case management" team** to connect child care resources, public benefits, education and training through the Employment Services Program (ESP), SNAP Employment and Training, One–Stop Career Centers (and the College Navigators), Adult Education, Community Colleges and other partners.
- **Partners create priorities for customer access** to adult education enrollment, One–Stop Career Center ITAs, community college grants or other resources are created for "shared" customers who are moving along a career pathway.
- **Leverage the Career Ready 101 tools across partners** for individuals with barriers moving along a career pathway. ABE, OSCC, and Community Colleges can collaborate to provide access to Career Ready 101 to individuals who are "shared" customers across programs, including TANF/SNAP, MRC, MCB, Veterans and other partners.

c) **Expand existing Career Pathways Models in regions.** Workforce Development Boards, One–Stop Career Centers and WIOA partners (TANF, MRC, MCB, Veteran's etc.) work with ACLS to support the ABE Career Pathways models and offer comprehensive services for "shared customers".

d) **Out–stationing of staff across Core Program sites** (One–Stop Career Centers, Partner or community sites) based on career pathway maps and customer needs.

- On–site expertise of CORE WIOA program staff at One–Stop Career Centers to develop integrated assessment, referrals, targeted workshops and access One–Stop Career Center resources to support a career pathway for individuals e.g. basic skills, high school

equivalency preparation, ESOL, Career pathway programs, Career Ready 101, National Career Readiness Certificate (NCRC), Community College Navigators (info on higher education options/financial aid), financial counseling, job fairs, employer industry panels job seekers, etc. Local partners agree on a job description for out–stationed personnel to meet local customer needs to help navigate the broader workforce system (e.g. understand One–Stop services and CORE Programs), refer to guidance set by state agencies.

- Staff work together to develop on–site workshops for job seekers at One–Stop Career Centers provided by staff from WIOA Partner programs (OSCCs, adult education, DTA, and higher education etc) tailored to individuals with limited education and skill to provide information onspecific resources for this population (e.g. high school equivalency preparation, ESOL, Career Pathway programs, transition to college opportunities), Career Ready 101, National Career Readiness Certificate (NCRC) child care vouchers (DTA), public benefits counseling, transportation (DTA), Community College Navigators (info on higher education options/financial aid), financial counseling, job fairs, employer industry panels job seekers, etc. (Offered at various sites.)
- **One–Stop Career Centers ensure adequate and designated space** for the out–stationed staff in each region for each program. Career Center staff provides training and ongoing support to the out–stationed personnel.

6. **Develop career pathway maps or service flowcharts for adult individuals with disabilities** for "shared customers" between local One–Stop Career Centers, and Title IV Vocational Rehabilitation through MRC and MCB and other partners. Local MOU partners can customize the template developed by the WIOA Steering Committee (ATTACHMENT C–5). The local MOU partners will i**dentify the roles for each** partner in supporting career pathway development specifically for individuals with disabilities.

In order to implement the elements of a career pathway model in the region that require shared program design, service delivery, staffing or infrastructure costs, local MOU partners could consider the following areas for shared resources to:

a) **Adoption of best practices from Disability Employment Initiative grant** such as employer–driven trainings, on–the–job training, and other collaborative initiatives;

b) Align and map out the supports for individuals from different programs along a career pathway to support long–term, credential attainment. (See "Case Studies in ATTACHMENT C–6).

c) **Creation and implementation of workshops for job seekers with disabilities at One–Stop Career Centers** covering specific resources, SSI and VR benefits counseling, pre– and post–employment support services offered through VR, job fairs, employer industry panels job seekers, etc. (Offered at various sites.)

- Access to support and adaptive technologies

d) Out–stationing of staff across Core Program sites (One–Stop Career Centers, Partner or community sites) based on career pathway maps and customer needs.

e) **Facilitate financial support for ABE programs** to invest in assistive technologies for customers with disabilities

7. Develop career pathway maps or service flowcharts for veterans who are "shared customers" between local One–Stop Career Centers and the Department of Veterans' Services and other key partners. Local MOU partners can customize the template developed by the WIOA Steering Committee (ATTACHMENT C–7). The local area partners will identify the roles for each Partner in supporting career pathway development specifically for Veterans.

In order to implement the elements of a career pathway model in the region that require shared program design, service delivery, staffing or infrastructure costs, local partners could consider the following areas for shared resources to:

a) **Creation and implementation of workshops for job seekers who are Veterans at One–Stop Career Centers** covering specific resources, Disabled Veteran Outreach Program (DVOP)/Local Veterans Employment Representative (LVER), Department of Veterans resources, use of TORQ for career counseling, Career Ready 101, NCRC testing, employer industry panels job seekers, resources for Veteran's with disabilities (e.g. access to support and adaptive technologies) etc. (Could be offered at various sites.)

b) Creation of a referral processes for directing Veterans with Significant Barriers to Employment (SBE) to local DVOPs and other appropriate services.

8. **Develop career pathway maps or service flowcharts for businesses** that seek to partner with the public workforce system to meet their talent sourcing, talent development, and pipeline development needs with thelocal One–Stop Career Centers, and other MOU partners. (ATTACHMENT C–8). Specific strategies and system collaboration could include:

a) **Develop (utilize "regional" LMI analysis) a local business talent assessment**, utilizing regional labor market data, regional economic development agencies, and business intelligence gathered from interactions with MOU partners.

b) Develop a coordinated, streamlined regional strategy for business partner outreach and follow up.

o **Utilize MassBizWorks** as a starting place to develop a regional consultation process to coordinate partners, access statewide training for regional business services staff and share information on

c) Share feedback directly from businesses that utilize public services (e.g. hiring results)

IV. Timeline and Amendments for State MOU

A. Duration

1. The effective date is April 1, 2016.

2. WIOA Sections 121(c) (g) require that the MOU be reviewed not less than once every 3–year period to ensure appropriate funding and delivery of services, also including effectiveness, physical and programmatic accessibility. WIOA Regulations Subpart C 20 CFR Part 678.500 further requires MOU renewal following the 3–year review if substantial changes have occurred.

B. Amendments

1. A Partner on the MOU can request an amendment to the MOU or the Steering Committee can make a recommendation to MWDB and Governor for changes or renewals.

2. The statewide Workforce Development Board's Steering Committee for the Workforce Innovation and Opportunity Act shall review the MOU once every year to ensure appropriate funding, delivery of services, and achievement of outcomes.

3. The infrastructure cost agreements specified in WIOA section 121(h) and referenced in this MOU shall be in place by July 1, 2017 for funding the Fiscal Year 2018 period.

V. Governance of Shared System

A. Accountability

1. The Governor bears ultimate accountability for Governance of federal programs authorized under WIOA.

2. The Massachusetts Workforce Development Board (Board) will provide guidance and direction to the workforce system through State WIOA Workforce Development Plan.

a) The WIOA Steering Committee will ensure fidelity to the Plan and oversight of cross–system integration and operation.

b) All WIOA Core Program Partners and partners on the MOU will execute the MOU through agency director and designated staff in the Steering Committee, work groups, and State Board meetings.

B. Data and Outcome Reporting Across Partners

1. WIOA Core Program Partners will work together to develop separate, agency specific data matching agreements and MOUs between partners to measure the outcomes of customers utilizing workforce system and core partner services and evaluation studies on the impact of education, workforce and health and human service investments.

2. Under the large umbrella of the workforce system, the Massachusetts Workforce Development Board and the Department of Unemployment Assistance will work with other critical, non–WIOA partners to develop separate, agency specific data matching agreements relevant to understanding education, workforce and economic development outcomes and meeting the data requirements of state–designed WIOA measures developed by the partners included in the State Plan. For example, the Executive Office of Education and the Department of Higher Education, Mass Department of

Correction (state prisons), Department of Public Safety (oversees jails – County Houses of Corrections), Commonwealth Corporation, etc.

VI. Local Memorandum of Understanding (MOU)

The Workforce Innovation and Opportunity Act (WIOA) Sec. 121(c) and WIOA Regulations 20CFR Parts 678.500–510 requires that a Memorandum of Understanding be executed between local Workforce Development Board and required WIOA partners in the One–Stop Career Center (listed in Section III.A of this MOU).

The State WIOA required partners (Section III. A of this MOU) agree that staff or programs operating in a region will be identified to participate in the development of the Local Memorandum of Understanding (Local MOU). The Local Workforce Development Board will act as the convener of MOU negotiations and together with Partners will shape how local One–Stop Career Center services are delivered.

A. Process

The Local Workforce Development Board will convene representatives of WIOA required and non–WIOA partners (Section III. A & B of this MOU) in the region and other stakeholders to develop shared service strategies for job seekers and businesses and identify related shared customer flow.

Local strategies will include but not limited to operational and service workflows, related referral processes, coordinated staff development and training, marketing and community integration, co–locations of staff (physical or virtual) and the nature and provision of related infrastructure and shared costs.

These strategies will be designed locally to meet the service, resource and technology needs of the center and take into consideration the individual characteristics, service needs and resources of each of the WIOA required partners.

Strategies should be both data and demand–driven to further support the development of local service strategies and the needs of businesses and job seekers.

The MOU will include agreements on the specific infrastructure and shared program costs including the method by which revenue and costs will be supported by each partner. Refer to section VI. D. for the definition of shared program and infrastructure costs.

Cost calculations will take into consideration the proportionate share of use by each partner consistent with budgets, mandates and program limitations and must be spent solely for purposes allowable according to the partner authorizing statutes and other applicable legal requirements, including Federal cost principles.

B. Memorandum of Understanding Content

The Local MOU must include but is not limited to:

1. **A description of the process to develop an MOU**, career pathway models for populations, and shared customer definitions.

2. **A description of the priority populations identified by the MOU Partners.** At a minimum, WIOA requires each local MOU address: unemployment insurance claimants; low–income adults including TANF and SNAP recipients, homeless etc.; adult education participants (Title II); individuals with disabilities (Vocational Rehabilitation Title IV); veterans; older workers; re–entry populations; and, youth including youth with barriers to employment.

3. **A description of the continuum of services for available for each priority population** in the region based on a customer–centered design or career pathway model. Include a map for customer flow across MOU partners for each priority population. The description should include:

a. **A definition of shared customers** between MOU Partners (both WIOA required and non–WIOA partners) along the service continuum (*e.g. the characteristics and estimated numbers of individuals who could be co–enrolled between adult education Title II and One–Stop Career Center etc.*)

b. **The types of supports and services available for each priority population** through the MOU partners (both WIOA required and non–WIOA partners) that promote the education, training and career advancement of individuals receiving services. The roles of the MOU partners in providing supports and services.

c. **Methods for referring individuals** or business customers between the partners for appropriate services and activities.

4. **A description of the continuum of services available for businesses** in the region based on a customer–centered design or career pathway model. Include a map for the business customer flow across MOU partners in the local area.

5. **Access to technology and materials that are available through One–Stop Career Center delivery system.** Exploration of access to One–Stop Career Centers services (in–person, virtual etc.) during times when specific customers from core programs are available (e.g. evenings and weekends). [This issue would be locally negotiated based on resources and approved at a state level when staffing contracts are involved.]

6. Coordinated staff development and training.

7. Assurances of participation of required WIOA Partners (minimum partners described in Section III. A of the MOU) in the competitive selection process for the One–Stop Career Center lead operator in the local region.

8. A final plan or interim plan to fund joint costs:

a. Funding of infrastructure costs of One–Stop Career Centers

b. Funding of shared services and operating costs of service delivery system

NOTE: The specific requirements for the local funding agreements, which are related to how the shared and infrastructure costs of the One–Stop Career Center service delivery system will be paid by the One–Stop Career Center partners, need not be satisfied in the funding agreements for PY 2016. States and local areas may continue to negotiate local funding agreements as they have been doing so under WIA for purposes of PY 2016. However, the local funding agreements must satisfy the requirements of section 121(h) of WIOA for purposes of funding the one–stop system in PY 2017.

9. Duration of the MOU.

10. Assurances that the MOU will be reviewed and if substantial changes occurred, renewed.

11. Assurances that the MOU review will occur not less than every three years.

12. The MOU may include other provisions agreed to by all parties that are consistent with all partner programs, services and activities authorizing statutes and regulations.

13. The MOU must include all requirements as set–forth in WIOA MOU policy guidance (to be issued).

14. The local MOU will reflect an agreement of the MOU partners to jointly review the WIOA mandated performance metrics for the region or metrics negotiated as part of any shared and infrastructure contract costs between a local area (Board) and the mandated OSCC partner, including incentive and penalties.

Although the Local Workforce Development Board (with agreement of the Chief Elected Official and WIOA required partners) may enter into a separate agreement between each partner or group of partners under the purview of WIOA, the State Core Partners require that a single "umbrella" MOU be developed to address the issues relating to the local One–Stop Career Center service delivery across all WIOA required partners unless sufficient evidence can be provided as to why a region cannot develop an umbrella MOU.

The MOU is fully executed when it contains the signatures of the Local Board, WIOA required partners (Section III. A of this MOU), and the Chief Elected Official (CEO) and the time period which the MOU is in effect. *MOUs should be updated not less than every three years to reflect any changes.

C. Interim Plan or Local MOU impasse

If necessary an interim infrastructure funding agreement may be put in place, however must be finalized within 6 months of the signing of the MOU. If it is not finalized within that timeframe, the local board must notify the Governor as described in WIOA 121 (h) and the WIOA regulations 20 CFR Part 678.725) and the state infrastructure mechanism will trigger.

This consensus must occur annually so that any failure of the CEO, local Workforce Development Board and WIOA required partners (Section III. A of this MOU) to reach consensus and sign the local MOU with the final or interim agreement by the beginning of each program year (July 1, 2016 and

each subsequent July 1) will not prevent infrastructure costs from being funded by triggering the state One–Stop Career Center infrastructure funding mechanism.

The local Workforce Development Board must report to the State Board, Governor, and the appropriate WIOA required state agencies if MOU negotiations with WIOA required partners have reached an impasse.

The local Workforce Development Board and partners must document the negotiation and efforts that have taken place in the MOU negotiations.

The Governor and or State may consult with the appropriate Federal agencies to address the impasse related to issues other than infrastructure costs.

Impasses related to infrastructure costs must be resolved using the State Infrastructure cost funding mechanism.

D. Infrastructure and Shared Cost Funding

WIOA sec. 121(h), sec. 121(i), WIOA Regulations 20 CFR 678, Subpart E 20CFR 700 –760) require that One–Stop Career Centers partners must contribute jointly to fund infrastructure costs, as well as use a portion of the funds available to support their programs, activities and services operated through a local Comprehensive One–Stop Career Center consistent with the proportional burden, program mandates and limitations and the state infrastructure–cost default funding caps, should local consensus not be reached.

These support costs are defined as shared and infrastructure costs. The proportion of the shared and infrastructure costs paid by each WIOA required partner (Section III. A of MOU) must be in accordance with Federal cost principles, which require that all costs must be allowable, reasonable, necessary, and allocable to the program and all other applicable legal requirements.

The Core Partner funding of costs is intended to:

1. Maintain the one–stop delivery system to meet the needs of the local areas;

2. Reduce duplication by improving program effectiveness through the sharing of services, resources and technologies among Partners;

3. Reduce overhead by streamlining and sharing financial, procurement, and facilities costs;

4. Encourage efficient use of information technology;

5. Ensure that costs are appropriately shared by one–stop partners by basing contributions on proportionate share of use, and requiring that all funds are spent solely for allowable purposes; and

6. Ensure that services provided by one–stop center are allowable under the Partner's program.

The WIOA required partner (Section III. A of MOU) agree to develop agency–specific guidelines to be utilized during local MOU negotiations to assist in determining each WIOA required partner (Section III. A of MOU) programs' proportionate share of shared and infrastructure costs (shared costs are defined in VI. E. 1 and infrastructure costs are defined in VI. E. 2.). These guidelines shall be consistent with the individual Partner's mandates, budgets and program limitations and take into consideration the default caps on required contributions delineated in WIOA 121 (h) and WIOA Regulations 20 CFR Part 678.735. Once contributions are identified locally via successful MOU negotiations or at the state level if local consensus fails, the method of transferring negotiated partner funds to the one–stop system may be via direct contract from the partner to the local area or to the area via funds transferred from the partner to EOLWD, as appropriate.

E. Cost Defined

1. Shared Costs

Shared costs are costs jointly identified by the local Workforce Development Boards, One–Stop Career Centers and WIOA required partner (Section III. A of MOU) to provide services to shared customers (co–enrolled participants) across program staff and facilities. One–Stop Career Centers and WIOA required partners on the local MOU will develop the appropriate activities for the shared customer pools. Activities and services including but not limited to:

- Intake
- Needs assessment
- Basic skills assessments
- Identification of appropriate services to meet needs
- Referrals to other One–Stop Career Center partners
- Business services.
- Support for programs to invest in or create access to assistive technologies

Shared costs WIOA 121 (i) and WIOA Regulations 20 CFR Part 678.760) must be determined as part of the Local MOU and maybe comprised of cash and non–cash resources.

2. Infrastructure Costs

One–Stop Career Center infrastructure costs are defined as non–personnel costs necessary for the general operation of the center, including:

- Facility rental costs
- Utilities and maintenance
- Equipment (including assessment–related and assistive technologies for individuals with disabilities)
- Technology to facilitate access to the One–Stop Center (including planning and outreach)
- Common One–Stop delivery system identifier costs (signage and other identifier–related)

Infrastructure costs are funded either through:

- A local One–Stop Career Center infrastructure funding mechanism determined by a local agreement between Local Board, Chief Elected Official (CEO) and WIOA required partners;

or

- A State One–Stop Career Center infrastructure funding mechanism set by the Governor, after consultation with the CEOs, Local Workforce Development Boards and State Board that determines the WIOA required partner contributions.

F. Local One–Stop Infrastructure Funding Mechanism

1. In the local funding mechanism, the Local Workforce Development Board, Chief Elected Officials, and WIOA required partners (Section III. A of this MOU) agree to amounts and methods of calculating amounts each partner will contribute of One–Stop Career Center infrastructure funding, include infrastructure funding terms within the MOU and sign the MOU.

2. The local infrastructure funding must meet all of the following requirements:

a) The infrastructure costs are funded through cash and fairly evaluated in–kind partner contributions and include any funding from philanthropic organizations or other private entities or through alternative financing options.

b) Contributions must be negotiated between the Local Board, CEOs and WIOA required partners (Section III. A of this MOU)

c) The proportionate share of funding from each WIOA required partner (Section III. A of this MOU) must be based upon a reasonable cost allocation methodology whereby costs are charged to each partner in proportion to relative benefits received, and must be allowable, reasonable, necessary and allocable.

d) Partner shares must be periodically reviewed and reconciled against actual costs incurred.

G. State One–Stop Infrastructure Funding Mechanism

In the State One–Stop Career Center infrastructure funding mechanism, the Governor, after consultation with the Chief Elected Officials, State Board, Local Workforce Development Boards determines the WIOA required partner (Section III. A of this MOU) contributions, based upon a methodology where infrastructure costs are charged to each partner in proportion to relative benefits received and consistent with the partner's programs' authorizing laws and regulations including Federal cost principles, and other applicable legal requirements.

WIOA Section 121 (h) and WIOA Regulations 20 CFR Part 678.735 include the limitation for the required partner (Section III. A of this MOU) contributions, based on a percentage of their Federal funding allocation. These limitations do not apply at the outset to the local funding mechanism, instead are a cap on required contributions determined by the Governor if consensus is not reached at the local level between the local board, chief elected officials and WIA required partners.

The Governor will issue policy guidance for use by local areas to determine funding for the cost of infrastructure; and to assist Local Workforce Development Boards, CEOs and WIOA required partners in determining equitable methods of funding the costs. In addition, guidance will include timelines regarding notification to the Governor for not reaching local agreement that will trigger State– Infrastructure Funding Mechanism. Core Partners agree to assist in the development of proposed language to be submitted to the Governor for consideration in finalizing One–Stop Infrastructure Policy guidance.

VII. Signatories

By signing this agreement, all parties agree that the provisions contained herein are subject to all applicable Federal, State and local laws, regulations or guidelines. By signatures affixed below, the parties specify their agreement:

Secretary Ronald L. Walker, II Executive Office of Labor and Workforce Development	Secretary James Peyser
Secretary Marylou Sudders	
Director Alice Sweeney	
Director Robert Cunningham Department of Unemployment Assistance	Commissioner Jeffrey McCue
Commissioner Nicky Osborne, Massachusetts Rehabilitation Commission	Commissioner Paul Saner
Secretary Alice F. Bonner Executive Office of Elder Affairs	Secretary Francisco Ureña
Nancy Snyder, President & CEO *Commonwealth Corporation*	Commissioner Carlos E. Santiago *Department of Higher Education*
Director William D. McKinney Department of Labor Standards (Apprenticeship)	

VIII. Definitions

1. ***Administrative Entity***: Entity(ies) designated by the CEO to coordinate and administer WIOA activities and services within a local area on the local board's behalf and in accordance with all applicable federal, state, and local laws, regulations, rules, policies, plans, and the terms of this MOU.

2. ***Chief Elected Official:*** Identified in WIOA Section 3 Definitions (9) as the chief elected officer of a unit of general local government in a local area or the individual(s) designated under a local agreement pursuant to WIOA Section 107(c)(1)(B).

3. ***Career Services*****:** The services which shall be available, at a minimum, to individuals who are adults or dislocated workers through the career center delivery system in each local area. The career services that must be provided as part of the career center delivery system are listed in WIOA Section 134(c)(2).

4. ***Combined Plan***: Per WIOA Section 103, a state may develop and submit a combined plan for the core programs and 1 or more of the programs and activities defined in Sec. 103 (a) (2).

5. ***Common Customers*****:** Those job seekers that are receiving services through the One–Stop Career Center system and one additional MOU partner.

6. ***Common Measures*****:** Primary indicators of performance," for its six core programs

7. ***Core Partner*****:** An entity that carries out one or more of the programs or activities identified under WIOA Section 121 (b)(1) and is required under that Section to participate in the career center delivery system and to make the career services under its program or activity available through the career center system

8. ***Cost Allocation*****:** Per 66 Fed. Reg. 29639, cost allocation is the measurement of actual costs in relation to the benefit received in order to determine each partner's fair share of career center operating costs.

9. ***Fair Share*****:** The portion of career center operating costs allocated to each partner in proportion to the benefits the Partner receives from participation in the career center system.

10. ***Fiscal Agent*****:** An entity appointed by a local area's CEO in accordance with WIOA Section 107 (d)(12)(B)(i)(II) and (III)) to be responsible for the administration and disbursement of WIOA and other funds allocated for workforce development activities in the local area. WIA Section 107(d)(12)(B)(i)(II) provides that designation of a fiscal agent does not relieve the CEO from his/her liability for any misuse of grant funds.

11. ***Governor's Massachusetts Workforce Development Board (MWDB*****):** Enacted by the Massachusetts Governor and Legislature on December 2, 2015, the Board will assist the Governor in creating an integrated statewide strategic plan for workforce development which will link workforce policies, education and training programs, and funding streams with the economic needs of Massachusetts and its regions and in complying with the provisions and requirements of WIOA Section 101. The new legislation can be found here:
https://malegislature.gov/Laws/SessionLaws/Acts/2015/Chapter142

12. ***In–Kind Contributions*****:** 66 Fed. Reg. 29639–29640 defines these types of contributions as donations from third parties that are not to be confused with contributions to the career center by partner programs of such things as space, equipment, staff, or other goods and services for which the partner program incurs a cost. In–kind contributions may include funding from philanthropic

organizations or other private entities or through other alternative financing options, to provide a stable and equitable funding stream for on–going career center delivery system operations. WIOA 121(c)(2)(A)(i).

13. ***Local Area*:** A local workforce investment area designated by the Governor, under section 106, subject to sections 106(c)(3)(A), 107(c)(4)(B)(i), and 189(i).

14. ***Local Workforce Development Board (local board):*** The board created by the CEO pursuant to WIOA Section 107 with responsibility for the development of the local plan and for oversight of the workforce development activities in the local area.

15. ***Additional Partner*:** Per WIOA 121 (b)(2), an entity that carries out a program not identified as required under WIOA that is approved by the LWDB and the CEO may be included as a career center partner in a local area.

16. ***Massachusetts Career Center Delivery System:*** The career center delivery system is essentially a collaborative effort among public agencies, non–profit organizations, and private entities that administer workforce investment, educational, and other human resource programs to make the variety of services available under those programs more accessible to eligible job seekers and businesses.

17. ***Massachusetts Career Center Operator:*** An entity or consortium of entities designated in accordance with WIOA Section 121(d) to operate a career center site and to perform career center service delivery activities in accordance with all applicable federal, state, and local laws, regulations, rules, policies, plans, and the terms of this MOU.

18. ***Mass BizWorks:*** Massachusetts BizWorks is a federal and state collaboration designed to enhance and align the services offered to Massachusetts businesses. It simplifies and coordinates efforts among agencies that work with businesses.

19. ***Resource Sharing:*** Per 66 Fed. Reg. 29639, Resource Sharing is the cash and/or resources each partner will contribute to fund its fair share of costs for operation of the career center system. This can include "in–kind" contributions from third parties to partner programs. The LWDB, CEO and career center partners may fund the costs of infrastructure off career centers through methods agreed on by the LWDB, CEO and career center partners through Resource Sharing.

20. ***Specialized Service Centers:*** A specialized service center of a core partner is defined as a local service center providing specialized services to shared customers such as assistive technology, benefits counseling, and vocational counseling.

21. ***Training Services:*** Services to adults and dislocated workers as described in WIOA Section 134(c)(3). Per WIOA 134(c)(3)(D) these may include occupational skills training, including training for nontraditional employment, on–the–job training, incumbent worker training, programs that combine workplace training with related instructions, which may include cooperative education programs, private–sector training programs, skill upgrading and retraining, apprenticeships, entrepreneurial training, transitional jobs, job–readiness training, adult education and literacy activities in combination with a training program, or customized training.

22. ***WIOA:*** The Workforce Innovation and Opportunity (WIOA) Act amends the Workforce Investment Act of 1998 to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth, and for other purposes.

23. ***WIOA Local Plan:*** Per WIOA Section 108, the local plan is a comprehensive 4–year plan developed by each LWDB, in partnership with the chief elected official and submitted to the Governor. The plan shall support the strategy described in the State plan. At the end of the first 2–year period of the

24. WIOA State Plan: The term "State Plan", used without further description, means a unified State plan under Section 102 or a combined State plan under Section 103.

ATTACHMENT C–2: Youth Career Pathways Map

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT C–3: Unemployment Insurance Service Flow for Reemployment Services and Eligibility Assessment (RESEA) Grant

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT C–4: Customer–Center Service design flowchart for low–skilled, low–income individuals

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT C–5: Customer–centered service design flowcharts for adult individuals with disabilities

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT C–6: Case Studies of Career Pathway for Individuals with Disabilities

Case Studies of Career Pathway for Individuals with Disabilities:

Shared Participants between Vocational Rehabilitation (VR) and One–Stop Career Center to support long–term, credential attainment

A scan of regional work happening across Massachusetts points to areas where Vocational Rehabilitation, Workforce Boards, One–Stop Career Centers, adult education, community colleges and other partners work together to support long–term progress for individuals along a skills and employment pathway. Several key practices are consistent:

REFERRAL AND CO–ENROLLMENT PRACTICES FOR PERFORMANCE

1. Consumer visits the Career Center and discloses to the worker that they have a disability. The consumer is offered OSCC orientation and assistance with Job Quest Portal. Consumer is asked if he/she is enrolled with VR. If the answer is no, then they should be asked if they would like to be referred to VR.
2. Consumer visits VR agency and develops an Individual Plan for Employment (IPE). After training services are completed, consumer works with VR Counselor and OSCC counselor on job search and related services.

In the examples listed above, the VR agency and the Career Centers would both receive credit for the services provided when the employment goal is achieved. Establishing a good referral process between VR and Career Centers is vital to a successful collaboration with the Career Center and the VR agencies.

INTEGRATED SUPPORTS AND DESIGN

Vocational Rehabilitation, Ticket–to–Work, One–Stop Career Centers, adult education and community colleges offer a range of resources to job seekers with disabilities that have greater impact on the success rate of an individual if they are leveraged.

Initial Vocational Rehabilitation assessment process offers a consumer a wide range of preparation and support services documented in an Individualized Plan for Employment (IPE). For the individual:

- Physical and Mental Restoration Services
- Career Counseling
- Training (OJT, Pharmacy Tech, High School Internships, Competitive Integrated Employment Services vendors, Transitional Internship Program, Transition to Adulthood Programs, etc)
- Benefits Planning
- Assistive Technology
- Vehicle Modification
- Job Site Accommodations
- Job Coaching Services

Once an individual is ready for employment, VR counselors work on job placement and can collaborate with One–Stop Career Centers and other organizations to develop:

- Resume
- Interview Skills
- Employer / Job Opening leads

- Career Ready 101 assessment or National Career Readiness Certificate
- Job Fairs
- Employer contacts
- Post–placement support/job site accommodations from VR

POST–SECONDARY CREDENTIALS

Adult education, Vocational Rehabilitation and Career Centers can work with individuals with disabilities to assist in enrollment in post–secondary programs and certificates that lead to employment with higher wages. One Stop Career Centers have been working on new ways to assess individual with disabilities utilizing Career Ready 101 (instead of TABE or Accuplacer) and worked with community colleges to increase the number of individuals with disabilities who access post–secondary education. The Disability Employment Initiative assisted regions in developing models. Assessment, funding for tuition and fees (financial aid or public resources), education coaching, accommodations, transportation to school etc can be resourced across the partners.

PERFORMANCE

Regional Partners need to work together to design a career pathway that integrates services from the individual's perspective. A critical discussion point is how each partner agency will achieve the prescribed performance measures while co–enrolled in long–term programming or with multiple agencies. One key issue is to ensure that each partner agency understands the performance measures for partner program the ways to ensure performance requirements support the long–term progression for participants. For example, One Stop Career Centers are measured on job placement after an individual "exits" from service. If a participant is referred to VR or a community college for enrollment, the Career Center needs follow up information and data to keep the individual active in the data management system so that employment is not measured until after the participant completes a credential is actually looking for a job placement.

Regional Examples from Disability Employment Initiative (DEI):

Franklin Hampshire Region

Franklin Hampshire Career Center works with a participant named "Eli". Eli became a customer of the Career Center around January of this year, he has been working as a janitor with very limited hours, and he has maintained that job for a number of years. In interviewing Eli, he shared that he wanted a 'career' not just a job. He knew he wanted to go into a specific field.

The Career Center works with its partners because Eli is co–enrolled in Department of Mental health, a MRC and a member of a vocational rehabilitation Clubhouse model program. Eli enrolled in training under DEI and WIA funding.

The Center contacted his DMH worker as well as his Clubhouse advocate. The customer researched the career he wanted. He had been a MRC client, but had not had contact with MRC for over a year. The Career Center and MRC worked together to secure funding from all agencies to help pay for school, books and fuel to get to training. Participating agencies: Career Center – Lead agency, Dept.

of Mental health, MRC, Star Light Center – Human resources unlimited and Springfield Tech. Comm. College – Department of Disabilities.

Career Center of Lowell

The Career Center of Lowell has a partnership with Class Inc., DMH and DDS. DMH refers a high volume of clients to the Career Center and stays actively involved by bringing the DMH clients to interviews and assisting them in completing their applications while working with the Career Center etc. DMH and Career Center staff work together to leverage DMH and Career Center resources. In addition, the Career Center works with a job coach and business developers from Class Inc. through DDS for job placement.

The Career Center writes the resumes, assist with their job search, and completes mock interviews. The agencies work together to align resources based on the customized need of the shared participants.

North Shore Career Center

Just 2 years ago "Sharon" was homeless and living in a shelter. She had severe depression and anxiety and no support or guidance in her life. With the help of a Case Worker at the Shelter she was able to get suitable housing and was referred to the North Shore Career Center and the Massachusetts Rehabilitation Commission for assistance. She is also connected with a Therapist that has helped Sharon tremendously. Through assessment testing (CareerReady 101) the Career Center was able to determine that Sharon had good Customer Service and office skills. The Career Center and MRC were able to recommend her for a job at Boston College working in the Documents Department. Sharon was quite capable of taking public transportation; however, at times if the cars were too crowded her anxiety level would increase. The Career Center recommended that she apply for the "RIDE". The Career Center explained that the "RIDE" was available for people with disabilities. She made an appointment for an assessment in Charlestown for RIDE services. Sharon was found eligible for services when necessary. Although Sharon loved her job she wanted to do more. She entered the CVS Pharmacy Tech program through MRC, completed the program and is now working at a CVS in Boston. In this particular store all Pharmacy Tech graduates start at the front of the house and work their way into the Pharmacy. Sharon has been there for a few months and now is able to apply for a transfer to another store. She would like to transfer to the North Shore to be closer to home. The Career Center is working with her and MRC to help her accomplish this.

CareerPoint (Holyoke One–Stop Career Center)

CareerPoint established a regional disability resource committee, which includes Mass Rehab Commission, Mass Commission for the Blind, Sunshine Village, Community Enterprises, Human Resources Unlimited, the disability departments of both Springfield Technical Community College and Holyoke Community College, and the Department of Developmental Services. These meetings have resulted in greater communication and understanding of services. Another positive result was that we were able, through the offices of Springfield Technical Community College, to assist customers with free tutoring. All of these agencies are included on our e–mail listing for events, job postings, and job fairs.

The Disability Resource Coordinator from the One–Stop Career Center has presented at the staff meeting of both Mass Rehab, as well as the Department of Developmental Services. MRC has made numerous referrals to the DEI program that we have been able to assist with tuition/training and job placement. As a direct result of the Regional Meetings, we have increased awareness of the DEI Grant, as well as our Center services and have streamlined the process of inter–communication regarding clients.

Career Point has established an in–house disability committee which includes staff from the veteran's office, Youth Services, Business Services, as well as the mature workers program. These meetings have proved to be a great resource for case conferencing and have resulted in co–enrollments of customers and in some cases training contracts and employment.

ATTACHMENT C–7: Customer–centered service design flowcharts for Veterans

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT C–8: Customer–centered service design flowcharts for businesses

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT D: Integrated, technology–based job seeker flow chart at for One–Stop Career Centers (with Core Program partners)

New statewide customer flow to manage individuals from various referral sources who are triaged based on new, intensive skill assessment tools to Job Ready and Skill Building Teams within the Career Center.

ATTACHMENT E: List of Massachusetts One–Stop Career Centers

Greater Boston

Boston Career Link

1010 Harrison Avenue

Boston, MA 02119

617–541–1400, TTY: 617–442–3610

CareerSolution

75 Federal Street, 3rd Floor

Boston, MA 02110

617–399–3100, 800–436–WORK (9675)

Career Source

186 Alewife Brook Parkway, Suite 310

Cambridge, MA 02138

617–661–7867, 888–454–9675

TTY: 800–439–2370

Career Source

(affiliated limited services)*

4 Gerrish Avenue

Chelsea, MA 02150

617–884–4333

Employment and Training Resources

1671 Worcester Road

Framingham, MA 01701

508–766–5700

Employment and Training Resources

275 Prospect Street

Norwood, MA 02062

781–769–4120

The Career Place

100 TradeCenter

Suite G–100

Woburn, MA 01801

781–932–5500, (888) 273–WORK

Northeastern Massachusetts

ValleyWorks Career Center

Northern Essex Community College

100 Elliott Street, Haverhill Campus

Student Center, 1st Floor, Room SC118

Haverhill, MA 01830

978–241–4730

ValleyWorks Career Center

Heritage Place

439 South Union Street, Building 2

Lawrence, MA 01843 978–722–7000

Career Center of Lowell

107 Merrimack Street

Lowell, MA 01852

978–458–2503, TTY: 978–805–4915

North Shore Career Center

70 Washington Street

Salem, Massachusetts 01970

781–691–7400

North Shore Career Center

(affiliated limited services)*

5 Pleasant Street

Gloucester, MA 01930

978–283–4772

Access Point – NSCC – Lynn

(affiliated limited services)*

North Shore Community College

300 Broad Street, LW 131

Lynn, MA 01901

781–691–7450

Southeastern Massachusetts

Attleboro Career Center

95 Pine Street

Attleboro, MA 02703

508–222–1950

CareerWorks

34 School Street

Brockton, MA 02301

508–513–3400

Fall River Career Center

446 North Main Street

Fall River, MA 02720

508–730–5000

Career Opportunities, Falmouth

(affiliated limited services)*

210 Jones Road, Unit 14,

Falmouth, MA 02540

508–444–2874, TTY : 508–732–5300

Career Opportunities Hyannis

372 North Street

Hyannis, MA 02601

508–771–JOBS (5627), TTY: 508–862–6102

Greater New Bedford Career Center

618 Acushnet Avenue

New Bedford, MA 02740

508–990–4000

Plymouth Career Center

36 Cordage Park Circle, Suite 200

Plymouth, MA 02360

508–732–5300, TTY : 508–732–5300

Quincy Career Center

152 Parking Way

Quincy, MA 02169

617–745–4000

Taunton Career Center

72 School Street

Taunton, MA 02780

508–977–1400

Central Massachusetts

North Central Career Center

(affiliated limited services)*

25 Main Street

Gardner, MA 01440

978–632–5050, TTY: 508–792–7571

North Central Career Center

100 Erdman Way

Leominster, MA 01453

978–534–1481, TTY: 978–534–1657

Workforce Central Career Center

425 Fortune Boulevard, Suite 201

Milford, MA 01757

508–478–4300, TTY: 508–478–1887

Workforce Central Career Center

5 Optical Drive, Suite 200

Southbridge, MA 01550

508–765–6430, TTY: 508–765–6437

Workforce Central Career Center

340 Main Street, Suite 400

Worcester, MA 01608

508–799–1600

Western Massachusetts

Franklin/Hampshire Career Center

One Arch Place

Greenfield, MA 01301

413–774–4361, TTY: 413–772–2174

Franklin/Hampshire Career Center

178 Industrial Drive, Suite 1

Northampton, MA 01060

413–586–6506, TTY: 413–586–4921

CareerPoint

850 High Street

Holyoke, MA 01040

413–532–4900, TTY: 413–535–3098

BerkshireWorks Career Center

160 North Street

Pittsfield, MA 01201

413–499–2220, TTY: 413–499–7306

FutureWorks

One Federal Street, Building 103–3

Springfield, MA 01105

413–858–2800, TTY: 413–858–2800

ATTACHMENT F: STATEWIDE ONE–STOP CAREER CENTER STANDARDS

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT G: Workforce Development Board Certification Standards

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT H: Wagner–Peyser Exemption Letter

This document is a scanned copy of a letter from USDOL on waiving the merit staffing requirement in MA.

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT I: Veteran's 503 Form

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state–plan/

ATTACHMENT J: SCSEP 48–Month Durational Limit

Durational Limit Requirement

Participants enrolled in the MA–SCSEP have a 48–month durational time limit to participate in the program and secure an unsubsidized job placement. The Sub–grantee Employment Specialist tracks and reports on the 48–month durational time limit for all participants. EOEA will monitor the reports and will not approve any extensions over and above the 48–month limit.

This program participation durational limit is a requirement of the federally funded SCSEP grant and it is designed to assist the maximum number of individuals to participate in this subsidized training program and achieve their goal or securing unsubsidized employment.

Procedures for implementing the 48–month Durational Limit

1. Grantee *Durational Policy*. Sub–grantees must have a copy of EOEA's durational limit policy that has been approved by DOL.

*2. Informing Participants of Policy.*All new participants must be informed of the durational limit policy at the time of enrollment, and all current participants must be informed of the new policy when approved by DOL. In addition, the grantee must inform all participants who are within

3. Updating Waiver Factors. Sub–grantees must regularly run the WDL report to ensure that all participants due to reach their durational limit within the year have had their waiver factors updated within the program year.

Waiver factors are defined the following way:

- Severely disabled
- Frail
- Old enough for but not receiving Social Security Title II
- Having Low literacy skills
- Severely limited employment prospects in areas of persistent unemployment
- Limited English proficiency

- 75 or older

4. Ensuring the Accuracy of Durational Calculations in SPARQ database. Errors in SPARQ data can affect the accuracy of the individual durational limit. A Sub–grantee's errors for an exited participant can affect the time of participation with another grantee with which the participant is now enrolled.

5. Exiting Participants for Durational Limit. Participants must be exited on their durational limit date as listed in the WDL report. Participants must be given 30 days' written notice of their termination and must be informed that the termination is subject to appeal under the grantee's grievance policy. A copy of the grievance policy should be attached to the termination notice. Element 6(v) on the Exit Form, Durational Limit, should be checked as the reason for exit.

ATTACHMENT K: Termination and Resignation from SCSEP

Termination Policy

MA–SCSEP Sub–grantees are required to give all MA–SCSEP participants a written copy of the Executive Office of Elder Affairs' SCSEP termination policy during initial enrollment, along with a verbal explanation of the policy. This policy must be applied fairly and consistently in terminating SCSEP enrollment for all participants. Participants cannot be terminated due to age, as there is no upper age limit for participation in SCSEP. Participants should only be terminated when it is clear that a program violation has occurred (see 12.2) and a record of the issue or incident is properly recorded in the participant's file.

All participants must receive a written SCSEP Termination Notice 30 days prior to the date of termination. All participants should be informed of their right to appeal any termination. The SCSEP Termination Notice must inform participants that the termination is subject to the EOEA's Termination Policy and Procedures, and a copy of the Complaint Resolution Committee and Grievance Procedures must be attached to the Sub–grantee's Termination Notice.

Termination Reasons

Listed below are reasons for termination and standard termination procedures for SCSEP participants:

1. Termination Due to provision of False Information.

If, at any time, the Sub–grantee determines that an individual was incorrectly declared eligible as a result of false information knowingly given by the participant, the Sub–grantee must give the participant immediate written notice with an explanation and must terminate the participant 30 days after receipt of the notice. The participant will be removed immediately from the host agency and placed on leave without pay during the 30–day notice period.

2. Termination Due to Incorrect Initial Eligibility Determination.

If, at any time, the Sub-grantee determines that it incorrectly determined a participant to be eligible for the program through no fault of the participant, the Sub-grantee will give the participant immediate written notice explaining the reason(s) for termination and will terminate the participant's enrollment 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

3. Termination Due to Income Ineligibility Determined at Recertification.

If, at any time, the Sub-grantee finds a participant to be no longer eligible for enrollment, provider will give the participant written notice explaining the reason(s) for termination and will terminate the participant 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

4. Termination Due to achieving 48-Month Individual Durational Limit.

A participant will be terminated when he or she meets the 48-month maximum participation duration date. The Sub-grantee must send a notification of termination letter at least 30 days before the 48-month maximum participation date. The participant will be able to continue participating in the program until the date of exit.

5. Termination Due to Becoming Employed During Enrollment.

To qualify for enrollment in the SCSEP a participant must be unemployed. All participants are informed that they may not be employed while participating in the program and that they must notify the Sub-grantee immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the Sub-grantee of the employment will have their enrollment terminated immediately from the program. If this occurs, the participant will be placed on Leave without Pay immediately. The Sub-grantee must send a 30-day letter of termination to the participant.

6. Termination for Cause

There are several reasons to terminate a participant "for-cause." When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination. Examples of permitted reasons for termination include:

- Falsification of official records, such as timesheets
- Intentional disclosure of confidential or private information obtained from the host agency, grantee, or Sub-grantee
- Theft
- Physical violence or intentional destruction of property
- Obscene, abusive, harassing, or threatening language or behavior
- Sexual harassment of colleagues or others
- Causing an imminent threat to health or safety

- Non-compliance with drug and alcohol free policy, which prohibits participants while performing their host agency assignment or while carrying out objectives required by the IEP
- Frequent tardiness or absences exceeding 3 times during a 30 day period without good cause
- Failure to regularly attend or properly justify absence from the group training meetings or individual monitoring meetings conducted by the MA-SCSEP provider.

IEP-related termination reasons

If a participant fails, without good cause, to cooperate fully with the Sub-grantee to accomplish the goals of his or her IEP strategy, an IEP-related termination "for-cause" may be in order. All IEP-related violations should be considered on a case-by-

case basis. A Notice of Intent to Terminate must be submitted by Sub-grantee for approval to the SCSEP State Director prior to any IEP-related terminations. Examples of lack of compliance with the IEP without good cause include refusal to:

- Accept training opportunities outlined in the IEP
- Accept a new community service assignment to enhance skill development in support of IEP goals
- Accept supportive services that will enhance his/her ability to participate in a community service assignment consistent with the IEP
- Participate in sub-recipient offered services such as job search, skill training or resume writing

The IEP-related termination option should be used as a last resort. Before considering termination proceedings, the Sub-grantee should make every effort to find out why a participant is not cooperating to meet their employment and training goals. A participant must be given a chance to correct the offending action.

Written notice shall be given to the participant, citing a specific incident in which the participant did not fulfill his or her IEP responsibility. The notice should list the specific

event, cite the jointly signed IEP agreement, and provide a period of 30 days to take corrective action.

Termination Procedures

Step one: Documented Verbal Warning. The Sub-grantee verbally warns the participant and documents the verbal warning in case notes of the participant's file.

Step two: Written Warning. The Sub-grantee will complete a written warning and send it to the participant. A copy of the written warning will be put in the participant's file.

Step three: Corrective Action. The Sub-grantee will complete and send to the participant a 30-day Corrective Action Plan. The Corrective Action Plan must be discussed in person and signed by the

Sub-grantee and the participant. To follow up on the Corrective Action Plan, the Sub-grantee will issue and request a weekly progress report from the participant.

The Corrective Action Plan, minutes from all meetings with the participant and copies of weekly reports must be included in the participant's file.

Step four: Termination. If a participant fails to comply satisfactory with the 30-day Corrective Action Plan, the Sub-grantee will provide a MA-SCSEP Termination Notice to the participant informing him or her of the reason(s) for termination and the effective date, which must be a minimum of 30 days after the issuance of the notice. This notice will specifically reference the infraction and include the person's right of appeal in accordance with the Complaint Resolution Committee and Grievance Procedures. The Sub-grantee will meet with the participant to:

- Review the SCSEP Termination Notice.
- Inform the participant of his or her last day at the Host Agency, or inform the participant that he or she is being placed on a 30 day unpaid leave of absence until the exit date. During this time SCSEP staff is available to assist the participant in job search activities.
- Inform the participant of the right to appeal by implementing the Complaint Resolution Committee and Grievance Procedures.
- Have the participant sign the exit paperwork.
- Have the participant sign the last time sheet.
- Place a complete set of case notes in the participant's file.

SCSEP Termination Notice

A SCSEP Termination Notice is completed for each participant whose enrollment is ended. It must state the participant's right of appeal and a copy of the Complaint Resolution Committee and Grievance Procedures must be included with the SCSEP Termination Notice. The signature of the Sub-grantee program director or designee is required on each termination notice. A copy of the SCSEP Termination Notice shall be a part of the participant's record.

Sub-grantee must inform EOEA on all involuntary terminations for-cause.

Resigning from SCSEP

If a Participant decides to leave the program for any reason, two weeks' notice shall be given, and a written letter of resignation must be submitted to the Employment Specialist and copied to the Host Agency Supervisor. A copy of the Participant's resignation letter must be kept in the Participant's personnel file

ATTACHMENT L: SCSEP Complaint/Grievance Procedures

Requirements

The following policy must be fully adopted by all MA-SCSEP Sub-grantees. If this policy is not fully adopted by MA-SCSEP Sub-grantees, then the Sub-grantee must submit a policy implementing the

same governing elements as provided below for the approval by the Executive Office of Elder Affairs.

MA-SCSEP Sub-grantees are required to give all MA-SCSEP participants a written copy of the Executive Office of Elder Affairs' SCSEP Grievance Procedures during the initial enrollment, along with a verbal explanation of the policy. This procedure must be applied fairly, consistently and uniformly. All grievances and rendered decisions must be kept on file. In notifying the complainant of a final decision, the Sub-grantee must advise the complainant of their right to further appeal.

Note: This policy does not cover allegations of discrimination which should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210. The complainant should file a written complaint within (90) days in the case of an alleged act of discrimination.

Grievance Procedures

MA-SCSEP Sub-grantees are committed to a safe training environment. Any SCSEP participant who believes that he/she has encountered differential, irregular or illegal action at a Host Agency must be directed to take specific actions and follow these steps:

Step 1. File the written complaint- The complainant should first file a written complaint with the MA-SCSEP Sub-grantee within thirty (30) days after the alleged act occurred.

1) The grievance should clearly explain the circumstances around the incident and the incident itself.

2) The grievance should be detailed, include date, time, location and names of people directly involved or witnessing the incident.

Step 2. Informal Hearing - After receiving a written grievance, the MA-SCSEP Sub-grantee shall make every effort possible to settle the problem, following these steps:

- MA-SCSEP Sub-grantee must document the receipt of the written grievance.
- MA-SCSEP Sub-grantee must conduct an interview with the parties concerned. During the interview the following information must be gathered and documented in writing:

o Date of the incident or incidents and parties involved.

o Description of the problem: action, decision or condition giving rise to the incident as seen by the complainant.

o Other pertinent information that might be necessary to resolve the grievance.

- MA-SCSEP Sub-grantee shall render a written decision based on the information gathered during the above mentioned interviews within five business days from the date the initial interview was held. Such written decision shall include an account of all follow-up steps taken by the MA-SCSEP Sub-grantee to resolve the matter, and a list of advice or

recommended solution(s) given to the parties involved regarding the merits of the complaint and how to remedy the situation.

- Inform the complainant that if he/she is not satisfied with the decision, he/she has the right to appeal it.
- If grievance can be resolved, the MA-SCSEP Sub-grantee shall document the resolution in writing and submit copies of the documentation to the parties involved. The parties must sign and date the agreement.
- If the complainant accepts this decision, the procedure is complete.
- If the complainant does not accept this decision, and files an appeal, then the grievance is brought up to the next level of review, which is described below, until it reaches the final steps in the process.

Step 3. Second hearing - If the first informal hearing does not resolve the issue, a second process shall be followed:

All interested and involved parties shall present the grievance to the MA-SCSEP Sub-grantee in writing.

- Copies of all written grievances statements shall be made available to both sides.
- The SCSEP Sub-grantee shall form an ad hoc Complaint Resolution Committee with 3 members.
- Both parties shall be informed within five business days in writing when the committee will meet for the purpose of hearing the complaint, and the exact time and place of the hearing. At the hearing before the Complaint Resolution Committee, the complainant shall have the opportunity to present witnesses in his/her behalf, if appropriate, and shall have the opportunity to ask questions of the person or persons whose actions are alleged to have caused the complaint.
- The Complaint Resolution Committee shall consider the facts and make the decision within five days after the day of the hearing. The decision shall be made by a majority vote based on information in the file, written statements, and the testimony given at hearings. The decision shall be submitted in writing to the parties involved within five business days after a decision is made.
- Minutes shall be made of each hearing. The minutes, along with the written statements and other documentation presented at the hearing, shall be maintained in the Sub-grantee's files for at least three years after the final disposition of the grievance. If the complaint has not been resolved through the combined processes outlined above, the MA-SCSEP Sub-grantee shall inform the complainant of the process and procedure for appeal to the MA-SCSEP Sub-grantee - the Executive Office of Elder Affairs, 1 Ashburton Place, 5th Floor, Boston, MA 02108.

Procedures for Appealing to the state office:

- An appeal may be filed within five working days after a written decision is sent with the Executive Office of Elder Affairs' Office of the General Counsel, 1 Ashburton Place, 5th floor, Boston, MA 02108. The subject of the appeal can either be an alleged wrong decision (substance) or an inadequate compliance with hearing procedures (process).

- The MA-SCSEP Sub-grantee shall prepare for the Executive Office of Elder Affairs a report summarizing the complaint, the informal and formal investigation, and the disposition of the complaint and/or the written decision of the MA-SCSEP Sub-grantee's Complaint Resolution Committee.
- The Executive Office of Elder Affairs' Office of the General Counsel shall review the results of the complaint resolution procedure of the Sub-grantee. The General Counsel, or his/her designee, may seek or obtain additional information and shall affirm or amend the decision in writing within 15 business days. The decision of the Executive Office of Elder Affairs' Office of General Counsel is final. If the complainant alleges a violation of federal law (other than civil rights law) not resolved within 60 days they should follow the procedure listed below:

Violations of the Law and Discrimination:

- Complainants alleging violations of the law, other than those alleging discrimination, which are not resolved within 60 days as a result of the combined complaint resolution procedures of the MA-SCSEP Sub-grantee and the Executive Office of Elder Affairs, may file an appeal with: Division of Older Worker Programs, Employment and Training Administration; U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210.If the complaint alleges discrimination, it should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210.
- Once complete, the Executive Office of Elder Affairs maintains the complaint and decision in the files.
- If, in the course of the complaint resolution process, a participant is placed on approved break for administrative reason or removed from the payroll pending the results of the Complaint Resolution Committee or subsequent appeals process, and such determination is made in the participant's favor, the participant may extend their services to make up for lost hours during the appeal process and shall be restored to an active status.

ATTACHMENT M: Department of Unemployment Insurance Corrective Action Plan, Organizational Chart, SF-424, Signature Page, FY16 Approval Letter

The federal portal does not provide the ability to include this chart/graphic in the State Plan submission. Please review the missing information by viewing the copy of Massachusetts State Plan posted on www.mass.gov/massworkforce/state-plan/