

WIOA STATE PLAN FOR
THE COMMONWEALTH OF NORTHERN MARIANAS

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the U.S. Secretary of Labor that outlines a four-year workforce development strategy for the State's workforce development system. The publicly-funded workforce system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all jobseekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan — a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult Program (Title I of WIOA),
- the Dislocated Worker Program (Title I),
- the Youth Program (Title I),
- the Adult Education and Literacy Program (Title II),
- the Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by title III), and
- the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II and III of this document) where specified, as well as the program-specific requirements for that program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

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

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

Overview

Across the board approach of innovation and transformation of the CNMIs workforce development system is strongly supported by the leadership of the CNMIs Governor Ralph DLG. Torres and its appointed State Workforce Development Board.

Human capital is the single most essential component of economic development. The implementation of US PL 110–229 in the CNMI for the end of foreign worker reliance is set for December 2019. The US Secretary of Labor granted this extension from the prior deadline of December 2014. This discretionary authority though has ended with the second extension. The CNMI is mandated to develop and implement training to fill its workforce needs with qualified US workers. With the looming end of foreign workers, the CNMI has formed a task force ad hoc committee under the Strategic Economic Development Council to carry forward with discussions and strategies to prepare the CNMI prior to and final transition of foreign workers. As this plan is being written, there has been numerous meetings and discussions on the approaches of addressing the workforce pipeline gap when the transition period sunsets in December 2019.

Preparing the CNMIs workforce through continuous design and development of education and training workforce development programs and strategies is key to the CNMIs economic prosperity and departure of its dependency on foreign workers. The CNMI also recognizes that it does not have the sufficient workforce to populate its private sector pipeline, however the focus on getting the CNMIs available workforce that are not employed and needing additional education and training including individuals with disabilities and those experiencing other barriers to employment is key to the CNMIs ability and efforts to fill the void that will be left by foreign workers. A shift from public to private sector employment plays a critical role in the sustainability of the CNMIs private sector economy.

The integration of workforce development programs is focused at an earlier stage such as from elementary to high school and subsequently to the adult service delivery programs. The CNMI is poised to embracing the opportunities in developing its workforce development system into a system of education, skilled, and competitive workforce development and eco-system. Development of promising career pathways is an integral workforce development strategy and initiative that will bring the CNMIs human capital development to the levels of competitiveness locally, regionally, and globally. In addition, job-driven training (e.g., work experience, OJT, internship, etc.) and customized training will help individuals to better meet the needs of employers and thus increase opportunities for job placement.

The use of labor market intelligence and analysis provides the guidance and strategic workforce development goals and initiatives that the CNMI is embarking on. These labor market analysis information with the economic analysis component provides the path to shape the CNMIs current and future workforce development programs and system design. The long term dependency on foreign labor has tremendously benefitted the CNMIs economic growth and employment opportunities while at the same time presents the greatest opportunity as well for the CNMI to re-design its programs and workforce system that will develop its local resident workforce with the necessary education and training tools that will fill the void of foreign workers.

The strong partnerships and collaborations between both public and private sector is essential to the success of the CNMIs efforts in transforming its workforce system. The delivery design is also focused on ensuring that not only the greater workforce population benefits but more so those that are in the target or at risk populations in the workforce landscape. The CNMI is built on the foundation of providing care to all its citizens by continuously investing in its human capital through the opportunities of funded education opportunities and/or training and employment programs for both duo customers in the CNMIs workforce system.

I. WIOA STATE PLAN TYPE

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

Unified State Plan. This plan includes the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program. Yes

Combined State Plan. This plan includes the Adult 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. No

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) No

Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.) No

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

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

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

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

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

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

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

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

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532)) No

II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs. 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.

1. Economic and Workforce Analysis

A. Economic Analysis

The hospitality industry remains the main industry of the CNMI with plans for economic diversification for long term sustainability. Most recently the inclusion of the gaming industry to the CNMI https://www.fhb.com/en/assets/File/Marketing/2015_GuamCNMI_EconForecast.pdf has jump started the economy which is experiencing tremendous growth in construction activities on new developments and refurbishing of existing buildings. As of the writing of this state plan, a total of 1,324 existing and new hotel rooms are permitted to be constructed and/or being refurbished to get back into the market that will support the increasing need for more hotel rooms. The CNMI currently only has 3,547 active hotel rooms insufficient to the growing number of visitors to the islands. The Hotel Association of the Northern Marianas reported on March 18, 2016 its highest occupancy room rate at 98 percent beating the record back in 1997 before the Asian Economic Crisis. The same report showed room rates at an all time of \$166 per night far exceeding the record back in August 1996.

The need for a diverse market mix is critical for the CNMI's hospitality industry. A great effort by the CNMI Governor and the Marianas Visitors Authority has been put forth to attract the return of the Japanese visitors market. A great increase of FAM tours have been organized by the CNMI Visitors Authority Office. Other FAM tours are also being organized to ensure visitors market diversification and sustainability inclusive of increased efforts in attracting other airlines to choose the CNMI in their travel destinations such as the return of Phillipine Airlines direct flight to Saipan.

The current experience of on-going economic activities does provide the CNMI the opportunity to re-evaluate other industries for long term economic sustainability
<http://www.wia.gov.mp/downloads/2013-0723-Final-Report-and-Recommendation-Economic->

Development-Forum.pdf . The CNMI consists of 3 primary islands, Saipan, Tinian and Rota. Each island presents its own uniqueness for economic activity and diversification allowing the CNMI the opportunity to maximize its potential for growth and sustainability. The next CNMI CEDS (Comprehensive Economic Development Strategy) is already being planned by the CNMI Department of Commerce. Economic optimism for the CNMI exists with greater anticipation for positive growth in current and other potential sectors that will be created by the current economic activities.

CNMIs Response: The leading industry drivers of the CNMIs economy are as follows sourced from the CNMIs Revenue and Tax Office W2 Data. NAICS Major Group Leading SOC Major Groups

Total Occupations i. Existing Demand Industry Sectors and Occupations

The latest comprehensive study of demand industry sectors and occupations is contained in the latest PWWAS Study http://www.wia.gov.mp/downloads/2014_PWWAS_061715_FINAL.pdf. An update to this study is also currently being planned by the CNMI Department of Commerce necessary for industry employers in their labor certification application process. The CNMI continues to utilize this most recent report as a planning tool to design and develop training needs of its local workforce.

ii. Emerging Industry Sectors and Occupations

The entrance into and growth of the gaming industry in the CNMIs economy has shown emerging market sectors such as Real Estate acquisitions and development. The CNMI is experiencing tremendous growth and business activity particularly in this industry sector which translates to increased activities of realtor professionals, financial professionals, legal professions. Other emerging sectors and occupations are those of security, IT professionals, and gaming inspectors. Other emerging sectors and occupations are being created in the service and retail sectors.

The sudden increase in construction projects is also emerging in the CNMI creating a huge demand for skilled construction workers. The CNMI currently has an inventory of less than 1200 skilled construction workers. The increase in demand for skilled workers versus the low supply has definitely created an increase in construction occupations that will also require sustainability for the maintenance of these newly permitted projects in the CNMI.

The next CEDS study will provide the CNMI a more comprehensive analysis of potential and emerging industry sectors and occupations. Presently, what is clearly visible are those mentioned earlier.

iii. Employer's Employment Needs

The transition of foreign workers under US PL 110-229 and the gradual reduction of CW workers every fiscal year through the year 2019 is of great concern to the CNMI. The available workforce combined from all 3 islands proves to be insufficient to populate the workforce pipeline that is being created by the current economic growth and activities. The current permitted projects anticipate a workforce need of 7,820 new workers, and

this number are only for the anticipated hotel rooms to be constructed bringing the total workforce for this sector to 10,530. Additionally, the gaming industry created a workforce need of professionals directly aligned with the needs of the industry such as foreign language skills, high end professional jobs for the sophisticated industry clientele, and other professional categories created by the new CNMI industry. These needs also translates to other sectors or sub-sectors of the service related industries that require similar workforce employment needs that may not be readily available with the present workforce which will require for trainings to be developed to fit the needs of the newly acquired CNMI visiting clientele.

CNMIs Response: The leading industries are as follows.

NAICS Major Group Accommodation and Food ServicesAdministrative and Support and Waste Management and Remediation ServicesAgriculture, Forestry, Fishing and Hunting Arts, Entertainment, and Recreation Construction Educational Services Finance and Insurance Health Care and Social Assistance InformationManagement of Companies and EnterprisesManufacturing Mining, Quarrying, and Oil and Gas Extraction Other Services (except Public Administration) Professional, Scientific, and Technical Services Public AdministrationReal Estate and Rental and Leasing Retail Trade Transportation and Warehousing UtilitiesWholesale Trade The top 10 leading occupations are as follows.

1. Management Occupations
2. Construction and Extraction Occupations
3. Transportation and Material Moving Occupations
4. Food Preparation and Serving Related Occupations
5. Installation, Maintenance and Repair Occupations
6. Personal Care and Service Occupations
7. Arts, Design, Entertainment, Sports and Media Occupations
8. Building and Grounds Cleaning and Maintenance Occupations
9. Architecture and Engineering Occupations
10. Sales and Related Occupations

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless

individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. ** Veterans, unemployed workers, and youth, and others that the State may identify.

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. SKILL GAPS

Describe apparent 'skill gaps'.

B. Workforce Analysis

US PL 110-229 Consolidated Natural Resources Act (CNRA) calls for the transition of foreign workers by the year 2019. The initial transition date of December 2014 was extended under the discretionary authority of the US Secretary of Labor granting the CNMI a 5 year extension of the CW program now set to expire by December 2019 without further authority of the US Secretary of Labor to grant an extension. The CNMIs workforce is still dependent on foreign workers to supplement its local workforce. With the CNMIs expanding economy, the need for more workforce is validated by the permitted projects that will be needing a total of 7,820 new workers upon completion of all the projects.

The CNMI in response to US PL 110-229 is also mandated to report to the US Secretary of Labor annually on its efforts and initiatives to transition the foreign workers. Employers petitioning for foreign workers are required to pay an education fee of \$150 that will go for the education and training development of the CNMIs local workforce. The current CNMI budget act or PL 19-08 appropriates \$1.7m for the Northern Marianas College (NMC) and the Northern Marianas Trades Institute (NMTI). Despite the limited or insufficient funding necessary for trainings and curriculum design that is responsive to US PL 110-229, the CNMI continues in good faith to work with its meager workforce funds either local or federal to respond to the intent and spirit of US PL 110-229.

In addition to its official state workforce study reports such as the 2014 PWWAS and 2014 Broadband Survey, in order for the CNMI to get a better understanding in analyzing its workforce, the office of the CNMI Secretary of Labor invokes the Freedom of Information Act or FOIA through the office of USCIS. By invoking the FOIA, only then can the CNMI be able to fully get a better view

of the foreign workers job occupations for purposes of training and education curriculum design as required under PL 110-229 for foreign workers transition. However the FOIA effort, the CNMI is still presented with FOIA data challenges where from FY 12-FY 15 a total of 1,817 foreign worker occupations were not reported and for the same time period requested through the FOIA a total of 22,560 foreign worker visas were issued without job codes and occupations. Despite these data challenges, the CNMI is determined to develop its workforce capacity that will increase the employment participation of its local workforce for a sustainable and self sufficient livelihood.

The CNMI 5 year high school graduation data also shows 1,859 age working student population 16 yrs and older. Sixty one percent goes to college, 20 percent enter the military, whereas 15% seek jobs in the CNMI and 4% remain undecided.

Individuals with disabilities served by the Office of Vocational Rehabilitation in 2010-2013 and who achieved an employment outcome consistent with their primary employment factors (e.g., interests, skills, abilities, capabilities, informed choice, etc.) remained constant during the 4-year period with an average of 35 successful closures, though the success ratio has declined since 2011 to 65% in 2013, which remains well above RSA Standard and Indicator 1.2 set at 55.8% for combined agencies (General VR and Blind Program). At the same time, OVR saw an increase in the number of cases closed after services were provided but without an employment outcome. Some of the reasons that contributed to the declining success ratio were: 1) limited job placement opportunities and a majority of consumers were looking for immediate employment; 2) ineffective collaboration with stakeholders adversely impacted timely service delivery and coordination; and 3) the need to reach out to and educate more employers about the benefits of hiring qualified workers with disabilities. For consumers with most significant disabilities, the success ratio is 24% below the average rate of OVR's general population in 2013. When surveyed, OVR's partners identified the top three barriers to achieving employment for consumers with most significant disabilities as 1) not having education or training, 2) lack of job skills, and 3) employers' perceptions about employing individuals with disabilities. For OVR consumers who are transition-aged youth 14-24 years old, the number of employment outcomes and success ratio are very low when compared to the general population and those with most significant disabilities. When polled, partners indicated that the barriers to achieving employment for transition-aged youth are: 1) lack of job skills, 2) lack of education/training, and 3) lack of job search skills. (Source: CNMI Comprehensive Statewide Needs Assessment Report of 2014, <http://www.ovrgov.net/resources/files/2014%20CSNA%20Report.pdf>)

i. Employment and Unemployment

The CNMIs 2010 census data reported an unemployment rate of 11.2 percent where 10,711 in the age working population universe of 16 yrs and over are not in the labor force. This data report however does not present the current workforce analysis of the CNMI considering that the report reflects data collection back in 2009. The latest and most dependable workforce analysis report would be the 2014 PWWAS http://www.wia.gov.mp/downloads/2014_PWWAS_061715_FINAL.pdf. The 2014 Broadband Survey reporting the CNMIs unemployment at 16.8 percent, however this same report was patterned similarly after the 2010 census data collection showing a total of 10,805 not in the labor force. Included in this group are students, high school dropouts, homemakers, retired workers, seasonal workers interviewed in an off season who were not looking for work, institutionalized people, and people doing only incidental unpaid family work.

CNMIs Response:

The CNMIs 2015 W2 data on occupations reported by employers are as follows. Total Occupations The CNMIs 2014 W-2 data shows 27,232 occupations, where 51% or 13,924 are those of Non-US workers while 49% or 13,308 are those of US and FAS workers combined. The 2014 Broadband Survey report shows 27,861 in the labor force or 72.1 percent of the 38,666 age working population, while 4,674 are unemployed and 23,187 are employed.

The CNMIs foreign workforce from FY 12 - FY 15 combined is 33,570. The current FY 16 CW allocation for the CNMI is set at 12,999 with a gradual reduction. The CNMI is currently exempted from the H visa national caps until 2019.

ii. Labor Market Trends

The CW foreign worker data shows a great demand in certain occupations such as Executives and Managers, Management Support, Accountants and Auditors, Registered Nurses, Science Technicians, Marketing and Sales, Administrative Support, Protective Service, Food Service, Health Service, Building Service, Make-Up Artist, Agriculture/Horticultural Worker, Mechanics and Repairs, Construction Trades, Precision Production, Machine Operator, Transportation/Material Moving, and Handlers, Helpers, and Laborers. Additional related information is found on the 2014 PWWAS http://www.wia.gov.mp/downloads/2014_PWWAS_061715_FINAL.pdf.

III. Education and Skill Levels of the Workforce

The 2014 PWWAS provides the latest education and skills levels of the CNMIs workforce http://www.wia.gov.mp/downloads/2014_PWWAS_061715_FINAL.pdf. The report also differentiates the data between the 3 municipalities of Saipan, Tinian and Rota. The CNMI continues to invest in the education of its citizens through the SHEFA and CNMI scholarship programs. Many of the scholarship recipients attend college in the US, the local college, and in Guam. The CNMI has invested more than \$80M since inception of both scholarship programs and continues to do so for it believes that investing in the education of its citizens is not only the right decision but also a worthy investment of its assets, its human capital. The CNMI also reports an annual strong percentage of high school graduation rate of more than 95%.

Additionally, both scholarship programs governed by its own boards continue to align themselves to the demand driven occupations and economic sectors of the CNMI. This realignment is not only responsive to the call under US PL 110-229 but also responsive to the scholarship programs of bringing home the talent to the CNMI. As of March 29, 2015 SHEFA reported a total of 19 certificated graduates, 418 Associates Degree, 313 Bachelors Degree, 43 Masters Degree, and 6 Doctorate Degrees.

The CNMI recognizes several career pathways into the job force. They are a high school diploma or its equivalent, an Associate's degree, post secondary certificates or degrees, professional certificates or licenses, vocational training certificates, and employer-based training.

IV. Skill Gaps

The CNMI is faced just as any other with workforce skills gaps. Both educational institutions namely the Public School System (PSS) and the Northern Marianas College (NMC) continue to address the basic skills deficiency of its new high school graduates that are entering the local college. These basic skills gaps are being addressed at the state level in identifying the barriers and how to bridge

the gap between the two learning institutions so that the students can successfully place at college entry level courses such as English and Math. Other skills gaps identified are those without the necessary computer and digital literacy skills, high school equivalency diplomas for at the least entry level work opportunities, critical and analytical skills, language skills, writing skills such as technical writing skills, financial literacy skills, and other related soft skills necessary for the successful entry into the workplace.

In the trades related occupations, there are identified gaps not just with the lack of interest generally in the trades profession but also the necessary skills such as technical reading, technical writing, basic mathematical skills, reading skills on technical instructional materials, and other related skills necessary for a successful entry into the trades profession. . The CNMI through its only trades school the Northern Marianas Trades Institute has been very instrumental in advancing the "other college" the trades profession. Many high school students similarly with non-traditional students are beginning to see the interest and promising careers in the trades profession.

CNMIs Response: The leading industries identified are as follows.

NAICS Major Group Accommodation and Food Services Administrative and Support and Waste Management and Remediation Services Agriculture, Forestry, Fishing and Hunting Arts, Entertainment, and Recreation Construction Educational Services Finance and Insurance Health Care and Social Assistance Information Management of Companies and Enterprises Manufacturing Mining, Quarrying, and Oil and Gas Extraction Other Services (except Public Administration) Professional, Scientific, and Technical Services Public Administration Real Estate and Rental and Leasing Retail Trade Transportation and Warehousing Utilities Wholesale Trade Leading Occupations are as follows.

1. Management Occupations
2. Construction and Extraction Occupations
3. Transportation and Material Moving
4. Food Preparation and Serving Related Occupations
5. Installation, Maintenance, and Repair Occupations
6. Personal Care and Service Occupations
7. Arts, Design, Entertainment, Sports and Media Occupations
8. Building and Grounds Cleaning and Maintenance Occupations
9. Architecture and Engineering Occupations
10. Sales and Related Occupations

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.*

* 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.

A. The State's Workforce Development Activities

The CNMIs workforce system continues to transform itself into a more structured and successful workforce development system. The CNMI believes that workforce education and skills gaps are both critical informations to designing and re-designing education and training activities. Inclusive in these workforce development activities is the blended approaches of incorporating career pathways from junior to high school to college and into the workplace either as interns or through subsidized employment and training programs. All CNMI core program partners are actively participating and networking its greater and common efforts of developing the CNMIs workforce skills and talents.

Private sector mentoring programs, cooperation education job fairs such as developing interview skills, trades professions job fairs, employer and/or state sponsored job fairs, classroom developmental instructions, and through the Adult Education and Literacy program- knowledge and work skills capacity building for students to work, further education, community involvement and family self-sufficiency. Trainings administered through community based or non-profit organizations, and financial literacy trainings in partnership with local banking institutions are also more of the CNMIs workforce development activities.

Subsidized employment and training workforce development activities are also recognized by the CNMI as key initiatives in the development of its workforce. Complementing classroom instruction with work experience is a known and successful combination for workforce development strategy and greatly encouraged as part of a succession planning strategy for the CNMI.

CNMI's Response: The CNMI's core workforce partner programs all work together through cross collaborations and delivery of workforce development activities. For example, the CNMI's only local college institution through its mandate under the CNMI's Constitution provides higher education classroom training, certificates and degree programs. All services relative to the education and development of the CNMI's workforce activities are channeled through this process. The local college institution is governed by a Board of Regents and similarly the CNMI's Public School System is governed by an elected Board of Education members. The CNMI is clearly cognizant of the roles and responsibilities of each core program partner hence the cross referrals for workforce development activities minimizing and/or eliminating duplicative workforce development activities.

The Vocational Rehabilitation program helps to prepare consumers (eligible individuals with disabilities) for competitive integrated employment through training or educational services consistent with and provided in the context of an approved individualized plan for employment. On-the-job training is a win-win for both consumers and employers. For consumers, they gain valuable work experience and increase their chances for job placement. For employers, they add value to their company by diversifying their workforce and an incentive exists whereby the program may reimburse the employer for wages paid to the consumer participating in OJT. In addition, more employers these days are finding that workers with disabilities are seeing to their duties and responsibilities diligently and with much appreciation. It is very possible for individuals with most significant disabilities to successfully participate in OJT and afterward transition to job placement with job coaching services and other accommodations provided by the program. Employers are also capable of providing natural job supports to workers with disabilities by tapping existing resources.

VR's goals and priorities are to improve the delivery of competitive integrated employment services to its clients; facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other partners; strengthen partnerships with employers to identify and provide opportunities for employment to consumers including transitioning youth with disabilities; continue to collaborate with the Workforce Investment Agency to prepare mutual clients for employment; and to improve VR service delivery to effectively meet the employment needs of clients with most significant disabilities. VR will emphasize customized employment, supported employment, individualized services, pre-employment transition services to students with disabilities (e.g., job exploration counseling, work-based learning experiences, counseling on postsecondary college options/opportunities, instructions in self-advocacy, and workplace readiness training to develop social skills and independent living), employer engagement and education, increased collaboration and coordination with stakeholders including the CNMI Disability Network Partners, the Transition Coalition, the Community Guidance Center, and the State Workforce Development Board, competitive integrated employment, support for advance training in the STEM fields, and other methods or strategies that will expand and improve services to individuals with disabilities.

CNMI's Response: From the perspective of the Title IV Vocational Rehabilitation Program, regular communication among the WIOA core programs will be a key ingredient to building and/or strengthening partnerships resulting in improved service delivery to the populations being served. The Office of Vocational Rehabilitation continues to be committed to working diligently alongside the core programs to coordinate workforce activities in a manner most effective and efficient given our unique circumstances and resources through a shared mentality approach related to cases, costs, and data. OVR looks forward to formalizing this commitment with the core programs through the execution of an official memorandum of agreement.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A) above.

B. The Strengths and Weaknesses of Workforce Development Activities

The strong collaboration and partnership amongst the core programs are recognized as the CNMI greatest strengths including that of leveraging its local and federal resources. The desire to achieve an educated and skilled CNMI workforce is a great asset that is the fundamental driver to continue to develop the CNMIs workforce talent. The vision to succeed and to have a better life for all its citizens has been a long term strategy and vision of the CNMI hence its testament of not only engaging in these workforce development activities but also a true testament of investing even with its meager resources in its scholarship programs.

Some of the identified weaknesses of the workforce development activities is primarily the lack of sufficient workforce funding, the lack of a greater pool of service providers or community rehabilitation programs, and the long term dependency on government sponsored programs such as food stamp. However, with these weaknesses the CNMI sees the opportunity to engage its workforce to see the greater opportunity in training that will enhance the individuals earnings potential and better family life. Additionally, with the transition of foreign workers by 2019, both strengths and weaknesses of training and curriculum design does present some challenges and opportunities for a better CNMI workforce.

CNMIs Response: The CNMIs workforce development issues are identified in the weaknesses and threats components of the SWOT analysis. Other issues are: 1. Dependence upon sectors that are more susceptible for economic downturn limits the ability of the CNMI to sustain economic growth at the level that is comparable with the rest of the region/world. 2. Limited land resources constrain industrial location and expansion. 3. The education and skill levels of much of the labor force are not high enough to compete in the technological global economy. 4. Other factrors are infrastructure problems, the lack of sufficient CNMI residents to fill jobs, and the unavailability of a reliable public transportation system that limits the ability of individuals targetteed by WIOA to avail of low cost transportation through a reliable system.

CNMI's Response: After a thorough examination, the Vocational Rehabilitation Program outlines below its strengths and challenges in carrying out its workforce development activitiesStrengths:

- VR is an individualized service delivery system that puts the client or consumer at the center of decision making and values informed choice.
- VR utilizes to the maximum extent possible comparable benefits prior to providing Vocational Rehabilitation Services except when comparable benefits are not adequate, timely, or would otherwise interfere with IPE implementation. Every effort is made to provide highest quality services at the most reasonable cost. Goal is to provide services to as many individuals as possible.

- VR is an active member of and in good standing with the local Disability Network Partners that was established in 2015 and comprised of representatives from various public agencies (Council on Developmental Disabilities, Commonwealth Office of Transit Authority, etc.), non-profit organizations led by self-advocates including VOICES of the CNMI and the Center for Living Independently, UCEDD, P&A, the Public School System, boards and councils such as the State Rehabilitation Council and Statewide Independent Living Council, etc. with a general goal of working together to leverage resources and expertise to improve services to our local island community including individuals with developmental and other disabilities so they may have meaningful, productive, and self-sufficient lives as well as employers so they may be able to meet their business needs through a workforce highly motivated and skilled.

- VR is a very unique program capable of providing a broad array of services that otherwise would not be available in other programs. These services may include those job-related in nature such as work apparel, drug test, and police clearance; support services like transportation that is provided alongside other substantial VR service(s); and supported employment services such as job coaching and personal assistance.

- VR staff are committed to working closely with partners including the WIOA core programs to meet the mandates of the law with the goal of increasing quality outcomes for the populations we serve.

Challenges:

- Timely delivery of VR services is an ongoing challenge for various reasons. One, the VR process from application to eligibility to plan development to IPE implementation takes time. Second, efforts to obtain existing documentation in a timely manner is at times met with difficulty as a result of external factors. Third, arranging for diagnostic evaluations or assessments also take time due to a shortage of community rehabilitation programs especially in the sister islands of Tinian and Rota, resulting, for example, in the inability to access available professional providers. And fourth, procurement of off-island services at times is inevitable. Take, for instance, assistive technology devices. The more high tech the consumer's AT needs are, chances are that intervention by off-island vendors will be required to not only supply us with the actual AT itself but to also conduct the assessments and the trainings necessary. In addition, the government's procurement rules and regulations for items above \$2,500 require substantial time for processing. Despite VR's best efforts and intentions, clients who have expressed dissatisfaction due to service delays are encouraged to seek assistance from the Client Assistance Program.

- In order to increase work-based learning experiences and employment opportunities for consumers, VR must continue its efforts to expand employer networks but still remain true to its belief that such efforts require the ongoing yet delicate nurturing of relationships. Building new and strengthening existing relationships with stakeholders including employers will be essential to VR realizing increased employment outcomes with competitive wages in integrated settings.

- Currently, CNMI OVR has only 4 professionals and 2 paraprofessionals providing direct services to individuals with disabilities. Counselors are working around the clock to provide services to the main island of Saipan as well as to the other islands of Tinian and Rota on a monthly basis. The lone VR transition counselor attends to all IEP meetings, co-location activities at all 5 public high schools including the Northern Marianas College and the Northern Marianas Trades Institute, and at times makes room for home visits as necessary. In addition, her role is to actively engage in conversations and negotiations with potential employers for training and employment placement purposes. Additional VR staff (e.g., Employment Specialist) will be needed in the near future to assist with

efforts of increasing employer engagement and expanding employer networks thus allowing counselors to ensure the provision of quality counseling and guidance services.

- OVR tracks and reports its own data (as is the case with other programs), though there is a need to track common measures and share data across the WIOA core programs.

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 CNMIs responsible State entities have the commitment and capacity necessary to carry out the workforce development activities. The strong collaboration and partnership between state workforce programs are firmly established with the understanding, focus, and commitment in the transformation and development of the CNMIs workforce development activities. Leveraging, sharing of critical information of participants served for the delivery of essential and holistic workforce development services is well established and open while also ensuring that the confidentiality of the population served are protected.

The alignment of the CNMIs workforce with that of the private sector's partnership is just as critical. The relationships established with a blended workforce development activities approach has resulted in many successes of the participants served. The CNMIs state entities are equipped with the knowledge, education, and workforce delivery and professional skills necessary to execute the planned and designed workforce development activities for an educated and skilled CNMI workforce.

Additionally, the involvement of a private sector led State Workforce Development Board membership in carrying out the necessary workforce development activities provides the leadership and professional guidance to the State workforce entities in the delivery of effective workforce development strategies for an educated, skilled, and competitive CNMI workforce system and human capital successful employment outcomes.

CNMIs Response: The CNMI recognizes its strengths and weaknesses in certain areas however it is confident of its Core partner program capacities specifically in the administration of the Adult, DW and Youth WIOA Programs. Despite budgetary and limited FTE constraints, the WIOA Title I state agency administering office has the professional personnel and capacity to administer these programs with continuous capacity building of its personnel in response to the changing WIOA initiatives governing the administration of all three programs.

The Vocational Rehabilitation program does not expect to implement an Order of Selection for the duration of the 2017-2020 Unified State Plan as their fiscal resources are adequate to meet the needs of all eligible individuals with disabilities regardless of disability category. Collaboration and coordination and cost-sharing with partner agencies over the last couple of years have helped to reduce expenses while still providing valuable services such as advocacy, outreach, public awareness, community education, and even training, workshops, and conferences that benefit a wide audience including employers, policymakers, individuals with disabilities including students and youth, self-advocates, family members, and other stakeholders.

OVR continues to support their professionals and professionals as they increase their knowledge, skills, and abilities to more effectively serve their clientele. Two VR counselors are currently pursuing

their master's degree in rehabilitation counseling through San Diego State University's distance learning program. One VR counselor aide is continuing his studies at the Northern Marianas College and is more than half way to earning an associate's degree in Rehabilitation and Human Services. In the fall of 2016, OVR's transition counselor will begin her 1-year certificate program in school to work transition serving the needs of high school students with disabilities. In FY 2017, OVR will pursue the recruitment and hiring of an employment specialist who, in coordination with the counselors, will work with employers to identify OJT and job placement opportunities.

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.

1. Vision

The CNMI under the leadership of Governor Ralph DLG. Torres envisions a workforce system that embraces an all inclusive workforce system that embraces the entire CNMI workforce population to be educated, skilled, and reach the levels of self sufficiency for a better life. The Governor calls upon the business sector to "hire local, hire our community." The Governor supported by his appointed State Workforce Development Board envisions now and into the future for all CNMI families to be given the opportunities to affordable and accessible education and training and as a result be able to easily transition into the employment market where their newly acquired knowledge and skills will be useful.

Under the CNMIs administration, the Governor has also created a task force to align programs that deals with indigent or at risk populations. The most recent organization of the CNMI Indigenous Affairs Office mandates to seek opportunities for the indigenous population by getting them involved in the available education and training programs within the CNMI. Additionally, other strategic mandated initiatives calls for the Nutritional Assistance Program to revisit program polices by increasing the participation of those that required to register for work and other areas of program policies where it provides for a greater increase in workforce training and increased education and employment participation of the target population.

The CNMIs strategic vision continues remains also committed in the investment of its citizens through scholarship program funding. Besides the general CNMI Scholarship Program, exists each municipality specific scholarship programs as well to educate its community and as a CNMI in whole. The PWWAS http://www.wia.gov.mp/downloads/2014_PWWAS_061715_FINAL.pdf is a testament to this talent building initiative and strategic vision and goals of the CNMIs workforce development system.

The CNMI further recognizes the increasing growth of its economy and as a result the generation of the new developments presents new employment opportunities with certain skills requirements. The CNMIs strategic initiatives with its education and training partners such as the Public School System, the Northern Marianas College, the Adult Education Office, and the Northern Marianas Trades Institute are all working consistently on the alignment of their education and training initiatives that is responsive to the demand driven sectors of the CNMIs economy, existing occupations and new occupations created by the growing economy.

The participation of the CNMI workforce in both local, regional, and national opportunities where their education and skills development can be useful is an overarching strategic vision and goal of the CNMI. The CNMIs long term plan of an increased educated and skilled workforce will decrease the unemployment rate, increase the standards of living of every CNMI household and family, provide a better and competitive employment opportunity for its workforce, and continue to strive for a workforce development system that is globally competitive as the rest of the world's economy and workforce system transforms.

The CNMI further envisions its workforce development system to develop into a system of recognizable and portable credentials. This strategic vision is considered highly essential for its workforce to be able to climb the income ladders of employment competition. This strategic vision

and goal is also responsive to the increased occupations currently held by foreign workers where the investment of its human capital's education and training can fill the gaps if not all.

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.

* Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

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

2. Goals for Achieving the CNMIs Workforce Development Vision

1. Increased focus and re-alignment of education and training programs that is responsive to the growing CNMI economy and business sector workforce needs
2. Continued investment in its human capital through budget appropriations of its state driven scholarship programs
3. Re-tooling and continuous investment in capacity building of its State entities workforce program delivery providers
4. Improved service providers performance and outcome oriented training activities that leads to a successful employment placement
5. Continuous re-designing for a seamless service delivery approach for those considered most in need or target populations
6. Expanding and moving beyond the norm of service delivery approaches into a creative and innovative workforce delivery system with improved outcomes on education and training of its workforce population
7. Support and funding or workforce surveys for the collection of current labor market information, economic development activities, and skills needs of private sector employers

8. Increased support for a concerted aligned effort across the entire CNMI workforce eco-system that will produce the tangible results of a workforce system design that embraces those seeking the services to better their lives
9. Improved public sector environment as public servants to those seeking and needing the workforce system's services that will lift families out of poverty, acquire their educational needs, acquire the necessary training for a better employment opportunity and upward economic mobility
10. Focus on using data to implement innovative policy changes and successful implementation and execution
11. Align policy makers in the vision and crossing political boundaries for an educated, skilled, and competitive CNMI workforce delivery system that produces tangible and successful outcomes of individuals and families
12. Create an environment of a workforce development system that provides for an all inclusive workforce population regardless of affiliation or economic identity
13. Strengthen career pathways to support the transitions of workers from educational and training into the workforce and into self-sustaining professions.
14. Integrate education and training opportunities to allow all future workforce individuals in the CNMI to prepare and meet the ever changing demands of tomorrow's jobs.
15. Collaborate with WIOA and other core partners to provide pre-employment transition services to students/youth with disabilities for better employment outcomes.
16. Increase employer engagement to ensure job-driven workforce where employers are matched with skilled workers (e.g., customized training/employment).

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.)

Performance Goal 1

The implementation of US PL 110-229 phasing out of foreign workers by December 2019 provides the CNMI the opportunity to reshape, realign, and refocus its workforce development strategies by designing its education and training initiatives that is aligned and supported by labor market data analysis and economic indicators. CNMI education and training institutions continues to retool and redesign itself that is responsive to the employment sectors providing the necessary education and skills capacity for a successful placement or employment outcome

Performance Goal 2

The CNMIs current minimum wage is at \$6.05 an hour with the next increase of \$.50 cents come September 30, 2016. The improvement of the education and training development programs provides the opportunity for an upward mobility in income earnings of the CNMIs working population most especially those considered target populations

Performance Goal 3

Employment retention is key for the CNMIs workforce development success. The CNMI continues to provide the means and programs to access education and employment training opportunities to individuals seeking the needed services such as acquiring new work skills and required knowledge for the workplace

Performance Goal 4

Achieving workforce credentials for the CNMIs workforce is essential in remaining competitive and finding sustainable employment. The CNMI is focused on ensuring that workforce development activities at all levels of education and training leads to recognizable credentials on education and skills attainment

Performance Goal 5

The CNMIs K-12 population is the CNMIs future workforce. Investing for the future of the CNMIs economic and workforce success is key in building this very foundation of its human capital development workforce development initiative.

4. ASSESSMENT

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

4. Assessment on the CNMIs overall effectiveness of its Workforce Development System

The CNMI collects customer satisfaction surveys to all served in its workforce system. These surveys serves as a great tool and information for the continuous improvement of the CNMIs workforce development initiatives and strategies. The CNMI appreciates the feedback from its customer and utilizes the comments to review and/or revisit on its current programs and delivery services approach.

Individuals and employer feedback are both considered essential to the delivery of a successful workforce development system. The dual customer service approach and feedback helps to design and improve the CNMIs workforce delivery programs and system.

The CNMI core partners will develop a work group to go through performance and data. This group will meet regularly to ensure that the data collected is assessed and will be compared against the baseline set to measure the effectiveness of the CNMI's workforce delivery system.

CNMIs Response: The CNMI is held to certain performance standards whether they are national levels of acceptable performance or program specific performance levels. This is only one of many means or tools that the CNMI uses to monitor its overall effectiveness and delivery of its workforce development system with the final measure of that of its workforce development product, its human capital's ability to perform in education and employment opportunities. The CNMI considers these evaluations however they are designed or collected. The outcome of its workforce development delivery system evaluations are considered paramount in the planning of the CNMIs current and future education, employment, and economic prosperity. The small island setting and distance from the more developed nation does not provide the CNMI the excuse to perform less but more so the opposite with the desire to be very competitive in the design and development of its workforce development system.

CNMIs Response: The CNMIs overall effectiveness of its workforce system is at the forefront of all stakeholders. The implementation of US PL 110-229 Consolidated Natural Resources Act which calls for the transition of non-immigrant workers out of the CNMI by the year 2019 has caused the CNMIs workforce system to re-evaluate itself on its effectiveness in the delivery of education and training services to the CNMIs human capital. Partners in education, employment and economic development have all been meeting with education and training program experts in collecting and analyzing data information of the CNMIs workforce from K-12 to post secondary and employment of its human capital. McREL-REL Pacific Consultants CNMI Research Alliance on College and Career Readiness has been working with the CNMIs workforce system partners and stakeholders in evaluating the CNMIs current assessment tools to that of using multiple measures in its evaluation that can provide better predictors of the CNMIs human capital for college readiness and success, as compared to only a single measure. The data being collected and analyzed by the consultants such as using more information about students to make Math and English placement decisions, recommendation for the usage of a combination of coursework and achievement information such as

using standardized test scores and high school GPA for placement decision are useful analysis to assist the CNMI in transforming its current workforce development system but also for continuous evaluation for improvement of its workforce development system.

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).

CNMI core partners and other key service providers will collaborate in designing effective policies to ensure that those in most need in the community are provided opportunities to participate in educational and training programs supporting their entry or transition in the workforce. Strategies to address the needs of the population will include:

ACCESSIBILITY

Workforce core partners will work to identify and reduce barriers to employment for all residents. Policies and procedures will be developed and implemented to ensure employment access for all CNMI residents.

KEY STAKEHOLDERS

Core partners and employers will collaborate to develop programs and initiative to increase opportunities for CNMI residents to gain the skills, credentials, and experience needed to get a job and to sustain employment, reduce the skills gap between the employers and the workforce. Recognizing and identifying the CNMI employers' education, training, and workforce needs will be set as priorities.

CAREER PATHWAYS

Core partners will strengthen the career pathways process by improving the delivery and transitional navigation into the workforce. Career pathways will provide the CNMI workforce with the skills, education, work-based training opportunities, resources, support, and accommodations needed to gain employment.

INTEGRATED EDUCATION AND TRAINING

CNMI Core Partners must ensure all CNMI residents to programs that address literacy skills. Free or affordable options will be offered to obtain education, skills, and training opportunities that will include soft and hard career skills and basic literacy and numeracy skills (including financial). These options will assist in securing and sustaining employment.

CUSTOMIZED TRAINING AND EMPLOYMENT

Ensuring competitive integrated employment opportunities by matching employers with skilled and talented workers including individuals and youth with disabilities.

CNMIs Response: The CNMI has been undergoing tremendous transformation with respect to its workforce needs. The following industry sectors and occupations are specifically being targetted for greater focus in education and training and lesser dependency on non-immigrant workers.

Job Code	Job Description	FY12	FY13	FY14	FY15	Grand Total
10	Executives & Managers	202	4	40	362	608
12	Management Support	56		10	153	219
14	Accountant, Auditor	99	2	15	188	304
20	Architect, Surveyor	1			6	7
37	Civil Engineer				5	5
39	Electrical/Electronic Engineer	41			6	47
43	Mechanical Engineer	4			2	6
47	Engineer - speciality not list	7			1	8
49	Engineer - speciality unknown				2	2
50	Mathematician	2		1	11	14
60	Physical Scientist			1		1
75	Social/Religious/Rec Worker	2		18	209	229
90	College/University Teacher			1		1
93	Teacher	17	4	9	46	76
95	Vo/Ed Counselor	1		2	1	4
100	Physician, Surgeon, Osteopath				1	1
101	Other Health Care Practitioner	7			4	11
110	Registered Nurse			3	126	129
111	Pharmacist, Dietician	16			4	20
115	Physical Therapist	2			11	13
120	Writer, Technical Writer, etc.	19	4	1	41	65
122	Actor, Actress, Director			2		2
125	Musician, Singer, Composer	6		1	8	15
128	Dancer, Choreographer				17	17
130	Other Types of Performers		1		1	2
135	Editor, Reporter, etc.	7		1	14	22
140	Athletes & Related Workers	11		1	41	53
150	Science Technician	57	1	24	212	294
155	Health Technician	3			81	84
200	Marketing & Sales	326	8	60	488	882
300	Administrative Support	56	1	34	290	381
400	Private Household Servant	45	32	2	32	111
405	Child Care Worker - Private	3		1	1	5
420	Protective Service			52	137	189
430	Food Service	302	11	68	811	1,192
450	Health Service	10		7	115	132
460	Building Service	56	5	103	995	1,159
480	Personal Service	39	1	8	25	73

Job Code	Job Description	FY12	FY13	FY14	FY15	Grand Total
482	Make-up artist, etc.			10	121	131
500	Agri/Horticultural Worker	76	19	25	97	217
560	Fisher, Hunter, Trapper	8		4	28	40
600	Mechanics & Repairers	119	10	20	285	434
650	Construction Trades	99		52	768	919
700	Extraction				1	1
750	Precision Production	57	2	14	213	286
800	Machine Operator	76	10	20	163	269
850	Transportation/Material Moving	34		6	132	172
900	Handlers, Helpers, & Laborers	56	5	27	224	312
991	Homemaker	28			1	29
999	Occupation Not Reported	1,656	99	26	36	1,817
(blank)	Unknown	3,631	9,590	8,221	1,118	22,560
Grand Total		7,237	9,809	8,890	7,634	33,570

Target Industries/Sectors:

Accommodation and Food Services

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).

CNMI Core partners are currently developing a data base of key stakeholders and identified career pathways. This inventory will provide much help in supporting career pathway development activities across the CNMI.

Training for key stakeholders will be planned for and conducted by appropriate core partners who will identify and define career pathways that are available in the CNMI. This training will also provide opportunities to expand and/or redefine pathways that may need to be restructured to meet employers' ever-changing needs and expectations.

The transformation and innovation of the CNMIs workforce development system is administered through the Governor appointed State Workforce Development Board members who are tasked to carry out the Governor's vision and transformation of the CNMIs workforce development system with the implementation of the following strategies for the alignment and achievable workforce development activities

1. Conduct evaluations and assessments of the current CNMI workforce development service delivery design to assist in the recommendation and/or improvements to the Governor
2. Assess the current and/or available infrastructure of the CNMIs workforce development core and non-core programs for improved and integrated customer centric service delivery and focus
3. Evaluate the current mechanism and processes currently used to extend services to individuals and employers alike and make recommendations for improvement, efficiency, and reduced duplication of services
4. Develop a holistic dual service delivery and intake process
5. Develop a uniform intake platform where data and information collection and sharing amongst all core programs are readily available to all to assist in the effective delivery and/or referral to other workforce partner services and programs
6. Implement workforce development core and non-core partner programs training for a better understanding of each partner's workforce development programs and services without duplication of workforce development services
7. Develop and create a community of a Unified CNMI One Stop workforce development programs and service delivery design facility and infrastructure
8. Develop an alliance of both core and non-core programs for the successful transformation and redesign of the CNMIs workforce development programs and service deliveries
9. Develop and implement an across the board capacity training amongst all core and non-core programs that is either directly or indirectly involved in the development and delivery of the CNMIs workforce development programs and services
10. Implement a physical cross training of core and non-core programs for programs and services knowledge building and understanding

CNMI's Response: The Title IV Vocational Rehabilitation Program remains committed to strategically aligning itself with the core programs consistent with the WIOA mandates. The Office of Vocational Rehabilitation welcomes and supports the formalization of an MOA to bind the core programs in alignment efforts that embrace and promote a shared mentality approach pertaining to cases, costs (as in the case of a One-Stop or American Job Center), and data. Program alignment via cross-agency collaboration with emphasis on results-driven practices will contribute to an integrated service delivery at the local level that meets the needs of our target population(s). The creation of a physical One-Stop on the main island of Saipan will help achieve this strategic initiative of aligning the core programs. The physical dislocation on a small island setting however does not hinder the delivery of workforce development activities and services but the CNMI does recognize the need and importance of co-locating core and non-core programs that will better meet the needs of those that it serves within its workforce delivery system.

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 CNMI SWDB is governed by its established operational by-laws. The CNMI SWDB is organized with primary members from the leading economic sectors of the CNMI. CNMI SWDB are appointed for 2 years by the Governor to carry out the responsibilities under WIOA. Each member of the SWDB will be appointed to serve in committees that will carry out the duties of the SWDB and to report to the whole body their committee reports and for action by the whole board, if any. This operational by-laws will also include the frequency of SWDB meetings, any special meeting, and compliance with the required public notice of a meeting. A quorum must always be established in order for the CNMI SWDB to conduct its business.

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.

Title II, Adult Education

The CNMI's Adult Education and Family Literacy program plays a critical role in the workforce development system by providing access to educational services to adult learners. The program increases opportunities in the educational and workforce development of adults as parents, workers, and citizens. As a core member of WIOA, Adult Education is excited to be collaborating in so many levels to bring the workforce development system to adult learners. Adult Education makes an impact by assisting adults attain a high school equivalency diploma and transitioning them into postsecondary education and training through career pathways.

Adult Education programs will continue to provide critical services and activities that will support adult learners by improving access to educational, training, and work opportunities. This can be achieved by helping adults be literate and obtain knowledge and skills for employment. Adult Education will also support the educational and skill development of parents and family members to participate in the educational development of their children and improve the economic opportunities for them. The program will support non-English speaking adult learners in learning and improving their English and math proficiency and understanding the rights and responsibilities of U.S. citizenship. In addition, the program will assist in the re-entry of incarcerated individuals into the CNMI community by providing educational, training, and work opportunities.

- **ACCESSIBILITY:** Adult Education will support efforts in increasing enrollment and retention by offering year-round flexible schedules and student support services in learning-conducive environment. The program will use technology to improve delivery methods of teaching and learning of adults. The development of and improvement in distance education will provide adult learners access to educational, training, and work resources that would not be otherwise available to them. Recognizing that many jobs require computer and digital literacy, the CNMI's Adult Education program will encourage and support the integration of these digital literacy skills into all adult education and literacy activities. Professional development opportunities will be provided to train instructors to address and assess digital literacy skills into instruction in all content areas.
- **KEY STAKEHOLDER PARTNERSHIPS:** Adult Education will educate students, parents, work seekers, teachers, student support staff, and administrators about in-demand careers and prepare them for these careers.
- **CAREER PATHWAYS:** Through the use of career pathways, Adult Education will aid in the transition and access of adult learners into postsecondary education, training, and work opportunities. The program will support the linkage of employers with the core programs and prioritize work-place learning and career opportunities.

- **INTEGRATED EDUCATION AND TRAINING:** Opportunities and participation of an integrated system of education and training will allow for the preparation of adult learners into the workforce. CNMI residents will be able to obtain the knowledge and skills necessary to secure in-demand careers.

Title 1 Adult, Dislocated Worker, and Youth Programs

The CNMIs Title 1 Programs is part of the CNMIs workforce development system. Title 1 programs are specifically designed and intended to target the at-risk and most in need population. In order to successfully implement the strategies that will transform the CNMIs workforce development system, the following activities will be implemented to achieve the desired outcomes of the strategies.

- Conduct frequent outreach efforts of the Title 1 programs that promotes an increased participation of the intended target population
- Coordinate closely with other CNMI core programs the activities so that duplication of activities is minimized and desired outcomes is accomplished
- Increase awareness of the new required expenditure on OSY WIOA funding
- Increase awareness of the programs and services offered by Title 1 funding programs to employers
- Consistently monitor labor market events such as business closure, lay offs, downsizing for the immediate implementation of Rapid Response and layoff aversions
- Consistently improve communications between the core and non-core programs for the effective delivery and implementation of the CNMIs workforce transformation initiatives
- Consistently share data information with core program partners for the effective and holistic service delivery approach for individuals seeking program services
- Leverage program financial resources by avoiding duplication of services and costs and maximizing services through co-enrollment approached across core and non-core program partners

Title IV, Vocational Rehabilitation

The Office of Vocational Rehabilitation will work closely with the WIOA core partners and the State Workforce Development Board to help develop an all inclusive workforce for the CNMI. Collaboration and coordination with partners will be emphasized. Increasing employer engagement will be key as we recognize the importance of also serving employers in the dual customer approach to provide them with the services and supports they will need to be able to promote a diverse workforce to include individuals with disabilities as well as those experiencing other barriers to employment. Best practice strategies or evidence-based approaches for assisting our clientele to achieve competitive integrated employment will be utilized to the maximum extent possible. Regular communication especially regarding cost-sharing of workforce development activities and development of infrastructure that will promote improved access to programs and services as well as evaluations of program performance will be expected. Sharing of data among the WIOA core programs will be critical to maintaining most effective partnerships for greater outcomes for all involved.

CNMIs Response: The CNMI is continuously working on aligning not just its core program partners but all workforce system partners. In this effort the CNMI plans to implement the following strategies to reach alignment of core and non-core program workforce partners.

1. Work on the achievement of the creation of a physical AJC location

2. Execute MOU/MOA between core and non-core workforce partner programs on the delivery of services
3. Eliminate duplication of services but rather leverage services that can best be delivered by the core or non-core workforce partner program
4. Implement a referral system process that meets the needs of participants without duplication of efforts and services
5. Implement a robust workforce data system that captures all common core and non-core workforce partner program information where all can have access to with information/data protection policies
6. Implement a program/service delivery training program where all core and non-core workforce partners can learn from each other's services and programs which will help improve and achieve success in the alignment of programs and services to those being served by the CNMIs workforce development system
7. Align outreach of programs and services in a unified way so that those being provided the outreach sessions will receive the information from all partners during and at the same outreach activities
8. Promote a more cohesive approach for the implementation of working towards co-designing or developing education and training programs that better supports alignment of services and program to those served by the CNMIs workforce system such as aligning college transition courses by engaging the local college institution and the Public School System's K-12 in the process of curriculum design and development that meets both institutions academic requirements.
9. Implement a strategic approach where the unified services to common customers are approached and delivered in an agreed standard procedure that will achieve the desired outcome of the services and programs the customer is seeking
10. Implement the strategy of customer centric approach without disregarding program specific delivery and requirement with the focus of leveraging program services and funding

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The CNMI is transforming its workforce development system across all core and non-core programs. The Governor of the CNMI expects all workforce related programs across the CNMI whether core or non-core program to collaborate, cooperate, leverage resources for the effective and outcome oriented results of the workforce development programs. No longer is it acceptable to continue operational strategies independent of the CNMIs workforce development and transformation initiatives. The appointed SWDB will also play a key role the implementation of the required board

functions that will assist the CNMI Governor in achieving his vision of the CNMIs workforce transformation and systemic changes.

Department heads are Governor appointees therefore the expectation to follow the initiatives of the CNMI Governor for a better workforce development and service delivery to include the Governor's call on businesses to "hire local, hire our community" is fundamental in the process of the CNMIs workforce transformation efforts and initiatives. The appointed SWDB primarily from the private sector will play just as important a critical role in achieving success in the transformation of the CNMIs workforce system. The SWDB's recommendations to the Governor in setting the standards of excellence in building the CNMIs human capital in education and training by improving programs and services is key to the CNMIs overall workforce and economic success.

CNMIs Response: The CNMIs workforce development system is in collaboration and partnership with other CNMI workforce related programs such as the Older Worker Program or SCSEP administered under the Office of the Secretary Department of Community and Cultural Affairs whom also administers the Nutrition Assistance Program (NAP). Registrants/Participants of the WIOA Program are always referred to other CNMI workforce partner programs for expanded services that the individual is in need of. The CNMIs Public School System (PSS) administers the Career Technical Programs at the high school level on all 3 islands. PSS, the CNMIs Northern Marianas College and the Northern Marianas Trades Institute are all working together to provide the necessary education and training of the CNMIs workforce needs. High School students for example are being brought to the training grounds of the Northern Marianas Trades Institute (NMTI) for classroom and hands on training, SCSEP participants are provided training in collaboration with the local college and WIOA funded programs and services, high school students are continuously being provided college access programs and outreach activities, while nutrition assistance program clients are also assisted for employment services through the CNMI Department of Labor's Employment Services Division, provided subsidized employment and training services through the CNMI Department of Labor WIA Division either for youth, adult, or dislocated worker program services.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services 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 CNMIs core partner programs work closely together. The CNMI consists of 3 small island communities where information and services is easily known to all. Additionally, the core program partners and other non-core programs are just as involved in the process of providing a professional, committed, comprehensive, and customer centric service focus. The CNMIs vision is to have an educated, trained, and skilled workforce that can compete for education and employment opportunities locally, regionally, and globally and in bringing everyone to be involved as One Community will only bring the desired results and success of the CNMIs workforce development transformation initiatives.

Coordination of activities and resources to provide a comprehensive, high quality, customer centered services, including supportive services to individuals including those population identified in section II (a) (10 (B) will be implemented through

1. Development of MOU/MOA between the core programs
2. Improve and develop the menu of shared services without duplication
3. Improve communications between core and non-core workforce related programs and services
4. Improve core program knowledge across all workforce development core programs and that of non-core programs
5. Improve referrals to workforce programs and workforce service specific programs
6. Improve collaboration and leveraging of resources and services
7. Develop and promote an environment of a holistic CNMI workforce development programs and services
8. Promote awareness and capacity building to all core and non-core programs that leads to a better understanding and support towards a customer-centered services delivery

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

The CNMIs economy is primarily the hospitality industry with large association memberships such as HANMI and the Chamber of Commerce membership association. The CNMI understands along with a private sector driven SWDB that providing the highest level of quality and efficient services to employers can only bring successful and tangible outcome oriented results. The development and investment in the CNMIs human capital feeds into the private sector economy where employers provide the employment and training opportunities.

Engaging in improved employer relations across core and non-core programs is not an option to be considered but rather the "must do" approach in order to achieve and succeed with the execution of the CNMIs workforce development initiatives and transformation efforts. The CNMIs economy depends on the successes of the private/employer sectors hence the need to ensure that all programs core or non-core are responsive to, actively participates in collaboration, partnerships, and leveraging of programs and services benefitting the CNMIs economy of employers.

The achievement of this approach can be accomplished through

1. Coordination and partnership of all core programs in the service delivery approach to employers
2. Development of a comprehensive and unified programs and services information material specifically targeted for employers
3. Promotion and development of a strong business relationship with employers that can assess their current and future workforce development and needs
4. Encouraging the active engagement of employers through the CNMI State Workforce Development Board private sector membership
5. Improvement on information sharing to employers on workforce partnership benefits

6. Production of the workforce talent that is responsive to employer's workforce needs whether short or long term
7. Engagement of the Higher Education Institution(s) and training providers in acquiring labor market intelligence for the design and development of employer's current and future workforce needs

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

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

The CNMI Higher Education Institution and the Public School System are both members of the CNMI State Workforce Development Board. Both institutions work closely with the CNMI Department of Labor in aligning their educational and training programs that is responsive to both the required academic requirements but also responsive to the needs of the CNMIs demand driven industries and occupations.

Frequent collaboration and sharing of labor market intelligence/data is one of the key strategies the CNMI has with the two education partners. US PL 110-229 calls for the transition of foreign workers by December 2019. The CNMI through the CNMI Secretary of Labor invokes the Freedom of Information Act with USCIS seeking the critical data on jobs held by foreign workers for sharing with the state leaders, SWDB, and the entire CNMI workforce partner system for the development and responsiveness of the CNMIs education and training program as required under the federal statute and also as required by the CNMIs overall unified state plan.

CNMIs Response: The CNMIs only local college institution is the Northern Marianas College. Certificated and Degree Programs are offered at NMC. For certifications and degrees not offered locally, NMC is actively engaged with other off-island accredited institutions under an articulation agreement with the local college through on-line post secondary education and credentials access. NMC offers degree programs in Hospitality, Accounting, Computer Technology, and Business Management.

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.

The CNMI is focused on developing a transformed education and training system that is aligned with the changes under US PL 110-229. Other CNMI education and training providers are just as important in being held to the same standards of operations and alignment in order to meet and respond to what are considered demand-driven in the CNMIs economy. The use of labor market intelligence and the sharing of such labor market intelligence gathering of data is critical and shared across the entire CNMI workforce eco-system providing the assurances of a responsive and job-driven CNMI workforce development system.

Engagement of other education and training providers including those on the eligible list can be accomplished by

1. Involving their participation on workforce development stakeholders meeting(s)
2. Developing an open communication between all institutions of learning and trainings
3. Improving the sharing of data and information that promotes the alignment and/or re-alignment of education and training programs

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 CNMI has the overall CNMI Scholarship Program for qualified CNMI residents to apply for. SHEFA is specific to Saipan whereas Tinian and Rota also have their own respective municipal local scholarship fundings. The CNMI maximizes leveraging efforts from other available programs whether federally or locally funded. Core and non-core programs with workforce related funding activities are all part of the greater effort in enhancing and improving for an increased and upward mobility and access to available CNMI workforce development programs within the CNMI providers of education and training programs.

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 CNMI has been investing in its human capital development through its locally funded scholarship programs. Young and old adults to include non-traditional students are all exposed to the numerous available resources for education and training upward mobility. College Access Programs events are organized by the Northern Marianas College inviting all individuals in the community, the Public School System also sponsors Career Days for high school students inviting all related workforce partners and programs further enhancing and increasing the awareness of postsecondary education and credentialed programs and services.

CNMI's Response: The Title IV Vocational Rehabilitation Program strongly supports postsecondary outcomes for the individuals we serve. Professional staff providing direct services engage clients in discussions about the importance of postsecondary education or training to attain credentials consistent with the local job market to better compete in the 21st century workforce. VR counselors stress the value of a career over simply a job for long-term employment that promises competitive wages and opportunities for advancement. VR is very capable of assisting consumers in their pursuit of postsecondary education or training goals and pays for the services in whole or in part after an analysis of comparable benefits or programs such as the Federal Pell Grant, CNMI Scholarship, Saipan Higher Education Financial Assistance, etc. There are also opportunities for VR to collaborate and leverage resources with WIOA core programs such as the Title I Program, for instance, to support a mutual consumer's participation in training certification programs offered by private providers. Whatever the case may be, VR counselors are trained to factor into the equation the individual needs of the consumer and customize a plan that takes into consideration his or her primary employment factors and informed choice.

CNMI's Response: Title II's Adult Education will be involved in improving access to postsecondary credentials. It will use and invest state leadership funds to improve its academic bridge program for students transitioning from adult education to postsecondary education through career pathways. All adult education students will be encouraged to explore pathways for a smoother transition into postsecondary education. Adult Education will work with the single state board to clearly define career pathways to assist adult education students to industry recognized credentials, certificates, licenses or certificates that are portable and stackable.

There are other ways to improve access leading to postsecondary credentials. The island's lone postsecondary institution can partner up with the Public School System's CTE to collaborate on or improve pre-apprenticeship programs that meet industry demands. Funds will be prioritized for training that gives individuals the basic tools they need to succeed in their business of choice. By prioritizing and establishing a minimum of requirements for funds spent on these types of trainings, the single state board will be providing accountability that the workforce is supporting services that meet both job seekers and businesses benefits. These minimum requirements will be reviewed annually to see if adjustments should be made to ensure they are meeting industry demands.

The CNMIs Board of Professional Licensing issues the following credentials which adds to building the CNMIs workforce talent after achieving post secondary credentials.

Engineering

Architecture

Land Surveying

Landscape Architecture

Engineering Technology Degrees

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.

The CNMIs Department of Commerce Secretary is a member of the SWDB. Other CNMI entities involved in economic development financing is the Commonwealth Development Authority, to include the SBDC. Connecting economic development component to the workforce development and transformation initiatives is critical to the overall success of the CNMIs workforce development system. The economic development plan and strategies is the key indicator and gauge to align the workforce development initiatives on how the CNMIs economy is moving whether its growing or not, the creation of new industries translating to new employment opportunities, and development of new or improvements on existing education and training programs that are responsive to the changing CNMI economic landscape.

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.).**

The CNMI Department of Commerce Statistics Division by local statute and mandates is responsible for the collection of data related to all sectors of the CNMI's economic environment. For the workforce system, longitudinal data systems have yet to be developed and currently workforce data is housed and collected individually by the core programs. The CNMI however has plans to coordinate such labor market information system where unique common data information is available and accessible to all core program partners. The CNMI does have a state job bank where all job postings are available to the public <http://www.marianaslabor.net/sec.asp?seclD=1>.

The lack of a physical One-Stop in the CNMI does not hinder the ability of the programs to share, collaborate, partner, and leverage, however the CNMI is determined to develop/create its physical One Stop so that seamless services is provided on a dual-customer service approach at one location, and for all core and non-core programs to successfully deliver and effectively communicate through a uniform communication and case management system.

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

The CNMI Title 1 program collects its participant information through its Pacific Workforce Case Management System. The CNMI will be working on the development or purchase of a case management system that embraces all core programs with the ability to allow other non-core programs data collection to be included as well. The CNMI Title 1 Program reports only on the data sourced from its Pacific Workforce Case Management System.

Adult Education uses the CASAS TOPs Enterprise (TE) management system to collect data to input into the National Reporting System (NRS) for its annual reports. As a core partner, we are working with Title 1 programs to combine efforts to come up with a data system that can be utilized by all.

* 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.

The CNMI SWDB will be developing these policies while also looking at creating the first CNMI physical One Stop Service Delivery System. The implementation of a universal intake process from all core to non-core programs will tremendously improve the CNMIs data collection, shared performance data and benchmark, and overall improvement in the delivery of a one location for access and delivery of workforce education and training services.

CNMIs Response: The CNMI SWDB will be working towards the development and completion of a uniform revised state operating systems and policies by December 2016.

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.

ADULT EDUCATION AND LITERACY ACT PROGRAM

Adult Education and Literacy Organizational Chart

Office of the Governor: RALPH DELEON GUERRERO TORRES

1. Northern Marianas College (NMC) Board of Regents
2. NMC Acting President: DAVID ATTAO
3. Dean of Academic Programs and Services: BARBARA MERFALEN
4. Adult Education State Director: LORRAINE C. MAUI

This chart is designed to reflect the Governor of the CNMI as the authorized State Official who has the authority to sign the State Plan or Extension for Adult Education and Literacy.

Title 1 Program

Office of the Governor: RALPH DELEON GUERRERO TORRES

CNMI State Workforce Development Board

- CNMI Department of Labor Office of the Secretary - Edith E. DeLeon Guerrero
- CNMI Department of Labor Workforce Investment Agency Division
- CNMI Department of Labor Employment Services Division

CNMI's Response: Title IV Vocational Rehabilitation Program Organizational Chart:

The Office of Vocational Rehabilitation currently employs twelve (12) personnel (3 vacant) that provide VR services to an estimated three hundred (300) individuals/consumers per year. VR administrative support and services are provided by:

- One (1) Director who is a product of federal CSPD Master's degree in Rehabilitation Counseling Program with CRC Credential and graduate of the National Rehabilitation Leadership Institute
- One (1) Fiscal Officer with over thirty (30) years dedicated to the CNMI OVR
- One (1) Administrative and Operations Manager who is a graduate of the National Rehabilitation Leadership Institute
- One (1) Administrative Assistant
- One (1) Data Analyst

- One (1) Administrative Clerk/AT Assistant

Direct VR services are provided by:

- One (1) Case Services Manager (vacant)
- Three (3) VR Counselors (General)
- One (1) VR Transition Counselor
- Two (2) VR Counselor Aides
- One (1) Employment Specialist (vacant)
- One (1) ILOB Caseworker Assistant (vacant).

The following organizational chart of one core program shows how the the CNMI workforce development system is structured.

B. STATE BOARD

Provide a description of the State Board, including—

The CNMI State Workforce Development Board are appointed by the Governor for a 2 year term. The SWDB is comprised mainly of members from the private sector. There are currently 14 members on the CNMI SWDB. Six members are from the private sector, 1 from the Senate, 1 from the House of Representatives, the Commissioner of education, the Northern Marianas College President, CNMI Secretary of Commerce, CNMI Secretary of Labor, CEO of the Commonwealth Health Care Corporation, OVR Director, and ABE State Director.

CNMI's Response: The CNMI will revisit the membership of its SWDB with completion of appointees that will be WIOA compliant by December 2016.

1. MEMBERSHIP ROSTER

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

CNMI SWDB Roster

1. Ms. Josephine Mesta, Director of Human Resources Hyatt Regency Saipan
2. Ms. Edith DeLeon Guerrero, CNMI Secretary of Labor
3. Mr. Rip Stephanson, Owner North Pacific Ent. Inc.
4. Mr. Mark Rabauliman, CNMI Secretary of Commerce
5. Ms. Esther Muna, CEO CHCC
6. Ms. Arlene Yamagata, CNMI OVR Director
7. Ms. Marcie Tomokane, Manager Bank of Guam Saipan Branch
8. Ms. Marian Aldan-Pierce, President Duty Free Saipan, Limited
9. Ms. Annie G. Hayes, Manager Herman's Modern Bakery Inc.
10. Ms. Lorraine C. Maui, CNMI State ABE Director

11. Mr. David Attao, Interim NMC President
12. Dr. Rita Sablan, CNMI Commissioner of Education
13. Representative Angel Demapan
14. Senator Teresita A. Santos

2. BOARD ACTIVITIES

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

ADULT EDUCATION:

The WIOA performance accountability measures in Section 116 will be used to assess effectiveness of Adult Education programs and for the improvement of service deliveries. Performance reports will be published for adult programs on fiscal management, program implementation, and data management. The state adult education office will target programs for technical assistance if they fail to meet state performance benchmarks. If they fail to meet benchmarks for two consecutive years, consequences could lead to the reduction or elimination of funding.

The CNMI SWDB will perform the following activities to effectively assist the Governor to carry out the WIOA functions:

1. Assess the current CNMI workforce development system education and training programs
2. Review existing state workforce policies and procedures and make the necessary changes for implementation and compliance under WIOA
3. Analyze CNMI labor market information to effectively implement strategies and initiatives for the transformation of the CNMI's workforce development system across the board that will address the needs of the target populations
4. Assess and review the current training programs and make changes or recommendations in order to align with the CNMI's demand driven sectors and occupations
5. Assess the current workforce service delivery design and make recommendations to the Governor for efficiency and alignment of programs and services
6. Review functions and services of core and non-core workforce partner programs for seamless and better leveraging of resources
7. Assess the needs of each municipality of the CNMI and make recommendations to the Governor and respective municipal Mayor on the transformation of a holistic CNMI workforce delivery system
8. Review and/or assess the delivery of programs and services that serve persons with disabilities for a better delivery of program services and program design
9. Assess the workforce infrastructure and make recommendations to the Governor for the creation of a CNMI universal One Stop
10. Assess training and developmental programs to ensure that they are current/consistent with the needs of the CNMI's employer sector and economic growth and development

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.

CNMI's Response: Program data from each of the core programs will also be reviewed and analyzed to ensure proper adjustment of baseline performance indicators. The indicators used by the core partners noted herein will be used as the foundation for the establishment of an annual and quarterly review process. A base level customer satisfaction survey format that is a WIOA statute requirement will be used to determine achievements of performance standards. At a minimum the SWDB will include the six common performance measures describe in section 116(b) for each of the core programs under Titles I, III, and IV. The SWDB is also exploring possibilities for the integration of performance reporting and alignment of system data collection and sharing. The cross-systems alignment is contingent upon the core partner's negotiation and cooperative agreement. Monitoring will also be conducted on a regular basis by the respective core programs to ensure progress towards meeting or exceeding the states negotiated performance levels.

Adult Education and Family Literacy:

The WIOA performance accountability measures in Section 116 will be used to access effectiveness of Adult Education programs and for the improvement of service deliveries. Performance reports will be published for adult programs on fiscal management, program implementation, and data management. The State Adult education Office will target programs for technical assistance if they fail to meet state performance benchmarks. If they fail to meet benchmarks for two consecutive years, consequences could lead to the reduction or elimination of funding.

The CNMI SWDB will develop an assessment tool such as the customer satisfaction survey and review the performance measures of each core programs negotiated benchmarks.

CNMI's Response: Title IV Vocational Rehabilitation Program

The Office of Vocational Rehabilitation and the State Rehabilitation Council jointly submits an annual report to RSA, the Governor's Office, CNMI Legislature, partner agencies and its stakeholders on the results of evaluations conducted throughout the program year of the effectiveness of the VR program, as well as the progress made in improving the effectiveness of the program from the previous year. The compilation and analysis of the following information is utilized in the evaluation process: • WIOA common performance measures/benchmarks data • Achievement/Challenges of VR-specific goals and objectives • Consumer and Employer satisfaction surveys • Quarterly reporting and reviews of program data • Information collected from the OVR leadership, SRC and SILC through the Executive and QA/QI Committees • RSA monitoring of VR Program • Internal quality assurance case reviews • Fiscal reports that include the required set aside funds When technical assistance is necessary to help achieve

program success including meeting WIOA performance benchmarks, OVR reaches out to organizations such as: • Workforce Innovation Technical Assistance Center based out of Interwork Institute at San Diego State University • Councils of State Administrators of Vocational Rehabilitation • Rehabilitation Services Administration, Office of Special Education and Rehabilitative Services, U.S. Department of Education The SWDB will work with the core partners to integrate evaluations that impact the workforce system in the CNMI. Information developed and utilized from the integrated data, program specific evaluations, One-Stop or American Job Center reviews, and various Board reports will be considered in the development of the integrated evaluation process.

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.

The CNMI currently does not have a physical One Stop location however the creation of a One Stop is an on-going initiative.

CNMI's Response: Core program partners have maintained a continuous dialogue on specific workforce programs and activities that are provided by their respective agencies/programs that will be made available through a comprehensive One-Stop. An ad-hoc committee through the State Workforce Development Board that consists of the core programs and various partnering agencies will be looking into establishing a framework for cost sharing on joint case services as well as infrastructure costs.

The committee is also tasked with the development of policies and procedures for the One-Stop consistent with WIOA requirements. Criteria and standards will be established to ensure that the Center provides exceptional customer service, effective and innovative services, and highly qualified staff as well as ensure the Center's physical and programmatic access for individuals with barriers to employment, including customers with disabilities.

The assessment criteria will contain, at a minimum, the following:

- an assessment of customer focus and center design
- assessment of the method used to ensure skills attainment
- monitoring checklist
- facility checklist
- self-evaluation toolkit
- staff review tool
- delivery method for technical assistance

- **assessment of professional development**
- **methodology for the utilization of performance data to ensure continuous quality improvement and**
- **assessment of employer engagement**

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.

Adult Education and Family Literacy

Adult Education and Family Literacy programs characterizes a sequence of basic skill attainment as defined by the National Reporting System (NRS) educational functioning levels. Program assessments include annual enrollment figures and state state performance benchmarks.

Adult Basic Education (ABE) instruction had the most enrollees in 2014-2015 with 150 participants; Adult Secondary Education (ASE) was the second largest group with 71 participants; and English as a Second Language (ESL) had the lowest with 20 participants.

Of those reported, 190 were Pacific Islanders, Asians-49, and Whites-2 participants. There were 121 males and 120 female participants.

The largest age group served by the programs ranged between 19-24 years of age with 95 participants. The next largest group, 25-44 years of age with 90 participants. The 16-18 age group had 44 participants which had 32 more compared with the last age group of 45-59 with 12 participants.

CORE OUTCOME MEASURES: There are five core outcome measures of the NRS; educational gain, high school equivalency diploma, entered employment, retained employment, and entered postsecondary or training. The CNMI is measured by their performance in these five categories. Every spring the U.S. Department of Education negotiates a target for program effectiveness and outcomes and adult education programs are measured by whether these targets were met.

The CNMI Title I is measured on the performance of their 9 common measures. These measures and performance are continuously reviewed allowing for adjustments in the delivery strategies of the employment and training programs.

1. Adult: 1-Entered Employment; 2-Retention; 3-Average Earnings
2. Dislocated Worker: 1-Entered Employment; 2-Reterntion; 3-Average Earnings
3. Youth: 1-Placement in Employment/Education; 2-Attainment of Degree/Certificate;3-Literacy/Numeracy Gains

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.

Program evaluations and research projects is achieved through numerous ways and the CNMI has the following options to pursue to achieve this goal while aligning the evaluations with the US Secretary of Labor and US Secretary of Education under WIOA with state evaluations

1. Utilize the expertise of the CNMI Department of Commerce Statistics Division in designing an evaluation survey instrument with the acceptable survey methodologies and data collection standards
2. Review and/or observe existing training programs through independent research contractors providing neutral analysis

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),

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds is applied as a whole across the CNMI for the delivery of workforce development education and training programs.

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

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds is applied as a whole across the CNMI for the delivery of workforce development education and training programs.

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

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds is applied as a whole across the CNMI for the delivery of workforce development education and training programs.

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.

The CNMI Adult Education State Office will run competitions for its funds under WIOA Title II using the revised 12 considerations and the 5 new application requirements. These applications will include alignments with local workforce plans and participation in the one-stop system. The funds will be awarded to eligible providers that will provide some or all of the approved activities within the CNMI region.

Eligible program providers may include some or all of the following:

- Adult education;

- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and

2. Is for the purpose of educational and career advancement.

The CNMI follows its state procurement and contract rules. All training services will be vetted in accordance to the CNMI Procurement Rules and Regulations and in accordance to the requirements under WIOA on the competitive process and requirements on service providers vetting processes.

The CNMI's Response: The Adult Education Office will run a two year competition and distribute no more than 82.5% of the grant funds to award grants and contracts under section 231 to eligible providers within the State to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the State.

Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. (c) each eligible agency receiving funds under this title shall ensure that— (1) all eligible providers have direct and equitable access to apply and compete for grants or contracts under this section; and (2) the same grant or contract announcement process and application process is used for all eligible providers in the State.

(d) SPECIAL RULE.—The Adult Education Office 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 not individuals described in subparagraphs (A) and (B) of section 203(4), 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.

(e) In awarding grants or contracts under this section, the Adult Education Office shall consider the 13 considerations listed in Sec. 231 (e).

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.

The CNMI follows state procurement rules. Required contract language clauses are also governed by state procurement rules and contract formats are reviewed through the CNMI Attorney General's Office and the CNMI Procurement Office.

C. TITLE IV VOCATIONAL REHABILITATION

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

The CNMI Office of Vocational Rehabilitation is a combined program, therefore the distribution of funds is with one agency.

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 CNMI currently has stand alone data systems across the core programs. The CNMI has been exploring numerous options on data collection systems on their efficiency and affordability. It is the goal of the CNMIs workforce development system to implement a universal intake platform and data collection system with a longitudinal design that crosses over all core and non-core programs for efficient data collection usage, analysis, and reporting.

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.

The CNMI is in the plan of work to create a physical One Stop that will incorporate a universal intake platform.

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

The CNMI SWDB will assess and make recommendations to the Governor on alignment of workforce programs, efficient service delivery designs, while assuring affordability and comprehensiveness of such recommendation(s).

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 CNMIs goal is to modernize its data collection system with the capability of good data features and collection capability that is also in conformance with the core programs federal reporting requirements and compliance.

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.

The core programs have follow up requirements to perform. This mechanism serves as the tool to assess the progress of exiting participants for some for a period of months or more of follow up services on participant success.

C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

The CNMI does not have unemployment insurance wage record data.

D. PRIVACY SAFEGUARDS

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

The CNMI will comply with all applicable requirements of all federal laws, executive orders, regulations and policies governing WIOA Title I -B programs. The CNMI workforce development system provides the assurances of protection of individuals identifications and information. The collection of individual information for use and/or purposes of core program requirements are all given the protections under the Privacy Act and shall be maintained under the highest standards of privacy and protection.

The Adult Education and Family Literacy program complies with the Family Educational Rights and Privacy Act. All have received training and are certified. Student files and other collection of information are protected and maintained under the highest standards of privacy.

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.

The CNMI workforce development system provides Priority of Service to Veterans and certain spouses. Upon the entrance and/or registration of a veteran the CNMI workforce development system will and has been prioritizing and accelerating services to veterans and certain spouses beyond other target populations. The CNMIs small island community of workforce services and programs provides the ability to quickly refer veterans and certain spouses for additional services required. The CNMI is not a recipient of the JVSG program however it does work closely on a regional level with the region's JVSG recipient for extension of services to the CNMIs veterans needed priority of service.

CNMIs Response: The absence of a physical One-Stop does not necessarily hinder the priority of services for veterans for Title 1-B Adult and DW Programs. The CNMI however ensures with other core partner programs the consistent application of prioritizing veterans in accordance to 38 U.S.C. § 4215.

CNMIs Response: The CNMI will implement a change amongst all core and non-core workforce partner programs implementing the following strategies.

1. Develop a common intake form for all core and non-core programs to use with the inclusion of 38 U.S.C. § 4215 on the form.
2. Include in the CNMIs workforce data system a feature that captures the information priority of service to veterans
3. Include in the design of the CNMIs workforce data a checkbox to validate the registrant whether veteran or not. If veteran, then the system shall be designed to flag POS immediate implementation for the veteran registrant.

The CNMI is not a recipient of the JVSG program however it does work closely on a regional level with the region's JVSG recipient for extension of services to the CNMIs veterans needed priority of service. Guam Department of Labor is the recipient of the JVSG program and provides regional DVOP services to the other pacific jurisdictions including the CNMI. The CNMI will be revisiting with the Guam Department of Labor to revive the DVOP program for the CNMI veterans. The CNMI however refers promptly qualified veteran(s) to the Guam Department of Labor for DVOP services as well as connecting the veteran to the local CNMI Veteran's Affairs Office for additional services if necessary.

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.

All CNMI workforce partner programs are responsible for developing a strategic operations and delivery of workforce programs and services that also includes an all inclusive workforce program delivery approach and accessibilities by removing all known barriers that may otherwise restrict access of individuals with disabilities to the CNMIs workforce programs and services. The CNMI adheres to federal mandates of full accessibility and continuous improvements to the workforce development system to include capacity building of workforce partners programs and personnel on the requirements of accessibilities to all programs and services. The CNMIs Disabilities Office also provides the necessary assistance and assurances of working with the CNMIs workforce development programs and services ensuring compliance and certifications of accessibility at all levels.

The CNMIs One-Stop center has yet to be physically created but despite the lack of such a physical One-Stop at the moment, all CNMI offices within the jurisdiction of the CNMI Government are accessible to individuals with disabilities. The CNMI does have a specific government offices that oversees compliance of ADA accessibility whether it's public or private sector.

CNMI Response: All CNMI workforce partners that will be participating in the One-Stop Center activities will be required to undergo training to ensure accessibility compliance - both programmatically and physically - with the WIOA and ADA. Training topics will cover such areas as: Sensitivity; Etiquettes for effective communication with people with disabilities; Overview of the common disabilities in the CNMI; Reasonable accommodations; General rights of individuals with disabilities to access public programs and services; EEO and anti-discrimination laws, ethics, and sexual harassment prevention; Accessible technology to aid in the provision of quality service delivery; among other things. One-Stop Center program participants will be provided with information as to their rights and responsibilities including what steps they can take to file a discrimination complaint in languages or formats best suited to their individual needs. The CNMI will ensure that its One-Stop Center will be accessible to and usable by people with disabilities. Parking, ramps, path of travel, doors, signs, restroom clear space and fixtures, alarms, etc. of the One-Stop Center will be made accessible. The CNMI workforce development board will ensure to evaluate the quality of the One-Stop Center program activities and to review physical and program accessibility on an annual basis with a commitment to continuous improvement. In addition, The CNMI SWDB has a strong commitment in developing policies that will ensure that individuals with disabilities are afforded full physical and programmatic access to the CNMI's workforce systems and services. Core partners in collaboration with the SWDB, Disabilities Network Partners (DNP) and relevant elected officials will be establishing criteria that will be used to evaluate core programs and/or services to ensure effectiveness of the workforce delivery system. The Policies developed will include requirements for Core

Program's procedures ensuring compliance to WIOA section 188, particularly the accessibility criteria.

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.

The CNMI is a melting pot of numerous languages. English language learners are accorded the assistance and services through interpretation services or available resources and other materials translated in their native language(s).

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 CNMIs 3 core programs collaborated in the development of the CNMIs Unified State Plan. The writing of this state plan was made possible through

1. Coordination between the 3 core programs was successful through consistent communications as the state plan writing was in progress
2. Utilization of program specific knowledge and content assisted in the writing and organization of this Unified State Plan
3. WIOA State Plan federal guidance sharing between the 3 core programs also provided the necessary guidance in planning and coordination in the development and writing of this Unified State Plan
4. WIOA implementation sessions at the state level involved all the core programs and prescribed the roles of each core program in the coordination and planning of the Unified State Plan
5. Communication with the state educational institutions such as the Commissioner of Education assisted in the development of this Unified State Plan on specific section(s) of the plan writing

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes
10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

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

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

The CNMI consists of 3 inhabited island municipalities mainly Saipan, Tinian and Rota. The CNMI is a single region or workforce development area. Saipan is the capitol of the Commonwealth of the Northern Mariana Islands. The central government is located on the island of Saipan and the most populated. The CNMI workforce development area is focused on all 3 islands providing the same education and training opportunities. Each island has an elected Mayor however the CNMI is governed by a single Governor.

The economic activity of each island is unique. Saipan being the most populated and most developed recently approved for the entrance of the gaming industry. This new industry has created an environment of competitive employment opportunities for all 3 island residents and increased opportunities for workforce development programs that responds to the needs of the new industry and sub-sectors created by the industry. Tinian also has the gaming industry while Rota is also developing its own gaming industry while still actively engaged in the agricultural industry. Each island municipality has its own unique economic environment however the overall workforce development area for the CNMI is considered the entire region of the CNMI.

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.

Each island municipality manages its local affairs through the administration and under the Office of the Governor of the CNMI. The CNMI does not differentiate each island municipality outside of the identity of the entire Commonwealth of the Northern Mariana Islands and its governmental affairs. The entire CNMI island chain is considered one Commonwealth of the Northern Mariana Islands. The CNMIs general fund through the budgetary act process provides the funding appropriations for each island municipality. The Mayors of Tinian and Rota has the expenditure authority of its island municipal budget while any local municipal revenue creation is administered through their respective Mayors and Municipal Councils. The island of Saipan is fiscally managed through the Executive Branch’s appropriation and designated department units of the overall central government.

CNMIs Response: The CNMI is a single state area. Saipan, Rota and Tinian are all part of the entire Mariana Islands chain and are not considered local or separate from the CNMIs island chain for purposes of workforce development activities. The only differentiation is the control of each municipalities locally generated revenues/budget. The CNMI SWDB will be developing a policy on this matter by December 2016.

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

The CNMI does not identify local areas but rather identified itself as a single state area. All 3 island municipalities are administered through the central government under the Office of the Governor. Distribution of development resources is premised on the vision of building a unified single Commonwealth of the Northern Marianas and not as a separate or local area.

CNMI's Response: The CNMI SWDB will be developing a policy on this matter by December 2016.

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

The CNMI currently does not have a physical One Stop Operator System however it does have a virtual One Stop that is currently in use. The CNMI does plan pursuant to WIOA to develop a physical One Stop Operator System through the development of a Memorandum of Understanding between the core programs with provisions and processes for appeals in any dispute regarding the operations of the One Stop infrastructure and funding allocations.

A dispute resolution process will be developed through the CNMI's State Workforce Development Board where a partner or partners in dispute will be accorded the opportunity for fairness that will achieve a successful dispute resolution.

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 Workforce Innovation and Opportunity Act and other federal laws take precedence to include the established SWDB policies and procedures in providing the guidance for the CNMI's statewide workforce development system single area and for the expenditures of state funds for identified workforce investment activities that are considered allowable and approved provided for by WIOA and identified workforce investment allowable funding activities.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

The CNMI will utilize the Governor's set aside funding only for allowable activities provided under the WIOA and as established by the SWDB policies. The CNMI has never experienced mass layoffs however should there be an occurrence of such mass layoff event(s) the allowable and available Rapid Response funding will be utilized solely for the activities allowable under these circumstances and situation. The CNMI through its Department of Labor Employment Services Division provides the necessary services to assist workers and companies should a layoff situation occur such as

providing subsidized employment and training through the WIOA Dislocated Worker Program funding.

CNMI's Response: The CNMI may not have experienced mass layoffs however it has responded to companies when they make their announcement of closures or reduction in force. Rapid Response is initiated by the CNMI DOL Title 1 B Core Program extending the services to minimize the impact of the employees dislocation from employment. DW services have and continue to be provided for qualifying individuals under these circumstances if the situation occurs which is seldom in the CNMI.

CNMI's Response: The CNMI does not experience much dislocation of workers however there are areas of allowable statewide activities that the CNMI will be re-evaluating and developing policies on that could assist in responding should the event occur in the CNMI while ensuring that the funding program is not engaged in an activity that may involve supplanting when dealing with the business sector. The CNMI has been improving statewide its job bank employment services and will continue on this initiative where individuals/businesses affected could be better served.

The CNMI does not have unemployment insurance benefits however layoff aversion is monitored upon the announcement of a company as required by CNMI local law providing ample notice to the CNMI Department of Labor. Rapid response in this matter is immediately provided to companies and employees who will be affected engaging them into employment services to transition back as quickly as possible into generating unsubsidized income. Other services provided and will continue to be provided to avoid individuals on extended layoff is providing training services that will improve or enhance the individual's work skill and capacity for a potential new job different from their previous job which may no longer be in demand resulting in business closure and dislocation from employment.

Business buyouts or mergers is not a common transaction in the CNMI. Workforce upskilling to assist in the aversion of layoffs is provided and will continue to be provided to those displaced or qualified individuals. Business partnership and engagement by providing subsidized employment and training for businesses and individuals is what the CNMI has been implementing and will continue to do so.

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

The CNMI most recently went through the mass destruction of Typhoon Soudelor on the island of Saipan. The experience of such destruction quickly organized through the established protocols of the CNMI Emergency Management Center and Homeland Security a Rapid Response implementation standards of operations and procedures involving numerous key CNMI government programs and services alongside the FEMA program and other federal emergency responders. The CNMI Governor's General Authorized Representative or GAR is the overall responsible person to coordinate the Rapid Responses actions during a natural disaster such as what the CNMI experienced with Typhoon Soudelor.

CNMI's Response: In cases of natural disasters, the CNMI's Office of Homeland Security takes the lead on natural disasters response in coordination with federal responding agencies such as FEMA, other federal agencies and CNMI local departments and agencies on the list of first responders for natural disasters or state emergencies. The

CNMI SWDB will be updating its state policies and procedures by December 2016 with respect to the use of Rapid Response funds under the WIOA Dislocated Worker Program.

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 CNMI is not a recipient of TAA benefits nor Wagner Peyser Program.

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.

The CNMIs workforce development system has a blended workforce development approach. The delivery of education and training instructions are placed on a high scale of outcomes and expectations where the outcome product of the workforce development programs here being the participant is identified and ready to enter competitively for employment. The involvement of the private sector employers provides the CNMI the opportunity to understand the needs of employers in terms of their need for a qualified and skilled worker.

The CNMI through the Northern Marianas College, the Northern Marianas Trades Institute, its K-12 public school system all contribute to the delivery of quality education and trainings. High level of educational teaching and standards is the CNMIs strength in developing its workforce delivery system of a well structured educational and training programs.

CNMIs Response: The CNMIs WIOA Title I Program engages with employers on the execution of On-the-job-training contracts where the statutory 50% wage costs reimbursements to the employer is provided. Additionally, customized classroom training programs such as those specifically designed for the Allied Health Professions with recognized state providers are also provided. These recognized credentials successfully completed by the participant subsequently engages the participant for further employment and training services such as that of the On-the-job training concept that secures immediate employment primarily with the local hospital and/or private health clinic providers.

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

The CNMI currently does not have an approved Registered Apprenticeship Program. The CNMI however is committed for the inclusion of a Registered Apprenticeship Program with a buy-in of employer sponsorships. The Northern Marianas Trades Institute, the only Trades Institute of the CNMI is a certified NCCER training institution. NCCER is a recognized apprenticeship program. In partnership with the Northern Marianas Trades Institute and the Northern Marianas College, the CNMI is poised to engage with employers to adopt the concept of a US Registered Apprenticeship Program.

The CNMIs focus on developing its human capital with recognized credentials and the inclusion of a US Registered Apprenticeship Program is one of its workforce development training initiatives.

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 CNMI State Workforce Development Board is the initial recipient of applications for WIOA training providers. The application(s) shall be submitted to the CNMI State Workforce Investment Agency here being the CNMI Department of Labor. The CNMI's training provider resources is very limited and it is the policy of the CNMI SWDB that accredited post-secondary educational institutions and other CNMI recognized training providers such as NMTI are on the CNMI eligible training provider list.

Eligible training providers are required to submit their training programs, credentials outcomes of each training program, training contact hours required for the participant to successfully complete the credentialized training program, costs of the training, and other relevant requirements that meets the standards and performance of training providers espoused by WIOA.

CNMI's Response: The CNMI has very limited training providers but regardless of this limitation the SWDB is working on revising its existing training providers eligibility criteria that conforms to the requirements of WIOA Section 122 and that meets the training needs of the CNMI's unique situation. These policies are work in progress with an expected completion timeline of December 2016.

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

The CNMI workforce development system works closely with the CNMI Nutrition and Assistance Program (NAP) which is administered through the CNMI Department of Community and Cultural Affairs (DCCA). The CNMI workforce development system adopts the criterias spelled out under WIOA by targeting the at-risk and/or most-in-need population. The registration process and documentations of individuals seeking education and training services which includes the sourced documentation evidence of a NAP recipient serves as one of the supporting documentation of the registering individual.

The CNMI has taken the position of moving its NAP recipients from welfare dependency to a self sufficiency life approach. The NAP program administering office works closely with the CNMI Department of Labor through a MOU where the CNMI Department of Labor Employment Services Division provides the services of job placement assistance, job bank registration, referrals to education and training services within the CNMI's workforce development education and training programs. Additionally, the NAP Office works closely with the CNMI Department of Labor Workforce Investment Agency's youth, adult, and dislocated worker programs. Additionally, NMTI and NAP have engaged in a program called Prepping for Success specifically designed for long term NAP dependent clients.

The strong engagement, collaboration, leveraging, and partnerships between all CNMI workforce development partners and programs is a long term CNMI workforce development initiative with proven outcomes of individuals achieving self sufficiency and sustainable employment within both public and private sector employment market. As of January 2016, the CNMI has a total of 505 individuals required to register for work.

CNMIs Response: The CNMIs intake system identifies this target population prioritizing them for WIOA funded activities. Program criterias are in place where registrants are qualified and prioritized for qualifying services needed to engage the participant that will help them achieve success and ultimately self sufficiency. Additionally, cross referrals from workforce partner programs such as the Nutrition Assistance Program (NAP) provides the monitoring and prioritization of this target population.

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

The CNMI is a single workforce development area consisting of the 3 main islands of Saipan, Tinian, and Rota. Transfer of funds between the adult and dislocated worker programs is not expected. The CNMIs invests its workforce development resources equally across all 3 islands.

CNMIs Response: The allowability for the Governor to transfer funds at 100% between the Adult and Dislocated Worker Program is administered under the provisions of WIOA. The services and activities for adult and/or dislocated worker generally assists/provides the decision mechanism/criteria to transfer funds between both funding programs. The CNMIs WIOA participants are generally adults and the transfer of funding from the dislocated worker program is often more utilized to transfer to the adult program to fund for adult participants services and activities.

C. YOUTH PROGRAM REQUIREMENTS

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS.*

* Sec. 102(b)(2)(D)(i)(V)

The CNMI consists of 3 populated islands, Saipan, Tinian and Rota. The island of Saipan has the most concentrated youth population however as a Single Workforce Development Area, the CNMI spreads its youth workforce investment activities equally across all 3 islands. The CNMI is limited with available training providers. The islands of Tinian and Rota primarily has the services of the CNMI Public School System which provides youth development initiatives from K-12.

CNMIs Response: It is the policy of the CNMI SWDB that the federal performance measures will be applied to the eligible service providers for either adult, dislocated, or youth provider. Core indicators measuring the performance of the provider(s) in areas such as 1) education or training activities or employment success; 2) credential attainment indicator will be made applicable. These accountability measures are some of the criterias that will determine the performance and accountability of service providers receiving WIOA funds. Other youth attainment indicators will also be made applicable to determine the performance, effectiveness, and accountability of the service provider(s). The CNMI SWDB will be revising its current policies and procedures to ensure compliance with WIOA program and performance requirements. These policies and procedures revisions is expected with a completion timeline of December 2016.

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.

The CNMI is focused on the development of its human capital, from youth to adulthood. The CNMI will engage the following strategies to achieve an improved outcome for out-of-school youth.

1. Engage all workforce partner programs in the delivery of workforce development services and programs that specifically targets the OSY population
2. Allocate the required percentage of its youth funding program under the WIOA funding stream
3. Develop and implement education and training programs that are career path oriented

4. Develop education and training programs that leads to recognized credentials
5. Collaborate, partner, and leverage with other core partner programs resources that improves the expected outcomes and achievement of the program on its targeted OSY population
6. Improve on the collection and analysis of OSY data on their education and skills development needs that will lead to the development of innovative education and training programs
7. Implement innovative approaches of outreach services that targets OSY who are lacking high school equivalency diploma that encourages their participation back into the classroom
8. Implement classroom and employment dual service approach that encourages the OSY population to be engaged in their educational attainment and employment
9. Improve communications with other non-core workforce partner programs of the importance of a universal CNMI workforce development system design and implementation for the overall success of the CNMIs youth to adulthood workforce population
10. Build strong collaborations with state leaders for greater support of youth programs that targets those considered at-risk or most-in-need youth population
11. Develop a system of care across all levels of the CNMIs workforce development system that specifically targets the OSY population
12. Incorporate the involvement of families as part of the system design for improved OSY outcomes

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)

The CNMI SWDB adopts the required 14 program elements described in WIOA section 129 (c) (2). The involvement of all core programs including those considered non-core programs is the overall strategy of the CNMIs workforce development program system design and implementation. The CNMI believes in investing in its future workforce, its youth population.

From K-12, to Higher Education Institution, Disabilities Programs including those from K-12, non-core youth program services, non-school season programs, private sector partnerships, State leaders support elected and non-elected are all involved in the desire to develop a youth system of care at all levels that will ensure the delivery and successful outcome of all required 14 elements under WIOA but also the development of system of programs and services that addresses other barriers affecting the CNMIs overall youth population.

CNMI Response: The CNMIs investments in its youth programs is considered paramount for the success of the CNMIs future human capital development. The CNMIs public school system governed by the CNMI State Board of Education oversees the elementary and secondary education of the CNMIs youth population. Private school institutions also fall under the purview of the CNMIs State Board of Education. At risk youth population

are also accorded the same education rights. The CNMIs Public School System has implemented for numerous years on its school campus the Alternative Education Program specifically designed to assist students who are considered high risk and needing a different form of teaching environment that will help them succeed academically.

The CNMIs Department of Community and Cultural Affairs also administers the Division of Youth Services funded under a block grant. WIOA Title I B leverages every year with DCCA's DYS block grant program for the summer youth employment and training program. Juvenile delinquency programs, juvenile diversion programs, teen intervention, aggressive replacement training, project pay back program for youths under court ordered community work service are all administered at the state level under DCCA's block program.

Youth after school programs at village youth centers are the norm for the CNMIs island community. Tutoring services and study environment conducive to the better learning of the CNMIs youth population are well invested in by both the local government and responsible state workforce partner programs administering youth programs CNMI wide.

Every year the CNMIs youth receive services under the summer youth employment and training program connecting the youths with private sector employers gaining early on work experiences. The CNMI Public School System administers the Cooperative Education Program where annually high school students are provided the opportunity to work with employers earning a stipend or subsidized wages.

Additionally, the CNMIs Public School System administers the Career Technical and Education Program where career cluster focus is provided to the high school students preparing them in focusing on a career pathway that responds to the CNMIs overall workforce needs and economic development and success.

In collaboration with the CNMIs Northern Marianas College, the CNMIs youth population receives the College Start Smart Program/Cash for College preparing graduating students on the benefits of pursuing higher education and access to financial assistance in pursuit of their educational goals.

The CNMIs business community such as the local Chamber of Commerce are also one of the key players in the delivery of youth services compliant with WIOAs 14 youth elements. Entrepreneurship training, financial literacy are all delivered at the high school environment and further enhanced by the involvement of the CNMIs business organizations.

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).

An individual (including a youth with a disability) who has no educational/employment goal; or is at risk of dropping out of school; or has a poor work history (to include no work history); or has been fired from a job in the last 6 calendar months.

An individual (including youth with a disability) who has no vocational/employment goal; or who has a poor work history (including no work history); or has been fired from a job in the last 6 calendar months.

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.

§ 60-20-420 STUDENT ATTENDANCE

The Public School System recognizes two types of absences: excused or unexcused.

(a) Excused absence is absence necessitated because of illness or death in the family, or absence with the written approval of parent/guardian when such approval is not inconsistent with the academic needs of the student as determined by the principal.

(b) Unexcused absences are those which are not excused. They may generally be categorized as being of such a nature that prudence would have avoided or precluded the absence. Suspensions and expulsions are considered unexcused absences.

(c) All students who participate in sanctioned school activities that remove the student from regular classroom attendance shall be considered as present. Sanctioned activities must have an educational purpose and students must make up any lesson or assignment missed as a result of such activity. Educational purposes include the discovery and understanding of life skills, community awareness, cultural diversity, language development, natural resources, social structures, political systems, historical perspectives and character development.

(d) School principals/designees have the authority to make determination of whether or not an absence will be considered excused or unexcused.

(e) Student Absences

(1) Secondary school students (grades 7-12) who incur thirteen or more unexcused absences in a course during one semester shall be considered excessively absent and shall not receive a passing grade for that course for that semester. Students under block scheduling who incur seven or more

unexcused absences during a term shall be considered excessively absent and shall not receive a passing grade for that course during that term.

(2) Secondary students who do not receive a passing grade for a semester as a result of excessive absences shall receive a "no credit" (NC or 0.00) on their academic record, irrespective of the grade the student would have received before the excessive absences. The course must be repeated and the no credit may be deleted only upon successful completion of the repeated course.

(3) Elementary school students with 25 or more absences in a school year will not receive credit and will not be promoted, unless an exemption is granted by the Commissioner.

(4) For the purpose of this section, three unexcused tardies within a term or semester from a course/class shall equal one unexcused absence from the course/class for that term or semester.

(f) Tardiness

The term tardy is defined as being late to school, class or an activity with or without permission of parent/guardian. A student is considered tardy if he/she arrives after the designated time of the class or activity, regardless of whether the student is late by five minutes or fifteen minutes. A student who misses more than half of the class or activity shall be considered absent for the entire class or activity.

(g) Counseling for Absenteeism and Tardiness Problems

The teacher should counsel those students who are developing a pattern of being absent and/or tardy. The teacher will refer to a school administrator specifically designated by the school principal to handle such problems, those students who, in the teacher's judgment, are not making progress toward correcting the problem.

(1) Upon the first referral by a teacher, the administrator should attempt to determine the nature of the problem, inform the student and the student's parent/guardian of the absence and tardy policy and regulation.

(2) The teacher must refer the student to a school administrator and a parent conference must be held to discuss the problem and to explain the Board regulations and any appropriate discipline alternatives under the following circumstances:

(i) Under block scheduling, after the third unexcused absence or sixth tardy in a quarter.

(ii) For secondary schools without block scheduling, after the sixth tardy or sixth unexcused absence in a semester.

(iii) For elementary schools, after the sixth tardy in a semester or the sixth unexcused absence in a semester.

(3) In addition to counseling after teacher referrals, principals shall require doctor's excuses for absences in the following circumstances, unless a waiver for the absence is obtained from the school principal:

(i) Under block scheduling, a doctor's excuse will be required for any absence after the third in a term.

(ii) For secondary schools without block scheduling, a doctor's excuse will be required for any absence after the sixth in a semester.

(iii) For elementary schools, a doctor's excuse will be required for any absence after the sixth in a semester.

(h) Absenteeism and/or tardiness problems for special education students must be referred to the student's IEP team to address the problem and discuss any appropriate learning and/or disciplinary alternatives.

§ 60-20-422 Part-time Attendance

The PSS recognizes the need of some students to attend school on a part-time basis. The Board of Education has established this section regarding part-time attendance. It is the intent of this section to meet the individual needs of each student and at the same time establish rules and regulations that will preserve the discipline, health, and academic standards of the school.

(a) Eligibility Requirements

(1) To be eligible for part-time attendance, the student must be a resident of the CNMI.

(2) The student must be more than sixteen years old and less than twenty years unless the IEP of a student under 16 provides for part-time attendance. Students twenty years and older may apply and it will be at the discretion of the principal, and, in the case of a student with a disability, the IEP team, whether to approve part-time attendance for such students.

(3) The student must have parent/guardian approval if under 18 years of age.

(4) The student must demonstrate a definite need to attend school on a part-time basis. Examples are:

(i) Financial needs of student or family,

(ii) Health problems of self or family,

(iii) Vocational training in school or on the job,

(iv) Enrollment in a school of higher education, and

(v) Unique curriculum offerings.

(b) Application Procedure

(1) The student must secure an appointment with the guidance counselor and school principal prior to classification as a part-time student. The student must complete a part-time attendance request form at the conference. Before any decision is given concerning the request, a conference must be

held with the student's parent/guardian if the student is under 18 years of age. All applications and conferences must be completed during the time preceding the semester in which the student is to be enrolled on a part-time basis.

(2) After an application has been submitted, the principal shall rule on the request and report to the Commissioner the names of all students who are to be enrolled on a part-time basis. This same report shall be transmitted to the Board of Education. In the event the principal denies the request, the student may appeal to the Commissioner who must respond in a reasonable time.

(3) Part-time students are governed by the same rules and regulations that apply to regularly enrolled students.

6. IF NOT USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE SPECIFIC STATE DEFINITION.

The CNMI follows the definition in WIOA Section 3 (5) (B).

D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must 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).)

Public Comments - The Unified State Plan is still being posted for public comments and if any comments is received it will be incorporated in the Unified Plan.

Entity responsible for the disbursement of grant funds - CNMI Department of Labor

CNMI Response: The State Plan was posted for public comment on the state site <http://www.wia.gov.mp/wioa-state-plan-public-comments>. The state plan received only 1 comment but not in disagreement of the plan rather to include "dual enrollment" on the response(s). This comment was received on April 19, 2016.

WIOA Title 1 Youth Activities

The CNMI Public School System delivers K-12 youth education services. There are numerous in school and after school programs that are administered by the CNMI Public School System and/or partnered with the private sector such as 1) Cooperative Education Program or COOP; 2) after school tutoring and mentoring programs; 3) youth takeover days in partnership with the local Chamber of Commerce; 4) summer programs for younger youth administered by the Department of Community and Cultural Affairs funded by block grants under the Division of Youth Services; 5) summer youth employment and training programs funded under WIOA Title 1 Youth Funding Stream; 6) youth business enterprise programs in partnership with the Commonwealth Development Authority (CDA); 7) youth mentoring programs in partnership with local businesses that is aligned with the youths career/profession interest (a group dinner program engagement organized by the Public School System bringing business leaders to have a one-on-one conversation with the student about their similar career/profession interest).

The Northern Marianas College provides college level courses and also provides through its Community Development Institute other short term certificated programs and related programs such as providing work readiness workshops for the youth population during the summer youth employment and training season. Other out of school session programs are also administered through the Northern Marianas College in partnership with other non-core programs.

CNMI's Response: The CNMI's only college institution Northern Marianas College is often times the only eligible training provider for youth training activities.

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;

TITLE I-B ASSURANCES

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes
2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes
3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes
4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes
9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

**PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM
(EMPLOYMENT SERVICES)**

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

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

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.

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.

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

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;
2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;
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
4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE--

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.

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

B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWs IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION.

2. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF

REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE COMPLAINT SYSTEM, INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWS IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES.

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

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

3. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM.

Describe the State agency's proposed strategies for:

(A) PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

- 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.

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

(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

4. OTHER REQUIREMENTS

(A) COLLABORATION

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners

over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

(B) REVIEW AND PUBLIC COMMENT.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

(C) DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

(D) ASSESSMENT OF PROGRESS

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

(E) STATE MONITOR ADVOCATE

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

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)); No

2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; No

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and No

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. No

**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)).

Adult education programs have already adopted the Common Core State Standards into its curriculum and have aligned them with the College and Career Readiness Standards (CCRS) for Adult Education. In addition, adult education faculties have had the opportunity to attend the CCRS Implementation Training offered for Language Arts and Math as part of their professional development.

Programs measure student level and progress by using standardized assessment tools and by following assessment policy recommendations shared with them on an annual basis. Level gains and workforce skills are recorded using the Comprehensive Adult Student Assessment System (CASAS) TOPs Enterprise (TE) reporting system. The state uses the data provided by TE to analyze and improve performance.

Funds will be used to continue supporting professional development opportunities to aid in the implementation of standard based instruction for adult education in the Northern Mariana Islands.

The CNMI's Response: The Adult Education program will map the adopted Common Core State Standards (CCSS) as well as the Adult Education College and Career Readiness Standards (CCRS) into the Student Learning Outcomes (SLOs) that are required in every course syllabus.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide the adult education and literacy activities, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
 1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
 2. Is for the purpose of educational and career advancement.

The Northern Mariana Islands' Adult Education and Literacy Programs assist adults to become literate and obtain the knowledge and skills necessary to obtain a job or improve in their present jobs, to assist parents to be more involved with the educational development of their children, and to provide the opportunity for educational disadvantaged adults to complete a secondary education or credential.

Under Title II of the Workforce Innovation Opportunity Act (WIOA), eligible individuals are those who:

- has attained 16 years of age;
- is not enrolled or required to be enrolled in secondary school under State law; and who;

*is basic skills deficient;

*does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or

*is an English language learner.

Adult Basic Education (ABE) provides instruction in basic skills for adults with low literacy and numeracy skills. Adult Secondary Education (ASE) provides instruction for adults whose literacy and numeracy skills equate to a high school level and their goals are to obtain a high school equivalency diploma.

English as a Second Language (ESL) provides adults who lack proficiency in English and who seek to improve their literacy and competence in English.

In serving its students, the CNMI ABE program believes that adult learners learn best when:

1. They are in a comfortable with the learning environment and they attempt tasks that allow them to succeed within the contexts of their limited time and demanding lives;
2. They provide input into the planning of their learning goals and processes;
3. They have opportunities to engage in social learning, enabling them to learn from their peers and their instructors;
4. They have a variety of options appropriate to their learning styles and have opportunities to analyze and expand their modes of learning;
5. They are able to associate new learning with previous experiences and to use those experiences while learning;
6. They have an opportunity to apply theory/information to practical situations in their own life; and
7. When the instructors deal with learning difficulties and disabilities tactfully and patiently.

The NMI Adult Basic Education Program has been designed for:

- Non-native speakers of English to improve their conversational, reading, writing and numeracy skills in English;
- Adult students (16 years old and older) who did not complete their high school education, but plan to complete the high school equivalency examinations;
- Returning adult speakers who did not complete their high school education to prepare to take the high school equivalency examination;
- Adult literacy students to improve their basic reading, writing, and/or mathematics skill(s);
- Adults to be prepared for successful job placement, career training or career performance; and
- Adults who are parents preparing to become effective first teachers of their children. The performance measures for ABE programs are outlined in the Workforce Innovative Opportunity Act, Title II, Adult Basic Education and Family Literacy.

The ABE curriculum will integrate skills, which includes digital literacy, critical thinking, and college and career readiness skills. These skills will assists students in improving educational levels and successfully continuing education or training and entering employment.

The CNMI Adult Education State Office will run competitions for its funds under WIOA Tittle II using the revised 12 considerations and the 5 new application requirements. These applications will include alignments with local workforce plans and participation in the one-stop system. The funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region.

Eligible program providers may include some or all of the following:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;

- Integrated English literacy and civics education;
 - Workforce preparation activities; or
 - Integrated education and training that-
1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
 2. Is for the purpose of educational and career advancement.

The CNMI's Response: The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

Note: The Adult Office has never done a competition before. With the available funds, the office works with the community and its sister islands of Tinian and Rota to identify a space for us to come in and provide instruction. Our islands are very small and sites usually have less than 15 students. We also do not have much in terms of agencies capable in running programs, with the exception of possibly one (the Northern Marianas Trades Institute). Education for community members usually falls under the K-12 system, Adult Education, Northern Marianas College, and the Northern Marianas Trades Institute. This will be a developing process for the Adult State Office.

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.

The CNMI State Department of Corrections (DOC) houses individuals remanded into their custody from the main island of Saipan and its two sister islands, Rota and Tinian and at times from its smaller minimally populated northern island chain. The Department of Correction has been a partner with adult education and family literacy programs for many years. Within the last several months, DOC has made some changes to prioritize providing educational and career training to their incarcerated individuals. Priority has been set to those who are likely to leave the institution within five years of participation in the adult education program.

For those who meet the eligibility requirements, the program will offer adult education and literacy activities. The instruction offered may integrate life skills, employability skills, and digital literacy skills to help the inmates obtain the needed skills to become self-reliant and contributing members of the island community after leaving DOC.

Currently there are no funding opportunities to provide adult education programs outside of AEFLA. The local program has included instruction and employability skills to DOC inmates. These inmate students must lack mastery in basic skills, or have not obtained a high school diploma or its equivalent.

CNMI's Response: The Adult Education State Office will run competitions, that adhere to Sec. 231, for eligible providers and from funds made available under section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education and education for other institutionalized individuals. The funds described in subsection (a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for— (1) adult education and literacy activities; (2) special education, as determined by the eligible agency; (3) secondary school credit; (4) integrated education and training; (5)

career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other postrelease services with the goal of reducing recidivism. Each eligible agency that is using assistance provided under this section to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. In addition to any report required under section 116, each eligible agency that receives assistance provided under this section shall annually prepare and submit to the Secretary a report on the progress, as described in section 116, of the eligible agency with respect to the programs and activities carried out under this section, including the relative rate of recidivism for the criminal offenders served.

Note: This will be new to Adult Education. The office has made several attempts to offer instruction, but have not been able to enter the facilities. There is also a question of enrollment as there are less than 10 who are eligible for services and this number varies from time to time due to probation opportunities. This will be a developing process for the Adult Education Office.

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.

Current Adult Education providers already serve adult English language learners (ELL), including professionals with degrees and credentials from their native countries, with curriculum aimed to develop competence in English. Before WIOA, the CNMI was not included to participate in providing civics instruction.

Eligible providers in the CNMI will create a new Integrated English Literacy and Civics Education (IELCE) program that will retain the focus on English language proficiency, but will also include civics education instruction that will demonstrate the rights and responsibilities of citizenship and civic participation and career training. These services will enable English Language Learners to develop skills to function as parents, workers, and citizens of the United States.

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.

Funding will be allocated to eligible providers to deliver services of IELCE with priority given to programs providing a combination of integrated instruction and workforce training. These services are to prepare the adult ELL's to be placed in unsubsidized employment in in-demand industries and jobs that will help the island community to improve its economy.

IELCE will not be provided in every village or island through the availability of federal funds. In consideration of proposals for IELCV funds, the CNMI Adult Education State Office will consider:

- whether the IELCE instruction will be done by highly qualified and trained instructors who hold degrees or credentials in teaching English as a Second Language (ESL);
- whether the area has a need for an IELCE program.

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.

CNMI's Adult Education Office provides activities such as professional development opportunities; alignment of curriculum with standards and competencies that incorporate 21st century skills, workplace readiness activities with academic and life skill courses; providing technology assistance, which includes staff training, program management improvement and support; working with other partner agencies to increase enrollment and completion rates in adult education programs; and partnering with postsecondary institutions.

The Adult Education Office will use the funds for *required* State Leadership activities as follows:

- align with core partners and one-stop partners to support the strategies of its Unified State Plan, including the development of career pathways,
- improve instruction by developing high quality professional development programs that will include elements of reading instruction, dissemination of model programs and promising practices,
- provide technical assistance to providers based on researched evidence-based instructional practices, responsibilities of one-stop programs, effective use of technology, and
- monitor and evaluate the quality of adult education activities in the CNMI.

The CNMI's Response: Adult Education will use State Leadership funds for technical assistance to support local programs with programs, activities, and curriculum. The technical assistance will focus on data systems, assessment, integrated education and training, and career readiness and pathways.

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

The CNMI's Adult Education Office will be responsible in carrying out *permissible* State Leadership activities, if funding permits, by:

- maintaining membership and partnership in the Literacy Information and Communication System (LINCS) in order collaborate with other fellow agencies and minimize duplication of effort,
- furthering works on standards implementation, including the use of aligned and approved assessments to improve student preparedness for college and the workforce as a result of their participation in Adult Education and Literacy programs,
- improving assistance to adult learners to effectively meet personal and program goals,
- providing assistance to eligible providers in meeting adjusted levels of performance, via technical assistance, site visits, ongoing communications, and targeted professional development and program improvement activities,
- offering proven program models and content for integrated education and training and career pathways, and
- requiring evaluations of AEFLA programs every four years

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.

CNMI's Adult Education Office will visit programs to discuss program management, professional development needs, performance data and program compliance. If needed, specific trainings will ensure that proven and evidence based educational and student support models are being applied in the classroom. Monitoring site visits will be conducted with programs that are identified needing strategies for improvement of programs. With guidance from the Adult Education office, technical assistance will be given and will assist programs in developing an improvement plan. The Office will monitor the program closely and will conduct follow-up site visits to certify improvement plans are executed. Site visits may include classroom observations, and student surveys or evaluations. Monitoring examples may include financial, program management, data integrity, and teacher quality. All monitoring activities will result in a detailed compliance letter itemizing findings, recommendations, and commendations based on implementation of improvement plan and policy.

For on-going assessment purposes, the Adult Education Office will require all programs to submit on-going data that denote student participation levels and weekly attendance. Data submitted must also track student outcomes in the areas of obtaining or retaining employment, as well as transitioning into postsecondary education or training. Under WIOA, the Office will partner with the State Department of Labor (DOL) to track and report employment follow-up required in the new legislation.

The CNMI's Response: The Adult Education Office will assess the quality of its professional development programs by conducting an assessment on needs, services, and data. Programs will then create an action plan for planning professional development to address deficiencies or necessary improvements by outlining their strategies and activities. A rubric will be created to determine whether programs have demonstrated improvement.

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 **Northern Marianas College**

Full Name of Authorized Representative: **David Attao**

Title of Authorized Representative: **Acting President**

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

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The CNMI State Rehabilitation Council was provided with a draft copy of the VR services portion of the Unified State Plan for their review, input and recommendations. Two members submitted written comments. One member recommended the inclusion of a more complete description of the Trankilu Alternative Financing Program to emphasize its collaboration with the CNMI Assistive Technology Program to provide AT training as well as a description of the CNMI ATP. A general comment that was positive with no specific recommendation.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The recommendation was accepted.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Not applicable

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

The CNMI OVR has not requested a waiver.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable

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

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The CNMI OVR will continue its efforts to maintain or develop cooperative arrangements or agreements with various local, State, and Federal agencies and entities for referrals, training, services, facilities utilization, potential cost-sharing, and advocacy activities. These agencies include:

- Statewide Independent Living Council for information/referral, peer counseling, IL skills training, advocacy, transition services (transition from nursing homes and other institutions to community-based residences; assisting individuals to avoid institutional placement; and transition of youth with significant disabilities after completion of secondary education to postsecondary life), and transportation services.
- CNMI Council on Developmental Disabilities for systemic change, public policy development, advocacy, empowerment training including self-advocacy, identification of barriers to employment and community inclusion for individuals with developmental and other disabilities, referral services, and collaboration and coordination with public education, Medicaid, and self advocates, and awareness activities during Developmental Disabilities Awareness Month in March and National Disability Employment Awareness Month in October and other disability-related awareness activities throughout the year.
- Division of Public Health:
 - o Transitional Living Center for Work Experience Training for OVR and CGC's mutual consumers.
 - o CNMI Medicaid Office for cost-sharing arrangements for services provided and referrals. Though a Memorandum of Understanding with Medicaid exists, a current review may be required.
 - o Medical Referral Services (Rota and Tinian Health Centers, Guam, Hawaii, etc.) for service coordination, logistical support, and/or cost-sharing of mutual consumers who require off-island services and referral.
 - o Non-Communicable Disease Bureau (NCDB) for information/referral, public education and awareness, advocacy, and training assistance.
 - o Students and Youth with Special Health Care Needs Program for care coordination of services to target group between birth and 21 years old.
- Community Guidance Center (CGC) for referral of rehabilitation services and increased collaboration/coordination of mutual clients to ensure meeting their employment and rehabilitation needs.

- Scholarship Office for educational financial assistance at the Northern Marianas College and other institutions of higher education (IHE), referral of students to OVR for assistance and internships, and job/career exploration including information on rehabilitation careers.

- Northern Marianas College:

- o The University Center for Excellence in Developmental Disabilities for faculty, student, and family training and advocacy, accommodations, increased awareness and empowerment in the postsecondary setting, and referral services.

- o Counseling Office, Disability Support Services for referrals, sensitivity training, transition, accommodation assistance, financial aid counseling, and counseling on postsecondary educational opportunities.

- Adult Education and Literacy Program for educational and job skill training and referral services.

- Department of Community and Cultural Affairs Office:

- o Office on Aging which provides information & referral; transportation services as well as the coordination of the Older Americans Awareness Month activities in May; and Senior Community Service Employment Program for subsidized part-time employment opportunities for low income individuals aged 55 years and older.

- o Division of Youth Services for referrals and assistance on outreach.

- o Nutrition Assistance Program for referrals and food assistance.

- o Low Income Home Energy Assistance Program for assistance, utility payment subsidies and referral services.

- o Child Care Program to assist individuals with disabilities and low income families to pay for child care while working, attending school or training.

- Carolinian Affairs Office for referrals and outreach and collaboration/coordination for the translation of VR program materials in the Carolinian vernacular, if needed.

- Saipan Chamber of Commerce for sponsorship of employers' training & education, mentoring & jobsite training, and referral services (employer engagement).

- Society for Human Resource Management for employer engagement:

- o Information, referral and advocacy

- o Employer awareness and education

- o Collaboration with OVR for Work Experience (WE) and On-the-Job Training (OJT) placements

- Northern Marianas Protection and Advocacy Systems, Inc. for advocacy training, seminars, workshops, referrals, and cost-sharing of activities including National Disability Employment Awareness Month (NDEAM).
- CNMI Center for Living Independently for advocacy and IL skills training, information/referral, peer counseling, transition, and transportation.
- Mayors' Offices of Saipan, Tinian, and Rota for referrals, outreach, program support services and coordination, and utility subsidies payment.
- Karidat for temporary housing, maintenance expenses, food assistance, and referral services.
- Ayuda Network for referrals and inter-agency updates, training and development.
- Commonwealth Office on Transit Authority (COTA) for transportation services, public education and awareness, and information & referral services.
- Workforce Investment Agency for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stops), and other authorized activities per WIOA.
- Disability Network Partners for ongoing discussions about issues affecting the disability community in the CNMI, information sharing, cost-sharing on disability awareness as well as employer engagement activities and training opportunities, referrals, technical assistance, etc.
- CNMI Transition Coalition for improved collaboration and coordination aimed at improving school to work transition services and preparing students with disabilities for the 21st century workforce through the provision of pre-employment transition services (PETS).
- Veteran's Affairs Office to assist in the coordination of services for common consumers and deliver quality services for qualified disabled veterans.
- Dept. of Corrections / Division of Youth Services in developing a collaborative relationship with the Department of Corrections (DOC) and the Division of Youth Services (DYS) to coordinate service activities for individuals with disabilities who are interacting with the juvenile justice system, child welfare as well as adults scheduled for release. OVR will work with DOC in assisting inmates with disabilities with determining if they are eligible for OVR services. If found eligible, helping them to prepare for a successful employment transition as a component of their parole process.
- Special Education Program for referrals and the coordination and collaboration of the provision of pre-employment transition services to students with disabilities as defined by WIOA.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

- Trankilu Alternative Financing Program (also known as the Assistive Technology (AT) Loan Program) for affordable loans made available to anyone who intends to purchase assistive technology, adapted vehicles, or modifications for a CNMI resident with a disability. Employers

(provided that the assistive technology is to benefit exclusively the individual with a disability) and entrepreneurs with disabilities may qualify to participate in this program. They provide AT training as well as information and referral services.

TAFP works in collaboration with the CNMI Assistive Technology Program to provide AT training.

- The CNMI Assistive Technology Program is a federally-funded program under the CNMI Council on Developmental Disabilities and authorized under the Assistive Technology Act of 1998. In 1994, the CNMI Council on Developmental Disabilities was funded to develop, implement, and administer a Commonwealth-wide program to meet the assistive technology needs of persons with disabilities, which was known as STRAID. However, as a result of the new requirements of the Assistive Technology Act of 1998, as amended, the program is now called the CNMI Assistive Technology Program (CNMI ATP), which is under the CNMI Council on Developmental Disabilities. The CNMI ATP provides assistive technology-related services CNMI-wide to help children and adults with disabilities live productive, independent, and good quality lives. As an AT Act program, CNMI ATP carries out state level and leadership activities. State level activities consist of Alternative Financing Program (Trankilu Alternative Financing Program), Device Reutilization Program, Device Loan Program and Device Demonstration Program. Furthermore, CNMI ATP conducts state leadership activities CNMI-wide such as training, technical assistance, public awareness and outreach, information dissemination and referrals, and coordination and collaboration with various public, private and non-government entities.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

The CNMI OVR does not currently have cooperative agreements with any programs funded under the USDA.

But, as previously stated, the OVR will, when appropriate, continue to develop agreements with other state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

- Workforce Investment Agency for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stops), and other authorized activities per WIOA.
- Continue to maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodations and effective communications with individuals with varying disabilities.

5. STATE USE CONTRACTING PROGRAMS.

Not applicable

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.

Section 20 of OVR's Policy and Procedures Manual states: "The Rehabilitation Act of 1973, as amended, requires the development of cooperative agreements, formal interagency agreements and memorandums of understanding, as appropriate, with other public agencies (CFR 361.22, CFR 361.23, 361.24). The cooperative agreement is designed for use whenever public agencies enter into agreements and does not involve an exchange of funds. This may be accomplished by executing a COOPERATIVE AGREEMENT BETWEEN PUBLIC AGENCIES, and obtaining required signatory approvals. The Rehabilitation Act of 1973, as amended, also allows for third-party cooperative arrangements (CFR 361.28). Interlocal contracts with public agencies may be entered into by executing an INTERLOCAL CONTRACT BETWEEN PUBLIC AGENCIES and obtaining required signatory approvals. The interlocal contract is designed for use whenever public agencies contract with one another for the performance of any government service" (p. 78).

Where specifically School-to-Work Transition is concerned, the CNMI Office of Vocational Rehabilitation (OVR) and the Public School System-Special Education Program (PSS-SPED), in FY 2015, re-evaluated their existing Interagency Cooperative Agreement (ICA) and made necessary revisions per the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Section 8 of the ICA talks about Pre-Employment Transition Services: "The Rehabilitation Act of 2014, as amended (under Title IV of the Workforce Innovation and Opportunity Act signed into law by President Obama on July 22, 2014) requires OVR to provide eligible students with disabilities under IDEA or Section 504, ages 16-21 years, with pre-employment transition services (PETS), such as: Job exploration counseling, Work-based learning opportunities, Counseling on post-secondary educational opportunities, Workplace readiness training, and Instructions in self-advocacy. PSS-SPED will provide assistance to OVR in the coordination with employers on transition services including PETS for students with disabilities" (p. 3).

Procedures regarding the timely development and approval of individualized plans for employment for all CNMI OVR consumers, including students with disabilities, may be found in the Policy and Procedures Manual, under Section 16: INDIVIDUALIZED PLAN FOR EMPLOYMENT (IPE): "After determination of eligibility, Counselor shall develop an individualized plan for employment (IPE) within 60 work days, and the identification of rehabilitation needs, there will be an IPE initiated" (p. 35).

In addition to the ICA, the School-to-Work Transition Guidelines provides more practical information including best practices for delivering transition services. According to the Guidelines, the CNMI OVR must ensure that the "Individualized Plan for Employment (IPE) should be completed as soon as eligibility has been determined but no later than 60 days, and the necessary information has been gathered. An IPE should be in place prior to graduation or exit from school. The IPE is to be coordinated with the student's Individual Education Program (IEP) that is developed by the school system's transition team" (p. 2).

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;

Section 2 of the Interagency Cooperative Agreement states that the “OVR and PSS–SPED will engage in providing the other with consultation and technical assistance to plan for and ensure the smooth transition of students with disabilities” (p. 1).

VR staff are essentially a resource for schools and families to help educate students about supports needed for a smooth transition from school to work, further training, education and/or independent living. To achieve this objective the following general activities are completed:

- Consulting with and educating schools, parents, students, and other agencies about VR services.
- Conducting outreach that includes VR orientation presentations, dissemination of VR brochures, and technical assistance with transition IEP planning.
- Participation in transition fairs, job fairs, and other activities targeting parents and students to increase appropriate referrals.
- Conducting early identification and assessment of student needs for transition services.
- Bringing the VR program to the school campuses through continued co–location efforts.
- Communicating relevant VR policy which may impact a student’s application or eligibility for VR services.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Section 3 of the Interagency Cooperative Agreement states that the “OVR’s involvement during the transition planning phase of the IEP helps to ensure that the vocational or employment–related provisions of the IEP provide a bridge to the vocational rehabilitation services needed under an IPE for those students determined eligible for the vocational rehabilitation program” (p. 1).

As an extension of the 2015 Interagency Agreement between the Office of Vocational Rehabilitation and the Public School System–Special Education Program, the School to Work Transition Guide (SWTG) was developed to ensure a smooth transition process. This guide suggests best practices that can be used as a tool to assist in the improvement of communication, coordination, and services for students with disabilities transitioning from school to work. It was designed to be useful for all persons and agencies (stakeholders) involved in the transition process. This document varies depending upon the stakeholder’s needs at the time of use. The Agencies and Programs involved in the development of this guide agreed to the following core values:

- **Transition is Essential:** Transition is important for all students, regardless of disability. Transition provides the focus and early planning for all youth with disabilities to move towards achieving their goals.
- **Individualization:** Transition services are not the same for all students. Services are person-specific and developed with the young adult, their family, and those who know them well based on their interests, abilities, and needs.
- **Outcome Focused:** Transition services are specific outcomes driven activities designed to help students achieve their goals of training/education, employment, and independent living.
- **Achieve More Together:** Working together, as equal partners, creates a seamless transition from school to work. All can assist the student and their families identify their needs and develop plans to meet these needs. Everyone has something to contribute and leveraging of funds and staff leads to exceptional outcomes.
- **Student and Family Involvement:** Students and their families are actively involved in the entire transition process including service decisions. They are full and meaningful partners in the process.
- **Identification of Roles and Process:** Identifying the roles of every partner and the processes needed, sets clear expectations between partners about areas of focus and expertise, responsibilities, and where to go for assistance beyond the individual programs scope of practice. Knowing where to go for the right answers allows for smooth discussions about possibilities.
- **Increase Understanding:** Share information so all partners are aware of available resources to help in transitioning.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Section 10 of the Interagency Cooperative Agreement states the following: “When a student with a disability is both in school and has an IPE with OVR, the cost of services necessary for both the student’s education and for the student to become employed, will be delineated between the PSS–SPED in terms of what accommodation the student needs to complete his/her high school coursework and OVR in terms of what will work with the PSS–SPED representative in determining which is needed to complete high school coursework and which services pertain to fulfilling the IPE. When another adult service provider agency has been identified by the IEP team (that it can pay for part or all of the cost of a specific service or device), a representative of that agency shall be invited and included in the IEP meeting where the responsibility for payment is negotiated. Arrangements to share the cost of a given service or device will be fully reflected and explained in the IEP or the IPE, or both. (Note: OVR is a secondary source of financial assistance.) Nothing in this agreement shall be construed to reduce the obligation under IDEA for the PSS–SPED to provide/pay for transition services that are required to ensure [Free Appropriate Public Education, or] FAPE” (p. 4).

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Section 4 of the Interagency Cooperative Agreement states that “OVR and PSS–SPED will continue to support outreach activities that will increase referrals to OVR in an effort to provide eligible students with disabilities a smooth school to work transition” (p. 1).

Section I of the School to Work Transition Guidelines also describes the process for outreach to students with disabilities who may be in need of Transition services:

- “Outreach activities...are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in transition services. Outreach to these students should occur as early as possible during the Transition planning process and must include, at a minimum, a description of the following: Vocational Rehabilitation program purpose, Eligibility requirements, Procedures, and Scope of services that may be provided to eligible students.
- The VR Transition Counselor can provide information regarding OVR services that can be passed on to students and their families by contacting the SPED Teacher, Transition Coordinator, SPED Coordinator, or School Counselor.
- Ways the VR Transition Counselor may conduct outreach include: Providing VR brochures and business cards to the school; Presenting at the first Open House or Orientation held at the school; Conducting regularly scheduled school visits (co–location); Participating in Transition and job fairs at the school; Attending school IEP meetings when invited; Speaking about VR services at school staff meetings, teacher in–service training, student/parent group meetings, or interagency meetings.
- The VR Transition Counselor should work with school staff to ensure referrals of students with disabilities to the OVR program at the beginning of the school year as follows: Referral and application for OVR services is recommended at age 16 for students who are involved in or plan to be involved in Community–Based Work Experiences (CBWE); All other students are encouraged to apply for OVR Transition services two years prior to school exit; Students at high risk of dropping out should be referred if they are old enough to begin training or searching for employment; and VR Transition Counselor may act in an advisory capacity for at–risk youth who are too young to apply and/or do not have a disability” (pp. 2–3).

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.

There are no private non-profits providing VR services in the CNMI.

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.

A fee for services arrangement is in place with two (2) private companies to provide job coaching services: Pinnacle Staffing and Marianas Health. The job coaches assist individuals with most significant disabilities during their participation in the work experience and on-the-job training programs.

Personal assistance services are provided to consumers with most significant disabilities to help them to further maintain their employment through the choosing of their own PAs who are compensated by OVR.

Still, the CNMI has a limited number of community rehabilitation programs (CRP), supported employment and extended service providers. This creates challenges in providing for a comprehensive support services, which are required for a successful program. Discussions with public agencies and organizations to provide and/or fund supported employment and extended services are ongoing. In addition, CNMI OVR will continue to identify individuals who have received training to provide supported employment services to VR consumers.

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

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services for consumers with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management, and other similar venues,
- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,
- Participate in job/career fairs sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment, and
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate Transition services, including Pre-Employment Transition Services (PETS) for students with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management, and other similar venues,
- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,
- Participate in job/career fairs sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment, and
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies.

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;

During the general membership meeting of the CNMI Council on Developmental Disabilities (CDD) on 11/12/15, of which the OVR and the Medicaid are members, formal discussions on how we can collaborate with Medicaid to provide longer term supported employment and extended services to people with the most significant disabilities through applicable waiver(s) was initiated. The Medicaid Administrator informed council members that because of a Medicaid cap for the CNMI and other territories, certain waivers are not applicable, and until such time that the cap is lifted, Medicaid will be unable to provide home and community-based services in support of competitive integrated employment. The Medicaid continues to provide services under their State Plan of 1989. Mandatory services include: inpatient services; outpatient services; other lab and x-ray; nursing facility services (only when referred off-island); physician's services; early and periodic screening, diagnosis, and treatment for children under 18; home health care (only when referred off-island); family planning services; and rural health clinic (only when referred off-island). In addition, optional services are also covered, such as: clinic services; optometry services; other practitioner services; dental services; physical and occupational therapy (rehabilitation); speech, hearing, and language disorders; prescribed drugs, dentures, prosthetic devices, and eyeglasses; wheelchair; medical supplies; and transportation (to off-island facility only). Continued discussions with Medicaid by the CNMI Disability Network Partners (OVR included) will be planned including obtaining federal-level guidance and technical assistance on how CNMI's current Medicaid restriction on the cap may be overcome to provide additional longer term services needed by people with more significant disabilities in order to achieve competitive integrated employment.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

CNMI OVR partners with the Council on Developmental Disabilities by engaging in activities that promote and improve our public VR program; identify and address the employment and other needs of people with disabilities; strengthen partnerships among the local Disability Network Partners (OVR, CDD, Northern Marianas Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, Transition Coalition, employers, community rehabilitation programs, etc.); advocate that people with disabilities receive timely and quality services from community providers; educate the public on the mandates of federal and local statutes as they pertain to people with disabilities; leveraging of resources and expertise on similar State Plan goals/objectives for the benefit of VR consumers and potential applicants; among other things.

Collaboration with the CDD takes on the following form:

- Regular communications throughout the year.
- Involvement in mutual councils and boards, such as the Council on Developmental Disabilities, the State Rehabilitation Council, the Special Education State Advisory Panel, the Ayuda Network, the Consumer Advisory Committee of the University Center for Excellence in Developmental Disabilities, the Statewide Independent Living Council, etc.

- Involvement in mutual coalitions, for instance, the Transition Coalition and the Disability Network Partners.
- Attendance and participation at each respective programs' public hearing or forum to help inform the State Plan development.
- Leveraging of resources and expertise in areas of employment, advocacy, and systems change resulting in competitive, integrated, and timely services.
- Information and referral related to employment.

CNMI CDD is committed to promoting systems change, providing advocacy, and supporting the independence, productivity, integration, and inclusion of individuals with developmental and other disabilities in our island community.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

CNMI OVR has an ongoing relationship with the Community Guidance Center (CGC), a provider of comprehensive mental health and substance abuse services for residents of the Commonwealth of the Northern Mariana Islands. OVR is a member of the Mental Health Planning Council and ensures representation at scheduled meetings. In the past year, the CGC has begun to promote the Systems of Care model whose mission is "to promote the improvement of care and opportunity for youth with and youth at-risk of Severe Emotional Disturbances through improved collaboration with youth and family serving groups." OVR plans to continue supporting the program and initiatives by attending stakeholder/focus group meetings, participating in their needs assessment project and other activities in order to effectively and collaboratively support competitive integrated employment of individuals with mental health impairments in the CNMI. Preliminary discussions with the former CGC director on forging a memorandum of understanding will be continued with the new director or designee.

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 qualifications of CNMI OVR staff are under consistent review – at least semi-annually – to identify educational and training needs that are required to enhance professional development. These needs are incorporated in individual staff development plans that conform to both CNMI Personnel Service System Rules & Regulations (PSSR&R) and VR standards as established in the Rehabilitation Act Amendments of 1998. All counseling professionals who do not meet these standards will be required to demonstrate significant progress per Section 101(a)(7) of the Rehabilitation Act. Activities that will continue to be conducted on an annual basis include:

- Projections on the number of VR consumers to assess staffing needs, and to maintain or plan appropriate and adequate staffing levels;
- Findings of monitoring reports, SRC recommendations, Consumer Satisfaction Survey results, and performance evaluations will be reviewed for staffing suggestions. Other documents, such as reviewers' comments on the State plan development, deficiencies noted in submitted quarterly/annual RSA reports, and monitoring reports will also be reviewed;
- Consulting with VR counseling staff to identify training topics to support personnel development;
- Ongoing reviews of progress on the individual professional staff development plan.

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

The Office of Vocational Rehabilitation currently employs eleven (11) personnel that provide VR services to an estimated three hundred (300) individuals/consumers per year.

VR administrative support and services are provided by:

- One (1) Director who is a product of federal CSPD Master's degree in Rehabilitation Counseling Program with CRC Credential,

- One (1) Fiscal Officer with over thirty (30) years dedicated to the CNMI OVR,
- One (1) Administrative and Operations Manager,
- One (1) Administrative Assistant,
- One (1) Data Analyst, and
- One (1) Administrative Clerk.

Direct VR services are provided by:

- Three (3) VR Counselors (General),
- One (1) VR Transition Counselor, and
- One (1) VR Counselor Aide.

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.

CNMI OVR anticipates about a 5% increase in the number of individuals/consumers that will be served in FY 2017 and beyond due to the hiring of a VR Transition Counselor who actively seeks out potential applicants at the public high schools as well as the college and trades school campuses. In addition, VR Counselors make regular visits to the islands of Tinian and Rota thereby receiving a steady number of applications throughout the year, not to mention those received from Saipan. Average counselor caseload at any given time is sixty (60). In addition, WIOA puts special emphasis on employer engagement activities as employers comprise VR's second customer base. This given, it is reasonable to consider that within the next five (5) years the CNMI OVR will possibly be looking into the recruitment and hiring of an Employment Specialist to help meet the needs of employers as well as consumers. In addition, CNMI OVR will pursue the re-certification of the Case Service Manager position in the near future. The chart below represents current and projected vacancies by job title:

Job Title Total Positions Current Vacancies Projected Vacancies

Director 1 0 0

Fiscal Officer 1 0 0

Administrative & Operations Manager 1 0 0

VR Counselor 3 0 0

VR Transition Counselor 1 0 0

VR Counselor Aide 1 1 0

Administrative Assistant 1 0 0

Data Analyst 1 0 0

ILOB Case Worker Assistant 1 1 0

Employment Specialist 0 0 1

Case Service Manager 0 0 1

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

CNMI OVR has two (2) VR Counselors with a general caseload who are enrolled in San Diego State University's (SDSU) master's degree program in Rehabilitation Counseling via distance learning beginning in the Spring 2016 semester. These 2 VRCs successfully passed an interview with Dr. Charles Degeneffe of SDSU and were subsequently awarded federal financial assistance through the university. A third VRC with a general caseload will be encouraged to initiate contact with SDSU and apply for enrollment in FY 2017, if possible. As for our VR Transition Counselor, she was accepted to begin her one year certificate program in school to work transition through the University of Maryland in the Fall of 2015, however, Typhoon Soudelor made that impossible. Nevertheless, with an approved deferment, the VRTC will pursue her transition certificate program in the Fall of 2016.

CNMI OVR continues to encourage its counseling support staff to enroll at the Northern Marianas College at the level of their professional development needs and requirements. CNMI OVR will continue to explore educational and training opportunities offered by other educational institutions that can further assist with enhancing the professional development of its staff.

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

Currently the CNMI OVR has one VR counselor aide pursuing an associates degree in rehabilitation and human services at the Northern Marianas College. In addition, there are two VR counselors pursuing a masters degree in rehabilitation counseling from San Diego State University through distance learning.

iii. the number of students who graduated during the prior year from each of these 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.

None

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 CNMI OVR continues to maintain its affiliation with the San Diego State University (SDSU) as there are no institutions of higher education within the CNMI, Micronesia, or Hawaii that offer a Master's in Rehabilitation Counseling. CNMI OVR's recruitment efforts include contacts at SDSU and with the National Rehabilitation Leadership Institute (NRLI) as well as the Councils of State Administrators of Vocational Rehabilitation (CSAVR), to name a few, for referrals or information about recent graduates in the field.

CNMI OVR will continue its efforts in obtaining a list of CNMI students who are pursuing a 4-year degree in Rehabilitation and Human Services at the Northern Marianas College as well as those who are receiving local scholarship assistance and majoring in related fields at off-island universities and/or colleges. These students will be sent information about careers in rehabilitation counseling in hopes of igniting interest via brochures and information packets provided to the CNMI Scholarship Office.

Job skills development for current personnel will be accomplished through enrollment in appropriate classes at the Northern Marianas College. Staff's educational, skills, and professional development will also be reinforced by regularly scheduling staff to attend job skills training sessions conducted by other government or partner agencies, as well as in-service trainings provided by staff.

Other recruitment and retention activities include:

- Participating in job fairs and career day activities to generate interest and awareness among college and high school students including students with disabilities of potential career opportunities in the field of vocational rehabilitation;
- Encouraging students who are ready to graduate from high school and post-secondary institutions to file resumes that may be considered if and when a VR vacancy is created through retirement, resignation, promotion, or transfer of existing staff and when additional counseling positions are established in the future;
- CNMI OVR leadership will continue to identify stressors and trainings for managers to ensure they are able to assist employees in effectively dealing with stress;
- Providing supports to staff in the form of problem-solving sessions along with coaching, leadership, and mentoring services. A structured mentoring program aimed at pairing a more experienced staff with a less experienced employee will help to promote and encourage the development of specific job skills, provide ongoing feedback, and create an individual growth or career plan for staff;
- CNMI OVR will remain committed to providing its staff, especially those providing direct services, with opportunities to meet agency standards as well as career advancement.

CNMI OVR utilizes and practices the same recruitment strategy and procedure administered under the local Office of Personnel Management (OPM). Currently, CNMI OVR does not use nor does it have a different recruitment procedure or system to reach minorities and individuals with disabilities.

The CNMI government is in itself a minority as one of the five (5) insular areas; therefore, CNMI residents, for the most part, are considered minorities. It is important to point out that since the inception of the CNMI government in 1978, the OVR was also instituted as an agency and all its employees were and continue to be representative of minority groups. Currently, eight (8) of CNMI OVR's eleven (11) staff members are individuals with disabilities. CNMI OVR promotes the employment of qualified individuals with disabilities without regard to race, disability, etc.

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

To ensure that CNMI OVR counselors are comparable to U.S. mainland rehabilitation counselors, CNMI OVR maintains adherence to the highest standards as established by the mainland educational requirements of a certified rehabilitation counselor as the agency's standards. However, because of the limited pool of qualified applicants for VR counselor positions, CNMI OVR maintains its flexibility for the recruitment of individuals with a Bachelor's degree in Special Education, Humanities, Vocational Rehabilitation Counseling or related field from an accredited U.S. College or University. If the applicant does not have a Master's degree in Rehabilitation Counseling, he/she is informed that obtaining the graduate degree is a requirement of the position. Thus, an Individualized Degree Plan must be developed to ensure that the Master's in Rehabilitation Counseling degree is actively pursued within a reasonable period of time from date of employment.

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 delegable functions (determination of eligibility, IPE development, IPE amendment, annual review of the IPE, and closures) are performed by staff who are qualified VR professionals or are currently in an approved training plan working towards earning a Master's degree in Rehabilitation Counseling.

Currently, all work is signed off by the CNMI OVR Director who has a master's degree in Rehabilitation Counseling and is a Certified Rehabilitation Counselor (CRC) until such time CNMI OVR hires a full-time Case Service Manager with similar credentials.

To ensure progress of CNMI OVR's professional staff development among the frontline staff, VR counselors' transcripts, student records, and grades are submitted to the OVR director or designee for periodic review to determine progress.

4. STAFF DEVELOPMENT.

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

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

CNMI OVR's ongoing staff development activities which incorporate both on- and off-island opportunities include:

- Enrolling in relevant courses offered at the Northern Marianas College and any other organizations or institutions that offer coursework that will enhance job skills;
- Attending related trainings, workshops, and seminars offered by other government agencies and organizations as well as in-service trainings provided by CNMI OVR staff or its community partners;
- Attending conferences and workshops that cover specific VR-related issues to enhance program knowledge and practices and to earn VR counselor professional certifications and Continuing Education Units;
- Coordinating intensive training sessions with San Diego State University-Interwork Institute or other designed specifically for VR staff covering a variety of subjects that will enhance work skills, professional development, and program knowledge;
- Initiating inter-agency awareness through trainings and workshops covering VR issues with appropriate staff from partner agencies and other organizations; and
- Continued networking with San Diego State University-National Rehabilitation Leadership Institute (SDSU-NRLI) graduates and the Councils of State Administrators of Vocational Rehabilitation (CSAVR) for assistance in VR counseling, management, and staff training needs.

The educational needs for CNMI OVR personnel are determined based on:

- Input from the State Rehabilitation Council,
- Findings of the RSA Monitoring Report,
- Comprehensive Training Needs Assessment,

- Individual Staff Performance Evaluations, and
- Staff input into their individual training needs.

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

CNMI OVR continues to identify and engage in web-based trainings as appropriate at minimal to no cost to the program. Beginning FY 2016, RSA will no longer make available to VR agencies funds from the In-Service Training grant as those have phased out. This means that all staff development activities will be supported by our Title I-Basic Support grant. CNMI OVR plans to maintain its relationship with SDSU-II to provide needed trainings in topic areas determined important to enhance job skills as well as to improve the general performance of our VR program. Two (2) members of the CNMI OVR's leadership team (director and administration/operations manager) have successfully completed a year-long leadership seminar through the SDSU-NRLI that began in FY 2015 and ended in the first week of FY 2016.

Continuous sharing of information, especially those obtained at trainings, conferences, seminars, webinars, etc. are highly encouraged among staff members. Monthly staff meetings offer a welcome venue to share, review, and discuss various VR materials or literature. Quarterly meetings of the councils (SRC & SILC) also offer a forum for information sharing. In addition, CNMI OVR's website offers a wealth of information to benefit a wide audience including VR staff themselves.

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 majority of CNMI OVR staff members are multi-lingual, with personnel who can speak, read, and/or write in English, Chamorro, Carolinian, and Chuukese. A VR Counselor possesses ASL skills. Other counseling staff have also participated in the summer-long Deaf & Hard of Hearing trainings sponsored by the Western Oregon University. In FY 2015, both administration and counseling staff have participated in and successfully completed a beginning ASL course sponsored by the Northern Marianas College-Community Development Institute (NMC-CDI) at no cost.

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 FY 2016, CNMI OVR will reintroduce to the Public School System-Special Education Program (PSS-SPED) officials a proposed plan for the coordination of personnel development activities through joint training sessions that involve CNMI OVR employees and PSS-SPED faculty/staff. If needed, technical assistance will be obtained to provide the necessary training through a cost-

sharing arrangement. On January 11–15, 2016, CNMI OVR coordinated with SDSU–II to provide training and technical assistance to OVR and its partner agencies including the PSS–SPED on the WIOA requirements and implementation on topics that included pre–employment transition services (PETS) and coordination with education officials for improved services to students with disabilities as they transition from high school to postsecondary activities including competitive & integrated employment, continued education, and/or independent living.

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;

In 2014, CNMI OVR contracted the professional services of San Diego State University–Interwork Institute to conduct a comprehensive assessment of the VR needs of people with disabilities residing in the Commonwealth. In part, the purpose of the needs assessment was to help inform the development of OVR’s State Plan.

Itemized below are the needs of individuals with most significant disabilities, including their need for supported employment services:

- “Postsecondary educational and vocational training programs should be stressed along with the development of support systems for consumers that attend this training. Consumers that are SSA beneficiaries should have a Plan for Achieving Self Support (PASS) developed whenever possible to support the necessary funding for postsecondary education and employment.
- Since there are no sources of funding for extended service provision in CNMI, OVR should identify the Department that receives Medicaid funding and begin the process of determining if this agency is willing to submit a Medicaid waiver to potentially provide extended services to SE clients in CNMI.
- OVR should partner with the Council on Developmental Disabilities, NMPASI and the schools to develop self–advocacy skills training for people with disabilities, especially those with the most significant disabilities, in CNMI.
- OVR staff should begin working with young people with the most significant disabilities earlier than their senior year in high school. Several participants recommended that OVR begin sharing information about their program and services in the Freshman and Sophomore years.
- Partner with the CNMI Center for Living Independently (CLI) to provide benefits planning for SSA beneficiaries.
- Independent living (IL) services and skills training should be clearly linked to the VR program whenever possible.
- OVR should identify individuals or organizations in Tinian and Rota to provide job coaching and SE services to people with the most significant disabilities” (pp. 20–21).

B. WHO ARE MINORITIES;

The Comprehensive Statewide Needs Assessment Report also captured information regarding recommendations to assist minorities as well as individuals that are unserved or underserved:

- “It is recommended that OVR work in conjunction with the local hospital, health care providers or other government agencies to recruit psychologists or psychiatrists to come to the islands. This has been done in the past according to those interviewed for the CSNA and is of particular importance to Tinian and Rota. There are simply no psychiatric services available on these islands, and the need is significant. OVR should also explore the use of telemedicine through the Commonwealth Healthcare Corporation or Guam Memorial Hospital.
- A counselor from OVR visits the islands of Tinian and Rota once a month to do intakes and meet with current or potential consumers. The referral base on these islands may not dictate the need to increase these visits, but OVR should assess this need on at least a quarterly basis to determine if more frequent visits are needed. An organized outreach strategy should be developed for Tinian and Rota to ensure that OVR is maximizing the community’s awareness of OVR and available services.
- OVR should consider utilizing computer and video technology to provide counseling and outreach services to the islands of Tinian and Rota. The use of Skype or other software programs to connect to consumers by distance is one way to increase service to the outer islands while keeping costs manageable.
- OVR should ensure that they send a counselor to the distant villages in Saipan to do outreach and intake once a month” (pp. 28–29).

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Please see response to (B) above.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The following information was extracted from the Comprehensive Statewide Needs Assessment Report of 2014:

“OVR and WIA need to develop an MOU that is agreed to and signed by the leaders of both programs. This MOU should contain all of the elements identified in the 2014 RSA monitoring guide for VR programs and it is a Federal mandate that this MOU be in place” (p. 31).

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The following information describes the needs of transition–aged youth with disabilities in the CNMI and is taken from the Comprehensive Statewide Needs Assessment of 2014:

- “OVR counselors should participate in IEP meetings for students with disabilities as frequently as their schedule allows. OVR counselors should ensure that the IPEs they develop in partnership with the students and their families are consistent with the IEPs developed by school staff. OVR counselors should ensure that they are developing the IPE prior to graduation to ensure seamless service delivery.

- It is recommended that OVR review their requirement for current testing of special education students with the Public School System (PSS) administrative staff in order to speed the referral and intake process and to ensure that OVR is not funding for testing that is the responsibility of the schools under the Individuals with Disabilities Education Act (IDEA).
- It is recommended that OVR counselors meet with the students and parents at their homes to help complete the process in those cases where the intake cannot be done at the school site. The home visit process was mentioned as a particularly good option for Tinian and Rota as well as for the distant villages in Saipan.
- In partnership with the schools, OVR should develop a mentoring program (by using successful former consumers if possible) to help young people with disabilities and their parents and families to have high expectations for the future through role modeling and encouragement. Youth and their families should be encouraged to consider postsecondary education as a stepping–stone to career–level employment for the young person.
- The summer youth program is a valuable form of work experience for young people throughout CNMI, including students with disabilities. The types of summer youth jobs are based on the employers that are willing to participate in the summer youth program and not on the unique primary employment factors of OVR consumers. It would enhance the summer youth experience for OVR consumers if OVR staff worked in partnership with WIA and the schools to develop summer youth jobs that were reflective of the unique strengths, abilities, interests, concerns, capabilities, resources, priorities, and informed choice of the student/consumer.
- OVR should work in partnership with school staff to ensure that students in special education that graduate or exit the school system are followed by school staff for the time period required by IDEA and that school staff and OVR are communicating and planning with the students and their families well beyond the exit from school” (pp. 36–37).

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Information below was taken from the Comprehensive Statewide Needs Assessment Report of 2014:

- “OVR needs to develop a mechanism to pay individual service providers to work with consumers in CNMI. This is especially important in Tinian and Rota. It is recommended that OVR develop minimum qualifications for individual service providers across many areas of service provision and begin general recruitment through spreading the word in their communities and targeted recruitment based on local knowledge. Individuals can often engage in service provision with less investment and risk than a private non–profit. It will be important for OVR to establish standards for service providers and ensure accountability and quality. One of the ways that OVR can contribute to this effort is to “Grow your own” by preparing and training current or former consumers to provide the services they need delivered” (p. 40).

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE

COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT .

There is general consensus among community partners/stakeholders that students with disabilities will better prepare for the 21st century workforce through transition career services and pre-employment transition services. Curriculum on work readiness provided either in a classroom setting or community-based by private community rehabilitation programs/vendors should focus on helping the students to enhance their skills including soft skills and communication thereby boosting self confidence for increased positive outcomes throughout the employment process. Our VR Transition Counselor is in regular contact with the school personnel through co-location presence as well as attendance at IEP meetings and shares that VR-eligible students with disabilities are finding OJT experiences particularly challenging as the focus is on the specific essential functions of the job. In addition, the VR Transition Counselor adds that another component for successful job/career attainment is the employer, who is also a partner in supporting students with disabilities. The employer, as well, must be supported with information, instruction, and educated on innovative strategies to working with the student and the team so the student may be successful in any employer interactions such as work-based learning experiences including volunteerism.

CNMI OVR's Comprehensive Statewide Needs Assessment Report of 2014 states that: "...there are very limited opportunities for individuals with disabilities to receive employment preparation training or actual work experience prior to exiting the school system. There is a cooperative education and training program available for some students, but the time frame is limited. There was a clear consensus that young people with disabilities exiting the school system do not have the requisite knowledge about what the world of work requires, nor do they have enough exposure to work prior to exiting the school system" (p. 35). Work-based learning experiences should reflect the unique strengths, abilities, interests, concerns, capabilities, resources, priorities, and informed choice of students with disabilities.

CNMI OVR will maximize all efforts to increase successful transition outcomes in collaboration and coordination with community stakeholders including our education partners through the provision of pre-employment transition services (career 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 individuals in the State who are currently eligible for services by program category are as follows:

- Title I, Basic Support = 206 individuals (ST 10)
- Title VI, Part B, Supported Employment = 55 individuals (ST 10)

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

While the number of persons potentially eligible for OVR services is variable, our best estimate is 300 individuals between the ages of 16 and 64, will compose the BS and SE caseload for FY 2017. The estimated cost for these services for eligible individuals by program category, are as follows: (Estimates calculated based on a four (4) year average) Title I, Basic Support: 245 individuals

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Title VI, Part B, Supported Employment: 55 individuals

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

Currently and historically, the CNMI Office of Vocational Rehabilitation has been able to avoid implementing an order of selection, although policies and procedures are in place to ensure that should the need arise, the Program will be prepared. The OVR will continue to manage its fiscal resources to ensure that all active Individualized Plans for Employment (IPE) are achieved.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

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.

Title I, Basic Support: 245 individuals

Cost per individual = \$938

Total cost = \$229,698

Title VI, Part B,

Supported Employment: 55 individuals

Cost per individual = \$548

Total cost = \$30,127

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 CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) reviewed and jointly approved the following goals and priorities. The goals and priorities of the OVR for Fiscal Years 2017 – 2020 are developed in collaboration with the SRC and incorporate the findings of the FY 2011–2013 Comprehensive Statewide Needs Assessment (CSNA).

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Basic Support Services:

Goal 1. Improve the delivery of competitive integrated employment services to VR clients.

Objective 1.1: In FY 2017, 80% of cases will be determined eligible within sixty (60) days of receipt of VR application. For each fiscal year thereafter and ending in 2020, incremental increases of 5% will be the baseline standard.

Objective 1.2: In FY 2017, the Individualized Plans for Employment (IPEs) will be developed within sixty (60) days after eligibility determination with an 85% targeted success rate. For each fiscal year thereafter and ending in 2020, incremental increases of about 4% will be the baseline standard.

Objective 1.3: In FYs 2017–2020, continue to maximize OJTs as a way to provide work experience and job placement for consumers.

Objective 1.4: In FYs 2017–2020, increase self–employment opportunities for VR clients especially in Tinian and Rota where competitive integrated employment opportunities are significantly limited. The target will be at least 3 self–employment outcomes for this State Plan period.

Objective 1.5: In FYs 2017–2020 continue to support the training and/or education of VR professionals and paraprofessionals.

Objective 1.6: In FYs 2017–2020, VR professionals will continue to visit the islands of Tinian and Rota once a month to do intakes and meet with interested applicants and current consumers as well as to reach out to community partners including employers.

Objective 1.7: In FYs 2017–2020, OVR will conduct a minimum of one (1) outreach to distant villages in Saipan per quarter to accommodate those with transportation or other barriers.

Objective 1.8: In FYs 2017–2020, OVR will identify potential funding streams to support the hiring of one (1) Case Services Manager and one (1) Employment Specialist to help increase competitive

integrated employment outcomes as well as develop/strengthen relationships with the business community.

Objective 1.9: In FYs 2017–2020, seventy percent (70%) of consumers exiting the VR program will report satisfaction (agree to strongly agree) with the quality and timeliness of services.

Goal 2. Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.

Objective 2.1: In FY 2017, OVR, in collaboration and coordination with the PSS–SPED and/or private schools, will provide work readiness training to at least twenty–five (25) transition students with disabilities. For each fiscal year thereafter and ending in 2020, an incremental increase of 20% per year will be the baseline standard.

Objective 2.2: In FY 2017, OVR, in collaboration with community partners including non–profits, will provide self–advocacy skills training to at least twenty–five (25) transition students with disabilities. For each fiscal year thereafter and ending in 2020, an incremental increase of 20% per year will be the baseline standard.

Objective 2.3: In FY 2017, OVR, in collaboration with the PSS–SPED, the Workforce Investment Agency (WIA), and/or other community partners, will provide work–based learning experiences to at least twenty–five (25) transition students with disabilities. For each fiscal year thereafter and ending in 2020, an incremental increase of 20% per year will be the baseline standard.

Objective 2.4: In FY 2017, OVR, in collaboration with the PSS–SPED, the University Center for Excellence in Developmental Disabilities (UCEDD), Adult Basic Education and/or other community partners, will provide counseling on post–secondary educational opportunities to at least twenty–five (25) transition students with disabilities. For each fiscal year thereafter and ending in 2020, an incremental increase of 20% per year will be the baseline standard.

Objective 2.5: In FY 2017, OVR, in collaboration with the PSS–SPED and/or WIOA core and other community partners, will provide job exploration counseling to at least twenty–five (25) transition students with disabilities. For each fiscal year thereafter and ending in 2020, an incremental increase of 20% per year will be the baseline standard.

Objective 2.6: In FYs 2017–2020, upon request, OVR will increase attendance at IEP meetings of transition students beginning at age 14 as often as scheduling permits.

Objective 2.7: In FYs 2017–2020, to ensure seamless transition, VR professionals must ensure the development of the IPE prior to graduation and in consideration of the student’s IEP.

Objective 2.8: In FYs 2017–2020, VR professionals will continue with the practice of co–location at the public high schools, the Northern Marianas College, and other CRPs as appropriate. Co–locations make possible intakes at the school sites rather than requiring students and their families to come to the OVR office to complete the intake and application process. These are also opportunities for VR professionals to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, the co–locations provide a forum for Q&A by school staff, parents/guardians, and students with the VR professionals.

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including transition students with disabilities.

Objective 3.1: In FY 2017, OVR, in collaboration and coordination with community partners, will educate five (5) employers about reasonable accommodation in the workplace and the benefits of hiring people with disabilities (e.g., tax incentives) and how to increase an inclusive business culture. For each fiscal year thereafter and ending in 2020, incremental increases of five (5) employers will be the baseline standard.

Objective 3.2: In FYs 2017–2020, OVR will spearhead an ongoing awareness campaign targeting employers through the dissemination of disability employment materials via the various media outlets (e.g., print, radio, online, etc.).

Objective 3.3: In FYs 2017–2020, OVR will increase its involvement in job/career fairs sponsored by the various business industries (e.g., hotel, casino, etc.) in the CNMI.

Objective 3.4: In FYs 2017–2020, seventy percent (70%) of employers will report satisfaction (agree to strongly agree) with VR services provided to them.

Goal 4. Continue to collaborate with the Workforce Investment Agency (WIA) to prepare mutual clients for competitive integrated employment.

Objective 4.1: In FYs 2017–2020, VR professionals will enhance communication with WIA case workers to identify opportunities to leverage resources and expertise for the provision of training services to mutual clients leading toward competitive integrated employment.

Objective 4.2: In FY 2017, OVR and WIA will engage in shared funding of three (3) identified cases. For each fiscal year thereafter and ending in 2020, incremental increases of at least one (1) case per year will be the baseline standard.

Objective 4.3: In FYs 2017–2017, OVR and WIA will pursue the development of a memorandum of understanding (MOU) that will outline how individual program resources will be utilized to better serve mutual clients, jobseekers with disabilities and employers, through an integrated system of service delivery.

Objective 4.4: In FYs 2017–2020, OVR will work closely with the State Workforce Development Board to fully engage the workforce system stakeholders in the development, implementation, and modification of a Unified State Plan that incorporates the integration of quality services for individuals with disabilities.

Objective 4.5: In FYs 2017–2020, OVR will work with the SWDB towards the creation of an American Job Center (aka One–Stop) with an MOU in place that outlines the appropriate roles and contribution of resources for all required AJC program partners.

Objective 4.6: In FYs 2017–2020, OVR will work with the SWDB towards identifying and disseminating best practices related to meeting the needs of employers, workers and jobseekers including those with disabilities and other WIOA–required activities.

Supported Employment Services:

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.1: In FYs 2017–2020, continue to expand outreach to employers and try and develop more frequent and diverse opportunities for OJTs in the community.

Objective 5.2: In FYs 2017–2020, continue to support client's need for supported employment job coaching to assist him/her to acquire the necessary skills on the job and increase the likelihood that the job will continue when the OJT is completed.

Objective 5.3: In FYs 2017–2020, continue discussions with Medicaid regarding a waiver to potentially provide extended services to supported employment VR clients, address barriers, secure/obtain technical assistance on waiver request, submission, implementation, and work out other-related matters.

Objective 5.4: In FYs 2017–2020, continue identifying individuals or organizations in Tinian and Rota to provide job coaching and other supported employment services to VR clients with most significant disabilities. OVR will consider a "Grow your own" concept whereby OVR prepares and trains current or former clients to provide needed services in the sister islands.

Objective 5.5: In FY 2017, OVR will identify a CRP (on- or off-island) that could train VR professionals in benefits counseling in order for clients to understand how working impacts cash payments from SSA. In FY 2018, OVR will support the benefits counseling training of its VR professionals. In FY 2019–2020, VR professionals will be trained and prepared to provide benefits counseling services to their clients.

Objective 5.6: In FYs 2017–2020, Independent living (IL) services to VR clients will be provided in conjunction with VR services, as appropriate.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

The CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) reviewed and jointly approved the following goals and priorities. The goals and priorities of the OVR for Fiscal Years 2017–2020 are developed in collaboration with the SRC and incorporate the findings of the FY 2011–2013 Comprehensive Statewide Needs Assessment (CSNA).

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

As previously mentioned the goals and priorities of the CNMI OVR for Fiscal Years 2017–2020 were developed incorporating the findings of the FY 2011–2013 Comprehensive Statewide Needs Assessment (CSNA).

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

The CNMI Office of Vocational Rehabilitation (OVR) ensured that its goals and objectives for the VR portion of the Unified State Plan analyzed and incorporated the negotiated performance and accountability measures of section 116 of WIOA. (see (I) State Goals and Priorities).

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.

No other available information.

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.

CNMI OVR has not entered into nor is it requesting for an Order of Selection as there are sufficient resources to serve all disability categories.

B. THE JUSTIFICATION FOR THE ORDER.

Not applicable

C. THE SERVICE AND OUTCOME GOALS.

Not Applicable

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

Not applicable

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Not applicable

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.

Not applicable

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

The CNMI OVR will distribute Title VI Funds for Supported Employment (SE) Services at the WIOA-mandated requirement of 2.5% for administrative costs (e.g., indirect cost) and the balance for the provision and delivery of services to individuals with the most significant disabilities. Fifty percent (50%) of Title VI funds for SE services will be reserved for youth with the most significant disabilities who are between 14 and 24 years old. Services leading towards competitive integrated employment will include, but are not limited to, the following: job training (work-experience and OJT); job search and placement assistance; job coaching services; personal assistance services at the jobsite; assistive technology; modifications that may be required by VR clients at employment sites; transportation; and other employment-related services.

The CNMI OVR Supported Employment Goals and Priorities are:

Goal 5. Improve VR service delivery to effectively meet the needs of clients with the most significant disabilities.

Objective 5.1: In FYs 2017–2020, continue to expand outreach to employers and try and develop more frequent and diverse opportunities for OJTs in the community.

Objective 5.2: In FYs 2017–2020, continue to support client's need for supported employment job coaching to assist him/her to acquire the necessary skills on the job and increase the likelihood that the job will continue when the OJT is completed.

Objective 5.3: In FYs 2017–2020, continue discussions with Medicaid regarding a waiver to potentially provide extended services to supported employment VR clients, address barriers, secure/obtain technical assistance on waiver request, submission, implementation, and work out other-related matters.

Objective 5.4: In FYs 2017–2020, continue identifying individuals or organizations in Tinian and Rota to provide job coaching and other supported employment services to VR clients with most significant disabilities. OVR will consider a "Grow your own" concept whereby OVR prepares and trains current or former clients to provide needed services in the sister islands.

Objective 5.5: In FY 2017, OVR will identify a CRP (on- or off-island) that could train VR professionals in benefits counseling in order for clients to understand how working impacts cash payments from SSA. In FY 2018, OVR will support the benefits counseling training of its VR professionals. In FY 2019–2020, VR professionals will be trained and prepared to provide benefits counseling services to their clients.

Objective 5.6: In FYs 2017–2020, Independent living (IL) services to VR clients will be provided in conjunction with VR services, as appropriate.

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

CNMI OVR will maximize the use of 50% of Title VI funds to support youth consumers with the most significant disabilities in their achievement of competitive integrated employment through the provision of extended services not to exceed four (4) years, such as: job coach services, personal assistance services, transportation, and other employment–related services determined necessary for consumers to further maintain their competitive integrated employment.

Objective 5.2: In FYs 2017–2020, continue to support client’s need for supported employment job coaching to assist him/her to acquire the necessary skills on the job and increase the likelihood that the job will continue when the OJT is completed.

Objective 5.3: In FYs 2017–2020, continue discussions with Medicaid regarding a waiver to potentially provide extended services to supported employment VR clients, address barriers, secure/obtain technical assistance on waiver request, submission, implementation, and work out other–related matters.

Objective 5.4: In FYs 2017–2020, continue identifying individuals or organizations in Tinian and Rota to provide job coaching and other supported employment services to VR clients with the most significant disabilities. OVR will consider a “Grow your own” concept whereby OVR prepares and trains current or former clients to provide the supported employment services needed in their sister islands.

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.

CNMI OVR, in collaboration and coordination with the Council on Developmental Disabilities (CDD) and other Disability Network Partners (DNP), will continue discussions with the Medicaid program to navigate through the waiver system so as to obtain a waiver – or to first address the barrier(s) preventing waiver attainment – in the hopes of realizing greater opportunities for youth with most significant disabilities in their pursuit of competitive integrated employment.

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 methods to be used to expand and improve services to individuals with disabilities: a. Maximize training and/or postsecondary educational opportunities for VR clients to better prepare them for the 21st century workforce and develop support systems for consumers to attend this training. b. Collaborate with the local Social Security office to develop Plans for Achieving Self Support (PASS) to help fund the postsecondary education and employment of consumers who are SSA beneficiaries. c. Utilize the OVR Tracking System to monitor case status movements on a weekly or bi-monthly basis and identify modifications for enhancement, if any. d. Conduct regular case staffing with VR counselors either individually or in a group setting. e. Engage employers in identifying OJT and/or job placements for VR consumers. f. Participate in job/career fairs sponsored by both public agencies and private sector businesses. g. Expand self-employment opportunities for VR clients, especially in Tinian and Rota where the economy can remain stagnant for an indefinite period of time. h. Work with Disability Network Partners including the State Rehabilitation Council to identify potential vendors capable of providing supported employment and/or extended services to VR clients, especially those with the most significant disabilities. i. Reach out to potential VR applicants with transportation barrier by conducting intakes at the heart of distant villages in Saipan at least four (4) times during the fiscal year as well as monthly outreaches to the islands of Tinian and Rota. j. Evaluate OVR's current staffing composition and future needs to maximize output insofar as competitive integrated outcomes are concerned. k. Develop and/or strengthen relationships with the local business community through participation in employer-sponsored activities or events such as Chamber, SHRM, and Rotary meetings. l. Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of pre-employment transition services to students with disabilities to better equip them for the workforce. m. Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes. n. Attend IEP meetings of students with disabilities beginning at age 14 to introduce early on the VR program and to establish better coordination with the public schools in the provision of transition services. o. Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, etc. p. Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers. q. Utilize as a forum the State workforce development board meetings to bring to the forefront disability employment issues facing the Commonwealth and the integration of quality services to people with disabilities in the workforce system. r. Engage in discussions/negotiations with the State workforce development board regarding the development and maintenance of an American Job Center (aka One-Stop Center) where services to people with disabilities are streamlined and accessible. s. VR professionals to conduct co-locations at the public high schools, Northern Marianas College, and other venues to increase referrals to VR, dialogue with stakeholders such as school personnel, students, and parents/guardians, and coordinate for the provision of services including pre-employment transition services. t. Build awareness and understanding that Independent Living (IL) services could be provided in conjunction with VR services, as appropriate. u. Conduct performance evaluations of VR staff on a semi-annual basis to maintain an effective

program management system. v. Maintain relationship with the Rota Mayor's Office as outlined in the MOU, which includes maximizing the RMO point of contact for the effective coordination of VR services. w. Review internal and external processes and procedures that may serve as barriers and implement cost-effective resolutions. x. Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion. y. Identify and utilize comparable benefits to the maximum extent possible. z. Evaluate the OVR Tracking System in a continuous effort to improve data gathering to better track program performance. aa. Research and make available to businesses tax incentives information. bb. Enhance the OVR website so as to create a one-stop for disability employment information beneficial to all stakeholders including consumers/family members (as well as students with disabilities), service providers, and employer. cc. Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other. dd. In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc. ee. Support activities that will increase self-advocacy skills of people with disabilities. ff. Consider training current or former VR clients to provide much needed supported employment and/or extended services to individuals with disabilities especially those with the most significant disabilities in Saipan as well as the unserved or underserved municipalities of Tinian and Rota. gg. And all other potential strategies that are identified by OVR and its community partners throughout FYs 2017-2020.

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.

How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each state of the rehabilitation process and on a statewide basis. a. All VR services, including AT assessment/evaluation, devices and services will be provided in the context of an approved IPE. b. At intake and application for VR services as well as in the IPE development stage, VR counselors will ensure to capture information pertaining to the applicant or consumer's need for assistive technology to facilitate the achievement of their competitive integrated employment. c. VR professionals and paraprofessionals will engage the participation of applicants and consumers to identify and maximize comparable benefits such as the Assistive Technology Center for AT loan, demonstration, and training and the Trankilu Alternative Financing Program for assistance in securing a loan with a local bank toward the purchase of the needed AT device or equipment at a low interest rate. The Public School System-Special Education Program (PSS-SPED) AT expert, if any, will be utilized to provide assessment to students with disabilities. In the event an AT professional cannot be identified locally, CNMI OVR will reach out to the Guam Systems of Assistive Technology for their assistance and any needed service agreement. d. During IEP meetings of students with disabilities, VR professionals will work with our school and/or other community partners to address any significant AT needs of the students especially mutual clients. e. OVR consumers who are residing in Tinian and Rota and who are in need of assistive technology devices or equipment will be provided with the AT after exploring comparable benefits (e.g., Medicaid/Medicare, private insurance, etc.) through an approved IPE that takes into consideration shipping and handling costs for the ATs transport to the outer island of their residence.

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 outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program

- OVR will strengthen its collaboration with community partners including the CNMI Center for Living Independently, Community Guidance Center, the Mental Health Planning Council, the local Autism society, the Council on Developmental Disabilities, and the Public School System–Special Education Program (PSS–SPED) to identify outreach activities and serve individuals with the most significant disabilities. As expressed in the previous VR State plan, there is no need to specifically target minority individuals in the CNMI because the population are members of minority groups. Nevertheless, OVR will improve on efforts to facilitate information dissemination via the native languages of Chamorro and Carolinian as well as those of other Pacific islands and Asian countries.
- Conduct tri–annual comprehensive statewide needs assessment.
- Ongoing communication and interaction with community stakeholders comprised of individuals with disabilities and their family members, service providers, and the Disability Network Partners.
- Involvement/engagement at disability public hearings or forums to obtain feedback from minorities and those unserved or underserved to better understand their needs to achieve competitive integrated employment and to live meaningful independent lives.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

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

- a. OVR will continue to participate in discussions with the Public School System–Special Education Program (PSS–SPED) via the SESAP (Special Education State Advisory Panel) forums.
- b. OVR will work with partners to strengthen and solidify the newly–formed CNMI Transition Coalition comprised of partners from the OVR, PSS–SPED, Council on Developmental Disabilities, Northern Mariana Islands Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, etc. whose overarching mission is to collaborate to the maximum extent possible to meet the transition needs (e.g., pre–employment transition services) of students with disabilities resulting in the achievement of competitive integrated employment, continued education, and/or independent living.

c. VR professionals will make regular contact with PSS–SPED teachers et al. via the latter’s monthly professional development activities so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition services.

d. VR professionals will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14.

e. VR professionals will continue to participate in job/career fairs where students with disabilities will be actively participating.

f. OVR will support the activities of the PSS–SPED that prepare students with disabilities for employment, such as: job shadowing, mentoring, and other career exploration activities.

g. OVR will continue to conduct co–locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co–locations also allow VR professionals to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition services.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

CNMI OVR will continue discussions with community partners/stakeholders for the ongoing exploration and identification of vendors for inclusion in our local CRP network of providers.

In addition, efforts will be taken to develop a mechanism to pay individual service providers to work with consumers in CNMI, especially in Tinian and Rota where services are very limited due to the lack of CRPs there. The CSNA Report of 2014 recommended that OVR “begin general recruitment through spreading the word in their communities and targeted recruitment based on local knowledge. Individuals can often engage in service provision with less investment and risk than a private non–profit. It will be important for OVR to establish standards for service providers and ensure accountability and quality. One of the ways that OVR can contribute to this effort is to “Grow your own” by preparing and training current or former consumers to provide the services they need delivered” (p. 40).

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

a. Evaluate current OVR Tracking System and modify as necessary to be able to efficiently record performance measures data.

b. Communicate with WIOA core program partners in obtaining and tracking data provided consumer consent is obtained.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

- a. In collaboration and coordination with community partners, OVR will support the training activities through a cost-sharing arrangement/agreement with the statewide workforce development system that aims to increase knowledge of best practices in assisting individuals with disabilities to achieve competitive integrated employment and strategies for effective employer involvement/engagement in the process.
- b. Participate in training and employment activities or initiatives organized by the CNMI Department of Labor such as the CNMI Work Task Force.
- c. Maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodations and effective communications with individuals with varying disabilities.
- d. Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.
- e. Continue the representation of WIA and/or DOL on the State Rehabilitation Council (SRC).
- f. OVR to engage in meaningful discussions with the newly-formed/organized State workforce development board regarding an all-inclusive workforce that integrates quality services for people with disabilities in pursuit of competitive integrated employment.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

- Sponsoring and participating in public recognition/awareness activities and events with the SRC, SILC, and community partners including secondary education, institutions of higher learning, and public and private employers or businesses, to name a few.
- Developing and disseminating promotional materials containing information about the VR program and services offered; success stories of consumers including transition students who have prepared well for the workforce and obtained competitive integrated employment; disability employment information that would benefit a wide audience including employers/businesses; etc.
- Continuing monthly outreach travels to the municipalities of Tinian and Rota as well as the village outreaches in Saipan to make the VR program available to and accessible by individuals with disabilities who experience transportation or other barrier(s) due to the remote locations of their place of residence.

- Co-locations at the public high schools and the Northern Marianas College will help to increase access to the VR program and improve coordination efforts among partners for the provision of quality and timely VR and school-to-work transition services.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Support Council-related activities in the form of: Staff support; travel by Council members to attend conferences, meetings, and trainings; Facilities rental for meeting and training sessions; Consultant fees for training and policy development; Meeting materials and advertising costs; Printed materials for public awareness/information; etc. Total spent on SRC I&E activities in FY 2015: \$29,157.

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.

Strategies implemented support the overcoming of specific identified barriers. For the CNMI OVR Program those barriers include:

- Transitioning students access to the OVR.
- Remotely located residential locations with the limited public transportation services.
- Access by the MSD population, especially consumers with mental illnesses.

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.

Goal 1. Strive to deliver quality and timely services to applicants and consumers.

Objective 1.1: During FY 2015, 70% of consumers exiting the Vocational Rehabilitation (VR) program will report satisfaction (strongly agree to agree) with the quality and timely services provided by OVR.

Extent achieved: Objective met. (Note: Consumers who exited the VR program – both ST 26 and ST 28 – reported satisfaction with the quality and timely services provided by CNMI OVR.)

Strategies:

- VR consumers are treated with utmost respect and dignity.
- VR professionals and paraprofessionals maintain regular contact with consumers.
- VR services provided were comprehensive and met consumers' individual needs.
- Consumers were provided the opportunity to exercise informed choice throughout the VR process.

Objective 1.2: During FY 2015, strive for development of Individualized Plans for Employment (IPE) within 60 days after eligibility determination with an 85% targeted success rate.

Extent achieved: Objective met. (Note: Every month in FY 2015, IPEs were developed within sixty (60) days after eligibility determination at rates that fell anywhere between 85 and 100%.)

Strategies:

- Frequent monitoring of case status movements via the OVR Tracking System.
- Regular case staffing with VR professionals to ensure IPEs are developed in a timely manner.
- Utilization of VR paraprofessionals in helping to identify cases that require movement to the IPE phase.

Goal 2. Serve as an advocate for individuals with disabilities.

Objective 2.1: During FY 2015, OVR will increase employers' awareness of VR programs and services and the viability and benefits of hiring qualified individuals with disabilities by conducting educational activities aimed at 10 employers/businesses.

Extent achieved: Objective met.

Strategies:

- CNMI VR professionals and paraprofessionals as well as administrative personnel continue to make every effort to reach out to community partners including employers in both the public and private sectors with large or small businesses in formal and informal settings to promote the VR program as well as disability employment initiatives or opportunities including direct job placements.
- Radio ads targeting employers in an effort to increase their awareness of disability employment matters helped the cause.
- Disability employment information was also disseminated to the community through the quarterly "Disability Watch" newsletter of our Disability Network Partners (DNP) of which the Council on Developmental Disabilities, the Northern Marianas Protection & Advocacy Systems, Inc., and the University Center for Excellence in Developmental Disabilities are primary members.
- The Disability Network Partners collaborated, coordinated, and cost-shared in educating employers about affirmative action and equal employment opportunity through statewide workshops facilitated by Mr. Philip Marlowe of the Guam-based Office of Federal Contract Compliance Programs, U.S. Department of Labor during National Disability Employment Awareness Month in November 2014.

Objective 2.2: During FY 2015, OVR will participate in 10 community outreach activities to increase program exposure as well as to advocate for and promote the employment of qualified individuals with disabilities.

Extent achieved: Objective met.

Strategies:

- OVR actively participated in functions or events sponsored by partner agencies and other public or private agencies/organizations and thus helped to increase VR program's exposure on a statewide basis (Saipan, Tinian, and Rota).
- VR professionals continue to reach out to employers to promote competitive integrated employment as well as OJT placements for OVR clients including students with disabilities.
- At job/career fairs sponsored by the private and public sectors, VR professionals are on hand to support their clients as they submit their applications or resumes and at the same time they take advantage of the opportunity to network or connect with employers to find out latest employment opportunities that are being offered.

- VR professionals also help to increase VR exposure by conducting co-locations at the public high schools, at the Northern Marianas College, and at the Northern Marianas Trades Institute on a regular basis.

Objective 2.3: During FY 2015, OVR will strengthen its partnership with the Commonwealth Office of Transit Authority (COTA) to improve transportation services for individuals with disabilities. Measure of success – draft MOU.

Extent achieved: Objective met.

Strategies:

- OVR worked in collaboration and joint partnership with the SRC Executive Committee and Housing/Transportation/Advocacy Committee to discuss and negotiate the renewed terms of the Memorandum of Understanding, which was approved August 21, 2015.

Objective 2.4: During FY 2015, OVR will promote the development of self-advocacy skills training.

Extent achieved: Ongoing.

Strategies: CNMI OVR continues to have regular discussions with community partners including the Council on Developmental Disabilities, the Statewide Independent Living Council, the Center for Living Independently, the VOICES of the CNMI, and others regarding the need for self-advocacy skills training to benefit our disability community including students and youth with the most significant disabilities. CNMI OVR will continue to be an active partner on this initiative and support its ongoing implementation statewide.

Goal 3. Continue to work closely with the Workforce Investment Board to maintain and improve the best features of our workforce development system and to integrate services for consumers.

Objective 3.1: During FY 2015, OVR will cost share for training with the Workforce Investment Agency (WIA) to ensure continued collaboration for the integration of services.

Extent achieved: Objective met.

Strategies:

- VR counselors worked collaboratively with WIA case workers to pursue mutual cases resulting in the provision of training services made possible via a cost-sharing arrangement.

Objective 3.2: During FY 2015, OVR will continue its efforts towards the development and implementation of MOUs with WIA and the Department of Labor (DOL).

Extent achieved: Ongoing.

Strategies:

- OVR collected sample MOUs from off-island VR partners and continue to review them so as to create a draft document for presentation to WIA for their comment or feedback.

Goal 4. Facilitate the seamless transition of students with disabilities to employment or continued education.

Objective 4.2: During FY 2015, OVR will review the MOU with the Public School System (PSS) Special Education Program and the Northern Marianas College to continue to provide a seamless transition of services to students with disabilities.

Extent achieved: Objective met.

Strategies:

- OVR pursued continued dialogue with the PSS–SPED and the NMC to renew its MOUs with terms consistent with the WIOA requirements. In addition to actively involving the SRC Transition & Assistive Technology Committee in the review process, OVR tapped key personnel at the PSS–SPED and NMC to see through the successful review and modification processes.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Goal 1. Strive to deliver quality and timely services to applicants and consumers.

Objective 1.3: During FY 2015, OVR will increase Status 26, successful rehabilitations, by one more than the previous year.

Extent achieved: Objective not met. (Note: In FY 2015, OVR closed 22 cases as successfully rehabilitated as opposed to the target goal of 37 cases.)

Impediment(s) to achievement:

- Temporary case re–assignments impacted continuity of VR services. Re–assignments were necessary to address staff shortage due to pending contract renewal; off–island medical treatment, care & recovery; and maternity leave. CNMI OVR has a total of four (4) VR professionals providing direct services.
- For three weeks in July 2015, as a result of severe damages to underwater fiber optic cables, CNMI’s ability to connect to the rest of the world came to a complete halt. Landlines and cellular connections were disrupted, internet access was cut, banking transactions presented a great challenge, to name just a few.
- On August 2, 2015, Typhoon Soudelor – a category 3–4 hurricane – slammed into Saipan, CNMI resulting in severe damages to its island–wide infrastructures including public and private properties and households. OVR’s administration office sustained significant damages which greatly disrupted direct services well into September. In October, OVR was back on the grid with its power restored. Despite the little progress made to resume the timely provision of VR services, the availability of adequate office space continues to impede the OVR staff’s ability to function at 100% capacity. The counseling office – which used to comfortably house six (6) counseling staff – is now the residence to all eleven (11) OVR staff, with a new staff expected to come on board very soon.
- Lack of a case service manager to ensure effective case management.

Goal 4. Facilitate the seamless transition of students with disabilities to employment or continued education.

Objective 4.1: During FY 2015, OVR will transition at least 15% of the total number of seniors receiving special education services.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- Lack of coordination with the PSS–SPED to identify, serve, and track targeted seniors under the Special Education Program.
- Though strides have been undertaken to improve collaboration efforts with the PSS–SPED, more discussions are needed to better coordinate services to students with disabilities including mutual clients of both programs.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

Goal SE 1: Expand Options of vendors providing supported employment services.

Objective SE 1.1: During FY 2015, OVR will continue to identify and recruit providers for Supported Employment services.

Extent achieved: Ongoing.

Strategies:

- OVR continues to work with consumers with the most significant disabilities who require personal assistance services at the jobsite or college campus to select their PAs of choice who they believe are capable of providing them with needed services to further maintain their employment or continue with postsecondary college activities. SE funds are utilized to the maximum extent possible to provide supported employment and/or extended services for the duration allowed by law.

Goal SE 3: To strengthen partnership with the Community Guidance Center in an effort to improve services to mutual consumers with most significant disabilities.

Objective SE 3.1: During FY 2015, OVR will continue discussions with the Community Guidance Center (CGC) to formulate and implement a Memorandum of Understanding (MOU), which will delineate roles and responsibilities for the best delivery of services to mutual consumers with the most significant disabilities.

Extent achieved: Ongoing

Strategies:

- In collaboration with the SRC Executive Committee and the Quality Assurance/Quality Improvement Committee, OVR drafted an MOU and presented it to the CGC director for her review and input who then acknowledged receipt of the MOU but requested that further action be suspended until after the completion of their behavioral health needs assessment. CGC's needs assessment has since been completed; however, their director recently resigned her post. In February of 2016, OVR briefly met with the new CGC director and we agreed to a meeting in the near future to discuss the MOU hopefully before the end of FY 2016.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Goal SE 1: Expand Options of vendors providing supported employment services.

Objective SE 1.2: During FY 2015, OVR will continue to work with Marianas Health Services for the inclusion of Personal Assistance Services (PAS).

Extent achieved: Objective not met.

Impediment(s) to achievement:

- A simple lack of follow-through; however, in FY 2017, OVR will continue to identify individuals (especially those who will successfully complete the caregiver workshop/training that is currently being offered through the collaboration and coordination with community partners such as the Commonwealth Respite Service Program, Ayuda Network, University Center for Excellence in Developmental Disabilities and the Council on Developmental Disabilities) and/or initiate dialogue and negotiations with Marianas Health for the provision of personal assistance services through a fee for service arrangement.

Goal SE 2: To increase the number of consumers receiving supported employment services.

Objective SE 2.1: During FY 2015, OVR will increase the number of consumers receiving supported employment services from the previous year.

Extent achieved: Objective not met. (Note: In FY 2014, twenty-five (25) supported employment consumers received services, while in FY 2015, we fell short by three (3) of increasing the number of supported employment consumers from the previous year.)

Impediment(s) to achievement:

- Timely case status movements, for example, in FY 2015, twelve (12) supported consumer cases remained in ST 24–Services Interrupted.
- Lack of regular contacts with supported employment consumers.

Goal SE 3: To strengthen partnership with the Community Guidance Center in an effort to improve services to mutual consumers with most significant disabilities.

Objective SE 3.2: During FY 2015, OVR will increase the number of consumers with the most significant disabilities in a training program by 2 over the previous year.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- Due to limited CRPs in the CNMI, VR professionals continue to experience a heavy load with having to do A to Z that our work entails.
- Despite counselors' efforts to reach out to employers for potential OJT partnerships, employers are turning down opportunities due to various reasons.
- Timely case staff movements, for example, in FY 2015, twelve (24) supported employment cases remained in ST 24–Services Interrupted.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

No reporting for FY 2015 on the performance accountability indicators under section 116 of WIOA. The following information provided is based on the Evaluation Standards and Performance Indicators of RSA.

An assessment of the CNMI OVR was conducted by using the Evaluation Standards and Performance Indicators established by the Rehabilitation Services Administration of the Office of Special Education and Rehabilitative Services under the umbrella of the U.S. Department of Education.

The results of the CNMI OVR Evaluation Standards and Performance Indicators for FY 2015 are as follows:

Performance Indicator 1.1: Change of Employment Outcomes CNMI OVR failed this indicator. The program failed to obtain employment outcomes for FY 2015 (+1 from FY 2014). Federal Standard: Equal or exceeded previous year (37 successful closures) *** CNMI OVR Achieved: 22 successful closures

Performance Indicator 1.2: Percent of Employment Outcomes CNMI OVR passed this indicator. The program achieved by over 0.61% of the federal standard requirement of individuals who exit the program during the performance period who have achieved an employment outcome after receiving services. This reflects OVR's strong emphasis on its goal to ensure its consumers achieve employment outcomes. Federal Standard: 55.8% *** CNMI OVR Achieved: CNMI OVR Achieved: 56.41%

Performance Indicator 1.3: Competitive Employment CNMI OVR failed this indicator. Of all individuals determined to have achieved an employment outcome, only 68.18% exited the VR program in competitive or self-employment with earnings equivalent to at least the minimum wage. The CNMI is slowly moving towards meeting the federal minimum wage requirements by looking closely at providing education and/or training in hopes of consumers achieving competitive

integrated employment outcomes. CNMI's minimum wage is currently at \$6.05 per hour. Federal Standard: 72.60% *** CNMI OVR Achieved: 68.18%

Performance Indicator 1.4: Significance of Disability CNMI OVR passed this indicator. The program achieved by over 4.27% of the federal standard requirement of individuals who exited the VR program in competitive or self-employment with earnings equivalent to or at least the minimum wage, 66.67% were individuals with significant disabilities. Federal Standard: 62.40% *** CNMI OVR Achieved: 66.67%

Performance Indicator 1.5: Earnings Ratio CNMI OVR passed this indicator. The program achieved a 2.32 ratio, which exceeded the RSA-required ratio of 0.52 of the average hourly earnings of all individuals in competitive employment to the average hourly earnings of all employed individuals in the State. Federal Standard: 0.52 *** CNMI OVR Achieved: 2.32

Performance Indicator 1.6: Self Support CNMI OVR failed this indicator. Of all individuals who exited the VR program in competitive, self-, or BEP employment with earnings equivalent to at least the minimum wage, the difference between the percentage who reported their own income as the largest single source of economic support at the time they exited the VR program and the percentage who reported their own income as the largest single source of support at the time they apply for VR services. OVR will increase referrals of individuals who may require VR services to prepare for and obtain employment such as SSA beneficiaries and students/youth with disabilities. Federal Standard: 53 *** CNMI OVR Achieved: 13.33

Performance Indicator 2.1: Ratio of Minority to Non-Minority Service Rates CNMI OVR passed this indicator by over 0.29 of the federal standard requirement of the service rate for all individuals with disabilities from minority backgrounds as a ratio to the service rate for all non-minority individuals with disabilities. Federal Standard: 0.8 *** CNMI OVR Achieved: 1.09

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

Innovation and Expansion (I&E) funding was used, in accordance with federal regulation, to provide for allowable activities for the State Rehabilitation Council (SRC). Consistent with OVR goals and priorities, I&E efforts continue to promote competitive integrated employment outcomes for students and youth with disabilities, extend the community's capacity to serve persons who are blind or visually impaired, and integrate employment outcomes for persons with developmental disabilities. During FY 2015, the SRC utilized a budget of \$ 15,894 from I&E funding to carry out their allowable activities.

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 CNMI OVR will continue its efforts to provide supported employment (SE) services to individuals with the most significant disabilities to achieve meaning employment per their IPE goal. The Office continues to negotiate with both private firms and public agencies to identify opportunities for competitive integrated employment outcomes for clients participating in this program. OVR currently utilizes two (2) private firms to provide job coaching services and negotiations are ongoing for the inclusion of personal assistance services for supported employment consumers, though OVR has begun to provide PAS in FY 2015 utilizing the services of private citizens/individuals selected by VR clients themselves. The limited number of community rehabilitation programs (CRPs) and extended employment service providers in the CNMI pose a significant challenge to providing a full range of services to consumers who are most significantly disabled. OVR will expend Title VI, Part B funds on maintaining consumers employed in competitive integrated work settings by identifying organizations or individuals to assist the consumer in achieving their employment goal.

Quality of Supported Employment: Supported Employment services are coordinated by VR professionals in collaboration with community rehabilitation program providers such as Marianas Health and Pinnacle Staffing as well as through individual vendors chosen by VR clients themselves to provide the needed personal assistance services at the jobsite to further maintain competitive integrated employment for the duration allowed by law. Ongoing monitoring of Supported Employment cases will be conducted to evaluate the timeliness, appropriateness, and effectiveness of service delivery to VR clients including students and youth with the most significant disabilities.

Scope of Supported Employment Services: Services intended to support the competitive integrated employment of VR clients including students and youth with the most significant disabilities include job coaching services, personal assistance services on the job, assistive technology, and other post-employment services necessary for job preservation. Natural supports provided by the employer to assist an individual with most significant disabilities to maintain employment may be considered a type of supported employment service.

Extent of Supported Employment Services: The specifics and extent of services needed are determined on an individual basis and written into and provided in the context of an approved Individualized Plan for Employment (IPE). A maximum of twenty-four (24) months of extended services may be provided to a consumer with the most significant disabilities to help him/her achieve competitive employment and stability in an integrated work setting. Extended services may lead to natural supports on the job provided by supervisor and co-workers as well as supported by family and friends. When the IPE is developed, extended support services are planned in order to assure continued support for the consumers. Services will continue to be provided until such time the consumer's job skills meet the employer's expectations and the job is stable and permanently secured. Family-provided supports may include transportation as well as personal assistance services.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Timing of transition from supported employment to extended services: The timing of the transition to extended services for VR clients with the most significant disabilities receiving supported employment services from CNMI OVR as part of their approved IPE occurs as soon as the IPE services are completed and the consumer has achieved competitive integrated employment as described in the IPE, or after a period of time not to exceed twenty-four (24) months, whichever comes first. The CNMI OVR may, under special circumstances, extend supported employment services beyond 24 months, if the consumer and the VR counselor agree to extend the time to achieve the desired employment goal as reflected in the approved IPE.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Office of Vocational Rehabilitation**

Name of designated State agency **Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata**

Title of Authorized Representative: **Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

FOOTNOTES

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 **Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata**

Title of Authorized Representative: **Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata**

Title of Authorized Representative: **Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES, STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A)(15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO EXPAND AND IMPROVE THE PROVISION OF VR SERVICES TO INDIVIDUALS WITH

DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.

M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

The designated State agency, or designated State unit, as appropriate, assures that it will:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above **Yes**

D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.

F. COMPLY WITH REQUIREMENTS REGARDING THE PROVISIONS OF INFORMED CHOICE FOR ALL APPLICANTS AND ELIGIBLE INDIVIDUALS IN ACCORDANCE WITH SECTION 102(D) OF THE REHABILITATION ACT.

G. PROVIDE VOCATIONAL REHABILITATION SERVICES TO AMERICAN INDIANS WHO ARE INDIVIDUALS WITH DISABILITIES RESIDING IN THE STATE, IN ACCORDANCE WITH SECTION 101(A)(13) OF THE REHABILITATION ACT.

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR

LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14) OF THE REHABILITATION ACT.

I. MEET THE REQUIREMENTS IN SECTIONS 101(A)(17) AND 103(B)(2) OF THE REHABILITATION ACT IF THE STATE ELECTS TO CONSTRUCT, UNDER SPECIAL CIRCUMSTANCES, FACILITIES FOR COMMUNITY REHABILITATION PROGRAMS

J. WITH RESPECT TO STUDENTS WITH DISABILITIES, THE STATE,

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.

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

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

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	Baseline	30.00	Baseline	33.00
Dislocated Workers	Baseline	30.00	Baseline	33.00
Youth	Baseline	35.00	Baseline	38.00
Adult Education	Baseline	9.00	Baseline	9.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation</	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

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	Baseline	30.00	Baseline	33.00
Dislocated Workers	Baseline	30.00	Baseline	33.00
Youth	Baseline	35.00	Baseline	38.00
Adult Education	Baseline	9.00	Baseline	9.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	2,700.00	Baseline	2,900.00
Dislocated Workers	Baseline	2,700.00	Baseline	2,900.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

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	Baseline	63.00	Baseline	66.00
Dislocated Workers	Baseline	63.00	Baseline	66.00
Youth	Baseline	72.00	Baseline	75.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

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	0.00	Baseline	0.00
Dislocated Workers	Baseline	0.00	Baseline	0.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	33.00	Baseline	34.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

Adults, DW and Youth are all baseline levels for PY 2016 and PY 2017.

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

Adult Education levels were negotiated with federal grantors.

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	0.00	Baseline	0.00
Dislocated Workers	Baseline	0.00	Baseline	0.00
Youth	Baseline	0.00	Baseline	0.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	Baseline	0.00	Baseline	0.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

All baseline goals throughout PY 2016 and PY 2017.

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

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
Employment	8.00		8.00	
Median Earnings	7,500.00		7,500.00	
Credential Attainment	58.00		58.00	
Measurable Skills Gain	42.00		42.00	

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)
