WIOA STATE PLAN FOR
THE STATE OF MONTANA

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OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

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

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

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

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

I. WIOA STATE PLAN TYPE

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

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

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

COMBINED PLAN PARTNER PROGRAM(S)

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

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

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

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

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

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

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.)) Yes

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

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

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

II. STRATEGIC ELEMENTS

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

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING INDUSTRY SECTORS AND OCCUPATION

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

III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Health and education, trade and transportation, and leisure activities are some of the largest employing industries in the state, resulting in large worker demands. These industries, as well as mining and utilities, are more concentrated in Montana than in the nation as a whole, and have faster wage growth than the national average for their respective industries over the past ten years. In particular, the development of the Bakken oil field has increased average wages significantly in recent years, particularly in the eastern half of the state. The oil development has influenced wages both through the addition of high–paying mining jobs and through higher wages for all jobs in the eastern counties due to tight labor markets. The development of the Bakken oil fields spurred rapid employment growth in the Eastern region after the recession, but growth has slowed slightly over the past couple years due to cost controls implemented by the oil industry and reduced profits from the decline in oil prices in late 2014. In fact, worker shortages and a shift towards employment in the higher–paying mining industry caused the east to lead the state in wage gains for much of the last few years. The Eastern region has the highest average wage of all regions at $43,390. However, with the decline in oil prices and agricultural commodities, growth in this region has stalled. Jobs still increased over the year, but growth in the fourth quarter was minimal, and payroll employment from the first quarter of 2015 suggests job losses in the region. As oil prices stabilize, so will employment in the east. The South Central region has also benefited by the oil and gas industry in recent years, particularly with the expansion of the petroleum refineries in the Billings area. These jobs pay well, and have put upward pressure on wages. Similar to Eastern Montana, the South Central region had a slowdown in employment growth in 2014 due to lower oil prices, but the diverse economy in the region is expected to weather the downturn well. The South Central region is expected to be the state's fastest growing area in the long term, largely because of the expansion of the consumer economy in Montana's largest city. The Billings region also serves as a healthcare hub for all of the central and eastern portions of Montana, and parts of Wyoming. The demand for these services is expected to increase in future years as the population ages. Unfortunately, the North Central region of the state posted another disappointing year in 2014, with job losses over the year after slow growth in 2013. Payroll employment estimates indicate gains in manufacturing and transportation,

but federal government spending cutbacks have impacted growth in the region. Wage growth continues to be strong, however, and employment data from the first quarter of 2015 suggest that the North Central region is adding jobs and becoming more dynamic. Employment forecasts for this region expect a recovery of the employment losses, then a return to a growth rate lower than the other regions in the long–term. As one region's growth disappoints, another exceeds expectations. The Northwestern area of the state is gaining strength, now posting respectable job growth for the last three years. Much of the growth in the Northwest has been in the retail and wholesale trade industry, which has been supported by stronger wage growth and more discretionary spending by consumers. The financial activities industry (which includes real estate) has also added about 200 jobs to the region in 2014. Wage growth has picked up in the Northwest region, which will add even more momentum to economic growth. Average wages in the Northwest are lower than the state average, at $35,030 in 2014 compared to a statewide average of $38,880. Payroll employment data from the first quarter of 2015 indicate strong growth in both jobs and wages in the Northwest, with gains in the consumer based industries of trade, leisure activities, construction, and health care. Since the recession, Montana's fastest growing industry in terms of jobs has been healthcare, but the trade industry has surged in 2014 to claim the fastest growing industry spot. Retail and wholesale trade posted strong employment gains in 2014 by adding nearly 1,250 jobs at 1.7% growth. Wages for workers in the trade sector have also posted solid gains with a 3.8% increase in the average annual wage, moving it up to $32,870. The retail sector has been doing well because wage gains for all workers has put more money in the pockets of Montana consumers, plus lower fuel prices have allowed for greater spending on discretionary items. Employment growth in health care slowed in 2014, adding only about 950 jobs over the last year at a pace of 1.4%. This job growth is lower than recent years. Employment growth in health care from 2010 to 2013 averaged 1.9% per year. However, GDP growth in the health care industry was slightly faster than the five–year average. Faster GDP growth with slower employment growth suggests that health care industry improved productivity levels over the last year. Average wages in the health care industry are higher than the overall annual average wage at about $41,150 per year. Another industry showing signs of productivity enhancements is manufacturing, where employment grew by 2.9% over the year (adding over 500 jobs), and GDP grew at a very good pace of 5.8%. Manufacturing has been an important component to Montana's economic growth over the last five years, with very large gains of 15.4% GDP annual average growth. Montana's largest manufacturing products in terms of employment include food and beverages (including locally crafted beers), wood products, petroleum and coal refining, fabricated metals, machinery, and nonmetallic minerals. Miscellaneous manufacturing also is a large employing manufacturing sector, which includes medical equipment manufacturing, among other products. These industries are also the largest manufacturing sub–industries in terms of GDP, but the output value from petroleum and coal product manufacturing is more than the output from all other manufacturing combined. The construction industry gained ground in 2014, adding about 900 jobs at 3.8% growth, making it the fastest growing industry over the year in percentage terms. Construction was hit hard by the 2007 recession, losing about 30% of the total workforce, and has taken a long time to recover from those loses. The construction industry is expected to grow by about 3% in the next few years, but is not expected to regain its peak employment levels until after 2020 due to the heavy job losses during the recession. Construction workers earn average annual wages that are about $7,000 higher than the wages earned by all workers in Montana. Employment growth in mining has been fairly volatile in the last ten years, with the large gains related to the development of the Bakken oil fields. Surprisingly given the decline in oil prices in 2014, the job losses in mining are not in the oil and gas industry. Oil and gas employment levels in Montana have stayed fairly steady over the year, adding roughly 24 jobs. Instead, the job losses in mining have come from other types of mining and from the support activities related to mining. Low prices for all commodities and a slowing global economy have negatively impacted all types of mining in Montana. Mining comprises only about 2% of employment in Montana, but it represents a larger share of GDP (about 5%) because of its high annual wages.

Mining has the highest average annual wage of all the industries in Montana. Although oil and gas is not the cause of the employment losses in mining, the oil price decline may be related to employment losses in the business service industry over the past year. The business service industry includes the temporary employment services industry, which helped to provide workers to the oil fields. However, because this industry provides workers for many different industries, it is not possible to confirm that these job losses are related to the changes in the oil and gas industry. Data from the first quarter of 2015 indicates that the business services industry has returned to growth. The health care industry is expected to have the highest job demands, requiring 1,300 jobs per year through 2024. Mining, professional and technical services, and construction are expected to grow the fastest in percentage terms. Construction employment growth is finally gaining traction after a tough recession and prolonged recovery. Although employment growth in mining is expected to stall over the next two years in response to lower oil prices, growth is expected to return in the next ten years, resuming its place as one of Montana's fastest growing industries. Professional and technical services is expected to be Montana's fastest growing industry in percentage terms, adding an average of 600 jobs per year for the next ten years. The growth of Montana's professional and technical service industry represents the emergence of a knowledge–based service sector, which generally provides higher wage, professional jobs with good benefits. Montana's workforce and education systems will also need to continue efforts to make worker training more affordable and easily accessible. More efficient education and training systems, particularly those for adults already in the labor force, are necessary to give working professionals the opportunity to earn income while learning new skills. Businesses must also have greater involvement in the training systems, providing more on–the–job training to perfect worker skills and working with the education systems to ensure that curriculums teach the right skills for the job. All of these efforts must be pursued to steadily increase productivity levels of Montana's workforce so that each worker can achieve their highest levels of success. Increased employment opportunities and higher wages will naturally provide more incentives for workers to enter the labor force. But there are also pockets of workers with labor force participation rates that are lower–than–average who are good targets for recruitment efforts. Women, particularly those who maintain families caring for children or aging parents, have lower labor force participation rates than men. American Indians have lower labor force participation rates than all Montanans. Disabled Montanans, many who are veterans, also have lower labor force participation rates than the Montana average. These populations can be targeted with additional efforts to bring them into the labor force. For example, disabled workers may need special accommodations with equipment and work hours in order for them to be most productive at work. In rural areas, better transportation infrastructure can help workers get to work sites, while better internet infrastructure would allow for more work–at–home opportunities. Throughout the next ten years, workers will need to continue to improve their skill sets to adapt to the changing world economy, and the changing mix of industries and jobs expected in the future. In general, Montana's workforce will need to be slightly more educated than before, with a higher share of college undergraduate and graduate degrees. Occupations requiring higher education levels are projected to grow faster than occupations at low education levels, resulting in an overall shift towards a more educated workforce. Workers intending to progress in their careers will require additional education to succeed. Montanans with higher levels of education also face lower unemployment rates, lower poverty rates, and earn higher wages. Well–educated workers are also more likely to become entrepreneurs and to recommend productivity–enhancing processes to their employers.Currently, Montana's workforce is fairly well–educated in comparison to other states. For people 25 years and older, 92.5% of Montanans have a high school degree – the highest percentage in the nation. For bachelor's degrees, Montana is about equal to the national average, with 29% of people 25 and older holding bachelor's degrees or higher education, ranking 20th among the 50 states. However, Montana's educational attainment slips behind other states for graduate degrees, with only 9.1% of the population 25 and older having a graduate degree, ranking 33rd in the nation and behind the national average of 10.9%. In comparison, over 17% of the population over 25 has graduate degrees

in the top–ranking state of Massachusetts. In addition to higher wages and better productivity, highly educated workers are more likely to become entrepreneurs, and Montana continues to excel in this metric. Montana's business openings rate was at 6.4% of existing businesses in 2014, ranking fifth among states. Montana also has one of the highest percentages of households owning a business. Montana's entrepreneurialism has continued to drive job growth in the state, with businesses less than five years old comprising about 14% of Montana's total employment.

Montana's primary demand industry sector is healthcare, with a focus on credentialed occupations such as nurses, CNA's, phlebotomists and other health-care related. Energy and construction are also both expected to become high-demand industry sectors in the upcoming years, though both are currently in a downturn, with a focus on credentialed occupations such as bookkeepers, auditors, truck drivers and trainers/teachers.

More information about these and other high-demand industry sectors and occupations can be found at lmi.mt.gov/portals/135/publications/LMI-Pubs/Articles/2016/0716-EstimatingFutureWorkforceNeeds.pdf.

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'.

By 2024, the labor force is projected to add nearly 41,000 new prospective workers at an annual average growth rate of 0.8%, slightly slower than the growth of the overall population (0.9%) because of the aging population. Employment is expected to grow faster than the labor force, pushing the unemployment rate down to extremely low levels. Tight labor markets caused by worker shortages can provide economic benefits for workers because jobs are easy to find and wages increase rapidly. However, economic growth can be constrained if businesses cannot find the right workers, or enough workers, to produce their goods. Montana's overall economic growth will be slowed by worker shortages unless Montana finds ways to increase the available labor by increasing participation rates to record highs, shifting to more full–time jobs, and investing in productivity–enhancing technologies. Montana's workforce and education systems will also need to continue efforts to make worker training more affordable and easily accessible. More efficient education and training systems, particularly those for adults already in the labor force, are necessary to give working professionals the opportunity to earn income while learning new skills. Businesses must also have greater involvement in the training systems, providing more on–the–job training to perfect worker skills and working with the education systems to ensure that curriculums teach the right skills for the job. All of these efforts must be pursued to steadily increase productivity levels of Montana's workforce so that each worker can achieve their highest levels of success. Montana's labor market is currently facing unique circumstances and entering a sustained period of low labor supply, or in other words, a worker shortage. As of September 2015, Montana's statewide unemployment rate was 4.1%, and has hovered around this level for several months. Going forward, the Montana Department of Labor and Industry Research and Analysis Bureau (DLI R&A) projects declining unemployment rates. Multiple factors will compound to make the worker shortage more severe including a large wave of retirements among the baby boomer generation, a relatively small number of young people entering the labor force, and a healthy pace of employment growth throughout. DLI projects approximately 6,400 jobs added per year in Montana while the labor force is expected to grow by only 4,100 workers. As a result, unemployment rates are expected to decline to levels below 2% within ten years. Low unemployment rates and a worker shortage will benefit workers by making it easier to find jobs and increase wages. Additionally, employers struggling to find workers will be more willing to pay the costs to train the workers they need on their own. For these reasons, the average worker that qualifies for and utilizes WIOA program resources is more likely to have more significant barriers to employment than in a period of normal labor supply. Due to the more significant barriers that will need to be overcome, the population of workers that WIOA programs will serve will have more difficulty obtaining and retaining employment after program exit. For these reasons, the proposed performance measures are expected to be slightly lower than their historical averages. In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, Workforce Investment Act data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best–guess estimates and will likely change as more guidance is received. Without any precedent for gauging the effectiveness of employer services, Montana will test new measures to fill this need. For the Title III program, in the upcoming low–unemployment environment, we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses. Montana's core partners will collaboratively work with employers to identify their training and skill set needs and match their needs with clients from Job Service, community–based organization and agency partners. On top of training quality employees, DLI serves employers in many other ways. Assistance with recruitment and retention, comprehensive/customizable applicant testing, information and training on employment laws,

information on establishing fair pay rates, and many other services are all offered by DLI to employers to improve and streamline the process of finding employees. To measure the effectiveness of serving employers directly, each year DLI will report a four–quarter average of the share of total employers served. To calculate this, the numerator will be the number of unique Montana employers that were provided services and the denominator will be the quarterly average of the number of establishments in the state, as reported by the Unemployment Insurance program. The four–quarter average will be used to obtain a more stable estimate of employer counts due to the constant fluctuation of businesses opening and closing as well as the seasonality of hiring and layoffs. This performance measure will provide an estimate of the level of outreach and employer assistance activities while accounting for changes in the size of Montana's economy. For the Titles I, II, III and IV programs, employment retention will measure effectiveness in serving employers. Preparing clients to be reliable employees in the workplace, measured by job retention, can indicate how well employers are being served by these programs. The strong job growth over the past five years has reduced unemployment and increased wages. Montanans have also reacted to the stronger economy by increasing labor force participation rates. Montana's labor force is illustrated in Figure 5 along with employment totals. The difference between the labor force and the employed is the number of unemployed people. Montana's labor force decreased significantly during the recession, falling over 2% during 2008 and 2009. But when Montana's economy improved, better wage growth and lower unemployment rates led to a quick recovery of Montana's labor force participation rates. In contrast, the U.S. labor force has recovered much more slowly and is only 1.5% above the pre–recession peak. Montana's labor force participation rate was at 64.8% in 2014, higher than the 62.9% for the U.S. and ranking 20th highest among states. Montana's participation rate increased by nearly a full percentage point from the 2013 level of 63.9%, adding roughly 2,700 workers. Montana's participation rates are good, but they need to be even higher to accommodate future job growth. Montana's unemployment rates are currently at ideal rates, but expected to go lower in the future. Montana's wage growth has moved from fifth fastest to sixth fastest over the last five years. Personal income growth has moved from 13th fastest to 21st, although Montana's ten–year growth remains at seventh fastest among states. Employment growth in 2014 was strong, but slipped to 28th among states due to a slow 4th quarter. Employment growth ranking over the ten–year timeframe is stronger at 16th among states. Montana's economy has performed well in the last decade, and emerged from the recession better than other states. Our economic performance in 2014 follows these positive trends. Montana's labor market is currently facing unique circumstances and entering a sustained period of low labor supply, or in other words, a worker shortage. As of September 2015, Montana's statewide unemployment rate was 4.1%, and has hovered around this level for several months. Going forward, the Montana Department of Labor and Industry Research and Analysis Bureau (DLI R&A) projects declining unemployment rates. Multiple factors will compound to make the worker shortage more severe including a large wave of retirements among the baby boomer generation, a relatively small number of young people entering the labor force, and a healthy pace of employment growth throughout. DLI projects approximately 6,400 jobs added per year in Montana while the labor force is expected to grow by only 4,100 workers. As a result, unemployment rates are expected to decline to levels below 2% within ten years. Low unemployment rates and a worker shortage will benefit workers by making it easier to find jobs and increase wages. Additionally, employers struggling to find workers will be more willing to pay the costs to train the workers they need on their own. For these reasons, the average worker that qualifies for and utilizes WIOA program resources is more likely to have more significant barriers to employment than in a period of normal labor supply. Due to the more significant barriers that will need to be overcome, the population of workers that WIOA programs will serve will have more difficulty obtaining and retaining employment after program exit. For these reasons, the proposed performance measures are expected to be slightly lower than their historical averages. In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, Workforce

Investment Act data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best–guess estimates and will likely change as more guidance is received. Without any precedent for gauging the effectiveness of employer services, Montana will test new measures to fill this need. For the Title III program, in the upcoming low–unemployment environment, we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses. Montana's core partners will collaboratively work with employers to identify their training and skill set needs and match their needs with clients from Job Service, community–based organization and agency partners. On top of training quality employees, DLI serves employers in many other ways. Assistance with recruitment and retention, comprehensive/customizable applicant testing, information and training on employment laws, information on establishing fair pay rates, and many other services are all offered by DLI to employers to improve and streamline the process of finding employees. To measure the effectiveness of serving employers directly, each year DLI will report a four–quarter average of the share of total employers served. To calculate this, the numerator will be the number of unique Montana employers that were provided services and the denominator will be the quarterly average of the number of establishments in the state, as reported by the Unemployment Insurance program. The four–quarter average will be used to obtain a more stable estimate of employer counts due to the constant fluctuation of businesses opening and closing as well as the seasonality of hiring and layoffs. This performance measure will provide an estimate of the level of outreach and employer assistance activities while accounting for changes in the size of Montana's economy. The Research and Analysis Bureau of the DLI provides online access to labor market information and data at http://lmi.mt.gov. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O*Net database. Each job seeker will create an e–portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs. By 2024, the labor force is projected to add nearly 41,000 new prospective workers at an annual average growth rate of 0.8%, slightly slower than the growth of the overall population (0.9%) because of the aging population. Employment is expected to grow faster than the labor force, pushing the unemployment rate down to extremely low levels. Tight labor markets caused by worker shortages can provide economic benefits for workers because jobs are easy to find and wages increase rapidly. However, economic growth can be constrained if businesses cannot find the right workers, or enough workers, to produce their goods. Montana's overall economic growth will be slowed by worker shortages unless Montana finds ways to increase the available labor by increasing participation rates to record highs, shifting to more full–time jobs, and investing in productivity–enhancing technologies. Montana's workforce and education systems will also need to continue efforts to make worker training more affordable and easily accessible. More efficient education and training systems, particularly those for adults already in the labor force, are necessary to give working professionals the opportunity to earn income while learning new skills. Businesses must also have greater

involvement in the training systems, providing more on–the–job training to perfect worker skills and working with the education systems to ensure that curriculums teach the right skills for the job. All of these efforts must be pursued to steadily increase productivity levels of Montana's workforce so that each worker can achieve their highest levels of success. Throughout the next ten years, workers will need to continue to improve their skill sets to adapt to the changing world economy, and the changing mix of industries and jobs expected in the future. In general, Montana's workforce will need to be slightly more educated than before, with a higher share of college undergraduate and graduate degrees. Occupations requiring higher education levels are projected to grow faster than occupations at low education levels, resulting in an overall shift towards a more educated workforce. Productivity–enhancing processes to their employers. Larger challenges present themselves with the aging of Montana's workforce and the lack of young people to replace retiring workers. Montana's limited working–age population will cause tightness in the labor market in the future, with unemployment rates expected to reach very low levels within the next ten years. More job opportunities and higher wages will naturally bring more workers into the labor force, but these natural forces may not be enough to meet the labor demands of Montana's employers. Actions must be taken to streamline education and workforce training programs to allow workers to learn while on the job, reducing costly time out of the labor market. The Montana DLI continues to take the lead in addressing the worker shortage and other issues faced by the Montana economy. The department will continue to partner with businesses to address worker shortages, developing apprenticeships and other programs to ensure workers are quickly trained with the right skills for today's economy. Workers will need to take advantage of these training programs to continuously upgrade skills. Businesses will need to make investments to upgrade production processes and improve human capital. Businesses will also need to look for ways to attract workers from groups with lower labor force participation, which may require changes to the types of benefits offered or to hiring and promotion practices to remove unintended gender bias. These strategies will be needed for Montana's businesses to continue to successfully compete globally with rising labor costs. With actions designed to improve training, hiring, and retention practices, Montana will meet these upcoming challenges and continue to outperform the nation and other states in economic growth.

The small sample size in the CPS in Montana does not allow for unemployment estimates by industry, and most occupations can transition between industries fairly easily. However, Montana is able to provide the volume of claims by industry even though unemployment insurance claims are not a representative sample of the total unemployed population.

In July 2016, mining represented 3% of unemployment insurance claims, construction comprised 13% of claims, manufacturing was at 5.9% of claims, trade comprised roughly 10% of claims, health care comprises 15% of claims, and government represents 8% of claims.

In terms of education levels of its workforce, Montana's population is well-educated compared to other states for the high school level, with 92.5% of workers having a high school diploma or equivalent, ranking it the best in the nation in 2014. Montana is roughly equal to the national average for bachelor's degrees with 29% of workers 25 and older with a college degree. However, Montana's education attainment slips behind other states for graduate degrees, with only 9.1% of the population 25 and older having an advanced degree.

More information about employment and unemployment sectors can be found at lmi.mt.gov/portals/135/publications/LMI-Pubs/Articles/2016/0716-EstimatingFutureWorkforceNeeds.pdf.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in *Education and Skill Levels of the Workforce* above, and the employment needs of employers, as identified in *Employers' Employment Needs* above. This must include an analysis of –

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.*

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* Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

Montana posted strong wage growth in 2014, with the average wage increasing 3.5% over the year to $38,874. Montana's wage growth was faster than the nation as a whole (3.1%), ranking 11th fastest among states. Consistent with previous wage growth, the increases were the fastest in the private sector, with private wages increasing by 3.7% over the year. Federal, state and local government all had wage growth less than 3%. With inflation at only 1.6% over the year, real wages increased by 1.8%. Real wage gains, or those above the rate of inflation, mean that Montanans can afford more goods and services with their earnings than they could the year before, resulting in an increase in the standard of living for Montana families.

Montana's wages have been growing faster than the nation for most of the last ten years, ranking sixth fastest wage growth among the 50 states for both the five–year and ten–year timeframes. In dollar terms, Montana's average wage grew by $1,300 over the last year, and by over $5,100 in the last five years. Montanans' wages have grown at a compounding annual growth rate of 3.4% over the last 10 years from 2004 to 2014, compared to only 2.7% for the nation as a whole. Montana's industry mix helps to explain why our wage growth has outpaced the nation. Health and education, trade and transportation, and leisure activities are some of the largest employing industries in the state, resulting in large worker demands. These industries, as well as mining and utilities, are more concentrated in Montana than in the nation as a whole, and have faster wage growth than the national average for their respective industries over the past ten years. In particular, the development of the Bakken oil field has increased average wages significantly in recent years, particularly in the eastern half of the state. The oil development has influenced wages both through the addition of high–paying mining jobs and through higher wages for all jobs in the eastern counties due to tight labor markets. For the past five years, wage growth in the Eastern and South Central regions of Montana have outpaced other regions in the state. In 2014, wage growth has become

more balanced throughout the state, with all regions except South Central having faster wage growth in the last year than their five–year average. The South Central region posted wage growth of 3%, faster than inflation, but slower than in prior years. The Eastern portion of Montana still posted very large 7% wage increases despite a moderation in employment growth. Rapid wage growth over the past few years has helped Montana's wages catch up to those in the rest of the nation. Montana's average wage of $38,874 ranks 47th out of 50 states, too low for Montana's working families, but up one place from 2012. The average private sector job in Montana paid about a thousand dollars less than the overall average at $36,499, ranking 49th among states for private sector wages, above only Mississippi. Montana sank to this low wage ranking over a long period of time, with our average wage relative to the national average declining for most of the second half of the 20th Century. Since the turn of the century, Montana's wages have been regaining ground relative to the nation because of our rapid wage growth. Montana's lower wage levels compared to the nation can be partially explained by the prevalence of part–time work. The average job in Montana had a work week of only 32.8 hours in 2014 – the shortest work week in the nation. Montana's short work week is an indication that many jobs are part–time. But Montanans are known for being hardworking, and many people work multiple jobs or have their own business to compensate for lower earnings. In fact, Montana usually falls in the top ten states for the percentage of workers holding multiple jobs. Once the hours from multiple jobs are included, the typical Montanan works 38.1 hours per week, moving the state to the middle of the pack in terms of hours worked per week. Montana's wages rank better when comparing hourly wages, ranking 44th among states. However, Montana's hourly wage is more competitive among low–wage workers than among high–wage workers. The 10% of Montana workers with the lowest wages earn an average hourly salary of $8.77 per hour compared to $8.82 nationally, ranking Montana as the 23rd wage rate among low–earning workers. For the lowest earning 10% of workers, Montana's wages are 99% of the U.S. average. The wage rates among the lowest earning workers are likely bolstered by Montana's minimum wage, which is higher than the national mandatory minimum wage. Montana's low unemployment rate also places upwards pressure on the wage levels for low–wage jobs. Montana starts to slip behind the national average when comparing wages for high–wage jobs. Montana workers earning at the 25th percentile earn hourly rates of about 95% of the U.S. average, but those at the 50% quartile earn 89% of the national average. For high–wage jobs, Montana workers fall far behind national high–wage earners, earning only 84% of the hourly rates for the top quartile of workers, and only 79% of the hourly rates for the highest 10% of workers. In other words, Montana's poor ranking among states is because of disparity among high–wage jobs, while low–wage jobs have wage rates fairly competitive with the national averages.

The U.S. Personal Income Growth Finally Catches up to Montana Montana's wage growth has moved from fifth fastest to sixth fastest over the last five years. Personal income growth has moved from 13th fastest to 21st, although Montana's ten–year growth remains at seventh fastest among states. Employment growth in 2014 was strong, but slipped to 28th among states due to a slow 4th quarter. Employment growth ranking over the ten–year timeframe is stronger at 16th among states. Montana's economy has performed well in the last decade, and emerged from the recession better than other states. Our economic performance in 2014 follows these positive trends. Montana has outperformed the U.S. economy in personal income growth throughout the last ten years with the exception of 2013. Montana ranks 7th among states for the fastest personal income growth since 2004. Personal income growth in 2013 was lower in both Montana and in the U.S. due to the fiscal cliff, payroll tax cut expiration, and federal government sequester, all of which reduced the amount of spending in the economy and slowed economic growth. These impacts were primarily felt in the first quarter of 2013, but the federal government shutdown in the fall of 2013 also suppressed economic activity towards the end of the year. The tourist–related industries around Glacier and Yellowstone parks were particularly impacted by the closure of the national parks, reducing Montana's personal income growth to 0% in the 4th quarter of 2013. The Montana economy demonstrated resiliency with

a return to growth in the 1st quarter of 2014, posting personal income growth stronger than the U.S. during 2014 despite an oil–related slowdown in the last half of the year. Personal income is often measured on a per capita basis, with Montana's per capita income of $40,601 ranking 35th in the nation. The state's per capita income moved up one spot from 2013 with an increase of $1,235 (3.1%) over the year, led by strong growth among both wages and proprietor income. Montana has a higher ranking among states for per capita income than for wages because of a high rate of entrepreneurial activity. Roughly 10.6% of Montana's personal income is derived from proprietor income, higher than the 9.4% in the nation as a whole and ranking 11th in the nation for this metric. Similar to personal income growth, Montana's GDP growth in the past five years ranks fifth among states with a compounding annual growth rate of 4.5%, compared to 3.9% for the nation as a whole. State GDP measures the value of goods and services produced within the state. State GDP growth in the last five years was fastest in the manufacturing industry. Over the last two years, GDP growth in Montana has moderated to a respectable pace of 2.9%. Improvements in the growth rates of other states has moved Montana to 29th place for GDP growth among states over the last year. National and Global Influences Impacting Montana's Economy National GDP growth in 2015 has been slow thus far, with a national weather–related slowdown in the first quarter, followed by a rebound in the second quarter. Some of the inconsistency in output growth is related to the decline in oil prices in the last half of 2014, which reduced business investment in oil exploration. However, lower gas prices also have positive economic impacts through greater spending on other consumer products. A long–awaited improvement in U.S. wage growth has also contributed to greater consumer spending and GDP growth. In Montana, the impacts of the oil price decline are also balanced. Oil and gas development in Eastern Montana and North Dakota has benefited the economy in the last few years, and was critical to statewide economic and fiscal stability during the recession. Workers throughout Montana found good–paying employment in the Bakken until employment in their own local economies improved, while increased tax revenues from oil production helped counter the decline in other types of tax revenues. The oil fields have also been an important customer for transportation, construction, and professional service businesses, who otherwise faced lower demand during the recession. When the oil price declined in the second half of 2014, Montana's employment growth was impacted, particularly in the eastern region of the state. Total wages are the sum of all payroll wages paid in the state. Although total wages showed strong growth over the year, employment growth in Montana slowed in the second half of 2014. Growth resumed in the first quarter of 2015. Unemployment insurance claims also rose above expectations when the price of oil dropped abruptly in November 2014. Montana unemployment insurance claims in October 2014 were about 2,200 claims lower than the prior year. New unemployment insurance claims spiked in the second week of November after the price of oil dropped, moving claim totals in the latter half of November to only about 500 claims below 2013 levels. However, the impacts quickly dissipated as prices stabilized, with claim levels recovering before the turn of the year. With the slowdown in oil–related activity, transportation, construction, and professional service firms that have supported the Bakken development in recent years are likely to shift focus to other customer markets. Consumer industries within Eastern Montana will also be impacted by having fewer oil workers in the area. However, many of the wells in the Bakken region have low production costs, allowing for oil production to continue profitably despite the lower oil price. Workers have shifted from exploration work to production work, but the large backlog of work has kept many employees on the job. The oil price instability has not resulted in the feared "oil bust," but rather a slowdown in exploration activity. Oil production has remained fairly steady over the year, and experts predict that Montana's petroleum refining industry is likely to weather the oil price volatility fairly well. The continued stability in petroleum is important, as petroleum refining represents over half of Montana's manufacturing output. Oil and gas extraction comprised 1.2% of Montana's GDP in 2013, while output from petroleum and coal manufacturing is roughly three times that at 3.9% of GDP. In 2015, Montana's economy continues to generate job growth above the long–term average and to make record–breaking wage gains. Stronger growth in the rest of the nation is good news to Montana, helping to

stabilize our economic growth. Montana Job Growth Continues at Strong Pace Montana's economy continues to add jobs in 2015, adding an average of over 2,000 jobs per month in the first half of the year. This strong job growth has thrust Montana's total employment levels over half a million jobs for the first time in our state's history. Continued job growth in 2015 builds on the strong job growth our state has posted in the last four years, with 2012 and 2013 employment growth in Montana over 2% – over twice the historic average of about 1%. Total employment growth in 2014 was slightly slower than the prior two years at 1.3%, adding 6,237 jobs over the year. Job growth of 1.3% in 2014 remains above the long–term average, but concerns and uncertainty about the oil price decline slowed employment growth in the second half of the year. Figure 5 illustrates Montana's monthly employment and labor force levels over the last five years. The pace of total job growth slowed in the latter half of 2014, but resumed a fairly rapid pace in the first half of 2015. Labor Force Participation Rates Increasing – but Greater Participation Still Needed to Fill Job Demands The strong job growth over the past five years has reduced unemployment and increased wages. Montanans have also reacted to the stronger economy by increasing labor force participation rates. The difference between the labor force and the employed is the number of unemployed people. Montana's labor force decreased significantly during the recession, falling over 2% during 2008 and 2009. But when Montana's economy improved, better wage growth and lower unemployment rates led to a quick recovery of Montana's labor force participation rates. In contrast, the U.S. labor force has recovered much more slowly and is only 1.5% above the pre–recession peak. Montana's labor force participation rate was at 64.8% in 2014, higher than the 62.9% for the U.S. and ranking 20th highest among states. Montana's participation rate increased by nearly a full percentage point from the 2013 level of 63.9%, adding roughly 2,700 workers. Montana's participation rates are good, but they need to be even higher to accommodate future job growth. Montana's unemployment rates are currently at ideal rates, but expected to go lower in the future. Unemployment in Montana at Ideal Levels Montana's unemployment rate is currently at ideal levels, hitting 4.0% in July 2015. Montana's annual unemployment rate of 4.7% in 2014 was the 13th lowest in the nation. The state's unemployment rate has been lower than the U.S. rate since the 2001 recession, hitting its all–time low of 2.9% in 2007. The 2007 recession caused unemployment to spike up by four and a half percentage points, hitting a recessionary high of 7.4% in 2010 before Montana's economy started recovery. However, with strong employment growth since 2010, those high unemployment rates are now several years behind us. Montana's Looming Worker Shortage Montana's continued economic growth is threatened by a shortage of workers, with our population demographics restricting labor force growth. Nearly 6% of Montana's labor force is already over 65 years of age, the fourth highest share in the nation. An additional 97,000 workers are between the ages of 55 and 64 and close to retirement. While many Montanans continue to work past the typical retirement age, there is still expected to be at least 130,000 retirements among the baby–boomer population within the next ten years. In comparison, there are only 123,000 Montanans aged 16 to 24, and not all of these young Montanans will be in the labor force. There are simply not enough young people in Montana to make up for the expected retirements of the baby boomer population. The Montana Department of Labor and Industry (DLI) projects that Montana's labor force will only grow by 4,100 workers per year for the next ten years, leaving a shortfall in the amount of workers needed to fill the expected 6,500 jobs per year. These projections are based on Census Bureau population projections that predict that the size of Montana's working–age population will be stagnant, even with increased migration. The projections also assume that labor force participation rates return to pre–recession levels due to higher wages and more job opportunities. Even accounting for increased migration and greater labor force participation, Montana's unemployment rate is expected to reach levels of 1% to 2% within the next decade. Solutions to Montana's Worker Shortage Montana is pursuing a number of options to address the upcoming worker shortage. Many of Montana's efforts focus on enhancing or working with market forces to increase the availability of labor. One solution is to increase the number of hours worked by each worker. Montana has a high share of part–time employment. Among Montana workers aged 16 to 64, roughly 22% work less than 35 hours per week – the sixth highest

percentage of part–time workers in the nation. While part–time jobs may be ideal for semi–retired workers, students, and others who choose to only work part time while pursuing life goals, many workers would prefer full–time employment. Montana will also need to pursue efforts to increase labor productivity, thus producing more output for every hour worked. Labor productivity is not determined by how hard a worker works, but is instead determined by how efficiently a worker works. Enhancing productivity is achieved with better workforce education that allows workers to continuously upgrade skills and knowledge so that businesses can implement the latest technologies and practices. Better productivity also requires more communication and networking with researchers who are identifying best practices, and communication with upstream and downstream businesses to identify ways to save labor hours. Some productivity enhancing investments will occur naturally in response to market forces. For example, as labor becomes more expensive, businesses will invest in productivity–enhancing machines and technologies to allow each worker to produce more output. The new technologies will produce more output with fewer labor hours, allowing economic growth to continue despite the labor shortage. Ultimately, Montana's growth depends on our ability to increase technology, productivity, and innovation. Future Employment Growth The looming worker shortage in Montana is expected to slow job growth in the upcoming years. Montana is expected to add roughly 7,800 jobs per year in 2015 and 2016 at a rate of 1.6%, then slow to job growth of 5,950 jobs per year from 2017 to 2024. The faster growth in the near term is expected as a continuation of the strong job growth Montana has experienced in recent years, with the worker shortage slowing growth in the long–term to only 1.1%. Although slower than recent years, the 1.1% pace in the long term is just slightly above the long–term employment growth average of 1% annually since 1980. The health care industry is expected to have the highest job demands, requiring 1,300 jobs per year through 2024. Mining, professional and technical services, and construction are expected to grow the fastest in percentage terms. Construction employment growth is finally gaining traction after a tough recession and prolonged recovery. Although employment growth in mining is expected to stall over the next two years in response to lower oil prices, growth is expected to return in the next ten years, resuming its place as one of Montana's fastest growing industries. Professional and technical services is expected to be Montana's fastest growing industry in percentage terms, adding an average of 600 jobs per year for the next ten years. The growth of Montana's professional and technical service industry represents the emergence of a knowledge–based service sector, which generally provides higher wage, professional jobs with good benefits. New business startups occur in every industry in Montana, with business activities and construction having the largest number of business startups among industries. The highest startup rates are found in the business activities, transportation, and mining sectors.

Montana Industries Since the recession, Montana's fastest growing industry in terms of jobs has been healthcare, but the trade industry has surged in 2014 to claim the fastest growing industry spot. Retail and wholesale trade posted strong employment gains in 2014 by adding nearly 1,250 jobs at 1.7% growth. Wages for workers in the trade sector have also posted solid gains with a 3.8% increase in the average annual wage, moving it up to $32,870. The retail sector has been doing well because wage gains for all workers has put more money in the pockets of Montana consumers, plus lower fuel prices have allowed for greater spending on discretionary items.

Employment growth in health care slowed in 2014, adding only about 950 jobs over the last year at a pace of 1.4%. This job growth is lower than recent years. Employment growth in health care from 2010 to 2013 averaged 1.9% per year. However, GDP growth in the health care industry was slightly faster than the five–year average. Faster GDP growth with slower employment growth suggests that health care industry improved productivity levels over the last year. Average wages in the health care industry are higher than the overall annual average wage at about $41,150 per year. Another industry showing signs of productivity enhancements is manufacturing, where employment grew by

2.9% over the year (adding over 500 jobs), and GDP grew at a very good pace of 5.8%. Manufacturing has been an important component to Montana's economic growth over the last five years, with very large gains of 15.4% GDP annual average growth. Montana's largest manufacturing products in terms of employment include food and beverages (including locally crafted beers), wood products, petroleum and coal refining, fabricated metals, machinery, and nonmetallic minerals. Miscellaneous manufacturing also is a large employing manufacturing sector, which includes medical equipment manufacturing, among other products. These industries are also the largest manufacturing sub–industries in terms of GDP, but the output value from petroleum and coal product manufacturing is more than the output from all other manufacturing combined. The construction industry gained ground in 2014, adding about 900 jobs at 3.8% growth, making it the fastest growing industry over the year in percentage terms. Construction was hit hard by the 2007 recession, losing about 30% of the total workforce, and has taken a long time to recover from those loses. The construction industry is expected to grow by about 3% in the next few years, but is not expected to regain its peak employment levels until after 2020 due to the heavy job losses during the recession. Construction workers earn average annual wages that are about $7,000 higher than the wages earned by all workers in Montana. Employment growth in mining has been fairly volatile in the last ten years, with the large gains related to the development of the Bakken oil fields. Surprisingly given the decline in oil prices in 2014, the job losses in mining are not in the oil and gas industry. Oil and gas employment levels in Montana have stayed fairly steady over the year, adding roughly 24 jobs. Instead, the job losses in mining have come from other types of mining and from the support activities related to mining. Low prices for all commodities and a slowing global economy have negatively impacted all types of mining in Montana. Mining comprises only about 2% of employment in Montana, but it represents a larger share of GDP (about 5%) because of its high annual wages. Mining has the highest average annual wage of all the industries in Montana. Although oil and gas is not the cause of the employment losses in mining, the oil price decline may be related to employment losses in the business service industry over the past year. The business service industry includes the temporary employment services industry, which helped to provide workers to the oil fields. However, because this industry provides workers for many different industries, it is not possible to confirm that these job losses are related to the changes in the oil and gas industry. Data from the first quarter of 2015 indicates that the business services industry has returned to growth. The third industry posting job losses in 2014 is the information industry. The information industry includes data processing, telecommunications, and cable broadcasting, but the job losses in the industry come from the newspaper, radio, and movie publishing and broadcasting services. The news publishing industry has undergone significant consolidation and restructuring in the last several years that have resulted in job losses. Government posted little employment change over the last year. In the past few years, the federal sequesters, fiscal cliff, and other cuts in federal government spending have reduced government employment in Montana. In general, the government sector grows at the same pace as the overall population, but growth in this industry has been slower than population growth in recent years. Regional Growth During the recession and recovery, employment growth rates in the eastern portion of Montana led the state because of the rapid expansion of oil and gas drilling. In 2014, lower prices for oil and agricultural commodities have slowed employment growth in the Eastern region of Montana, with the more populated regions of the state posting the strongest economic growth. Employment growth was fastest in the Southwest region, which includes Bozeman, Helena, and Butte, in both 2013 and 2014. The Bozeman area has been expanding in the businesses and professional services sector, which includes occupations like engineers, computer programmers and economists. Rapid employment growth in the professional and technical services industry is reflective of a general shift in Montana towards a more service–based economy.

The development of the Bakken oil fields spurred rapid employment growth in the Eastern region after the recession, but growth has slowed slightly over the past couple years due to cost controls implemented by the oil industry and reduced profits from the decline in oil prices in late 2014. In fact,

worker shortages and a shift towards employment in the higher–paying mining industry caused the east to lead the state in wage gains for much of the last few years. The Eastern region has the highest average wage of all regions at $43,390. However, with the decline in oil prices and agricultural commodities, growth in this region has stalled. Jobs still increased over the year, but growth in the fourth quarter was minimal, and payroll employment from the first quarter of 2015 suggests job losses in the region. As oil prices stabilize, so will employment in the east. The South Central region has also benefited by the oil and gas industry in recent years, particularly with the expansion of the petroleum refineries in the Billings area. These jobs pay well, and have put upward pressure on wages. Similar to Eastern Montana, the South Central region had a slowdown in employment growth in 2014 due to lower oil prices, but the diverse economy in the region is expected to weather the downturn well. The South Central region is expected to be the state's fastest growing area in the long term, largely because of the expansion of the consumer economy in Montana's largest city. The Billings region also serves as a healthcare hub for all of the central and eastern portions of Montana, and parts of Wyoming. The demand for these services is expected to increase in future years as the population ages. Unfortunately, the North Central region of the state posted another disappointing year in 2014, with job losses over the year after slow growth in 2013. Payroll employment estimates indicate gains in manufacturing and transportation, but federal government spending cutbacks have impacted growth in the region. Wage growth continues to be strong, however, and employment data from the first quarter of 2015 suggest that the North Central region is adding jobs and becoming more dynamic. Employment forecasts for this region expect a recovery of the employment losses, then a return to a growth rate lower than the other regions in the long–term. As one region's growth disappoints, another exceeds expectations. The Northwestern area of the state is gaining strength, now posting respectable job growth for the last three years. Much of the growth in the Northwest has been in the retail and wholesale trade industry, which has been supported by stronger wage growth and more discretionary spending by consumers. The financial activities industry (which includes real estate) has also added about 200 jobs to the region in 2014. Wage growth has picked up in the Northwest region, which will add even more momentum to economic growth. Average wages in the Northwest are lower than the state average, at $35,030 in 2014 compared to a statewide average of $38,880. Payroll employment data from the first quarter of 2015 indicate strong growth in both jobs and wages in the Northwest, with gains in the consumer based industries of trade, leisure activities, construction, and health care. With stronger job growth, unemployment rates in all of Montana's regions have decreased over the year.The Northwest's 6.0% unemployment rate is still higher than desired, but the job gains in recent years demonstrate that this region is regaining strength. Unemployment rates continue to fall the further you move east, with a low rate of 3.4% in the Eastern region of the state. Some counties in this region continue to have unemployment rates at or below 2%, marking worker shortages in the region. Montana's reservations are some of the most economically sensitive regions of our state, and unemployment rates on the reservations are often two to three times higher than their surrounding areas. All of the reservations have improving unemployment rates over the last year with large declines on the Crow, Northern Cheyenne, and Rocky Boy's reservation. The Flathead reservation also posted job growth over the last year, bringing down unemployment rates. Rocky Boy's unemployment rate is highest, but job growth has reduced unemployment over the last year. However, the economic news is less favorable for the Blackfeet reservation, which experienced employment losses over the last year. The labor force also declined on the Blackfeet reservation, resulting in lower unemployment rates despite the job losses. The contradiction between the declining unemployment rate suggesting positive growth, and employment losses indicating a contraction underscores the importance of including different economic metrics when analyzing economies. Montana's reservation communities often have labor force participation rates below the rest of Montana because job opportunities have been scarce over a long period of time. Few job opportunities and low wages reduce economic engagement. In order to help research and understand the unique challenges faced by reservation economies, DLI recently expanded the types of data available for Montana's reservation areas.

Monthly unemployment rates calculated with the same data and same methodology used to publish county labor market information are now being published. These unemployment rates are directly comparable to the unemployment information published for the U.S., Montana, and all other areas in the U.S. Providing this data will allow for better comparisons of reservation areas to other regions, allowing for improved economic research and information. Examining employment growth on the reservation by month is now possible for Montana's reservations because of increased data availability. The Blackfeet reservation had a large spike in employment in 2012, but has experienced job losses over the last year. The Fort Peck reservation has benefited from the oil and gas exploration in the Bakken in the last several years, posting steady job gains until the price of oil started to decline in the second half of 2014. Recent 2015 data shows a return to growth on the Fort Peck reservation. The Fort Belknap reservation has been successful in adding employment opportunities over the last year, reducing unemployment levels by 0.9 over the last year to 12.8%. Both the Crow and Flathead reservations have shown steady growth since 2013, but the Northern Cheyenne and Rocky Boy's reservations have seen little change. Reservation economies have a high level of their employment in government, but part of the high concentration is because of the categorization of tribally–owned businesses. The government category includes the typical federal, state, and local government employment, but also includes tribal employment and any tribally–owned enterprises, even if the enterprise is operated as though it is a private business. For example, a hotel that is owned by the tribe would be counted in the government industry, not the leisure activities industry. Even accounting for these measurement issues, the reservation areas in Montana generally have a higher reliance on federal government funding than other areas of the state, particularly in the education and health care sectors. The cutbacks in federal funding from the fiscal cliff and sequester has therefore impacted the reservation areas more so than the rest of the state, with job losses in the health care, education, and government sectors in 2013 and 2014. However, most reservation economies have returned to a more positive growth path in 2015. Montana's Economic Growth Expected to Continue Montana's economy outperformed the nation again in 2014, with rapid wage increases, strong employment growth, and declining unemployment. Wage and employment growth has occurred throughout Montana, with the western half of Montana strengthening growth to rebalance the economy geographically. The decline in oil prices has impacted our state, slowing growth in the Eastern region of Montana in particular, but the economy is resilient and diversified enough to withstand these changes. Data from the first half of 2015 suggests Montana's economy has already overcome the challenges of low commodity prices, and is finding opportunity in other industries and areas. The path forward is not without challenges. With a stronger domestic economy and weakness overseas, the dollar will continue to appreciate in the next few years, slowing demand for Montana's exports. The Federal Reserve is expected to increase interest rates over the next year, which will further strengthen the dollar and influence national economic growth. Continued concerns about debt in Greece and the Eurozone are also likely, as are concerns about slower growth in China. However, the U.S. and Montana economies have displayed strength and resilience in the face of these challenges over the last year, and this momentum is likely to continue. Larger challenges present themselves with the aging of Montana's workforce and the lack of young people to replace retiring workers. Montana's limited working–age population will cause tightness in the labor market in the future, with unemployment rates expected to reach very low levels within the next ten years. More job opportunities and higher wages will naturally bring more workers into the labor force, but these natural forces may not be enough to meet the labor demands of Montana's employers. Actions must be taken to streamline education and workforce training programs to allow workers to learn while on the job, reducing costly time out of the labor market. The Montana DLI continues to take the lead in addressing the worker shortage and other issues faced by the Montana economy. The department will continue to partner with businesses to address worker shortages, developing apprenticeships and other programs to ensure workers are quickly trained with the right skills for today's economy. Workers will need to take advantage of these training programs to continuously upgrade skills. Businesses will need to make

investments to upgrade production processes and improve human capital. Businesses will also need to look for ways to attract workers from groups with lower labor force participation, which may require changes to the types of benefits offered or to hiring and promotion practices to remove unintended gender bias. These strategies will be needed for Montana's businesses to continue to successfully compete globally with rising labor costs. With actions designed to improve training, hiring, and retention practices, Montana will meet these upcoming challenges and continue to outperform the nation and other states in economic growth. Workforce Development, Education and Training Activities Analysis

Educational and Skill Levels of the Workforce By 2024, the labor force is projected to add nearly 41,000 new prospective workers at an annual average growth rate of 0.8%, slightly slower than the growth of the overall population (0.9%) because of the aging population. Employment is expected to grow faster than the labor force, pushing the unemployment rate down to extremely low levels.

Tight labor markets caused by worker shortages can provide economic benefits for workers because jobs are easy to find and wages increase rapidly. However, economic growth can be constrained if businesses cannot find the right workers, or enough workers, to produce their goods. Montana's overall economic growth will be slowed by worker shortages unless Montana finds ways to increase the available labor by increasing participation rates to record highs, shifting to more full–time jobs, and investing in productivity–enhancing technologies. Montana's workforce and education systems will also need to continue efforts to make worker training more affordable and easily accessible. More efficient education and training systems, particularly those for adults already in the labor force, are necessary to give working professionals the opportunity to earn income while learning new skills. Businesses must also have greater involvement in the training systems, providing more on–the–job training to perfect worker skills and working with the education systems to ensure that curriculums teach the right skills for the job. All of these efforts must be pursued to steadily increase productivity levels of Montana's workforce so that each worker can achieve their highest levels of success. Finding More Workers: Worker Groups with Lower Labor Force Participation Increased employment opportunities and higher wages will naturally provide more incentives for workers to enter the labor force. But there are also pockets of workers with labor force participation rates that are lower–than–average who are good targets for recruitment efforts. Women, particularly those who maintain families caring for children or aging parents, have lower labor force participation rates than men. American Indians have lower labor force participation rates than all Montanans. Disabled Montanans, many who are veterans, also have lower labor force participation rates than the Montana average. These populations can be targeted with additional efforts to bring them into the labor force. For example, disabled workers may need special accommodations with equipment and work hours in order for them to be most productive at work. In rural areas, better transportation infrastructure can help workers get to work sites, while better internet infrastructure would allow for more work–at–home opportunities. There is some evidence that Montana workers are already making strides in making work flexible for their employees. For example, nearly 6.1% of Montana's workforce works from home, the fourth highest percentage in the nation. But that still puts the majority of workers in traditional work arrangements that may not work for every employee. Significant changes to the culture of Montana's workplaces may be necessary in the future to maximize the employment contribution of every worker. Throughout the next ten years, workers will need to continue to improve their skill sets to adapt to the changing world economy, and the changing mix of industries and jobs expected in the future. In general, Montana's workforce will need to be slightly more educated than before, with a higher share of college undergraduate and graduate degrees. Occupations requiring higher education levels are projected to grow faster than occupations at low education levels, resulting in an overall shift towards a more educated workforce. Workers intending to progress in their careers will require additional education to succeed.

Montanans with higher levels of education also face lower unemployment rates, lower poverty rates, and earn higher wages. Well–educated workers are also more likely to become entrepreneurs and to recommend productivity–enhancing processes to their employers. Currently, Montana's workforce is fairly well–educated in comparison to other states. For people 25 years and older, 92.5% of Montanans have a high school degree – the highest percentage in the nation. For bachelor's degrees, Montana is about equal to the national average, with 29% of people 25 and older holding bachelor's degrees or higher education, ranking 20th among the 50 states. However, Montana's educational attainment slips behind other states for graduate degrees, with only 9.1% of the population 25 and older having a graduate degree, ranking 33rd in the nation and behind the national average of 10.9%. In comparison, over 17% of the population over 25 has graduate degrees in the top–ranking state of Massachusetts. Montana Entrepreneurs Continue to Lead the Nation In addition to higher wages and better productivity, highly educated workers are more likely to become entrepreneurs, and Montana continues to excel in this metric. Montana's business openings rate was at 6.4% of existing businesses in 2014, ranking fifth among states. Montana also has one of the highest percentages of households owning a business. Montana's entrepreneurialism has continued to drive job growth in the state, with businesses less than five years old comprising about 14% of Montana's total employment.

Montana uses the unemployment insurance program as a means to meaningfully engage with all unemployment claimants via one of two program activities, RESEA program or the Montana Way (100%), both of which require a one-time in-person assessment. This up-front customer touch ensures that all claimants are aware of the services available to them via the public workforce system and helps the State assess and understand its unemployed population and ultimately its available workforce capacity.

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.

Currently, Montana's workforce is fairly well–educated in comparison to other states. For people 25 years and older, 92.5% of Montanans have a high school degree – the highest percentage in the nation. For bachelor's degrees, Montana is about equal to the national average, with 29% of people 25 and older holding bachelor's degrees or higher education, ranking 20th among the 50 states. However, Montana's educational attainment slips behind other states for graduate degrees, with only 9.1% of the population 25 and older having a graduate degree, ranking 33rd in the nation and behind the national average of 10.9%. In comparison, over 17% of the population over 25 has graduate degrees in the top–ranking state of Massachusetts. In addition to higher wages and better productivity, highly educated workers are more likely to become entrepreneurs, and Montana continues to excel in this metric. Montana's business openings rate was at 6.4% of existing businesses in 2014, ranking fifth among states. Montana also has one of the highest percentages of households owning a business. Montana's entrepreneurialism has continued to drive job growth in the state, with businesses less than five years old comprising about 14% of Montana's total employment. Montana's economy outperformed the nation again in 2014, with rapid wage increases, strong employment growth, and declining unemployment. Wage and employment growth has occurred throughout Montana, with the western half of Montana strengthening growth to rebalance the economy geographically. The decline in oil prices has impacted our state, slowing growth in the Eastern region of Montana in particular, but the economy is resilient and diversified enough to withstand these changes. Data from the first half of 2015 suggests Montana's economy has already

overcome the challenges of low commodity prices, and is finding opportunity in other industries and areas. The path forward is not without challenges. With a stronger domestic economy and weakness overseas, the dollar will continue to appreciate in the next few years, slowing demand for Montana's exports. The Federal Reserve is expected to increase interest rates over the next year, which will further strengthen the dollar and influence national economic growth. Continued concerns about debt in Greece and the Eurozone are also likely, as are concerns about slower growth in China. However, the U.S. and Montana economies have displayed strength and resilience in the face of these challenges over the last year, and this momentum is likely to continue. Larger challenges present themselves with the aging of Montana's workforce and the lack of young people to replace retiring workers. Montana's limited working–age population will cause tightness in the labor market in the future, with unemployment rates expected to reach very low levels within the next ten years. More job opportunities and higher wages will naturally bring more workers into the labor force, but these natural forces may not be enough to meet the labor demands of Montana's employers. Actions must be taken to streamline education and workforce training programs to allow workers to learn while on the job, reducing costly time out of the labor market.

The strengths of the Montana workforce system and its workforce development activities include required but meaningful engagement with all UI claimants, an above-average educated workforce, low unemployment rate, strong economy, many available (good) jobs, and a growing economic base.

The weakness of the Montana workforce system and its workforce development activities include an aging/older working population, a projected high demand for skilled workers coupled with a projected labor shortage to fill those jobs, fluctuations and uncertainty in the energy industry, and a continually decreasing federal funds that support public workforce development and account for base and above-base allocations for infrastructure, general operations, and program participant and service delivery.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

To ensure workforce system effectiveness, Montana will organize a State Agency Management (SAM) Team for Workforce Development. Meetings will be held on a quarterly basis, or more frequently if needed. SAM Team meetings will be facilitated and agenda–based. Required team members will include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner–Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership will include representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor's Office of Economic Development. Additional members will be invited to join the team as necessary and relevant. Team members will be expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One–Stop certification process; act as an advisory group to each member's SWIB representative; act as advisors to each other's workforce development–related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team will develop a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system

across the state. This CIP will be presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs will be made available to the SWIB by the SAM Team and an annual update will be provided to the SWIB regarding system measurements under the CIP. DLI, in cooperation with the SWIB and other WIOA parnters, will use information gleened from the business engagement described above, in conjucntion with labor market data and trends, to define and develop a list of targeted and demand occupations that will be used as the basis for determining client training , employment planning and career development. This list of occupations will be updated annually.

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.

Montana's vision for its workforce system is one in which workforce development occurs via innovation through partner collaboration, integrated service delivery, data analysis and ongoing evaluation and improvement. This system will continue to be a strong supporter of the Governor's Main Street project. This effort creates a dynamic private–public partnership that has built and implemented a 5–pillar business plan for Montana, by Montanans. Those pillars include: Train and Educate Tomorrow's Workforce Today. 1. Create a Climate that Attracts, Retains and Grow Businesses. 2. Build upon Montana's Economic Foundation. 3. Market Montana. 4. Nurture Emerging Industries and Encourage Innovation. Vocational Rehabilitation and Blind Services (VRBS) and Adult Basic Education (ABE) will align with other workforce programs. And partners will better understand industry training needs in the state's local economies and will increase promotion of training services available to employers through Job Service offices including Incumbent Worker Training, Apprenticeship, OJT and soft skills training.

2. GOALS

Describe the goals for achieving this vision based on the above analysis of the State's economic conditions, workforce, and workforce development activities. This must include—

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

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

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

Montana's workforce system goals include: Continuing to tap what have historically been considered non–traditional labor pools; Streamlining duties of local service providers to allow holistic focus on the goals of WIOA; Devising an employer engagement strategy that includes all partners including local workforce organizations that operate outside the State's Workforce Development System, and is not solely built on collecting job postings; Understanding customer needs and expectations and acknowledging that while employment is the goal, our value to customers cannot always and only be measured in those terms; Ensuring that career planning is a central piece of our integrated service delivery model; Automating ongoing customer intake to better evaluate customer data and help drive more effective and consistent service delivery; Performing better data analysis to evaluate customer needs and system efforts, set better expectations, and increase overall situational understanding; Gain better understanding of local workforce needs and initiatives through local workforce organizations that operate outside the State's Workforce Development System; and Help direct resources to local workforce initiatives and organizations that are employer focused and collaborative which operate the State's Workforce Development System. Montana's workforce system will generally achieve these goals by engaging with and empowering: The State Workforce Innovation Board which brings together private employers and workforce service and education & training providers; State government leadership; A State Agency Management team made up of state agency core program managers and other workforce partners; Local partner management teams that include Community Management Teams, Job Service Employer Committees, Business Expansion And Retention committees, Key Industry Network groups, Chambers of Commerce, Economic Development Corporations, Small Business Development Councils, Tribal Councils and others; Local one stop delivery teams that ensure service delivery staff are properly trained, adequately equipped, and able to effectively engage customers to provide proper and just–in–time workforce solutions; and Local workforce organizations that operate outside the State's Workforce Development System through cooperative agreements or a memorandum of understanding (MOU).

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.)

Montana's labor market is currently facing unique circumstances and entering a sustained period of low labor supply, or in other words, a worker shortage. As of September 2015, Montana's statewide unemployment rate was 4.1%, and has hovered around this level for several months. Going forward, the Montana Department of Labor and Industry Research and Analysis Bureau (DLI R&A) projects declining unemployment rates. Multiple factors will compound to make the worker shortage more severe including a large wave of retirements among the baby boomer generation, a relatively small number of young people entering the labor force, and a healthy pace of employment growth throughout. DLI projects approximately 6,400 jobs added per year in Montana while the labor force is expected to grow by only 4,100 workers. As a result, unemployment rates are expected to decline to levels below 2% within ten years. Low unemployment rates and a worker shortage will benefit workers by making it easier to find jobs and increase wages. Additionally, employers struggling to find workers will be more willing to pay the costs to train the workers they need on their own. For these reasons, the average worker that qualifies for and utilizes WIOA program resources is more likely to have more significant barriers to employment than in a period of normal labor supply. Due to the more significant barriers that will need to be overcome, the population of workers that WIOA programs will serve will have more difficulty obtaining and retaining employment after program exit. For these reasons, the proposed performance measures are expected to be slightly lower than their historical averages. In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, Workforce Investment Act data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best-guess estimates and will likely change as more guidance is received. Without any precedent for gauging the effectiveness of employer services, Montana will test new measures to fill this need. For the Title III program, in the upcoming low-unemployment environment, we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses. Montana's core partners will collaboratively work with employers to identify their training and skill set needs and match their needs with clients from Job Service, community-based organization and agency partners. On top of training quality employees, DLI serves employers in many other ways. Assistance with recruitment and retention, comprehensive/customizable applicant testing, information and training on employment laws, information on establishing fair pay rates, and many other services are all offered by DLI to employers to improve and streamline the process of finding employees. To measure the effectiveness of serving employers directly, each year DLI will report a four-quarter average of the share of total employers served. To calculate this, the numerator will be the number of unique Montana employers that were provided services and the denominator will be the quarterly average of the number of establishments in the state, as reported by the Unemployment Insurance program. The four-quarter average will be used to obtain a more stable estimate of employer counts due to the constant fluctuation of businesses opening and closing as well as the seasonality of hiring and layoffs. This performance measure will provide an estimate of the level of outreach and employer assistance activities while accounting for changes in the size of Montana's economy. For the Titles I,

II, III and IV programs, employment retention will measure effectiveness in serving employers. Preparing clients to be reliable employees in the workplace, measured by job retention, can indicate how well employers are being served by these programs.

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.

To ensure workforce system effectiveness, Montana will organize a State Agency Management (SAM) Team for Workforce Development. Meetings will be held on a quarterly basis, or more frequently if needed. SAM Team meetings will be facilitated and agenda–based. Required team members will include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner–Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership will include representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor's Office of Economic Development. Additional members will be invited to join the team as necessary and relevant. Team members will be expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One–Stop certification process; act as an advisory group to each member's SWIB representative; act as advisors to each other's workforce development–related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team will develop a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system across the state. This CIP will be presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs will be made available to the SWIB by the SAM Team and an annual update will be provided to the SWIB regarding system measurements under the CIP.

C. STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. DESCRIBE THE STRATEGIES THE STATE WILL IMPLEMENT, INCLUDING INDUSTRY OR SECTOR PARTNERSHIPS RELATED TO IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AND CAREER PATHWAYS, AS REQUIRED BY WIOA SECTION 101(D)(3)(B), (D). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7). "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23).

The mission of the Montana State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight. The SWIB will accomplish this through the following actions: Making policy recommendations for the Governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible Leading the strategic planning process for an integrated workforce development system, in consultation with Community Management Teams and local workforce organizations outside the State's Workforce Development System Creating performance standards that identify effective workforce development initiatives; coordinating the state's workforce innovation initiatives with the state's economic development plan Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce Encouraging public/private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System Reviewing local adult education proposals to offer recommendations for workforce alignment Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The SWIB is comprised of a majority of business leaders in the State of Montana, who are stakeholders in attaining quality outcomes for workforce and economic development initiatives. These private industry representatives, along with public and workforce representatives, play a vital role in ensuring that employers have access to a prepared workforce and that job seekers are able to access services, resources and training that will enable them to obtain employment. The standing committees of the State Workforce Innovation Board include: the Executive Committee, WIOA Committee, Apprenticeship/On–the–Job Training/Career Pathways Committee, Sector Strategies Committee, and the Youth Services Committee. These committees conduct business as an advisory body to the Governor on statewide workforce system issues, as well as to assume responsibility for performing all WIOA local workforce board duties. Executive Committee: The Executive Committee is comprised of the officers and no more than ten at–large representatives, and is composed of a majority of business members. The at–large representatives of the Executive Committee shall be members of the SWIB and are appointed by the chair. The Executive Committee leads the SWIB workgroups and has the authority to act on behalf of the SWIB. The Executive Committee's responsibilities are to: oversee implementation of the strategic plan; track workgroup plans and progress; offer leadership around alignment of workgroups; offer leadership around leveraging system partners; and drive the provision of critical workforce data. WIOA Committee: The WIOA Committee is charged with ensuring compliance with the applicable WIOA laws and regulations governing the Title 1B Adult, Youth and Dislocated Worker programs, and to bring policy issues and recommendations to the Governor and SWIB. Apprenticeship/On–the–Job Training/Career Pathways (AOC) Committee: The AOC Committee focuses on training and educational models that provide the current and future workforce with opportunities that are responsive and aligned with new and changing economies. Such opportunities emphasize "earn while you learn" models while meeting employers' needs immediately (i.e. on–the–job training,

apprenticeship, work–based learning) and using skills upgrading as a strategy to re–build declining economies. The committee is also responsible for bringing policy issues and recommendations to the Governor and SWIB. Sector Strategies Committee: The Sector Strategies Committee works to develop a deeper understanding of the interrelationships between business competitiveness and the workforce needs of target industries, crafting workforce–tailored solutions for those industries and their specific regions. The committee also brings policy issues and recommendations to the Governor and the SWIB. Youth Services Committee: The Montana SWIB and Youth Services Committee provide leadership by serving as a catalyst to connect out–of–school youth and at–risk youth with quality secondary and post–secondary educational opportunities and high–growth and other employment opportunities. The SWIB and Youth Services Committee will ensure that workforce youth activities complement and reinforce academic and occupational curriculum, as youth policy–makers and system builders.

To address sector strategies and integrate with the Governor's already-in-action Main Street Montana key industry networks initiative, DLI, in cooperation with the SWIB and other WIOA partner's, will use information gleaned from the business engagement described above, in conjunction with labor market data and trends, to define and develop a list of targeted and demand occupations that will be used as the basis for determining client training , employment planning and career development. This list of occupations will be updated annually.

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

As implementation of WIOA continues, Montana's core partners will continue to strengthen relationships that benefit mutual customers, identify customers (across programs) whose skills sets match employers' workforce needs, and align resources to promote efficiency and economy of scale. Montana's Job Service offices, community based–organizations, Adult Basic Education (ABE), and Vocational Rehabilitation and Blind Services (VRBS) will align services and work together to serve employers. Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – a number of discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded $14.9 million to create access to health care training in rural areas. Three full–time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates. Another TAACCCT grant awarded to Montana is RevUP. This $24.9 million grant promotes energy and advanced manufacturing careers in the state through a partnership among 13 community colleges and DLI. Funding supports infrastructure and capacity–building at the colleges, along with development of career pathways and credential and certification attainment. The grant is also developing "on and off ramps" so workers can leave and return to higher education at different stages of their careers. A Job Driven NEG grant was subsequently awarded to provide training dollars for eligible participants to be trained in the RevUP occupations. The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF, SNAP, Career and Technical Education, Economic Development, Job Corps and other youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan. Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners – and their customers – benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce services at Job Service offices or community based organizations that support their employment goals. Partners are also working together to strengthen the coordination of services to employer customers. The Job Service often takes the lead and partners educate employers on the value of hiring diverse populations and discuss work–based opportunities, including Registered

Apprenticeship and on–the–job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies. Montana was awarded a $70,000 two–year grant to develop a statewide business engagement plan. The grant was intended to improve business engagement performance through the delivery of enhanced business–focused services. Specific goals of the grant were to: increase market penetration; increase repeat business of employer customers at Job Service offices; increase the fill rate on job orders; reduce the number of days to fill job orders; enhance the data system to allow better reporting; and increase business customer satisfaction. Services to businesses increased significantly during the initiative – from 12,008 business contacts made in the year prior to the grant – to 35,571 contacts in the second year of the grant. The Job Service's Business Services Program performance was also enhanced, through stronger awareness by staff of the need for outreach businesses, staff training, development of tools and resources, and enhancement of the database used to record services to employer customers. Alignment with Education Montana partners have several initiatives that involve educational institutions, both secondary and post–secondary, as described below. Big Sky Pathways – Office of Public Instruction specialists and post–secondary staff from across the state that work with industries and secondary and post–secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities. Adult Pathways – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post–secondary education. An adult pathway consists of activities to overcome workforce barriers by bringing together industries, community services, government agencies, post–secondary education to identify, enroll and prepare career–limited adults for high–demand career opportunities. Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post–secondary training. In addition, the Carl Perkins Program Manager and ABE Director co–chair the Moving Pathways Career Pathways Forward Interagency State Team Project. When the request for proposals for ABE providers is released in 2017, all post–secondary institutions will be encouraged to apply. Dual Enrollment – High school students have the opportunity to enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at 50% off regular rates at Montana's colleges, and mandatory fees are waived. In some cases, the courses are free for high school students. Carl Perkins – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post–secondary studies. At the post–secondary level, career and technical education (CTE) programs help young adults preparing for first–time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two–year post–secondary institutions are characterized by their close relationship with employers and smooth transitions of program participants into the workforce at higher levels of income and employment success. Montana's Efforts to Enhance Job Seekers' Ability to Attain Post–Secondary Credentials Montana has several initiatives in place to promote attainment of post–secondary credentials, as described below. Complete College Montana is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to

increase their annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses. Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full–time enrollment and utilizing incentive–based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year–round attendance models. Prior Learning Assessment is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners. RevUP Montana is a $25 million workforce initiative to help address skill gaps and reduce the cost of career and technical education. RevUP has catalyzed several programmatic reforms within a variety of occupational areas, including welding, fabrication, industrial maintenance, machining, industrial electronics, commercial drivers, energy technology, diesel technology and entrepreneurship. At each college within the RevUP Montana consortium, a Workforce Navigator is employed. These staff are charged with recruiting, retaining and placing RevUP participants, and are actively engaged at Montana's Job Service offices. RevUP also seeks to promote a closer relationship between DLI and the two–year colleges, to create one unified workforce development system in Montana. Additionally, RevUP is exploring opportunities and current gaps in skills of incumbent workers to ensure employers have the trained workforce they need. Finally, RevUP Montana seeks systemic efficiencies in learning by allowing students seamless access to hybrid and online courses that may be available from other institutions. As noted earlier, the RevUP discretionary grant has expanded Montana's capacity to meet the workforce needs of businesses in growth sectors, while preparing the workforce for these job opportunities. This is one of the many ways Montana has leveraged resources to maximize the value of the workforce, education and economic development systems within the state. HealthCARE Montana discretionary grant is another multi–partner initiative that is strengthening the two–year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with particular attention to adult learners (especially in rural areas) and to veterans. Alignment of Education, Workforce and Economic Development Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of employers. Several models are already in place; future plans to promote success through alignment include: Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and employers Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between employers and the educational system Providing a continuum of training and credential opportunities that promote career advancement Meeting local and unique training needs of high–demand industries, including health care, energy and technology The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The state also seeks to promote community colleges, two–year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of employers in formal curriculum development and supporting continued expansion of comprehensive two–year education, with a focus on workforce development, access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurism in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local employers, upon request. These teams have evaluated grant requests for Montana's small business

Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

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 mission of the Montana State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training, and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.

Montana's State Workforce Innovation Board Chair is appointed by the Governor, and the board works through a committee structure. Committees include an executive committee (appointed by the board chair), three standing committees, and ad hoc taskforces that convene around topic-specific issues, recommendations from the Governor's Main Street Montana Key Industry Networks, and the established priorities of the SWIB. The board conducts at minimum 2 in-person meetings per year, typically taking place in the fall and spring. Additional meetings may be convened as deemed appropriate by the Chair in consultation with the Director of the SWIB and the Commissioner of Labor and Industry to address special issues. Committee and task force meetings makes use of electronic communication. Meeting notes are posted on the State Workforce Innovation Board website (swib.mt.gov).

The SWIB will implement its functions under section 101(d) of WIOA by doing the following: ? Making policy recommendations for the governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible; ? Leading the strategic planning process for an integrated workforce development system, in consultation with Community Management Teams and local workforce organizations outside the State's Workforce Development System; ? Creating performance standards that identify effective workforce development initiatives; coordinating the state's workforce innovation initiatives with the state's economic development plan; ? Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce; ? Encouraging public/private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System; ? Reviewing local adult education proposals to offer recommendations for workforce alignment; ? Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement; and ? The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs.

SWIB is implementing the following to ensure it meets its priorities as listed above: ? Reconfiguration of SWIB's standing committees to better carry out its duties and responsibilities. The new subcommittees are as follows: o Executive Committee: ? The committee will be composed of a majority of business members, but shall include the Governor or their designee, and the cabinet officer from the Department of Labor & Industry. This committee may also include the cabinet officers from other relevant state departments responsible for workforce development initiatives. ? This committee will have the authority of the SWIB when SWIB action is required. ? Duties will include, but are not limited to overseeing the implementation of the strategic plan; tracking workgroup plans and progress; offering leadership around the alignment of workgroups; offering leadership around leveraging system partners; and driving provisions of critical workforce data. o

WIOA committee: ? Will be responsible for understanding and making decisions on WIOA rules and regulations; guiding the development of Workforce Innovation Board's strategic plans; administering the state's "One-Stop" Certification Process; and coordinating and implementing the state plan. o Recruitment and Retention committee: ? Will be responsible for guiding the development of programs designed to support the following programs and populations: ? Youth; ? Workers with Disabilities; ? Veterans; ? Re-Entry Programs; and ? Native Americans. o Education and Training Committee: ? Will be responsible for guiding the development of programs supporting: ? Apprenticeship Programs; ? Jobs for Montana's Graduates Program; ? Work-Based Learning Programs; and ? Montana University System Partnership Programs. o In addition to the realignment of the SWIB Committees, the board will continue to authorize and create other ad hoc committees to meet objectives for statewide initiatives. ? The State of Montana's SWIB is designing a comprehensive, competitive "One-Stop" Operator application process. The application will require applicants to submit comprehensive and robust data about all services, partnerships, technology, accessibility, outreach, and community management teams. o Once the application process is complete the SWIB will use the information provided through its application process to assess gaps and barriers in services throughout the state and work with state agencies, partner organizations, regional stakeholders, and businesses to make recommendations to the Governor and agencies on how best to fill the gaps and barriers to employment for Montanans. ? The State of Montana's SWIB is a key partner in the implementation of workforce-based recommendations from a 2014 study entitled, Main Street Montana, which was initiated by the Governor's Office and conducted by high-level CEO's. The goal of the project is to create a dynamic public-private partnership to build and implement a business plan for Montana by analyzing Montana's overall workforce economy. Over 3,000 Montanans provided input for the study, and the SWIB responsible for implementing strategy leading to the development of policy and programs designed respond to industry workforce related recommendations from the Main Street Montana Project.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

The Research and Analysis Bureau of the DLI provides online access to labor market information and data at http://lmi.mt.gov. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O*Net database. Each job seeker will create an e–portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs. State Program and State Board Oversight As noted earlier, the State Workforce Innovation Board (SWIB) provides active support for the Governor's and key state agencies' goals and initiatives. The SWIB membership roster is included in Appendix 2. SWIB Staff Involvement in the Workforce System The SWIB Director and staff are employed within the Montana Department of Labor and Industry (DLI), through a Memorandum of Understanding. Organizationally, they are part of the Workforce Initiatives Section in the DLI Workforce Services Division. SWIB staff: provide administrative activities for the board; consult with business, educational institutions and related entities to facilitate workforce development opportunities; disseminate information regarding program efforts; perform research and analysis of new education and training initiatives; and build support and cooperation for program initiatives. The State Workforce Plan was thoroughly vetted before submission. The SWIB solicited input and suggestions from State Board members, appropriate state agency personnel, including the following partners, as well as members of the public and other interested parties. DLI's Workforce Services Division Department of Public Health and Human Services Department of Commerce Governor's Office Office of Public Instruction SWIB members attended state plan development meetings with agency partners, as well as formally reviewed draft pieces of the plan throughout the development and writing processes. The plan, both sections and in its entirety, was featured on several SWIB meeting agendas. The SWIB took action to formally approve the Montana Combined State Workforce Plan on February 23, 2016. The SWIB and Core Partnerships The Workforce Services Division within DLI is responsible for administering WIOA Title I and Wagner–Peyser programs, as well as the following programs: Trade Adjustment Assistance Work Opportunity Tax Credit State Registered Apprenticeship State Displaced Homemakers Migrant and Seasonal Farmworkers Senior Community Services Employment Program Foreign Labor Certification Federal Bonding National Emergency Grants Montana's Incumbent Worker Program Jobs for Montana's Graduates Labor

Market Information The Job Service Operations Bureau along with community–based organizations coordinates and guides the delivery of workforce development services in local communities, in coordination with the SWIB. There is also active coordination of Registered Apprenticeship with Job Service offices, and there are plans to coordinate Job Corps services with Registered Apprenticeship and the other services offered at Job Service offices. Vocational Rehabilitation (VR) programs fall under the direction of the Montana Department of Public Health and Human Services (DPHHS). This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service to the SWIB, DPHHS is also a signatory partner of the state One–Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. In addition to supporting the efforts of the Job Service offices, a member of the SWIB is also designated to serve on the State Board Vocational Rehabilitation Advisory Council to ensure systemic alignment of shared priorities. VR provides training to their partners on their services, in addition to actively sharing their expertise to ensure all customers are served effectively – including veterans, customers with disabilities and Montana's American Indian population. Adult Basic Education (ABE) programs fall under the direction of the Montana Office of Public Instruction. This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service to the SWIB, the Office of Public Instruction is also a signed partner of the state One–Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. Additionally, ABE coordinates the Interagency Career Pathways group. Members of this group include, but are not limited to, representatives from various workforce partners such as ABE, DPHHS, DLI, SWIB staff, the Governor's Office and the Montana University System.

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.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary.Coordination of all activities related to the workforce system is a priority for MT. Strategies we are implementing to ensure alignment include: 1. SWIB sub-committees and Board receiving updates and information on workforce system activities, programs, grants, projects, to allow recommendations to state agencies on collaboration; 2. The State Agency Management (SAM) Team that is mentioned in several sections of this Plan brings high level department leadership from multiple state agencies that administer education, workforce, and economic development programs, including grants and special projects. The SAM team will meet regularly to ensure communication and alignment of efforts across agencies.

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.

As implementation of WIOA continues, Montana's core partners will continue to strengthen relationships that benefit mutual customers, identify customers (across programs) whose skills sets match employers' workforce needs, and align resources to promote efficiency and economy of scale.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One-Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's certified One-Stop Centers to address the needs of the population within Montana's vast geographic expanse. Montana currently has 19 active CMTs in communities throughout the state. The CMTs will provide the local, community voice to the State Workforce Innovation Board (SWIB). The SWIB will work with CMTs and One-Stop operators to certify One-Stops under the WIOA and SWIB regulations.

Montana's Job Service offices, community based–organizations, Adult Basic Education (ABE), and Vocational Rehabilitation and Blind Services (VRBS) will align services and work together to serve employers. Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – a number of discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded $14.9 million to create access to health care training in rural areas. Three full–time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates.

Another TAACCCT grant awarded to Montana is RevUP. This $24.9 million grant promotes energy and advanced manufacturing careers in the state through a partnership among 13 community colleges and DLI. Funding supports infrastructure and capacity–building at the colleges, along with development of career pathways and credential and certification attainment. The grant is also developing "on and off ramps" so workers can leave and return to higher education at different stages of their careers. A Job Driven NEG grant was subsequently awarded to provide training dollars for eligible participants to be trained in the RevUP occupations.

The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF,

SNAP, Career and Technical Education, Economic Development, Job Corps and other youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan.

Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners – and their customers – benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce services at Job Service offices or community based organizations that support their employment goals.

Alignment with Education

Montana partners have several initiatives that involve educational institutions, both secondary and post–secondary, as described below.

Ø **Big Sky Pathways** – Office of Public Instruction specialists and post–secondary staff from across the state that work with industries and secondary and post–secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities.

Ø **Adult Pathways** – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post–secondary education. An adult pathway consists of activities to overcome workforce barriers by bringing together industries, community services, government agencies, post–secondary education to identify, enroll and prepare career–limited adults for high–demand career opportunities.

Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post–secondary training. In addition, the Carl Perkins Program Manager and ABE Director co–chair the **Moving Pathways Career Pathways Forward Interagency State Team Project**. When the request for proposals for ABE providers is released in 2017, all post–secondary institutions will be encouraged to apply.

Ø **Dual Enrollment** – High school students have the opportunity to enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at 50% off regular rates at Montana's colleges, and mandatory fees are waived. In some cases, the courses are free for high school students.

Ø **Carl Perkins** – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post–secondary studies.

At the post–secondary level, career and technical education (CTE) programs help young adults preparing for first–time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two–year post–secondary institutions are characterized by their close relationship with employers and smooth transitions of program participants into the workforce at higher levels of income and employment success.

Montana's Efforts to Enhance Job Seekers' Ability to Attain Post–Secondary Credentials

Montana has several initiatives in place to promote attainment of post–secondary credentials, as described below.

Ø **Complete College Montana** is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to increase their annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses.

Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full–time enrollment and utilizing incentive–based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year–round attendance models.

Ø **Prior Learning Assessment** is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners.

Ø **RevUP Montana** is a $25 million workforce initiative to help address skill gaps and reduce the cost of career and technical education. RevUP has catalyzed several programmatic reforms within a variety of occupational areas, including welding, fabrication, industrial maintenance, machining, industrial electronics, commercial drivers, energy technology, diesel technology and entrepreneurship.

At each college within the RevUP Montana consortium, a Workforce Navigator is employed. These staff are charged with recruiting, retaining and placing RevUP participants, and are actively engaged at Montana's Job Service offices.

RevUP also seeks to promote a closer relationship between DLI and the two–year colleges, to create one unified workforce development system in Montana. Additionally, RevUP is exploring opportunities and current gaps in skills of incumbent workers to ensure employers have the trained workforce they need. Finally, RevUP Montana seeks systemic efficiencies in learning by allowing students seamless access to hybrid and online courses that may be available from other institutions.

As noted earlier, the RevUP discretionary grant has expanded Montana's capacity to meet the workforce needs of businesses in growth sectors, while preparing the workforce for these job opportunities. This is one of the many ways Montana has leveraged resources to maximize the value of the workforce, education and economic development systems within the state.

- **HealthCARE Montana** discretionary grant is another multi–partner initiative that is strengthening the two–year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with particular attention to adult learners (especially in rural areas) and to veterans.

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.

Partners are also working together to strengthen the coordination of services to employer customers. The Job Service often takes the lead and partners educate employers on the value of hiring diverse populations and discuss work-based opportunities, including Registered Apprenticeship and on-the-job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies.

Montana was awarded a $70,000 two-year grant to develop a statewide business engagement plan. The grant was intended to improve business engagement performance through the delivery of enhanced business-focused services. Specific goals of the grant were to: increase market penetration; increase repeat business of employer customers at Job Service offices; increase the fill rate on job orders; reduce the number of days to fill job orders; enhance the data system to allow better reporting; and increase business customer satisfaction. Services to businesses increased significantly during the initiative - from 12,008 business contacts made in the year prior to the grant - to 35,571 contacts in the second year of the grant. The Job Service's Business Services Program performance was also enhanced, through stronger awareness by staff of the need for outreach businesses, staff training, development of tools and resources, and enhancement of the database used to record services to employer customers.

<u>Alignment of Education, Workforce and Economic Development</u>

Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of employers. Several models are already in place; future plans to promote success through alignment include:

Ø Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and employers

Ø Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between employers and the educational system

Ø Providing a continuum of training and credential opportunities that promote career advancement

Ø Meeting local and unique training needs of high-demand industries, including health care, energy and technology

Ø The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs

The state also seeks to promote community colleges, two-year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of employers in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development, access and academic progression.

Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurism in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local employers, upon request. These teams have evaluated grant requests for Montana's small business Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

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).

Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of employers. Several models are already in place; future plans to promote success through alignment include: Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and employers Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between employers and the educational system Providing a continuum of training and credential opportunities that promote career advancement Meeting local and unique training needs of high–demand industries, including health care, energy and technology The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The state also seeks to promote community colleges, two–year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of employers in formal curriculum development and supporting continued expansion of comprehensive two–year education, with a focus on workforce development,

access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurism in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local employers, upon request. These teams have evaluated grant requests for Montana's small business Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

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.

See Section G immediately following this section.

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).

Because of Montana's rural demographics and restricted budget, integrated education and training in the purist sense is not realistic. A rural approach to integrated education and training in conjunction with English Literacy and Civics Education is required. Programs serving a very small number of ELA students with varied abilities, career interests, and educational backgrounds, with little opportunity for integrated education and training, will work with the local workforce system to integrate workforce preparation into their existing English literacy and civics program. Eligible providers serving ELA students will be required to include career pathway instruction into their English Language Literacy and Civics Program. The career pathway activities must be tailored for the student's functioning level and meet regional workforce needs. ELA workplace curriculum must include student career planning within the MCIS/PEP Talk and all necessary activities that support student transition to employment, postsecondary, or training. ELA students will have the opportunity to be part of a career pathway, which includes at lower levels, career–infused components such as contextualizing instruction around high demand job clusters in the area and integration of work readiness skills, career awareness, and career planning.

State leadership funds will support the alignment of AE activities with those of other core partners to promote career pathways that will provide student access to employment and training services. The state will ensure eligible providers' integration of pathway instruction through a variety of funded activities. First, the state will collaborate with core partners to provide regional and statewide conferences and trainings.

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways will be the manner in which leadership dollars will align with the work of our

core partners. This collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. Secondly, the state will support the eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one–stop partners to help AE programs identify the components of job–driven training that needs to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands. Thirdly, the state will use funds to develop templates and identify resources that support a systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation.

State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction related to the specific needs of adult learners. Leadership activities in the components of reading will be used to create the foundation for adults to develop the skills for reading from complex text in postsecondary education and employment. Instruction in the essential components of reading will be made available to all programs through various venues depending needs of the individual program staff. Student information system data will be used to determine instructional needs in reading. The state will contract with reading experts to bring job–embedded professional development. Teachers will be required to participate in reading professional development that blends face–to–face and technology.

The state will also contract for services with individuals to bring research–based activities that support adult learners in other content areas and workforce learning activities. Program data will inform the state on promising instructional practices and effective instructional strategies. The state will use this information to disseminate information about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs having data that shows successful student exit trends will be provided with funds for to prepare workshops and regional trainings to share instructional strategies and activities that are positively impacting student outcomes.

The state recognizes the importance of students' acquiring 21st century work place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance will be available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance will be offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor will be selected based on their ability to provided rigorous, research–based content that will promote program improvement.

Working with one–stop partners to provide student access to education and training services will be a priority. Technical assistance may also be available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state will require each program to conduct monthly audits to evaluate students' pre–posttest gains, retention, pathway activities, and student exit outcomes. The state will use the monthly audits to evaluate program effectiveness. As documented evidence indicates a programs' ability to meet the learner needs, the state will conduct further investigation to determine what unique factors are contributing to the programs' continued success. If there emerges a model that can be replicated by other programs the state will use leadership funds to disseminate information about the specific model that appears to be a promising practice.

The state will also conduct regularly scheduled on site monitoring to gather additional information about the eligible providers' successes in equipping students with skills needed for seamlessly transitioning from AE to employment, postsecondary, or training. A monitoring tool will be used to guide the onsite monitoring; an onsite monitor will review student files, data entry protocol, and overall adherence to WIOA requirements. The onsite monitor will also conduct student and staff interviews using a template designed to capture the providers' alignment with core partners and implementation of career pathways. The desk audit coupled with results from the onsite monitoring will be used to evaluate the quality and improvement of adult education and literacy activities across the programs. They will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who are implementing innovative practices that were not readily captured in the monthly desk audit.

Desk audits and onsite monitoring results will also be used to identify priorities for funding permissible activities. Combined these two activities will provide the state information on the eligible provider's implementation of the state–adopted content standards, teacher quality, and the systemic approach to student transition. These will be the high priorities for permissible funds if program analysis indicates providers are facing challenges.

All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided MT AE Unit at the Office of Public Instruction. The state will provide continuing education units for teachers that will be tracked in the state student information system.

The state will work in collaboration with core partners to develop strategies for student retention and to provide assistance to eligible providers in developing and implementing the objectives of Title II of WIOA, as learner education gains and enhancement of employability skills will increase the success of clients across all core programs. This collaboration may require use of permissible funds.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

The state will fund local providers that can provide services to adults 16 years and older, not enrolled in secondary school, to include adult education and literacy services, peer tutoring, career pathways, and concurrent enrollment.

Providers must provide evidence of activities with other education institutions, local workforce partners, and agencies that support student career pathways. The MCIS/PEP Talk will be the common career planner used in adult education programs in order to share student career pathway information across agencies. The common career planning tool will be a resource in every AE program.

Beyond assisting students for attainment of a measureable skill gain, achieving a high school equivalency or postsecondary credential, or entering a career pathway, eligible providers must demonstrate that they have established cross–agency partnerships to help students navigate system challenges (completing applications, writing resumes, scheduling campus visits, etc.) that can be barriers to success. Providers must be willing to cooperate with agency partners to provide the wrap–around services common clients will require.

Through ongoing labor market analysis all providers will have an awareness of regional labor market needs to provide teachers with a working knowledge of regional career opportunities. Providers must be able to disclose their methodology for ensuring that employer and labor market needs are helping drive their instructional practice.

Allocations for providers will be awarded by a funding formula that recognizes the components of an effective AE program (WIOA Statewide Performance Report). Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Cost per student will be a consideration in awarding eligible providers; eligible providers will provide documentation of cost per student to demonstrate program effectiveness. Grant award preference will be given to providers that can demonstrate that instructional services will be delivered cost effectively to a reasonable number of students, and that they can make themselves readily available to core partners for necessary core–partner wrap around services. Consortium applications are encouraged to assist providers in meeting the cost benefit expectations and core partner collaboration.

Through partnership with RevUP, hired a post-employment training director to work with employers to establish training that results in post-secondary, industry recognized credentials, including those in pathways and stacked credential programs developed through RevUp. In addition, Montana Univerity System (MUS) and DLI have hired a joint position (funded by both agencies) to expand alignment between the workforce system and higher education. His work is directly related to increased credentials, apprenticeship registrations, and IRCs.

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.

Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurism in industries that support existing businesses. An important example of this work is the alignment of the Governor’s Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local employers, upon request. These teams have evaluated grant requests for Montana’s small

business Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

Montana has in the past and continues to operate as a single workforce area with one planning region and three workforce regions. Given the state's vast geography, low population and tri-agency structure housing the WIOA core programs, each partner issues policy to their local service sites. However, with the passage of WIOA, the core partners, human services, education and economic development partners are working more closely together than ever to ensure that services are coordinated and aligned, including participation in partners' conferences and joint strategy-planning activities.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One-Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services.

Community service includes worksites in economic development. Economic development is part of the one-stop system and are often members of the Community Management Teams in several areas across the state including the more rural locations in Montana. SCSEP staff are also part of the Community Management Teams in this areas which presents them the opportunity to provide information to and recruit community service worksites through local economic development.

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 Research and Analysis Bureau of the DLI provides online access to labor market information and data at http://lmi.mt.gov. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O*Net database. Each job seeker will create an e–portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.

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

Currently, Montana has no common reporting system between all programs to produce reports required by WIOA. Until such a system is created, each individual program will provide program data to Montana's DLI Research and Analysis Bureau (R&A), where analysts will produce the reports required for WIOA. R&A has experience matching participant records with state Unemployment Insurance wage records, higher education enrollment and completion records, as well as occupational licensing data. These matches will provide enhanced data for the programs while upgrades to case management systems are made to allow data collection that meets reporting requirements. Along with completing the administrative records–matching, R&A will compile the data into the PIRL format and calculate the performance measures for the final reports based on the performance report template. Using R&A as a centralized hub for generating performance reports will provide consistency in reporting across programs and allow for the interchange of demographic and background data between programs. This process will allow for the most descriptive and consistent data to be used in producing the required performance reports.

* 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.

DLI publishes and maintains a WIOA policy manual that provides guidance regarding the operation and service delivery of WIOA programs in keeping with state and federal laws and regulations: http://wsd.dli.mt.gov/wia/wiamanual_coverpage.asp.

DPHHS maintains guidance on WIOA as it pertains to VR programs: http://dphhs.mt.gov/detd/vocrehab.

OPI maintains guidance on WIOA as it pertains to ABE programs: http://opi.mt.gov/Programs/CTAE/ABE.html.

As all core partners begin to operationalize WIOA we have agreed and will work to develop integrated guidance that speaks in one voice, on behalf of all partners, to all WIOA programs and services. However, given the enormity of program changes (particularly for VR) and the timeline of state plan submission, that effort is in concept–form.

For ongoing, updated or new guidance, the WIOA core partner agencies and the State Workforce Innovation Board (SWIB) would be responsible for drafting, publishing and coordinating those, to include policy guidance, service delivery strategies, program and related measurements and funding.

MT has no local workforce areas so the responsibility for coordinating and communicating with CEO's, workforce program contractors, and other local workforce and economic development partners falls to state WIOA core partners and SWIB.

All state plan modifications will be, as was the case for the full original WIOA combined state plan, be routed through WIOA partners, SWIB, and the Governor for review, comment and approval.

The State and its one-stop partners, in conjuction with SWIB, over the course of the next year will develop guidelines for State-administered program contributions to the one-stop system including guidelines that establish program benchmarks, processes to gauge that performance, cost-sharing methodologies and triggers, and joint policy development and distribution processes.

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.

Workforce Services Division within DLI is responsible for administering WIOA Title I and Wagner–Peyser programs, as well as the following programs: Trade Adjustment Assistance Work Opportunity Tax Credit State Registered Apprenticeship State Displaced Homemakers Migrant and Seasonal Farmworkers Senior Community Services Employment Program Foreign Labor Certification Federal Bonding National Emergency Grants Montana's Incumbent Worker Program Jobs for Montana's Graduates Labor Market Information The Job Service Operations Bureau along with community–based organizations coordinates and guides the delivery of workforce development services in local communities, in coordination with the SWIB. There is also active coordination of Registered Apprenticeship with Job Service offices, and there are plans to coordinate Job Corps services with Registered Apprenticeship and the other services offered at Job Service offices. Workforce uses an automation system called MWorks to implement and track programs and services.

Vocational Rehabilitation (VR) programs fall under the direction of the Montana Department of Public Health and Human Services (DPHHS). This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service to the SWIB, DPHHS is also a signatory partner of the state One–Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. VR provides training to their partners on their services, in addition to actively sharing their expertise to ensure all customers are served effectively – including veterans, customers with disabilities and Montana's American Indian population. VR uses an automation system called MACS (and for other DPHHS programs, CHIMES) to implement and track programs and services.

Adult Basic Education (ABE) programs fall under the direction of the Montana Office of Public Instruction. This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service to the SWIB, the Office of Public Instruction is also a signed partner of the state One–Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. Additionally, ABE coordinates the Interagency Career Pathways group. Members of this group include, but are not limited to, representatives from various workforce partners such as ABE, DPHHS, DLI, SWIB staff, the Governor's Office and the Montana University System. ABE uses an automation system called MABLE to implement and track programs and services.

MT has no local workforce areas so all functional operations are as single area state coordinated locally via CMT's and other cooperative groups.

The state workforce system a a whole is overseen by the State Workforce Innovation Board (SWIB). SWIB's mission is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.

SWIB membership includes, among others, private sector employers, Labor & Industry, Health & Human Services, and Public Instruction.

Organization charts are not provided here as this platform does not allow for graphical representations.

B. STATE BOARD

Provide a description of the State Board, including—

Provide a description of the State Board, including— The mission of the Montana State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight. The SWIB will accomplish this through the following actions: Making policy recommendations for the Governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible Leading the strategic planning process for an integrated workforce development system, in consultation with Community Management Teams and local workforce organizations outside the State's Workforce Development System Creating performance standards that identify effective workforce development initiatives; coordinating the state's workforce innovation initiatives with the state's economic development plan Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce Encouraging public/private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System Reviewing local adult education proposals to offer recommendations for workforce alignment Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The SWIB is comprised of a majority of business leaders in the State of Montana, who are stakeholders in attaining quality outcomes for workforce and economic development initiatives. These private industry representatives, along with public and workforce representatives, play a vital role in ensuring that employers have access to a prepared workforce and that job seekers are able to access services, resources and training that will enable them to obtain employment.

1. MEMBERSHIP ROSTER

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

Crum, Dave Bioscience Alliance Board 406–750–3361 Private Sector 3324 13th Avenue, South Dave_crum@gfps.k12.mt.us Chair Great Falls, MT 59405

Aarstad, Rich MEA/MFT 406–444–6779 Workforce 225 N. Roberts raarstad@mt.gov PO Box 201201 Helena, MT 59620–1201

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Eychner, Scott Pam Bucy's designee 406–444–2648 seychner@mt.gov

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Byrd, Vicky Executive Director 406–459–2915 Workforce Montana Nurses Association Vicky@mtnurses.org 20 Old Montana State Highway Montana City, MT 59634

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Hammerquist, Kirk Milk River Construction 406–885–2925 Private Sector 470 Kinshella Road windflower.cheri@yahoo.com Kalispell, MT 59901

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Helt, Jacquie SEIU Healthcare 775NW 406–549–5931 or 406–544–9682 Workforce 1042 E. Broadway Jacquie.helt@seiu775.org Helena, MT 59601

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2. BOARD ACTIVITIES

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

The standing committees of the State Workforce Innovation Board include: the Executive Committee, WIOA Committee, Apprenticeship/On–the–Job Training/Career Pathways Committee, Sector Strategies Committee, and the Youth Services Committee. These committees conduct business as an advisory body to the Governor on statewide workforce system issues, as well as to assume responsibility for performing all WIOA local workforce board duties. Executive Committee: The Executive Committee is comprised of the officers and no more than ten at–large representatives, and is composed of a majority of business members. The at–large representatives of the Executive Committee shall be members of the SWIB and are appointed by the chair. The Executive Committee leads the SWIB workgroups and has the authority to act on behalf of the SWIB. The Executive Committee's responsibilities are to: oversee implementation of the strategic plan; track workgroup plans and progress; offer leadership around alignment of workgroups; offer leadership around leveraging system partners; and drive the provision of critical workforce data. WIOA Committee: The WIOA Committee is charged with ensuring compliance with the applicable WIOA laws and regulations governing the Title 1B Adult, Youth and Dislocated Worker programs, and to bring policy issues and recommendations to the Governor and SWIB. Apprenticeship/On–the–Job Training/Career Pathways (AOC) Committee: The AOC Committee focuses on training and educational models that provide the current and future workforce with opportunities that are responsive and aligned with new and changing economies. Such opportunities emphasize "earn while you learn" models while meeting employers' needs immediately (i.e. on–the–job training, apprenticeship, work–based learning) and using skills upgrading as a strategy to re–build declining economies. The committee is also responsible for bringing policy issues and recommendations to the Governor and SWIB. Sector Strategies Committee: The Sector Strategies Committee works to develop a deeper understanding of the interrelationships between business competitiveness and the workforce needs of target industries, crafting workforce–tailored solutions for those industries and their specific regions. The committee also brings policy issues and recommendations to the Governor and the SWIB. Youth Services Committee: The Montana SWIB and Youth Services Committee provide leadership by serving as a catalyst to connect out–of–school youth and at–risk youth with quality secondary and post–secondary educational opportunities and high–growth and other employment opportunities. The SWIB and Youth Services Committee will ensure that workforce youth activities complement and reinforce academic and occupational curriculum, as youth policy–makers and system builders

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.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary

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.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary

Annual WIOA monitoring is conducted by DLI staff for Titles 1 and 3. Performance data for Titles 2 and 4 will be compared annually and a report presented to the SWIB and to the State Agency Management Team to demonstrate programs are meeting performance. If discrepancies are identified, SAM Team, SWIB, and DLI's monitoring team will develop a Technical Assistance Plan across programs and provide continued evaluation.

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.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary

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.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary

As a part of providing services, participant data including social security numbers collected within our secure production database. Economists in the Research & Analysis Bureau of the Montana Department of Labor & Industry then extract the needed data out of the database for the evaluation time period, including the necessary variables for evaluation (such as personal identifiers, services provided, location service provided, type of funding used, or other factors). Using the personal identifying information (most often the social security number), participant data is then matched with wage records from the unemployment insurance program. These wage records provide employment histories for the participants so that the evaluation can determine whether the intervention of a service changed the trajectory of wage growth or led to more consistent employment patterns than what the participant previously experienced. Funding dollars are matched in from a third accounting dataset that tracks payments from the Department to various recipients. If needed, the analysis also utilized unemployment insurance claims data to determine whether the participant made unemployment insurance claims prior to or after the service intervention. Economists also occasionally do more sophisticated analysis, including regression or matching pair analysis, to research the impact of the service on the wages and employment patterns of participants. In addition, outcomes are compiled by location, type of provider, funding source, or type of service to evaluate the efficacy of how services are provided.

The Department of Labor & Industry also has active MOUs with the Departments of Corrections, the Office of the Commissioner of Higher Education, the Office of Public Instruction (adult basic education data only), and private education providers to share data needed for workforce training evaluation. These partners will continue to be important in

providing information on training outcomes that may be needed for the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Throughout this process, the confidential data is managed securely with the data being stored on confidential secure servers at all times. Results of matching is aggregated to protect individualized information, with no cells containing fewer than three individuals or businesses published, even if the data is not expressly protected by data security laws. The analysts conducting the evaluation receive annual confidential data training from the Bureau of Labor Statistics and are BLS-certified agents. The agency strives to maintain similar confidentiality rules and procedures as used by the BLS to build public confidence in data security. In addition, the economists receive annual state-sponsored training in handling health-related data (HIPSA training) and in data security and IT security threats. Matched data is destroyed after use, consistent with recommended data handling procedures.

The Research & Analysis bureau has conducted such research in the past, but is now expanding their capabilities to conduct evaluative research in response to the directives in WIOA and in response to a greater need for information in planning from agency leadership. Additional staff have been hired, and greater direct access to the data has been provided to facilitate more evaluative work with increased depth and scope. Thus far, evaluative work has been completed to provide a baseline to agency management and state leadership. As these findings are presented to the State Workforce Investment Board and the Montana Legislature, additional research questions will be raised by political and business leaders. The Research and Analysis Bureau strives to provide as much high-quality information as requested by these governing bodies given the funding provided by state and local authorities. The timeline for developing this evaluation process is: Dec. 31, 2016- have baseline evaluation complete, including of participants with jobs after a year and $ per participants in order to set improvement goals for next year. Performance goals may include, but are not limited to, the percent of participants retaining a job after a year; the percent of participants that achieved wage growth in a one-year and three-year timeframe; percent of participants achieving a certification or degree; percent of participants on welfare or public assistance (I'm not sure we can do that); dollars spent per successful participant; and/or type of funding spent per successful participant.

Jan. 31, 2017 – Consult with Department leadership and SWIB board to set performance goal schedule for upcoming years. Establish improvement goals for 1-year and 5-year timelines. Establish range of acceptable distribution for each service provider.

Feb. 2, 2017 – Establish new improvement goals for upcoming years, establish set metrics for evaluation, and inform service providers of metrics of evaluation. Solicit comment from service providers on metrics and goals.

March 1, 2017 – Finalize goals and performance metrics used for evaluation annually.

January in every year following- Evaluate performance from prior year. Notify providers that have not met goals.

March – providers not meeting goals put on probation if no improvement. Establish goals for upcoming year.

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),

Funds will be awarded to core program providers who can demonstrate their capacity to collaborate and coordinate with other core partner programs. WIOA Adult, Youth and Dislocated Worker funding is distributed through a formula that was approved by the SWIB under WIA. As a single workforce area, the funds are distributed using Montana Association of Counties (MACo) Districts. The Job Service offices and some community–based organizations are under contract to provide WIOA Adult services in all areas of the state, with the exception of the Lewistown office. Youth services are contracted primarily to community–based organizations within the MACo districts. In the Northwest corner of the state, the DLI Jobs for Montana's Graduates program provides WIOA youth services. Other non–Job Service entities, like community–based organizations, contract with the Department of Labor and Industry to provide adult and/or youth services. Dislocated Worker funds are distributed to the Job Service offices across the state through a single contract to the Job Service Operations Bureau. Approximately 10% of the Dislocated Worker funds are reserved at the state level for local offices with unforeseen layoffs or additional service needs during the year. Youth: 2. 1/3 unemployed in ASU 3. 1/3 excess unemployed (>4.5%) 4. 1/3 total number of individuals in the state, aged 16–21, who are economically disadvantaged

Montana applies a 90% hold harmless provision to WIOA Youth funds. Our policy has been updated and can be found at: http://wsd.dli.mt.gov/wioa The section of Policy that address this is Section 1.120 Funding Allocation

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

Adults: 1/3 unemployed in ASU 1/3 excess unemployed (>4.5%) 1/3 total number of individuals in the state, aged 22 – 72, who are economically disadvantaged

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

Dislocated Workers: Insured unemployed, using data for regular UI claims and UCFE claims Share of total individuals in the state who are economically disadvantaged (using Excess Poverty statistics and 70% of the Lower Living Standard Income Level, excluding college and military) for individuals aged 22–72 Excess unemployed (>4.5%) Declining employment

(calculated using annual average employment) Agricultural unemployment Long–term unemployment

As members of the one stop system all Job Service Offices work closely with the Dislocated Worker participants. To reach the goal of employment the offices work with the participants to work on interview skills, assessments, career planning, assistance towards skills for self-sufficiency, suitable training services, and/or On the Job Training. The offices work on providing the services to help the participant become self sufficient. The Job Service offices policy is that local areas Dislocated Worker budgets stay within 90% of the prior two years allocation. This will be done by reviewing local office budgets for the past two year and comparing them to draft budget of the current year. If any of the local offices show more than a 10% decrease from the prior years, adjustments will be to keep them with in the 90%.

As members of the one stop system, all Job Service Offices work closely with the Dislocated Worker participants. To reach the goal of employment the offices work with the participants to work on interview skills, assessments, career planning, assistance towards skills for self-sufficiency, suitable training services, and/or On the Job Training. The offices work on providing the services to help the participant become self sufficient.

State policy for distribution of dislocated worker funds to local areas has been updated to reflect that a "hold harmless" clause is in place so that each local area is guaranteed to receive an allocation percentage for a year that is no less than 90% of the average allocation percentage for that the local area for the prior two years. This is accomplished by reviewing local office budgets for the past two year and comparing them to a draft budget for the current year.

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.

Wagner–Peyser funds are distributed to the Job Service Offices around the state through a formula that is reevaluated by DLI biennially. For the management and funding of Job Service offices, Montana is divided into three regions. For each region, distribution of Wagner–Peyser funds is weighted using the following criteria:

Percent of labor force Number of recordable services provided to job seekers and employers Number of job orders entered by staff in Job Service offices Number of unique individuals served Percent of unemployed individuals, as a share of state total unemployed

Ninety percent of Wagner–Peyser funds are used for job search and placement services and recruitment and technical services for employers. The remaining 10 percent of the funds are used to provide accommodations for individuals with disabilities served in the Job Center offices.

The state will award multi-year grants on a competitive basis to eligible providers to develop, implement, and improve adult education and literacy activities. Grants will be awarded to

each of the state's multi-county workforce districts to align with core partner availability and services. Many platforms will be used to ensure direct and equitable access for the competition. These platforms may include local newspapers, newsletters, press release, social media, and contacts with other state and local agencies. Eligible providers contacted may include, but not limited to those listed in Section 203(5): a local education agency, a community or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private non-profit, a library, a public housing authority, other non-profits that have the ability to provide adult education, a consortium or coalition of entities listed, a partnership between an employer and an entity listed. The initial grant announcement will be in late April 2017 and allocations will be announced in June 2017. The competitive process will begin with a legal notice posted. This will be followed by the grant release, a bidder's conference to provide technical assistance, application review, list of accepted applicants released with follow-up budget and program negotiations with each accepted applicant.

The district competition will adhere to the provisions set forth in WIOA Title II Section 231-Grants and Contracts for Eligible Providers and Section 232-Local Applications. All district competitions will use the same grant application process. Grantees receiving funds under the initial competition will be required to submit annual extension plans each year until such time the state determines it is necessary to issue a new competition for the state or a specific region.

There will be two ways in which an eligible provider may demonstrate past effectiveness. An eligible provider that has been funded previously under Title II of the Act must provide performance data required under Section 116-Performance Accountability System. An eligible provider that has not been previously funded under Title II of the Act must provider performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes related to employment, attainment of secondary equivalency diploma, and transition to postsecondary education and training.

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.

Wagner–Peyser funds are distributed to the Job Service Offices around the state through a formula that is reevaluated by DLI biennially. For the management and funding of Job Service offices, Montana is divided into three regions. For each region, distribution of Wagner–Peyser funds is weighted using the following criteria:

Percent of labor force Number of recordable services provided to job seekers and employers Number of job orders entered by staff in Job Service offices Number of unique individuals served Percent of unemployed individuals, as a share of state total unemployed

Ninety percent of Wagner–Peyser funds are used for job search and placement services and recruitment and technical services for employers. The remaining 10 percent of the funds are

used to provide accommodations for individuals with disabilities served in the Job Center offices.

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.

Montana Vocational Rehabilitation and Blind Services (VRBS) distributes funding through contracts and our client benefits system. Since VRBS is a combined general and blind services agency, the funds are not distributed separately.

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.

Montana is in the development phase with an Integrated Workforce Registration (IWR) and a Workforce Integrated Profile Page (WIPP). The first phase, anticipated to be completed in March 2016, will set up a single sign–on where customers would register once, with a limited number of data points, and then have an account created in both MontanaWorks and the UI data system. Customers would add more detailed information pertinent to the services they access beyond initial registration. In phase two, DLI will build the WIPP landing page, which will provide real–time information from both MontanaWorks and the UI system on a single page. ABE and VR data will be included in WIOA performance reporting, but not included in MontanaWorks. Currently, Montana has no common reporting system between all programs to produce reports required by WIOA. Until such a system is created, each individual program will provide program data to Montana's DLI Research and Analysis Bureau (R&A), where analysts will produce the reports required for WIOA. R&A has experience matching participant records with state Unemployment Insurance wage records, higher education enrollment and completion records, as well as occupational licensing data. These matches will provide enhanced data for the programs while upgrades to case management systems are made to allow data collection that meets reporting requirements. Along with completing the administrative records–matching, R&A will compile the data into the PIRL format and calculate the performance measures for the final reports based on the performance report template. Using R&A as a centralized hub for generating performance reports will provide consistency in reporting across programs and allow for the interchange of demographic and background data between programs. This process will allow for the most descriptive and consistent data to be used in producing the required performance reports.

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 DLI Research and Analysis (R&A) staff's experience with administrative records–matching as a method of program evaluation will be leveraged under WIOA. Quarterly wage records provide an opportunity to observe the change in participants' wage histories over time and evaluate the impact program participation has on a customer's wages. In the past, R&A has performed analyses like these to evaluate outcomes from participation in

Registered Apprenticeship programs and Unemployment Insurance programs to highlight the program impacts on an individual's wages. More recently, R&A has begun collaborating with Montana's Office of the Commissioner of Higher Education (OCHE) to share data on enrollment and outcomes in higher education programs throughout Montana. This data sharing allows for a more holistic evaluation that looks beyond an individual's short–term gains in wages and accounts for educational gains that lead to long–term and otherwise unobserved improvements in an individual's wage potential. Currently, R&A and OCHE are working together to develop college report cards that will detail outcomes for Montana's colleges, in terms of degrees awarded, projected available jobs in various programs' occupational training, and wages of graduates. Results of the report cards will be used for planning purposes and to help program staff make informed decisions in supporting customers. Plans for Data Integration Montana is in the development phase with an Integrated Workforce Registration (IWR) and a Workforce Integrated Profile Page (WIPP). The first phase, anticipated to be completed in March 2016, will set up a single sign–on where customers would register once, with a limited number of data points, and then have an account created in both MontanaWorks and the UI data system. Customers would add more detailed information pertinent to the services they access beyond initial registration. In phase two, DLI will build the WIPP landing page, which will provide real–time information from both MontanaWorks and the UI system on a single page. ABE and VR data will be included in WIOA performance reporting, but not included in MontanaWorks. SWIB Support for Technology Alignment The SWIB assists the Governor in aligning technology and data systems across core programs through a review of program implementation and the steps underway for system coordination. The board will receive regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate. Alignment of technology and data systems will allow programs to realize true one–stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data will allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross–program solutions. Technology and data system alignment will also improve customers' service experience. In order to align technology across core partners, an assessment of the processes, eligibility, enrollment, reporting and business needs of each of the core partners will be conducted. After the assessment is complete, research will be conducted to determine if there is technology available to meet those needs or if current technology systems could be upgraded to achieve one, integrated system. Plans to Develop and Produce Required Reports Currently, Montana has no common reporting system between all programs to produce reports required by WIOA. Until such a system is created, each individual program will provide program data to Montana's DLI Research and Analysis Bureau (R&A), where analysts will produce the reports required for WIOA. R&A has experience matching participant records with state Unemployment Insurance wage records, higher education enrollment and completion records, as well as occupational licensing data. These matches will provide enhanced data for the programs while upgrades to case management systems are made to allow data collection that meets reporting requirements. Along with completing the administrative records–matching, R&A will compile the data into the PIRL format and calculate the performance measures for the final reports based on the performance report template. Using R&A as a centralized hub for generating performance reports will provide consistency in reporting across programs and allow for the interchange of demographic and background data between programs. This process will allow for the most descriptive and consistent data to be used in producing the required performance reports. Assessment of Participants' Post–Program Success Currently Montana can capture information to assess the progress of participants exiting core programs to enter and complete post–secondary education or enter and remain in employment. This can be

accomplished through the Department of Labor and Industry's Research and Analysis Bureau (R & A). R & A has access to several databases that can help provide information on progress of participants for these key milestones. R & A will compile data for each of the lead agencies for assessment of progress. Montana will be working toward consolidation of data in a data warehouse or combined reporting system. When that system is in place lead agencies should be able to assess progress through use of queries. Use of UI Quarterly Wage Records Montana's quarterly UI wage records will form the foundations of program evaluation and measurement of performance outcomes for the WIOA core programs. Montana's DLI R&A Bureau staff are experienced in matching state UI wage record files to program participants to ensure that performance outcomes can be produced quickly and consistently. As noted earlier in this section, R&A staff will use the UI wage record data to support system–wide analyses of customer outcomes and for staff to guide customers in selecting jobs and training opportunities that are likely to result in quality career paths. Privacy Safeguards for Data Montana follows the guidance on handling and protection of personally–identifiable information (PII) provided in TEGL 39–11. Social Security Numbers, in most fields in the MontanaWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MontanaWorks and staff have been trained to protect PII in paper form and in the transfer of PII across programs. Additional security measures regarding the system are in place and are evaluated on a continual basis. Priority of Service for Veterans Montana's Jobs for Veterans State Grant funds nine Disabled Veterans Outreach Program (DVOP) Specialists and one Veterans Intensive Service Coordinator. Priority of service is given at all Job Service offices to special disabled, other disabled and other eligible veterans in accordance with priorities determined by the U.S. Secretary of Labor. The current qualifications include: ? Disabled veterans receiving or have filed for VA compensation (or but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or, who were discharged or released from active duty because of a service–connected disability ? Veterans that are homeless or at risk of being homeless ? Veterans separated from service within the last three years and, at any point in the previous 12 months, have been unemployed for 27 or more consecutive weeks ? Veterans that have ever been incarcerated ? Veterans without a high school diploma or equivalent certificate ? Veterans that fall below the poverty line for the area in which they reside ? Veterans between the ages of 18 and 24 years' old ? The spouse of a service member who died of a service–connected disability, has been missing in action for more than 90 days, captured in the line of duty by a hostile force for more than 90 days, forcibly detained or interned in the line of duty by a foreign government or power for more than 90 days, or who has a total disability that is permanent in nature resulting from a service–connected disability or who died as a result of a service–connected disability ? A family member (parent, spouse, child, step–family member or other that live with but are not a member of the family) that provides personal care services to an eligible veteran Addressing Accessibility of the One–Stop System The State of Montana offers services to individuals with disabilities through the Job Service offices across the state. The workforce system is continually developing new and fostering ongoing partnerships to achieve seamless, comprehensive and integrated access to services and expanding the system's capacity to serve customers and employers with disabilities. Disability Resource Coordinators (DRCs) are funded through Wagner–Peyser and are located at each Job Service office. These coordinators assist individuals with barriers with a variety of employment–related services, and serve as a resource to the workforce community. The DRCs also develop linkages with and collaborate on an ongoing basis with employers to facilitate job placement for persons with barriers to employment. The DRCs assist anyone that encounters additional barriers to securing employment, such as individuals with physical or mental disabilities, learning disabilities, ex–felons, the aging

workforce, youth at risk and veterans. Disability Resource Coordinators work with partner agencies routinely to garner mutual support and share information through Community Management Teams, interagency and community organizations. The DRCs identify gaps in service and create working groups to recognize individuals who may benefit from their services. The DRCs, in collaboration with service providers, organize Resource Fairs, provide training opportunities to customers and the employer community, grow relationships with public and private schools to assist with continual learning opportunities. DRCs also meet annually with veterans' representatives to receive new information and collaborate on the best ways to support their targeted populations. Montana is a single–area workforce system. The SWIB is discussing a process for One–Stop center certification, particularly with the new core partners that are included in WIOA. Physical and programmatic accessibility will be among the criteria required for local site certification. Addressing Accessibility of the One–Stop System for Individuals who are English Language Learners The state of Montana provides LEP accessibility in the One–Stop System. Through Montana state government, three telephone–based language interpreting services are available in 250+ languages and dialects, 24 hours a day and 365 days a year. To comply with federal Wagner Peyser monitoring requirements all One–Stop Centers display EEO and Minimum Wage posters in Spanish along with all other required state and federal posters in English. The state ABE will operate Integrated English Literacy and Civics programs and serve all students in need of English language acquisition and civics education through eligible providers. VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers have fluent sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication. Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with Ubi–Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers. The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with American Indian consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six American Indian Vocational Rehabilitation Services programs (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the American Indian Vocational Rehabilitation Services programs and they are an excellent resource for assisting American Indians who are not English speakers. The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish. In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the consumer to interpret. Also, Montana has colleges and universities that offer a variety of foreign languages and if necessary it may be possible to utilize instructors or students from these programs to assist with interpreting or identifying community resources to assist with communication.

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 SWIB assists the Governor in aligning technology and data systems across core programs through a review of program implementation and the steps underway for system coordination. The board will receive regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate. Alignment of technology and data systems will allow programs to realize true one–stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data will allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross–program solutions. Technology and data system alignment will also improve customers' service experience. In order to align technology across core partners, an assessment of the processes, eligibility, enrollment, reporting and business needs of each of the core partners will be conducted. After the assessment is complete, research will be conducted to determine if there is technology available to meet those needs or if current technology systems could be upgraded to achieve one, integrated system.

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

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary. Meeting Youth Performance Measures Performance scores and documented performance accountability will be one of the factors that the SWIB will take into consideration in awarding funding to providers. During the February 2017 Request for Proposal process, competitors will be required to demonstrate their ability to meet performance accountability measures. Demonstrated effectiveness in meeting performance is a scored element in the RFP. WIOA youth performance measures will not have been in place long enough to use for demonstrated effectiveness; therefore, the performance information requested in the next RFP will be for the WIA youth performance measures of Placement in Employment/ Education, Attainment of Degree/Certificate and Literacy/Numeracy Gains. Additionally, competitors will be required to describe measureable skills gains. Competitors will be allowed to use literacy/numeracy for this because Montana currently does not have another mechanism in place to track measurable skills gains. The WIOA staff in DLI are working with Vocational Rehabilitation and Adult Education to develop a common method of tracking performance. The VR program's performance on the performance accountability indicators under section 116 of WIOA FY 2014 data is:

Employment rate 2nd quarter after exit: 71.0% Employment rate 4th quarter after exit: 66.9% Median Wage: $3,540 Credential Rate 11.6% Measurable Skill Gains 21.2% Effectiveness in Serving Employers

This information is baseline and actual performance levels will be set when further guidance is received. In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, WIA data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best–guess estimates and will likely change as more guidance is received. Without any precedent for gauging the effectiveness of employer services, Montana will test new measures to fill this need. In the upcoming low–unemployment environment we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses, including individuals with disabilities. VRBS has not previously had a measure related to effectiveness of serving employers. VRBS is seeking guidance on the issue and it is anticipated that when new regulations are finalized there will be adequate guidance to provide a measurement and projection.

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.

Currently Montana can capture information to assess the progress of participants exiting core programs to enter and complete post–secondary education or enter and remain in employment. This can be accomplished through the Department of Labor and Industry's Research and Analysis Bureau (R & A). R & A has access to several databases that can help provide information on progress of participants for these key milestones. R & A will compile data for each of the lead agencies for assessment of progress. Montana will be working toward consolidation of data in a data warehouse or combined reporting system. When that system is in place lead agencies should be able to assess progress through use of queries.

The three Core programs are all conducting Post-program success differently. Title 1 conducts quarterly Follow-Up calls to Adult and Dislocated Worker participants who have exited to employment. These participants are contacted at least once a quarter to see if they need assistance in job retention, wage gains and career progress. Appropriate follow-up services may vary among participants, for example participants with multiple employment barriers and limited work histories may need significant follow-up services to ensure long-term success in the labor market including program funded supportive services. Others may identify an area of weakness in WIOA training that may affect their ability to progress further in their occupation or to retain employment. Follow-up services for WIOA Adult and Dislocated Workers could include additional career planning and counseling, contact with the participant's employer, including assistance with work related problems, peer support groups, information about additional educational opportunities, limited financial support, and referral to support services available in the community. Title 1 Youth participants must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services are critical services that are provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. Youth follow-up services may include leadership development and supportive service activities, regular contact with youth participant's employer, including assistance in addressing work-related problems that arise, assistance in securing better paying jobs, career pathway development and further education or training, work-related peer support groups, adult mentoring, and providing services as necessary to ensure the success of youth participants in employment and/or post-secondary education. Adult Education and Vocational Rehabilitation programs follow clients after exit through performance outcomes.

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.)

Montana's quarterly UI wage records will form the foundations of program evaluation and measurement of performance outcomes for the WIOA core programs. Montana's DLI R&A Bureau staff are experienced in matching state UI wage record files to program participants to ensure that performance outcomes can be produced quickly and consistently. As noted earlier in this section, R&A staff will use the UI wage record data to support system–wide analyses of customer outcomes and for staff to guide customers in selecting jobs and training opportunities that are likely to result in quality career paths.

Use of UI Quarterly Wage Records

Montana's quarterly UI wage records will form the foundations of program evaluation and measurement of performance outcomes for the WIOA core programs. As part of administration of Montana's U.S. Bureau of Labor Statistics (BLS) programs, Montana's DLI R&A Bureau receive a quarterly file of Unemployment Insurance (UI) wage records for payroll workers in the state of Montana. These wage records are stored on secure servers meeting the standards of the BLS while R&A staff are experienced in matching state UI wage record files to person records and producing summary information from those records such that confidentiality is maintained. R&A staff will utilize the statistical software SAS to match WIOA participants with their wage records using SSNs as the primary key to link records.

Following this match, SAS software will be used to manipulate and analyze the data such that performance reporting requirements and evaluation needs can be met. As noted earlier in this section, R&A staff will use the UI wage record data to support system-wide analyses of customer outcomes that result on specific program experiences that will provide information to guide staff as they assist customers in selecting jobs and training opportunities that are likely to result in quality career paths.

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.

Montana follows the guidance on handling and protection of personally–identifiable information (PII) provided in TEGL 39–11. Social Security Numbers, in most fields in the MontanaWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MontanaWorks and staff have been trained to protect PII in paper form and in the transfer of PII across programs. Additional security measures regarding the system are in place and are evaluated on a continual basis

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.

Montana's Jobs for Veterans State Grant funds nine Disabled Veterans Outreach Program (DVOP) Specialists and one Veterans Intensive Service Coordinator. Priority of service is given at all Job Service offices to special disabled, other disabled and other eligible veterans in accordance with priorities determined by the U.S. Secretary of Labor. The current qualifications include: Disabled veterans receiving or have filed for VA compensation (or but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or, who were discharged or released from active duty because of a service–connected disability Veterans that are homeless or at risk of being homeless Veterans separated from service within the last three years and, at any point in the previous 12 months, have been unemployed for 27 or more consecutive weeks Veterans that have ever been incarcerated Veterans without a high school diploma or equivalent certificate Veterans that fall below the poverty line for the area in which they reside Veterans between the ages of 18 and 24 years' old The spouse of a service member who died of a service–connected disability, has been missing in action for more than 90 days, captured in the line of duty by a hostile force for more than 90 days, forcibly detained or interned in the line of duty by a foreign government or power for more than 90 days, or who has a total disability that is permanent in nature resulting from a service–connected disability or who died as a result of a service–connected disability A family member (parent, spouse, child, step–family member or other that live with but are not a member of the family) that provides personal care services to an eligible veteran

Priority of Service for Veterans has been implemented through training of the staff in the local offices that all Veterans receive Priority of Service. It is monitored by the VETS program through the audit process and by the Program Manager through office checks. The JVSG referral process to a DVOP is accomplished by the completion of the intake form when a Veteran or eligible spouse is identified upon entry into the Job Service. The intake form will not be completed by the DVOP. If a Veteran or eligible spouse is determined to have a qualifying Significant Barrier to Employment (SBE) they will be referred to the DVOP.

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

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

The State of Montana offers services to individuals with disabilities through the Job Service offices across the state. The workforce system is continually developing new and fostering ongoing partnerships to achieve seamless, comprehensive and integrated access to services and expanding the system's capacity to serve customers and employers with disabilities. Disability Resource Coordinators (DRCs) are funded through Wagner–Peyser and are located at each Job Service office. These coordinators assist individuals with barriers with a variety of employment–related services, and serve as a resource to the workforce community. The DRCs also develop linkages with and collaborate on an ongoing basis with employers to facilitate job placement for persons with barriers to employment. The DRCs assist anyone that encounters additional barriers to securing employment, such as individuals with physical or mental disabilities, learning disabilities, ex–felons, the aging workforce, youth at risk and veterans. Disability Resource Coordinators work with partner agencies routinely to garner mutual support and share information through Community Management Teams, interagency and community organizations. The DRCs identify gaps in service and create working groups to recognize individuals who may benefit from their services. The DRCs, in collaboration with service providers, organize Resource Fairs, provide training opportunities to customers and the employer community, grow relationships with public and private schools to assist with continual learning opportunities. DRCs also meet annually with veterans' representatives to receive new information and collaborate on the best ways to support their targeted populations. Montana is a single–area workforce system. The SWIB is discussing a process for One–Stop center certification, particularly with the new core partners that are included in WIOA. Physical and programmatic accessibility will be among the criteria required for local site certification.

Montana's one-stop service delivery system will comply with provisions of the American's with Disabilities Act (ADA) of 1990 regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. As part of Montana's one-stop operator application process, it will request that all applicants submit information on its facility's ADA accessibility in order to better assess barriers to services and better serve persons with disabilities.

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 state of Montana provides LEP accessibility in the One–Stop System. Through Montana state government, three telephone–based language interpreting services are available in 250+ languages and dialects, 24 hours a day and 365 days a year. To comply with federal Wagner Peyser monitoring requirements all One–Stop Centers display EEO and Minimum Wage posters in Spanish along with all other required state and federal posters in English. The state ABE will operate Integrated English Literacy and Civics programs and serve all students in need of English language acquisition and civics education through eligible providers. VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers have fluent sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication. Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with Ubi–Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers. The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with American Indian consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six American Indian Vocational Rehabilitation Services programs (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the American Indian Vocational Rehabilitation Services programs and they are an excellent resource for assisting American Indians who are not English speakers. The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish. In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the consumer to interpret. Also, Montana has colleges and universities that offer a variety of foreign languages and if necessary it may be possible to utilize instructors or students from these programs to assist with interpreting or identifying community resources to assist with communication.

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.

Assessment of System's Overall Effectiveness To ensure workforce system effectiveness, Montana will organize a State Agency Management (SAM) Team for Workforce Development. Meetings will be held on a quarterly basis, or more frequently if needed. SAM Team meetings will be facilitated and agenda–based. Required team members will include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner–Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership will include representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor's Office of Economic Development. Additional members will be invited to join the team as necessary and relevant. Team members will be expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One–Stop certification process; act as an advisory group to each member's SWIB representative; act as advisors to each other's workforce development–related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team will develop a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system across the state. This CIP will be presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs will be made available to the SWIB by the SAM Team and an annual update will be provided to the SWIB regarding system measurements under the CIP. Montana, as a small state with limited workforce program funds and a significant small–business climate (97% of all private employers have fewer than 50 employees), faces unique challenges and is committed to ensuring its workforce system meets the needs of the state's businesses and workers, today and in the future. Such challenges demand that WIOA core and other partners effectively leverage partnerships and collaborate in service delivery efforts. These efforts allow the state to ensure that customer expectations and needs are understood; that service offerings and locations meet those needs without duplication; that data evaluation tools and processes are in place; and that the system continually evolves and improves on its own. To support these efforts, Montana will continue to work together across provider and programs lines to develop a seamless, demand–driven workforce service delivery system comprised of public and private organizations, employers, local, state and federal employment and training programs, secondary, post–secondary and adult education programs, Vocational Rehabilitation and Blind Services, and other human capital support agencies. This system will engage, support and enhance the economic health of Montana's business community and ensure a well–trained and highly qualified workforce for years to come. Workforce System Vision and Goals Montana's vision for its workforce system is one in which workforce development occurs via innovation through partner collaboration, integrated service delivery, data analysis and ongoing evaluation and improvement. This system will continue to be a strong supporter of the Governor's Main Street project. This effort creates a dynamic private–public partnership that has built and implemented a 5–pillar business plan for Montana, by Montanans. Those pillars include: 1. Train and Educate Tomorrow's Workforce Today. 2.

Create a Climate that Attracts, Retains and Grow Businesses. 3. Build upon Montana's Economic Foundation. 4. Market Montana. 5. Nurture Emerging Industries and Encourage Innovation. Vocational Rehabilitation and Blind Services (VRBS) and Adult Basic Education (ABE) will align with other workforce programs. And partners will better understand industry training needs in the state's local economies and will increase promotion of training services available to employers through Job Service offices including Incumbent Worker Training, Apprenticeship, OJT and soft skills training. Montana's workforce system goals include: ? Continuing to tap what have historically been considered non–traditional labor pools; ? Streamlining duties of local service providers to allow holistic focus on the goals of WIOA; ? Devising an employer engagement strategy that includes all partners including local workforce organizations that operate outside the State's Workforce Development System, and is not solely built on collecting job postings; Understanding customer needs and expectations and acknowledging that while employment is the goal, our value to customers cannot always and only be measured in those terms; ? Ensuring that career planning is a central piece of our integrated service delivery model; ? Automating ongoing customer intake to better evaluate customer data and help drive more effective and consistent service delivery; ? Performing better data analysis to evaluate customer needs and system efforts, set better expectations, and increase overall situational understanding; ? Gain better understanding of local workforce needs and initiatives through local workforce organizations that operate outside the State's Workforce Development System; and ? Help direct resources to local workforce initiatives and organizations that are employer focused and collaborative which operate the State's Workforce Development System. Montana's workforce system will generally achieve these goals by engaging with and empowering: ? The State Workforce Innovation Board which brings together private employers and workforce service and education & training providers; ? State government leadership; ? A State Agency Management team made up of state agency core program managers and other workforce partners; ? Local partner management teams that include Community Management Teams, Job Service Employer Committees, Business Expansion And Retention committees, Key Industry Network groups, Chambers of Commerce, Economic Development Corporations, Small Business Development Councils, Tribal Councils and others; ? Local one stop delivery teams that ensure service delivery staff are properly trained, adequately equipped, and able to effectively engage customers to provide proper and just–in–time workforce solutions; and ? Local workforce organizations that operate outside the State's Workforce Development System through cooperative agreements or a memorandum of understanding (MOU). Several strategies are planned to align programs, including: ? As noted below, the SWIB Apprenticeship, On–the–Job Training and Career Pathways Committee includes the leadership from Adult Basic Education. Through regular communication, partners will continue to align service strategies for job seekers with the workforce needs of Montana's employers. ? The SWIB Sector Strategies committee will focus efforts to align business engagement entities throughout Montana, and will establish clear partnerships between government agencies, regional sector partnership groups and the SWIB. The committee will work to partner and align the efforts of such entities as the Montana State Employers Council, local Job Service Employer Councils, Community Management Teams, the Main Street Montana Key Industries Network and local workforce organizations that operate outside the State's Workforce Development System. ? On a regular basis, DLI will invite the core partners to Job Service driven events such as Job Service Employer Committee meetings, meetings of Community Management Teams, Job Fairs and other events where the core partners can collaborate and leverage resources on behalf of their customers. ? DLI will invite agency partners to provide training to Job Service staff and promote interagency staff training for coordinated service strategies. Agency partners will also be invited to – and invited to present at – Job Service training events and

conferences. This will also promote shared information and knowledge. ? Montana's workforce system will continue to collaborate with economic development entities at the state level and local levels. Several examples of coordinated efforts are discussed throughout the plan. The mission of the Montana State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight. The SWIB will accomplish this through the following actions: ? Making policy recommendations for the Governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible ? Leading the strategic planning process for an integrated workforce development system, in consultation with Community Management Teams and local workforce organizations outside the State's Workforce Development System ? Creating performance standards that identify effective workforce development initiatives; coordinating the state's workforce innovation initiatives with the state's economic development plan ? Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce ? Encouraging public/private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System ? Reviewing local adult education proposals to offer recommendations for workforce alignment ? Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement ? The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The SWIB is comprised of a majority of business leaders in the State of Montana, who are stakeholders in attaining quality outcomes for workforce and economic development initiatives. These private industry representatives, along with public and workforce representatives, play a vital role in ensuring that employers have access to a prepared workforce and that job seekers are able to access services, resources and training that will enable them to obtain employment. As implementation of WIOA continues, Montana's core partners will continue to strengthen relationships that benefit mutual customers, identify customers (across programs) whose skills sets match employers' workforce needs, and align resources to promote efficiency and economy of scale. Montana's Job Service offices, community based–organizations, Adult Basic Education (ABE), and Vocational Rehabilitation and Blind Services (VRBS) will align services and work together to serve employers. Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – a number of discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded $14.9 million to create access to health care training in rural areas. Three full–time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates. Another TAACCCT grant awarded to Montana is RevUP. This $24.9 million grant promotes energy and advanced manufacturing careers in the state through a partnership among 13 community colleges and DLI. Funding supports infrastructure and capacity–building at the colleges, along with development of career pathways and credential and certification attainment. The grant is also developing "on and off ramps" so workers can leave and return to higher education at different stages of their

careers. A Job Driven NEG grant was subsequently awarded to provide training dollars for eligible participants to be trained in the RevUP occupations. The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF, SNAP, Career and Technical Education, Economic Development, Job Corps and other youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan. Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners – and their customers – benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce services at Job Service offices or community based organizations that support their employment goals. Partners are also working together to strengthen the coordination of services to employer customers. The Job Service often takes the lead and partners educate employers on the value of hiring diverse populations and discuss work–based opportunities, including Registered Apprenticeship and on–the–job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies. Montana was awarded a $70,000 two–year grant to develop a statewide business engagement plan. The grant was intended to improve business engagement performance through the delivery of enhanced business–focused services. Specific goals of the grant were to: increase market penetration; increase repeat business of employer customers at Job Service offices; increase the fill rate on job orders; reduce the number of days to fill job orders; enhance the data system to allow better reporting; and increase business customer satisfaction. Services to businesses increased significantly during the initiative – from 12,008 business contacts made in the year prior to the grant – to 35,571 contacts in the second year of the grant. The Job Service's Business Services Program performance was also enhanced, through stronger awareness by staff of the need for outreach businesses, staff training, development of tools and resources, and enhancement of the database used to record services to employer customers. Alignment with Education Montana partners have several initiatives that involve educational institutions, both secondary and post–secondary, as described below. ? Big Sky Pathways – Office of Public Instruction specialists and post–secondary staff from across the state that work with industries and secondary and post–secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities. ? Adult Pathways – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post–secondary education. An adult pathway consists of activities to overcome workforce

barriers by bringing together industries, community services, government agencies, post–secondary education to identify, enroll and prepare career–limited adults for high–demand career opportunities. Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post–secondary training. In addition, the Carl Perkins Program Manager and ABE Director co–chair the Moving Pathways Career Pathways Forward Interagency State Team Project. When the request for proposals for ABE providers is released in 2017, all post–secondary institutions will be encouraged to apply. ? Dual Enrollment – High school students have the opportunity to enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at 50% off regular rates at Montana's colleges, and mandatory fees are waived. In some cases, the courses are free for high school students. ? Carl Perkins – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post–secondary studies. At the post–secondary level, career and technical education (CTE) programs help young adults preparing for first–time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two–year post–secondary institutions are characterized by their close relationship with employers and smooth transitions of program participants into the workforce at higher levels of income and employment success. Montana's Efforts to Enhance Job Seekers' Ability to Attain Post–Secondary Credentials Montana has several initiatives in place to promote attainment of post–secondary credentials, as described below. ? Complete College Montana is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to increase their annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses. Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full–time enrollment and utilizing incentive–based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year–round attendance models. ? Prior Learning Assessment is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners. ? RevUP Montana is a $25 million workforce initiative to help address skill gaps and reduce the cost of career and technical education. RevUP has catalyzed several programmatic reforms within a variety of occupational areas, including welding, fabrication, industrial maintenance, machining, industrial electronics, commercial drivers, energy technology, diesel technology and entrepreneurship. At each college within the RevUP Montana consortium, a Workforce Navigator is employed. These staff are charged with recruiting, retaining and placing RevUP participants, and are actively engaged at Montana's Job Service offices. RevUP also seeks to promote a closer relationship between DLI and the two–year colleges, to create one unified workforce development system in Montana. Additionally, RevUP is exploring opportunities and current gaps in skills of incumbent workers to ensure employers have the trained workforce they need. Finally, RevUP Montana seeks systemic efficiencies in learning by allowing students seamless access to hybrid and online courses that may be available from other institutions. As noted earlier, the RevUP discretionary grant has expanded Montana's capacity to meet the workforce needs of businesses in growth sectors, while

preparing the workforce for these job opportunities. This is one of the many ways Montana has leveraged resources to maximize the value of the workforce, education and economic development systems within the state. ? HealthCARE Montana discretionary grant is another multi–partner initiative that is strengthening the two–year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with particular attention to adult learners (especially in rural areas) and to veterans. Alignment of Education, Workforce and Economic Development Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of employers. Several models are already in place; future plans to promote success through alignment include: ? Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and employers ? Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between employers and the educational system ? Providing a continuum of training and credential opportunities that promote career advancement ? Meeting local and unique training needs of high–demand industries, including health care, energy and technology ? The State will look to organizations outside its Workforce Development System for opportunities to support local, employer engaged, innovative workforce programs The state also seeks to promote community colleges, two–year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of employers in formal curriculum development and supporting continued expansion of comprehensive two–year education, with a focus on workforce development, access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurism in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local employers, upon request. These teams have evaluated grant requests for Montana's small business Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One-Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's certified One-Stop Centers to address the needs of the population within Montana's vast geographic expanse. Montana currently has 19 active CMTs in communities throughout the state. The CMTs will provide the local, community voice to the State Workforce Innovation Board (SWIB). The SWIB will work with CMTs and One-Stop operators to certify One-Stops under the WIOA and SWIB regulations.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

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

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

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

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

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

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

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

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

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

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

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

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Montana has in the past and continues to operate as a single workforce area with one planning region and three workforce regions. Given the state's vast geography, low population and tri–agency structure housing the WIOA core programs, each partner issues policy to their local service sites. However, with the passage of WIOA, the core partners, human services, education and economic development partners are working more closely together than ever to ensure that services are coordinated and aligned, including participation in partners' conferences and joint strategy–planning activities. Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One–Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's certified One–Stop Centers to address the needs of the population within Montana's vast geographic expanse. Montana currently has 19 active CMTs in communities throughout the state. The CMTs will provide the local, community voice to the State Workforce Innovation Board (SWIB). The SWIB will work with CMTs and One–Stop operators to certify One–Stops under the WIOA and SWIB regulations.

MT consulted with the SWIB and it was determined to use existing Job Service workforce regions as they have been established. Local elected officials are represented on the SWIB.

Additionally, as Montana worked to understand, engage on and ultimately resolve its CEP/BOS issues, letters were sent to and conversations were had with many CEO's regarding establishing new and/or maintaining current local area designations. Ultimately it was determined by all involved that existing boundaries would be retained. However, CEOs and other interested parties are aware of their rights and the process to request that new areas be considered, if they at any point so choose, per issuance of updated State policy in May 2016.

Finally, local workforce activities are financed and coordinated at the Montana Association of Counties (MACo) District level (there are 12 MACo regions across the state, and lead local officials are encouraged to attend Community Management Team (CMT) meetings in their jurisdiction.

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.

Montana has in the past and continues to operate as a single workforce area with one planning region and three workforce regions. Given the state's vast geography, low population and tri–agency structure housing the WIOA core programs, each partner issues policy to their local service sites. However, with the passage of WIOA, the core partners, human services, education and economic development partners are working more closely together than ever to ensure that services are coordinated and aligned, including participation in partners' conferences and joint strategy–planning activities. Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One–Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's certified One–Stop Centers to address the needs of the population within Montana's vast geographic expanse. Montana currently has 19 active CMTs in communities throughout the state. The CMTs will provide the local, community voice to the State Workforce Innovation Board (SWIB). The SWIB will work with CMTs and One–Stop operators to certify One–Stops under the WIOA and SWIB regulations.

DLI engaged with local chief elected officials via phone calls and written letters to understand their thoughts and determine the need and interest in continuing to operate a Concentrated Employment Program (CEP) local area and a Balance of State (BOS) local area. Per those discussions, all parties agreed that there was no interest in continuing that model at this time and that the state is best served by operating as a single workforce area. However, per WIOA regulations and state-issued workforce policy, the option to request establishment of a local area is available should that need or desire arise in the future. Additionally, DLI continues to work with USDOL to fully and correctly understand, define and document its single workforce area structure.

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

WIOA formally reauthorized the expired Workforce Investment Act of 1998 and removed the Concentrated Employment Program provision of the law, automatically making Montana a single workforce area for the purposes of administering WIOA WIOA Section 106 requires the state to provide notice of and the opportunity for entities to request initial or general designation as a local workforce area. At the time of submission of this plan, Montana had received no such requests or public comments speaking to this opportunity. As such, Montana will continue to operate as a single area planning state unless and until such a request is received. DLI is designated as the single administrative entity, grant recipient and fiscal agent for WIOA Title I funds. The SWIB provides oversight of the statewide system and has provided input into this statewide Combined WIOA Plan. DLI maintains the statewide management information and financial system for WIOA, to eliminate duplicative

administrative costs and to promote the efficient use of resources within the workforce system.

Pending implementation of WIOA Final Rules, the State will issue updated guidance on the Appeals process for designation of local areas and determination of infrastructure funding. Montana continues to work with USDOL to understand and finalize terminology and definitions around it being a single area planning state. Additionally, Montana WIOA core partners continue to work to understand and implement a compliant yet also realistic and viable infrastructure cost sharing allocation methodology. As both of these issues are concluded, State policies and planning documents will be updated to reflect all decisions.

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

C. Cooperative Agreements with Agencies Not Carrying Out Activities under the State Workforce Development System Cooperation, collaboration, and coordination with agencies not in the statewide workforce investment system are usually expressed through cooperative agreements or a memorandum of understanding (MOU). Vocational Rehabilitation and Blind Services (VRBS) presently has agreements with the following entities: ? Section 121 Vocational Rehabilitation Projects located in Montana ? Mental Health ? Developmental Disabilities (currently expired, but under negotiation) ? Montana Small Business Development Centers (SBDC) ? The Randolph–Sheppard/Business Enterprise Program ? Public Transportation Programs ? Social Security ? MonTECH (the State Assistive Technology Program) ? Non–educational agencies serving out–of–school youth Section 121 Vocational Rehabilitation Projects VRBS presently has cooperative agreements with all of the six Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy’s Reservation, Northern Cheyenne Reservation and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the six reservations that currently have a tribal vocational rehabilitation project.

Pending implementation of WIOA Final Rules, the State will issue updated guidance on the Appeals process for designation of local areas and determination of infrastructure funding. Montana continues to work with USDOL to understand and finalize terminology and definitions around it being a single area planning state. Additionally, Montana WIOA core partners continue to work to understand and implement a compliant yet also realistic and viable infrastructure cost sharing allocation methodology. As both of these issues are concluded, State policies and planning documents will be updated to reflect all decisions.

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 state WIOA unit within DLI provides technical assistance and training to all WIOA case managers, including ongoing technical assistance and one formal, three–day training session each year. In 2015, staff from Adult Education, the Department of Public Health and Human Services, and two–year colleges participated in the training; it is anticipated that this approach of including partners in formal WIOA training will continue into the future. The WIOA unit also hosts at least two new Case Manager training sessions in–person each year. This provides the opportunity to train new case managers on the programs and on the operation of the MontanaWorks data system. The Governor's set aside funds are used for overall program operations to enhance the quantity and quality of services to employers and job seekers throughout the state. Set aside funds will also be used for oversight staff in the administration of the required activities, as described in WIOA Regulation 20CFR Part 682.200, including: ? Administering and monitoring the WIOA program ? Maintaining the Eligible Training Provider List, along with maintaining performance information and information on the cost of attendance (including tuition and fees) ? A list of eligible providers of youth activities ? Providing technical assistance in carrying out WIOA activities ? Operating a fiscal and management accountability information system, and ? Performance measure data collection The set aside funding is also used for SWIB operations and board staff. There are currently no other allowable statewide employment activities underway at this time; however, the increase in the set aside funding will allow the SWIB and the Governor to explore options in providing new statewide employment and training opportunities. DLI's Job Service Operations Bureau receives Rapid Response funding to provide those services to employers and the affected workers through the statewide network of 23 local Job Service offices. Local Job Service staff coordinate all the Rapid Response activities and, when needed, bring a variety of state and local service providers together for interagency Rapid Response workshops. Layoff aversion assistance is provided through the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. In Montana, trade–impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner–Peyser programs. All of these programs are operated by the Job Service Operations Bureau through the statewide network of 23 local Job Service offices. Local staff coordinate all the Rapid Response Activities, help employers or workers file TAA petitions and bring a variety of state and local service providers together for inter–agency Rapid Response workshops. Co–enrollment of TAA participants in the WIOA Dislocated Worker program – as well as in other programs for which they are eligible – is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA–approved training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests.

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 Governor's set aside funds are used for overall program operations to enhance the quantity and quality of services to employers and job seekers throughout the state. Set aside funds will also be used for oversight staff in the administration of the required activities, as described in WIOA Regulation 20CFR Part 682.200, including: Administering and monitoring the WIOA program Maintaining the Eligible Training Provider List, along with maintaining performance information and information on the cost of attendance (including tuition and fees) A list of eligible providers of youth activities Providing technical assistance in carrying out WIOA activities Operating a fiscal and management accountability information system, and Performance measure data collection The set aside funding is also used for SWIB operations and board staff. There are currently no other allowable statewide employment activities underway at this time; however, the increase in the set aside funding will allow the SWIB and the Governor to explore options in providing new statewide employment and training opportunities. DLI's Job Service Operations Bureau receives Rapid Response funding to provide those services to employers and the affected workers through the statewide network of 23 local Job Service offices. Local Job Service staff coordinate all the Rapid Response activities and, when needed, bring a variety of state and local service providers together for interagency Rapid Response workshops. Layoff aversion assistance is provided through the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. In Montana, trade–impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner–Peyser programs. All of these programs are operated by the Job Service Operations Bureau through the statewide network of 23 local Job Service offices. Local staff coordinate all the Rapid Response Activities, help employers or workers file TAA petitions and bring a variety of state and local service providers together for inter–agency Rapid Response workshops. Co–enrollment of TAA participants in the WIOA Dislocated Worker program – as well as in other programs for which they are eligible – is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA–approved training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests

DLI's Job Service Operations Bureau receives Rapid Response funding and uses that to respond to mass layoff events such as plant closures in order to quickly coordinate services and provide unemployment and job search information and access to companies and their affected workers. This is done via a statewide network of 23 local Job Service offices. Job

Service staff coordinate all the Rapid Response activities and, when needed, bring a variety of state and local service providers together for interagency Rapid Response workshops.

Layoff aversion assistance is provided through a partnership between DLI and the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster.

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.

Layoff aversion assistance is provided through the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. In Montana, trade–impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner–Peyser programs. All of these programs are operated by the Job Service Operations Bureau through the statewide network of 23 local Job Service offices. Local staff coordinate all the Rapid Response Activities, help employers or workers file TAA petitions and bring a variety of state and local service providers together for inter–agency Rapid Response workshops. Co–enrollment of TAA participants in the WIOA Dislocated Worker program – as well as in other programs for which they are eligible – is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA–approved training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests.

The process for the Rapid Response Team is in the event of the need to provide Rapid Response services the Job Service Operations Bureau and/or local office staff will coordinate with the Rapid Response team to provide the information and services to the impacted workers. Team members are adjusted to meet the community and individual needs of the impacted workers. For an example in the case of a natural disaster FEMA may included with the core group.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE

TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

In Montana, trade–impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner–Peyser programs. All of these programs are operated by the Job Service Operations Bureau through the statewide network of 23 local Job Service offices. Local staff coordinate all the Rapid Response Activities, help employers or workers file TAA petitions and bring a variety of state and local service providers together for inter–agency Rapid Response workshops. Co–enrollment of TAA participants in the WIOA Dislocated Worker program – as well as in other programs for which they are eligible – is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA–approved training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests

Rapid Response services are provided to all work groups having lay offs. Once staff is aware of the TAA petition they will share the program information with the impacted workers by providing a Rapid Response workshop. Staff will share standard Rapid Response information along with TAA program specific information. They provide the impacted workers with a TAA brochure along with discussing the program during the workshop. They will also mail the workers a letter after the workshop to remind them about what the TAA program has to offer and to contact our staff about participating in the 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.

Work–Based Training Models Training provided to Montanans using federal WIOA funds must be in high–wage/high–demand occupations, as determined by state labor market information. On–the–job training (OJT) contracts are developed at the local level. They are the result of the relationship between Job Service staff, other WIOA providers and the employer. The employer is screened prior to establishing the OJT contract, to ensure the job provides a wage that meets the participant's needs and to ensure the employer meets all regulatory aspects to be eligible for OJT funds. The length of OJT training is determined through research of the O*Net system to identify the complexity of the specific job in conjunction with the participant's current level of skill in that occupation. The assessment also evaluates whether the OJT job requires high–skills and will provide a living wage for the trainee. OJT contracts are not written for low–skilled jobs that do not provide additional career opportunities in the future. The Incumbent Worker Training Program is a competitive grant program that provides funding to help eligible Montana small businesses purchase training for their current (incumbent) workforce. The program also helps preserve existing jobs for Montana residents. Training can be customized to meet specific employer needs. The training must be skill–based or result in a certificate or credential, and must improve the productivity, efficiency or wages in the workers' existing jobs. Training should be short–term and the business must have a demonstrated need for the training as a way to remain competitive in their industry or the global economy.

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

Montana's Registered Apprenticeship (RA) program currently includes 44 occupations, 800 employers and approximately 1,400 apprentices. The RA State Director works with Job Service staff and community–based organizations to ensure they are aware of apprenticeship opportunities in their area of the state and efforts are underway to develop linkages across the databases to further this communication. The State Director is also establishing connections with WIOA, and coordinates with the youth Jobs for Montana' Graduates program, as well as Youth Build and high school pre–apprenticeship programs.

Registered Apprenticeship, under the umbrella of Work Based Learning, is a cornerstone of Montana's workforce development and service delivery strategy and serves as the primary competency training model for all types and sizes of business. Montana is projecting a worker shortage in the coming years, but with plenty of jobs, competency and credential based trainings that enable businesses to truly develop a workforce is a key to success. In the next two years Montana plans to transform its Registered Apprenticeship (RA) unit into a Work Based Learning (WBL) unit that encompasses RA and supports local Job Service staff as they market RA and WBL as a workforce training solution for all levels and types of occupations.

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

Determining provider eligibility for the Eligible Training Provider (ETP) List is carried out at the state level. Training providers applying for initial program eligibility must provide the following information to be considered for Montana's ETP: 1. A description of each program of training services to be offered; Information on cost of attendance, including costs of tuition and fees; Whether the training program leads to an industry–recognized certificate or credential, including recognized post–secondary credentials; Whether the certificate or credential can be stacked with other credentials over time as part of a sequence to move an individual along a career pathway or up a career ladder; Whether the provider has developed the training in partnership with a business and if so, which business; Which in–demand industry sectors and occupations best fit with the training program; A description of the prerequisites or skills and knowledge required prior to the commencement of training; Once the application is submitted, the State will determine whether required information has been provided. If so, the Training Provider will be placed on Montana's Eligible Training Provider List. Training providers applying for continued eligibility will be required to apply after the first full fiscal year and every two years after that. Applications for continued eligibility must be submitted by December 1st for the year in which eligibility expires. Continued eligibility application will be required for every Eligible Training Provider who was approved in the WIA.

Applications for continued eligibility must show the training program is still authorized by the appropriate oversight agency to operate in Montana. The application must include the following (in addition to updating the information provided for initial eligibility): 2. The total number of participants enrolled in the program; The total number of participants completing the program; The total number of participants exiting the program; Information on recognized post–secondary credential received by program participants; Information on the completion rate for such participants; Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology; Description of how the providers provide training services to individuals who are employed and/or individuals with barriers to employment; Information reported to State agencies on Federal and State training programs other than programs within WIOA title 1–B; and Social Security Numbers for all participants for the two previous years, regardless of funding source, which will be used to calculate the performance measures for the ETP. The calculation of these measures will be done by the State. The state is working directly with these providers to answer questions and help them submit subsequent eligibility applications. State staff are also developing a mechanism by which Registered Apprenticeship sponsors will be offered the opportunity to be included on the ETP list. This effort is coordinated between the RA State Director and WIOA staff.

WIOA Policy Manual Section 4.70 states: "Registered apprenticeship programs are not subject to the eligibility criteria or application requirements. While registered apprenticeship programs are automatically eligible, not all registered apprenticeship sponsors may wish to be included on the list. Registered apprenticeship programs are being given the option of being on Montana's ETP list. The State has developed a letter that will be sent to all Registered Apprenticeship sponsors telling them about the opportunity to be on the ETPL. In that letter, it states the Apprenticeship Sponsor (if they want to) will be placed on the ETPL and will remain there for 12 months. Each year following, they will be asked to verify their

status that they would like to remain on the ETPL as a provider. If a response is not received or the sponsor does not wish to be on the list, they will not be placed on it. When new sponsors are set up with the State Registered Apprenticeship Program, part of the process will be to inform them of the ETP availability.

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.

In accordance with WIOA Section 134(c)(3)(E), Montana implemented the additional adult priority of service for individuals who are basic skills deficient in July 2015. The revised priority of service policy is in the WIOA Policy Manual and is available to all WIOA adult service providers through the DLI website at: http://wsd.dli.mt.gov/wia/wiamanual_coverpage.asp. Individuals applying for enrollment in the adult program under the priority of service for public assistance or low–income individuals must provide documentation verifying receipt of public assistance or low–income status. Individuals applying for WIOA enrollment using the basic skills deficient priority of service must provide documentation to verify they are basic skills deficient. There are two acceptable ways to verify that the applicant is basic skills deficient: 3. An original or copy of the Test of Adult Basic Education (TABE) that shows the test score; or Documentation from an Adult Basic Education and Learning Center that verifies the applicant is enrolled in ABE and is working with them to improve their basic reading, writing and math skills. WIOA Unit staff have been monitoring verification of public assistance and low–income status since implementation of the Workforce Investment Act. Monitoring for the additional WIOA adult priority of service began on July 1, 2015.

Montana monitor’s each service provider once a year and this includes monitoring for priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. Monitoring includes looking at documentation in participant files that shows the person fits the priority for public assistance, other low-income individuals and individuals who are basic skills deficient. Montana policy states that WIOA Adults who receive individualized career and training services must have documentation proving the priority. State policy outlines the Priority of Service for Title 1 Adults and the only way someone can receive individualized career or training services is through meeting one of the categories for priority of service. 100% of WIOA Title 1 Adult participants meet one of the priority of service categories.

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

Transfer Between Adult and Dislocated Worker Funding Streams

The SWIB may direct the transfer of up to and including 100 percent of a program year allocation for adult or dislocated worker employment and training activities between the two programs, upon approval of the Governor, and based on a local needs assessment and performance indicators which will be established and approved by the SWIB pending WIOA final regulations.

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)

Montana is a single workforce area state and the WIOA Unit within the Workforce Programs Bureau in DLI provides oversight of the WIOA Title IB youth programs on behalf of the SWIB. DLI follows the Department of Administration Procurement Bureau's Request for Proposal (RFP) process. The SWIB's ad hoc Youth Council developed the criteria for the selection of youth providers for the Program Year 2012 WIA RFP. The SWIB will consider the following criteria (at a minimum) for awarding contracts to youth service providers in the next round of Request for Proposals: 1. Agency profile and experience in providing services to disconnected youth 2. Demonstrated effectiveness: includes performance measures and goals accountability 3. Financial systems: description of the offeror's financial systems in place for fiscal control and accounting procedures that are in accordance with generally accepted accounting principles 4. Work plan and method of providing activities and services 5. Description of how the provider will ensure that WIOA youth services are provided to youth who are: a. In–school (attending any school, including secondary or post–secondary school), age 14–21, are low–income and have one or more WIOA barriers; and b. Out–of–School youth (not attending any school), not younger than 16 or older than age 24 at the time of enrollment and has one or more WIOA barriers.

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.

WIOA Title I youth service providers coordinate services for out–of–school youth with Adult Basic Education, Vocational –Rehabilitation, Job Service Offices, juvenile justice and probation, public assistance programs including SNAP and TANF and post–secondary education. These partners are also members of the Community Management Teams (CMTs) established across Montana.

When youth providers develop worksites it will be with the intention of ensuring that the worksite is in line with the youth's career path, that the youth is receiving quality training and that the work experience may lead to permanent employment for that youth whether it's with the same employer or for another in that occupation.

Typically the majority of out–of–school youth enrolled in the WIOA youth program have dropped out of school and are in need of their high school diploma equivalency. All out–of–school youth are assessed for reading and math and when they have a basic skills deficiency they are referred to the Adult Basic Education center in their area for remediation. The WIOA provider and the ABE center will coordinate to determine the best approach for the youth's remediation efforts and help the youth identify a career pathway.

WIOA youth providers work with the alternative schools to help youth re–enter high school and obtain their diploma. During the assessment process an Individual Service Strategy is developed and youth providers discuss options with youth that have dropped out of school. If the youth expresses an interest in returning to school but not the "traditional" high school the youth provider will work to coordinate the youth's re–entry to school.

WIOA youth providers coordinate services with Vocational Rehabilitation whenever the opportunity is presented. Youth with disabilities have benefited from services provided through both programs. Now with the emphasis on career pathways and ultimately employment there is need for more collaboration and coordination between the WIOA youth program and Vocational–Rehabilitation to ensure youth are competitively seek and obtain jobs with real pay with livable wages

Strategies for improving outcomes including how we will leverage and align the core programs, required and optional one-stop partner programs and other resources: Montana's strategies for improving outcomes for out-of-school youth include 1) Ongoing partnership building with the six core partners and required one-stop partner programs such as TANF, SNAP, Career and technical education programs, and other resources. At the State level, a State Agency Management Team (SAM) is being developed where lead state agency officials representing the WIOA core programs and mandatory partner programs such as TANF will meet quarterly, or more frequently if needed. The SAM team will have an expectation to share information regarding program efforts and effects, ensuring that efforts are coordinated, and coordinate economic development strategies with the Office of the Governor and other State Agencies. The Youth Advisory Council of the State Workforce Innovation Board will also be focusing on out-of-school youth outcomes and helping to develop strategies to improve outcomes to this population. At the Local level, Community Management Teams are functioning and it is an expectation that all core partners as well as mandatory partners and other community resource programs meet once a quarter to talk about strategies to improve outcomes. It is expected that agencies come together to collaborate services for the benefit of each out-of-school youth participant. 2) A collaborative agreement between all core partners on service delivery is being signed and given to case managers, teachers, and counselors in the workforce system. This agreement was developed at the State level between agencies to provide a framework for service delivery. Having this agreement in place will show to the people working in the field that at the very top level, Montana is committed to a coordinated service delivery strategy. This will help with outcomes for our out-of-school youth population because it is the expectation that partners come together for service delivery and collaborate on what is available to each youth served.

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)

Montana's WIOA youth funding goes to youth providers in each of the Montana's Association of Counties (MACo) Districts. Montana determined that going through the Request for Proposal process for youth providers instead of bidding out each youth element better served Montana's rural nature and population of youth. WIOA youth providers are responsible for ensuring that all elements are made available to youth participants; however, they have the discretion of determining what specific elements may be provided based on the youth's individual objective assessment and the Individual Service Strategy. Montana youth service providers coordinate with partners in their areas, whenever possible, to coordinate and leverage funds to ensure youth are receiving the services they need. In some instances, youth elements such as Financial Literacy are provided by area Chambers of Commerce and/or banking entities at no charge to the WIOA program. Dropout prevention is another element that is provided to in–school youth through the Jobs for Montana's Graduates' program (where the program is available) at no cost to the WIOA program. WIOA youth service providers describe the method in which the youth will receive the required elements, whether it will be directly from the youth service provider or through a contract between the youth service provider and another entity, in the Provider Agreement Scope of Services. Montana conducts annual monitoring of youth service providers. The monitoring consists of a desk review of youth records in the management information system (MontanaWorks) used by WIOA providers. Monitors review case notes for documentation and the MontanaWorks employment plan, to ensure that the youth is receiving the appropriate services (e.g. the 14 elements that are included as services in MontanaWorks) as described in the youth's Individual Service Strategy. Following the desk review, an onsite review is conducted to review youth files for documentation verifying the youth is receiving one or more youth elements. Records are also reviewed throughout the year in conjunction with the quarterly reports submitted by providers. Program elements that will be made available to all youth include: 1. Tutoring, study skills training and instruction leading to secondary school completion, including dropout prevention strategies 2. Alternative secondary school offerings 3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, such as: a. Summer employment opportunities and other employment opportunities available throughout the school year b. Pre–apprenticeship programs c. Internships and job shadowing; and d. On–the–job training opportunities 4. Occupational skill training with priority consideration for training programs that lead to recognized post–secondary credentials that align with in–demand industry sectors or occupations 5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster 6. Leadership development opportunities, including community service and peer–centered activities encouraging responsibility and other positive social and civic behaviors 7. Supportive services 8. Adult mentoring for the duration of at least 12 months. This may be provided both during and after program participation. 9. Follow–up services for not less than 12 months after the completion of participation 10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth 11. Financial literacy education 12. Entrepreneurial skills training 13. Services that provide labor market and employment information about in–demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services 14. Activities that help youth prepare for and transition to post–secondary education and training

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).

A low–income youth (16–24) who requires additional assistance to: 1. Enter or complete an educational program: a youth who is in need of a high school diploma or equivalent; or has dropped out of a post–secondary educational program during the past 12 calendar months; or has a diploma but requires additional education in order to obtain or retain employment OR 2. Secure and hold employment: a youth (including a youth with a diploma or equivalent) not currently attending any school and who has not held a full–time job for more than three consecutive months; or has a poor work history, to include no work history; or has been fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment. In–school youth: A youth (14–21) who requires additional assistance to: 1. Complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has been suspended or expelled from school within the last 12 calendar months; or has previously been placed in out–of–home care (foster care, group home, or kinship care) for more than six months. OR 2. Secure and hold employment: an in–school youth who has not held a job for more than three consecutive months; or has a poor work history, to include no work history; or has been fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment.

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.

Montana defines attending school as youth 7–16 that are enrolled in and attending school full–time. Youth that are home schooled or enrolled in a private school are considered to be "attending school" if they have registered or provided notification to the Superintendent within their county of their intent to be considered a school. "Not Attending School" Youth under 16 and not attending school are considered to be truant; youth 16 and over and not attending school is considered to be a "drop–out." Montana adopted the definition of basic skills deficient from WIOA Law Sec. 3 (5). Basic Skills Deficient (Youth Eligibility Barrier) – means a youth: that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test (grade level scores below 9.0 (e.g., 8.9) is considered as "at or below the 8th grade level). Assessment instruments must be valid and reliable and provide reasonable accommodations to youth with disabilities in the assessment process in making this determination. Montana uses the Test of Adult Basic Education (TABE) as the acceptable basic skills assessment. Basic skills assessments are generally done through Adult Basic Education however WIOA Title IB programs have permission to administer the TABE in some instances. WIOA participants testing at 8.9 or below are required to have a specified number of hours of remediation and WIOA providers work closely with Adult Basic Education to ensure they are receiving remediation in preparation for the post–tests.

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

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).)

WIOA formally reauthorized the expired Workforce Investment Act of 1998 and removed the Concentrated Employment Program provision of the law, automatically making Montana a single workforce area for the purposes of administering WIOA WIOA Section 106 requires the state to provide notice of and the opportunity for entities to request initial or general designation as a local workforce area. At the time of submission of this plan, Montana had received no such requests or public comments speaking to this opportunity. As such, Montana will continue to operate as a single area planning state unless and until such a request is received. DLI is designated as the single administrative entity, grant recipient and fiscal agent for WIOA Title I funds. The SWIB provides oversight of the statewide system and has provided input into this statewide Combined WIOA Plan. DLI maintains the statewide management information and financial system for WIOA, to eliminate duplicative administrative costs and to promote the efficient use of resources within the workforce system

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:

F. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
G. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
H. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
I. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
J. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

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.

Staff receive ongoing training on all Wagner–Peyser program services. Training is provided face–to–face, via webinar and/or recorded and stored online for staff to view at their convenience. DLI provides webinars on timely subjects as they arise. Wagner–Peyser Job Service staff are cross–trained on all Wagner–Peyser programs. This maximizes scarce resources and ensures that job seekers and employers receive the best possible services. Each office has subject matter experts who train each other and conduct cross–training in staff meetings. All staff are required to be proficient in WIOA program eligibility criteria and how to make appropriate referrals to partner agencies. The following training sessions are available to field staff annually: Business Services WIOA Technical Assistance Veterans Services Disability Resources Migrant Seasonal Farmworker Services H2A When training needs are identified, especially with hard–to–place clients or in new areas that staff may lack expertise, specialized training is organized and delivered – either statewide or by specific request, depending on the extent of need. Recent examples of specialized training include: Ex–offender Assistance, Business Outreach, Documenting Services Delivered to Job Seekers and Employers, and RESEA training. UI staff provide training to local RESEA staff on basic UI eligibility requirements, issue identification, fact–finding tools and UI work search requirements. Staff are also empowered to attend training outside the agency when it enhances their skills and knowledge to better serve job seekers or employers. Montana supports all employers by providing customized business services and working with employers on work–based learning opportunities, on–the–job training and incumbent worker training. Montana will continue to work with employers in the labor community, including the Montana Registered Apprenticeship Program administered by Montana Department of Labor & Industry. By supporting talent development through Apprenticeship, employers gain a pipeline of loyal skilled workers, increased productivity, and they improve the bottom line. Montana will continue to look at opportunities that will help employers increase productivity, employee engagement, and training by implementing new programs and pilot projects.

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.

Under the direction of Montana’s Commissioner of Labor, Job Service staff work with all Unemployment Insurance (UI) claimants, with the exception of job–attached claimants. Claimants (other than job–attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office. Montana serves claimants in declining industries, ex–military claimants and those at risk of becoming long–term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an

Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow–on referrals to reemployment services focus on identifying high–demand jobs and training opportunities available locally or regionally, that can lead to higher–paying, long–term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area. Each RESEA appointment consists of a one–on–one assessment with a trained RESEA agent. Staff conduct a UI eligibility review with the claimant, provide relevant labor market and career information, ensure the claimant is registered with the Job Service, help the claimant develop a reemployment plan and refer the individual to at least one reemployment service, based on the individual's needs. The Workforce Services Division staff at the Job Service offices are trained to identify UI eligibility issues that may allow for early identification of improper unemployment payments and communicate those to UI staff. Additionally, staff assess each RESEA claimant's job readiness and barriers to reemployment. Case notes recorded in the Montana Works database document fact–finding on UI issues and are available to UI staff for further fact–finding and adjudication. All other claimants without job attachment or in agency–approved training receive a brief, one–on–one orientation to reemployment services to learn about the reemployment and training resources available to them. This is referred to as the "100% program," reflecting the fact that all claimants without a clear prospect of returning to work are supported in their job search efforts. The RESEA and 100% program activities focus on identification of local or regional jobs and high–demand training opportunities. Claimants may also receive comprehensive, specialized assessments and referral to Adult Basic Education, Job Corps, Apprenticeship programs or on–the–job training. Job Service staff interview claimants to probe for issues on their UI claims, to assess job readiness and to search for barriers to employment. Case notes recorded in MontanaWorks document fact–finding on issues. These notes are available to UI staff for additional fact–finding and adjudication. Several self–service resources are available to job seekers online. The MontanaWorks system includes the RESEA Assessment Survey, a tool to develop an Individual Employment Plan, career information and job matching resources. Job seekers may also use the Montana Career Guide, mock interview activities, career planning activities and a pocket resume resource to help organize their information for job applications and interviews. The system is designed for user–friendliness, with a drop down menu of Services and Tasks from which customers can access the resources they need. Customers registered with MontanaWorks can view jobs and receive email notification of jobs that meet their skills and interest. Additionally, the Montana Career Information System (MCIS) provides a number of online assessments and resources for job seekers. MCIS allows job seekers to create an e–portfolio to store the results of all their assessments, create resumes, and explore occupations, education and training options. PEP Talk is a workbook, used in conjunction with MCIS, which helps job seekers quickly go through the career planning process to create an education and employment plan. Job Service, University, and community–based organization staff are trained to help clients navigate and interpret the results of their assessments. As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, integration strategies

include training for Employment Services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

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.

Under the direction of Montana's Commissioner of Labor, Job Service staff work with all Unemployment Insurance (UI) claimants, with the exception of job–attached claimants. Claimants (other than job–attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office. Montana serves claimants in declining industries, ex–military claimants and those at risk of becoming long–term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow–on referrals to reemployment services focus on identifying high–demand jobs and training opportunities available locally or regionally, that can lead to higher–paying, long–term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area. Each RESEA appointment consists of a one–on–one assessment with a trained RESEA agent. Staff conduct a UI eligibility review with the claimant, provide relevant labor market and career information, ensure the claimant is registered with the Job Service, help the claimant develop a reemployment plan and refer the individual to at least one reemployment service, based on the individual's needs. The Workforce Services Division staff at the Job Service offices are trained to identify UI eligibility issues that may allow for early identification of improper unemployment payments and communicate those to UI staff. Additionally, staff assess each RESEA claimant's job readiness and barriers to reemployment. Case notes recorded in the Montana Works database document fact–finding on UI issues and are available to UI staff for further fact–finding and adjudication. All other claimants without job attachment or in agency–approved training receive a brief, one–on–one orientation to reemployment services to learn about the reemployment and training resources available to them. This is referred to as the "100% program," reflecting the fact that all claimants without a clear prospect of returning to work are supported in their job search efforts. The RESEA and 100% program activities focus on identification of local or regional jobs and high–demand training opportunities. Claimants may also receive comprehensive, specialized assessments and referral to Adult Basic Education, Job Corps, Apprenticeship programs or on–the–job training. Job Service staff interview claimants to probe for issues on their UI claims, to assess job readiness and to search for barriers to employment. Case notes recorded in MontanaWorks document fact–finding on issues. These notes are available to UI staff for additional fact–finding and adjudication. Several self–service resources are available to job seekers online. The MontanaWorks system includes the RESEA Assessment Survey, a tool to develop an Individual Employment Plan, career information and job matching resources. Job seekers may also use the Montana Career Guide, mock interview activities, career planning activities and a pocket resume

resource to help organize their information for job applications and interviews. The system is designed for user–friendliness, with a drop down menu of Services and Tasks from which customers can access the resources they need. Customers registered with MontanaWorks can view jobs and receive email notification of jobs that meet their skills and interest. Additionally, the Montana Career Information System (MCIS) provides a number of online assessments and resources for job seekers. MCIS allows job seekers to create an e–portfolio to store the results of all their assessments, create resumes, and explore occupations, education and training options. PEP Talk is a workbook, used in conjunction with MCIS, which helps job seekers quickly go through the career planning process to create an education and employment plan. Job Service, University, and community–based organization staff are trained to help clients navigate and interpret the results of their assessments. As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, integration strategies include training for Employment Services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

Dedicated phone lines at each Job Service office - allows for meaningful assistance by placing individuals in direct contact with highly trained UI staff and without placing the individual into the same queue as the general public.

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

Under the direction of Montana's Commissioner of Labor, Job Service staff work with all Unemployment Insurance (UI) claimants, with the exception of job–attached claimants. Claimants (other than job–attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office. Montana serves claimants in declining industries, ex–military claimants and those at risk of becoming long–term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow–on referrals to reemployment services focus on identifying high–demand jobs and training opportunities available locally or regionally, that can lead to higher–paying, long–term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area. Each RESEA appointment consists of a one–on–one assessment with a trained RESEA agent. Staff conduct a UI eligibility review with the claimant, provide relevant labor market and career information, ensure the claimant is registered with the Job Service, help the claimant develop a reemployment plan and refer the individual to at least one reemployment service, based on the individual's needs. The Workforce Services Division staff at the Job Service offices are trained to identify UI eligibility issues that may allow for early identification of improper unemployment payments and communicate those to UI staff. Additionally, staff assess each RESEA claimant's job readiness and barriers to reemployment. Case notes recorded in the Montana Works database document fact–finding on UI issues and are available to UI staff for further fact–finding and adjudication. All other claimants without job attachment or in agency–approved training receive a brief, one–on–one orientation to reemployment services to learn about the reemployment and training resources available to them. This is referred to as the "100% program," reflecting the fact that all claimants without a clear prospect of returning to work are supported in their job search efforts. The RESEA and 100% program activities focus on identification of local or regional jobs and high–demand training opportunities. Claimants may also receive comprehensive, specialized assessments and referral to Adult Basic Education, Job Corps, Apprenticeship programs or on–the–job training. Job Service staff interview claimants to probe for issues on their UI claims, to assess job readiness and to search for barriers to employment. Case notes recorded in MontanaWorks document fact–finding on issues. These notes are available to UI staff for additional fact–finding and adjudication. Several self–service resources are available to job seekers online. The MontanaWorks system includes the RESEA Assessment Survey, a tool to develop an Individual Employment Plan, career information and job matching resources. Job seekers may also use the Montana Career Guide, mock interview activities, career planning activities and a pocket resume resource to help organize their information for job applications and interviews. The system is

designed for user–friendliness, with a drop down menu of Services and Tasks from which customers can access the resources they need. Customers registered with MontanaWorks can view jobs and receive email notification of jobs that meet their skills and interest. Additionally, the Montana Career Information System (MCIS) provides a number of online assessments and resources for job seekers. MCIS allows job seekers to create an e–portfolio to store the results of all their assessments, create resumes, and explore occupations, education and training options. PEP Talk is a workbook, used in conjunction with MCIS, which helps job seekers quickly go through the career planning process to create an education and employment plan. Job Service, University, and community–based organization staff are trained to help clients navigate and interpret the results of their assessments. As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, integration strategies include training for Employment Services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

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;

Montana serves claimants in declining industries, ex–military claimants and those at risk of becoming long–term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department.

RESEA/100% appointments provide coordination and provision of labor exchange services through Job Service Montana offices.

W-P funds will be used to support UI claimants by providing job search and placement services, including counseling, testing, occupational and labor market information, assessment and referral to employers as well as by providing services for workers who have received notice of permanent layoff or impending layoff, or workers in occupations which are experiencing limited demand due to technological change, impact of imports, or plant closures.

W-P funds will be used to administer the work test for the State unemployment compensation system; and providing job finding and placement services for unemployment insurance claimants; and providing unemployment insurance claimants with referrals to, and application assistance for, training and education resources and programs.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

Under the direction of Montana’s Commissioner of Labor, Job Service staff work with all Unemployment Insurance (UI) claimants, with the exception of job–attached claimants. Claimants (other than job–attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office.

Montana requires in our State law that UI claimants register with their Job Service Offices.

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

Montana serves claimants in declining industries, ex–military claimants and those at risk of becoming long–term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow–on referrals to reemployment services focus on identifying high–demand jobs and training opportunities available locally or regionally, that can lead to higher–paying, long–term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Montana is working to develop combined state performance accountability measures that are intended to measure the following data across the core programs: The number of job seekers receiving services. The number of job seekers receiving referrals to partner services. The number of customers placed in employment. The number of employer contacts made. Describe results of assessments conducted in the past two years of the core programs' effectiveness Core programs are assessed each year based on State performance accountability measures. Where programs are found to be deficient, a report is written and technical assistance provided when necessary. As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, integration strategies include training for Employment Services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

Specific assessment protocols are in place in each local Job Service office that provide:

* guidance to local Job Service office staff as to the barriers and needs of the individual

* insight into the employment and career goals of the individual

* a basis for referral(s) to appropriate OneStop partners including WIOA education and training programs

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.

Assessment of Need The Value of Agricultural Production In 2014 agriculture generated $4.4 billion in income on 27,800 farms and ranches in Montana, making it Montana's largest industry. A comparison of selected Montana industries shows agriculture continues to outpace all other industry sectors. The 2014 value of crop production decreased to $2.2 billion, a decrease of $360.4 million or 14% below 2013. The value of livestock increased in 2014 to $2.2 billion, up $487.2 million from 2013. When comparing major industrial sectors in Montana, receipts were mixed compared to a year ago. Agriculture showed a 1% decrease, down $43.1 million from 2013. In 2014 crop production accounted for 50.3% of total agricultural production in Montana. By commodity group, food grains were valued at $1.25 billion in 2014, which is 56% of the total value of the state's crop production. Feed crops were valued at $659 million in Montana, comprising 29% of the crop production in 2014. Oil crops, fruits and tree nuts, vegetables and other crops made up another $359 million or 15% in crop value for 2014. The value of livestock production in Montana accounted for approximately half (49.6%) of total agricultural production for 2014. Meat animals were valued at $2.1 billion, which accounts for 95% of the total value of the state's livestock production. Poultry and eggs, dairy products, wool, honey and miscellaneous livestock make up 4.6% or $193 million of value in livestock production for 2014.

On an individual commodity basis, cattle and calves were Montana's most valuable commodity in 2014, with cash receipts totaling $1.99 billion. Wheat was the second most valuable commodity totaling $1.25 billion in cash receipts. A distant third for 2014 cash receipts is hay, at $3.9 million in Montana. Four of the six major livestock products in Montana for 2014 increased in value from the prior year. Wool and honey saw slight decreases in their cash receipts for 2014 compared to 2013. Of the 11 major crops only three commodities: oil crops, lentils and sweet cherries had an increase in value from 2013. Wheat and livestock account for nearly three–fourths (71.9%) of the state's agricultural receipts according to data from the Montana field office of the National Agricultural Statistics Service. Montana became the leading producer of pea and lentil "pulse crops" four years ago, and has held that position since. Montana is ranked second in the nation for average farm size, barley, spring wheat, winter wheat, durum wheat, Austrian winter peas, safflower and flaxseed production. Finally, Montana is ranked third in the nation for all wheat production and canola production. Montana agriculture is becoming more diverse and continues to add value to products that are available both locally and globally. Increasing production of corn and soybean crops that have been genetically modified will continue to expand opportunities for Montana producers, but also will require more advance planning. A majority of the nation's corn, soybeans and canola crops contain genes that confer herbicide resistance or defenses against insects. Coexistence between genetically modified, conventionally grown and organic crops requires that measures be taken to prevent comingling of GMO crops and identity–preserved or organically certified crops. Montana is

actively engaging in good neighbor efforts to avoid contamination and allowing each farmer to grow and market his or her desired products, which are often sold for a premium price.

Agricultural Employment in Montana The employment rates in agriculture are very difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production. Crop production in Montana is affected by our short growing season. It is not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted during certain times of the year, weeded, fertilized and then harvested as they mature or ripen. Montana growers have employed a substantial number of seasonal farm workers who sometimes will move from farm to farm but most often workers will stay on with one employer for the entire season. Montana–based seasonal farm workers typically are employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). The official estimates of agricultural employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agricultural workers available in their areas. This results in a steadily increasing rate of using the foreign labor H–2A program. The 2012 Census of Agriculture shows that 23,199 individuals worked for 7,322 farm and/or ranch employers in Montana. This estimate of agricultural workers shows little change between the peak season and low season, as the majority of agricultural workers for Montana are not a migrant community. The predominant demographic of Montana migrant seasonal farm workers (MSFWs) is a Montana resident that does not travel significant distances for seasonal/temporary work, or is a year–round employee, and is English–speaking. Since 2012, Montana farm payrolls have been steady with slight decreases. According to the Quarterly Census of Employment and Wages, agriculture employment accounts for approximately 1% of the total workforce. Montana DLI has established three workforce regions. The agricultural jobs in Montana are not necessarily concentrated in regional pockets but are spread throughout the state. Although there is not a single region with a concentration of agricultural employment, one county, Beaverhead, in region 2 has a higher number of employers utilizing farm workers. Table 3 shows the mean and median wages of agricultural occupations in Montana in 2014. This information was obtained from the Research & Analysis Bureau's Occupational Employment Statistics. In the Occupational Employment Statistics (OES) survey conducted in Montana several farm labor categories were not surveyed; in particular, the Farmers, Ranchers, and Other Agricultural Manager and Animal Breeder categories. The three categories listed are historically the highest paid professions. From the information collected in the Montana 2014 OES survey, the First–line Supervisors of Farming, Fishing, and Forestry Workers category was the highest paid, earning $38,650 annually on average. The next highest paid categories were Agricultural Workers, All Other ($34,770); Farming, Fishing and Forestry Occupations ($30,430), and Inspectors ($29,720). The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) participant is less than $6,200 annually. Many basic family needs such as nutrition, housing, health care, child care and transportation are out of reach for farm worker families. Montana has two particularly labor intensive crops; sweet cherries and huckleberries. The harvesting of these is done exclusively by hand picking. Both of these commodities are only produced during the summer season in Montana in Workforce Region 1. The Montana cherries growers produce primarily for the fresh market. Number of Migrant and Seasonal Farm Workers in Montana Estimates of agricultural employment in this report are derived from agricultural labor data that the Montana NFJP contractor (Rural Employment Opportunities) has provided to

Montana Department of Labor. Given the crop cycle, demand for farm workers tends to be highly seasonal, with peak periods of demand often lasting for a short duration. As a result, high job turnover and worker mobility are distinguishing features of the agricultural labor market. Survey–based official employment estimates conducted by the DLI count permanent farm jobs and any jobs filled by MSFWs identified by employers as working during the survey's reporting week. They do not necessarily count positions that are filled by MSFWs at other times of the month or workers that the employer brings on and doesn't report on tax roll and/or for Workman's Compensation and Unemployment Insurance. This report provides a best estimate of the number of MSFWs in Montana in 2014 since limitations on data availability preclude making a precise estimate. This best estimate references the Montana Department of Labor and Industry's Labor Day Report, 2012 Census of Agriculture and Rural Employment Opportunities. Given the lack of alternative or more up–to–date information, this report assumes that the observed relationship between the number of jobs and numbers of farm workers in 2012 has been constant, or little changed, over the last 4 years. Actual trends in the official agricultural employment data offer support for this assumption, including data from the economic rebound. Although displaying year–to–year variables, overall agricultural employment levels in Montana do not appear to have changed much over the last six years. The best estimate of MSFWs in Montana is 23,199. Barring any significant changes in crops and livestock production in Montana, the estimated numbers of MSFWs in Montana are expected to remain near these same levels over the next year.

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.

Refer to 1. Assessment of need

Top five labor-intensive crops are Spring Wheat at 104,300,000 bushels; Winter Wheat at 91,840,000 bushels; Canola at 84,180,000; Barley at 44,660,000 and Safflower at 42,420,000. Information from: https://www.nass.usda.gov/Statistics_by_State/Montana/Publications/Annual_Statistical_Bulletin/2015/Montana_Annual_Bulletin_2015.pdf

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.

Refer to 1. Assessment of need

From October 1, 2015 through June 30, 2016, 575 H2A workers were certified to work in Montana for 223 unique employers. The most common countries of origin of the H2A workers in Montana are Mexico, Peru and South Africa. The languages spoken by these individuals are Spanish and Afrikaans although most are bilingual. https://www.foreignlaborcert.doleta.gov/performancedata.cfm

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:

Outreach Activities Montana has a working partnership with the Montana NFJP grantee, Rural Employment Opportunities (REO) as well as with Migrant Education. DLI actively collaborates in outreach efforts with these organizations. REO is the WIOA Section 167 grantee in Montana and has field staff deployed around the state. In that capacity, REO has separate reporting and tracking requirements. REO has nine field offices around the state. Four of these are co–located in the Job Service offices. The other five field offices that are not co–located in the Job Services partner closely with the office in their respective areas. The agreements between these agencies require coordinated services, including outreach activities. The REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to Job Service offices or community–based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not reached by workforce staff. REO provides employment and training options/funding to MSFWs around the state and also to their qualifying dependents. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full–time and to become economically self–sufficient. Individuals are referred for additional services to Job Service offices or community based organizations. REO, in partnership with the Montana Food Bank, provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers. DLI and REO have a Memorandum of Understanding (MOU) in place. This MOU contains elements of annual joint outreach training opportunities and staff meetings, information–sharing between the partners regarding MSFW services, and collaboration on special projects and training. The Job Service expects to assign at least 876 hours of staff time to outreach in the next year. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP (Food Stamps) and TANF (cash

assistance) public assistance office, upcoming opportunities for occupational trainings, contact information for the local migrant council, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing if housing is needed. There are 21 outreach workers located in Job Service offices throughout the state who conduct a variety of MSFW outreach activities year–round. Outreach workers spend time in the service area contacting, explaining and encouraging MSFWs to use the services and resources available at the office. The outreach workers find MSFWs throughout the state, especially in rural areas where they live, work, and gather, such as markets, parks and other locations. The many responsibilities of the outreach workers include the following duties: Educating MSFWs on rights with respect to terms and condition of employment Developing and maintaining links between MSFWs, Job Service offices, public and private community agencies, MSFW groups and employers Coordinating outreach efforts with MSFW community service providers Assisting MSFWs with job search and placement, initiating job development contacts, and referrals to supportive services Assisting with the completion of the MontanaWorks system registration, resume, job applications and other documents as needed Providing assistance with obtaining unemployment insurance benefits, information on the UI4U web site, and referrals to specific employment opportunities if MSFWs are unemployed Making referrals to supportive services which MSFWs and their family members may be eligible to receive Providing information regarding current and future employment opportunities which may be available; this includes posting job orders and informing MSFWs about available H–2A job orders Informing MSFWs of the full range of available services, including job training opportunities available through Job Service offices and the local community–based organizations Informing MSFWs about the Job Service complaint system and providing assistance with filing and processing complaints In addition, information from WIOA Section 167 partners located in Job Service offices throughout the state is included to help MSFWs receive a comprehensive blend of core, intensive, and training services designed to place them into full–time, non–seasonal employment or upgraded agricultural employment. The outreach workers are also heavily engaged in the recruitment efforts of domestic workers to H–2A job vacancies. These activities include: Performing various recruitment activities, including outreach, to find and refer qualified domestic workers in order to fill H–2A job openings Encouraging agricultural employers to use the Agricultural Recruitment System for publishing job openings to fill their job openings locally and/or through the H–2A program, if necessary Conducting follow up contacts with domestic employees that were either referred to or applied to an H–2A job posting through the Job Service REO, as a partner in this effort, provides supportive services (gas and food) to qualifying H–2A workers The data gathered by the outreach workers on the number of MSFWs contacted through outreach activities and by other agencies in the area are recorded and submitted to the Monitor Advocate in the central office. The Monitor Advocate works directly with the Job Service offices to ensure that these sites are in compliance with federal mandates and Montana Workforce Services Division policies and procedures. Montana continues to partner with Rural Employment Opportunities, Migrant Education and the local Migrant Councils to assist in overcoming barriers and in providing services to the MSFWs. The required number of MSFW contacts by outreach staff per day, according Department of Labor guidelines, is a minimum of five contacts per eight hours worked. The outreach staff that are assigned to each Job Service office are not full–time outreach staff. Each of these staff members has several duties that must be met each day. Table 4 illustrates the goals for each local office where outreach workers are assigned. *Goal is based on an average month, not an eight–hour day because outreach employees are not dedicated to outreach full–time.

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

Refer to 2. Outreach Activities

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.

Refer to 2. Outreach Activities

Technical assistance provided to outreach workers will include small group training sessions at the local office level or yearly conferences with presentations concerning technical issues for all staff involved in outreach endeavors. Additional technical and computer resources will be offered to local office staff and WIOA partners. This collaboration with other organizations will offer informational resources through technical assistance to one-stop center services via information accessible to job seekers and MSFWs offering a basic summary of farmworker rights and how to understand the terms and conditions of employment being offered.

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.

Refer to 2. Outreach Activities

Increasing outreach worker training and awareness across core programs including the Unemployment Insurance program and the training on identification of UI eligibility issues through technical training modules and small group training sessions.

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.

Refer to 2. Outreach Activities

State merit staff outreach workers will be offered professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

through training conducted via PowerPoint Presentations, Conferences and Telephone Conferencing.

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

Refer to 2. Outreach Activities

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

Describe the State agency's proposed strategies for:

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

XI. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;

XII. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

Services Provided to Farmworkers and Agricultural Employers through One–Stop Centers Services Provided to MSFWs through the One–Stop System Montana is required to make the services of the Job Service offices available to all job seekers, including MSFWs, in an equitable manner. Each Job Service office must offer the full range of employment services, benefits and protections; this includes the full range of employment counseling, testing, job training, and referral services to MSFWs just as they are provided to non–MSFWs. Therefore, the services available from Job Service offices, including all other DOL–funded WIOA services, must be available to MSFWs in a manner appropriate to their needs as job seekers. The U.S. Department of Labor’s Employment and Training Administration (ETA) requires that states ensure equity of services for MSFWs and non–MSFWs. Montana’s Indicator of Compliance reports record all service outcomes tracked for regular job seekers, including MSFWs, such as receiving staff–assisted services, referrals to supportive services, referrals to jobs, career guidance, and job development contacts to ensure MSFWs continue to receive qualitatively equivalent and quantitatively proportionate services. Services Provided to Agricultural Employers through the One–Stop System The Montana Workforce Services Division recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for agricultural services comes from Wagner–Peyser and Foreign Labor Certification funds granted to the state annually. Wagner–Peyser funds are given to Montana on a formula basis. The Foreign Labor Certification funds are provided by DOL/ETA to Montana to process foreign labor application requests, conduct housing inspections, conduct agricultural wage and prevailing practice surveys, and collect agricultural crop and labor information. The Job Service offices provide customized services to employers on an individual and as

needed basis. These services are in addition to the MontanaWorks system, the online system available universally and at each Job Service office. MontanaWorks is used for registering job seekers for employment services, posting job openings online as well as in the offices, tracking services provided to job seekers and employers, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural employers: ? Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural employers ? Encourage agricultural employers to publish their job openings using MontanaWorks to fill job openings ? Provide labor market information with such data as supply and demand, salaries, training requirements, new and emerging occupations and industry growth ? Provide Rapid Response services due to planned closure or mass layoffs Additionally, REO provides employers with reimbursement of up to 75% of a participant's wages during a contracted work experience or OJT.

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

Refer to 3. Services provided to farmworkers and agricultural employers through the one–stop delivery system part a

Marketing the Employment Service Complaint System written materials, posters and verbal communication particularly in areas farmworkers gather such as community picnics, churches and other community events.

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

Refer to 3. Services provided to farmworkers and agricultural employers through the one–stop delivery system part a

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).

Workload requirements are such that the State Monitor Advocate also serves as the State Workforce Advocate. This person oversees the agricultural operations of Job Service offices to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non–MSFWs. Thus, the Monitor Advocate employee works as both a monitor and an advocate for the MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach

Plan as required by Title 20 CFR part 653.111 (h). This Agricultural Outreach Plan has been shared with the NFJP grantee, Rural Employment Opportunities (REO) for which they have had the opportunity to comment. This plan has also been provided to the State Workforce Innovation Board for public comment. Following public comment, the AOP, comments received and responses to the comments will be provided to the Montana State Workforce Innovation Board for approval.

There will be increased collaboration with our existing partner, the NJP Grant Holder, REO, through the MOU signed by both parties. Additional partnerships will be sought with Montana Migrant Council and Montana Legal Services Association, both farmworker advocacy groups.

(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.

See APPENDIX 4 for public comment.

(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.

Montana has consistently met five of the five equity ratio indicators during PY 2013–2014 and has been making steady improvement in meeting the minimum service level indicators from three of the seven to currently meeting five of the seven service level indicators. To ensure that all equity indicators will be met going forward, the Monitor Advocate has begun conducting annual programmatic reviews of all Job Service offices. After reviewing program performance data, the Monitor Advocate will contact the office manager to discuss findings and offer initial recommendations and appropriate technical assistance. If the Monitor Advocate identifies a finding, a Corrective Action Plan is requested and the Monitor Advocate follows up with each Job Service site to ensure that the Corrective Action Plan is being implemented appropriately and is brought into full compliance.

(D) ASSESSMENT OF PROGRESS

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

In 2014 agriculture generated $4.4 billion in income on 27,800 farms and ranches in Montana, making it Montana's largest industry. A comparison of selected Montana industries shows agriculture continues to outpace all other industry sectors. The 2014 value of crop production decreased to $2.2 billion, a decrease of $360.4 million or 14% below 2013. The value of livestock increased in 2014 to $2.2 billion, up $487.2 million from 2013. When comparing major industrial sectors in Montana, receipts were mixed compared to a year ago. Agriculture showed a 1% decrease, down $43.1 million from 2013. In 2014 crop production accounted for 50.3% of total agricultural production in Montana. By commodity group, food grains were valued at $1.25 billion in 2014, which is 56% of the total value of the state's crop production. Feed crops were valued at $659 million in Montana, comprising 29% of the crop production in 2014. Oil crops, fruits and tree nuts, vegetables and other crops made up another $359 million or 15% in crop value for 2014. The value of livestock production in Montana accounted for approximately half (49.6%) of total agricultural production for 2014. Meat animals were valued at $2.1 billion, which accounts for 95% of the total value of the state's livestock production. Poultry and eggs, dairy products, wool, honey and miscellaneous livestock make up 4.6% or $193 million of value in livestock production for 2014.

On an individual commodity basis, cattle and calves were Montana's most valuable commodity in 2014, with cash receipts totaling $1.99 billion. Wheat was the second most valuable commodity totaling $1.25 billion in cash receipts. A distant third for 2014 cash receipts is hay, at $3.9 million in Montana. Four of the six major livestock products in Montana for 2014 increased in value from the prior year. Wool and honey saw slight decreases in their cash receipts for 2014 compared to 2013. Of the 11 major crops only three commodities: oil crops, lentils and sweet cherries had an increase in value from 2013. Wheat and livestock account for nearly three–fourths (71.9%) of the state's agricultural receipts according to data from the Montana field office of the National Agricultural Statistics Service. Montana became the leading producer of pea and lentil "pulse crops" four years ago, and has held that position since. Montana is ranked second in the nation for average farm size, barley, spring wheat, winter wheat, durum wheat, Austrian winter peas, safflower and flaxseed production. Finally, Montana is ranked third in the nation for all wheat production and canola production. Montana agriculture is becoming more diverse and continues to add value to products that are available both locally and globally. Increasing production of corn and soybean crops that have been genetically modified will continue to expand opportunities for Montana producers, but also will require more advance planning. A majority of the nation's corn, soybeans and canola crops contain genes that confer herbicide resistance or defenses against insects. Coexistence between genetically modified, conventionally grown and organic crops requires that measures be taken to prevent comingling of GMO crops and identity–preserved or organically certified crops. Montana is actively engaging in good neighbor efforts to avoid contamination and allowing each farmer to grow and market his or her desired products, which are often sold for a premium price.
SOURCE: 2015 Department of Agriculture Statistics

Cash Receipts – 2014

Agricultural Employment in Montana The employment rates in agriculture are very difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production. Crop production in Montana is affected by our short growing season. It is not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted during certain times of the year, weeded, fertilized and then harvested as they mature or ripen. Montana growers have employed a substantial number of seasonal farm workers who sometimes will move from farm to farm but most often workers will stay on with one employer for the entire season. Montana–based seasonal farm workers typically are employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). The official estimates of agricultural employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agricultural workers available in their areas. This results in a steadily increasing rate of using the foreign labor H–2A program. The 2012 Census of Agriculture shows that 23,199 individuals worked for 7,322 farm and/or ranch employers in Montana. This estimate of agricultural workers shows little change between the peak season and low season, as the majority of agricultural workers for Montana are not a migrant community. The predominant demographic of Montana migrant seasonal farm workers (MSFWs) is a Montana resident that does not travel significant distances for seasonal/temporary work, or is a year–round employee, and is English–speaking. Since 2012, Montana farm payrolls have been steady with slight decreases. According to the Quarterly Census of Employment and Wages, agriculture employment accounts for approximately 1% of the total workforce. Montana DLI has established three workforce regions. These regions are displayed in Figure 1.

The agricultural jobs in Montana are not necessarily concentrated in regional pockets but are spread throughout the state. Although there is not a single region with a concentration of agricultural employment, one county, Beaverhead, in region 2 has a higher number of employers utilizing farm workers. Table 3 shows the mean and median wages of agricultural occupations in Montana in 2014. This information was obtained from the Research & Analysis Bureau's Occupational Employment Statistics.

In the Occupational Employment Statistics (OES) survey conducted in Montana several farm labor categories were not surveyed; in particular, the Farmers, Ranchers, and Other Agricultural Manager and Animal Breeder categories. The three categories listed are historically the highest paid professions. From the information collected in the Montana 2014 OES survey, the First–line Supervisors of Farming, Fishing, and Forestry Workers category was the highest paid, earning $38,650 annually on average. The next highest paid categories were Agricultural Workers, All Other ($34,770); Farming, Fishing and Forestry Occupations ($30,430), and Inspectors ($29,720). The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) participant is less than $6,200 annually. Many basic family needs such as nutrition, housing, health care, child care and transportation are out of reach for farm worker families. Montana has two particularly labor intensive crops; sweet cherries and huckleberries. The harvesting of these is done exclusively by hand picking. Both of these commodities are only produced during the summer season in Montana in Workforce Region 1. The Montana cherries growers produce primarily for the fresh market. Number of Migrant and Seasonal Farm Workers in Montana Estimates of agricultural employment in this report

are derived from agricultural labor data that the Montana NFJP contractor (Rural Employment Opportunities) has provided to Montana Department of Labor. Given the crop cycle, demand for farm workers tends to be highly seasonal, with peak periods of demand often lasting for a short duration. As a result, high job turnover and worker mobility are distinguishing features of the agricultural labor market. Survey–based official employment estimates conducted by the DLI count permanent farm jobs and any jobs filled by MSFWs identified by employers as working during the survey's reporting week. They do not necessarily count positions that are filled by MSFWs at other times of the month or workers that the employer brings on and doesn't report on tax roll and/or for Workman's Compensation and Unemployment Insurance. This report provides a best estimate of the number of MSFWs in Montana in 2014 since limitations on data availability preclude making a precise estimate. This best estimate references the Montana Department of Labor and Industry's Labor Day Report, 2012 Census of Agriculture and Rural Employment Opportunities. Given the lack of alternative or more up–to–date information, this report assumes that the observed relationship between the number of jobs and numbers of farm workers in 2012 has been constant, or little changed, over the last 4 years. Actual trends in the official agricultural employment data offer support for this assumption, including data from the economic rebound. Although displaying year–to–year variables, overall agricultural employment levels in Montana do not appear to have changed much over the last six years. The best estimate of MSFWs in Montana is 23,199. Barring any significant changes in crops and livestock production in Montana, the estimated numbers of MSFWs in Montana are expected to remain near these same levels over the next year. Outreach Activities Montana has a working partnership with the Montana NFJP grantee, Rural Employment Opportunities (REO) as well as with Migrant Education. DLI actively collaborates in outreach efforts with these organizations. REO is the WIOA Section 167 grantee in Montana and has field staff deployed around the state. In that capacity, REO has separate reporting and tracking requirements. REO has nine field offices around the state. Four of these are co–located in the Job Service offices. The other five field offices that are not co–located in the Job Services partner closely with the office in their respective areas. The agreements between these agencies require coordinated services, including outreach activities. The REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to Job Service offices or community–based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not reached by workforce staff. REO provides employment and training options/funding to MSFWs around the state and also to their qualifying dependents. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full–time and to become economically self–sufficient. Individuals are referred for additional services to Job Service offices or community based organizations. REO, in partnership with the Montana Food Bank, provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers. DLI and REO have a Memorandum of Understanding (MOU) in place. This MOU contains elements of annual joint outreach training opportunities and staff meetings, information–sharing between the partners regarding MSFW services, and collaboration on special projects and training. The Job Service expects to assign at least 876 hours of staff time to outreach in the next year. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits and protections afforded to MSFWs. Materials that

are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP (Food Stamps) and TANF (cash assistance) public assistance office, upcoming opportunities for occupational trainings, contact information for the local migrant council, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing if housing is needed. There are 21 outreach workers located in Job Service offices throughout the state who conduct a variety of MSFW outreach activities year–round. Outreach workers spend time in the service area contacting, explaining and encouraging MSFWs to use the services and resources available at the office. The outreach workers find MSFWs throughout the state, especially in rural areas where they live, work, and gather, such as markets, parks and other locations. The many responsibilities of the outreach workers include the following duties: ? Educating MSFWs on rights with respect to terms and condition of employment ? Developing and maintaining links between MSFWs, Job Service offices, public and private community agencies, MSFW groups and employers ? Coordinating outreach efforts with MSFW community service providers ? Assisting MSFWs with job search and placement, initiating job development contacts, and referrals to supportive services ? Assisting with the completion of the MontanaWorks system registration, resume, job applications and other documents as needed ? Providing assistance with obtaining unemployment insurance benefits, information on the UI4U web site, and referrals to specific employment opportunities if MSFWs are unemployed ? Making referrals to supportive services which MSFWs and their family members may be eligible to receive ? Providing information regarding current and future employment opportunities which may be available; this includes posting job orders and informing MSFWs about available H–2A job orders ? Informing MSFWs of the full range of available services, including job training opportunities available through Job Service offices and the local community–based organizations ? Informing MSFWs about the Job Service complaint system and providing assistance with filing and processing complaints In addition, information from WIOA Section 167 partners located in Job Service offices throughout the state is included to help MSFWs receive a comprehensive blend of core, intensive, and training services designed to place them into full–time, non–seasonal employment or upgraded agricultural employment. The outreach workers are also heavily engaged in the recruitment efforts of domestic workers to H–2A job vacancies. These activities include: ? Performing various recruitment activities, including outreach, to find and refer qualified domestic workers in order to fill H–2A job openings ? Encouraging agricultural employers to use the Agricultural Recruitment System for publishing job openings to fill their job openings locally and/or through the H–2A program, if necessary ? Conducting follow up contacts with domestic employees that were either referred to or applied to an H–2A job posting through the Job Service ? REO, as a partner in this effort, provides supportive services (gas and food) to qualifying H–2A workers The data gathered by the outreach workers on the number of MSFWs contacted through outreach activities and by other agencies in the area are recorded and submitted to the Monitor Advocate in the central office. The Monitor Advocate works directly with the Job Service offices to ensure that these sites are in compliance with federal mandates and Montana Workforce Services Division policies and procedures. Montana continues to partner with Rural Employment Opportunities, Migrant Education and the local Migrant Councils to assist in overcoming barriers and in providing services to the MSFWs. The required number of MSFW contacts by outreach staff per day, according Department of Labor guidelines, is a minimum of five contacts per eight hours worked. The outreach staff that are assigned to each Job Service office are not full–time outreach staff. Each of these staff members has several duties that must be met each day. Table 4 illustrates the goals for each local office where outreach

workers are assigned. *Goal is based on an average month, not an eight–hour day because outreach employees are not dedicated to outreach full–time.

Services Provided to Farmworkers and Agricultural Employers through One–Stop Centers Services Provided to MSFWs through the One–Stop System Montana is required to make the services of the Job Service offices available to all job seekers, including MSFWs, in an equitable manner. Each Job Service office must offer the full range of employment services, benefits and protections; this includes the full range of employment counseling, testing, job training, and referral services to MSFWs just as they are provided to non–MSFWs. Therefore, the services available from Job Service offices, including all other DOL–funded WIOA services, must be available to MSFWs in a manner appropriate to their needs as job seekers. The U.S. Department of Labor's Employment and Training Administration (ETA) requires that states ensure equity of services for MSFWs and non–MSFWs. Montana's Indicator of Compliance reports record all service outcomes tracked for regular job seekers, including MSFWs, such as receiving staff–assisted services, referrals to supportive services, referrals to jobs, career guidance, and job development contacts to ensure MSFWs continue to receive qualitatively equivalent and quantitatively proportionate services. Services Provided to Agricultural Employers through the One–Stop System The Montana Workforce Services Division recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for agricultural services comes from Wagner–Peyser and Foreign Labor Certification funds granted to the state annually. Wagner–Peyser funds are given to Montana on a formula basis. The Foreign Labor Certification funds are provided by DOL/ETA to Montana to process foreign labor application requests, conduct housing inspections, conduct agricultural wage and prevailing practice surveys, and collect agricultural crop and labor information. The Job Service offices provide customized services to employers on an individual and as needed basis. These services are in addition to the MontanaWorks system, the online system available universally and at each Job Service office. MontanaWorks is used for registering job seekers for employment services, posting job openings online as well as in the offices, tracking services provided to job seekers and employers, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural employers: ? Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural employers ? Encourage agricultural employers to publish their job openings using MontanaWorks to fill job openings ? Provide labor market information with such data as supply and demand, salaries, training requirements, new and emerging occupations and industry growth ? Provide Rapid Response services due to planned closure or mass layoffs Additionally, REO provides employers with reimbursement of up to 75% of a participant's wages during a contracted work experience or OJT. Review and Comment by Key Stakeholders Workload requirements are such that the State Monitor Advocate also serves as the State Workforce Advocate. This person oversees the agricultural operations of Job Service offices to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non–MSFW

Although significant outreach was achieved by local offices, the stated goal from the previous Agricultural Outreach Plan was not successfully reached. To remedy this, additional training in recognizing MSFWs and how to record each outreach contact and service offered to the MSFW.

(E) STATE MONITOR ADVOCATE

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

Workload requirements are such that the State Monitor Advocate also serves as the State Workforce Advocate. This person oversees the agricultural operations of Job Service offices to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non–MSFWs. Thus, the Monitor Advocate employee works as both a monitor and an advocate for the MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111 (h). This Agricultural Outreach Plan has been shared with the NFJP grantee, Rural Employment Opportunities (REO) for which they have had the opportunity to comment. This plan has also been provided to the State Workforce Innovation Board for public comment. Following public comment, the AOP, comments received and responses to the comments will be provided to the Montana State Workforce Innovation Board for approval. Data Assessment Montana has consistently met five of the five equity ratio indicators during PY 2013–2014 and has been making steady improvement in meeting the minimum service level indicators from three of the seven to currently meeting five of the seven service level indicators. To ensure that all equity indicators will be met going forward, the Monitor Advocate has begun conducting annual programmatic reviews of all Job Service offices. After reviewing program performance data, the Monitor Advocate will contact the office manager to discuss findings and offer initial recommendations and appropriate technical assistance. If the Monitor Advocate identifies a finding, a Corrective Action Plan is requested and the Monitor Advocate follows up with each Job Service site to ensure that the Corrective Action Plan is being implemented appropriately and is brought into full compliance. This Agricultural Outreach Plan has been shared with the NFJP grantee, Rural Employment Opportunities (REO) for which they have had the opportunity to comment. This plan has also been provided to the State Workforce Innovation Board for public comment. Following public comment, the AOP, comments received and responses to the comments will be provided to the Montana State Workforce Innovation Board for approval.

The State Monitor Advocate has approved 2016’s AOP.

F. WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3)); Yes

2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; Yes

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under Title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Montana State Office of Public Instruction (OPI) Common Core Standards (CCR) were adopted on November 4, 2011, with Montana being the last of 46 states to adopt these standards for K–12 education. These standards ensure that secondary students graduate prepared for college and the workforce, as they reflect the knowledge and skills that students need to be successful in the 21st century economy such as problem–solving, critical thinking, communication, teamwork, research and use of technology.

In February 2015, the Adult Education (AE) unit at the OPI adopted the College and Career Readiness Standards for Adult Education. These standards have identified the essential CCR standards that need to be incorporated into the adult education classroom. By adopting these standards, the Montana AE programs will have student expectations that are consistent with K–12 students. Additionally, AE programs will have access to K–12 tools and materials that support student learning.

The adoption of the College and Career Readiness Standards will drive adult education professional development, acquisition of textbook and technology–based resources, and selection of formative and summative assessments. Aligning adult education standards with the OPI CCR provides all adult students with the same academic opportunity to be prepared for employment or postsecondary training without remediation. Eligible providers will work with the state to identify curricular framework for the standards that take into account academic requirements for non–credit bearing courses in postsecondary and occupational standards. The eligible provider will ensure that all teachers have implemented, or will implement standards–based education, and agree to participate in ongoing professional development that supports standards–based education.

B. LOCAL ACTIVITIES

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

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

The state will require eligible providers to operate a program that will include adult education, literacy, work place adult education and literacy activities, English language acquisition activities, Integrated English literacy and civics education, work force preparation activities, or integrated education and training.

In 2015, all adult education providers successfully completed a Local System Logic Model that demonstrates how they can integrate all the adult education and literacy activities listed above in order to effectively provide the comprehensive adult education services required for transitioning adult to postsecondary education, occupational training or employment. This model has been the driving force for adult education services during the past program year. This confirms that programs can and are willing to deliver a variety of services in order to best meet individual student needs.

The foundation of every providers' Local System Model was the identification of partners they would need to collaborate with in order to provide the necessary variety of adult education and literacy activities. This allows for all activities to be provided concurrently with other activities as needed.

All eligible adult education and literacy providers will assess the need for providing an English language acquisition and civics education program in their area, and provide services when there is a demonstrated need. Services will include English Language Acquisition and Integrated Literacy and Civics Education.

The state will not fund family literacy activities, as this has not been included in the Montana allowable activities in the past. Limited resources have been the basis for this decision.

The Montana ABE will use the 13 considerations listed under “Required Local Activities” to fund each eligible provider in establishing and operating programs that provide AE and literacy activities. The Request for Proposals (RFP) will include the considerations and ask for respondents to summarize how they meet the described elements. Readers will be given a rubric and scoring guide that includes these considerations. Funding will be determined using a performance–based formula.

The state will fund local providers that can provide services to adults 16 years and older, not enrolled in secondary school, to include adult education and literacy services, peer tutoring, career pathways, and concurrent enrollment. Local providers will be selected with several criteria:

1. Scope: Programs must be able to provide data demonstrating they have met previously proposed state targets for the required percent of students making a measureable academic gain. For programs not previously funded, data demonstrating student learning gain, especially for individuals with low–levels of literacy, will need to be provided. Programs will also need to make available data that demonstrate they have provided students the knowledge and skills needed for successful transition to postsecondary education or employment. Both measureable skill gain data and transition data must be disaggregated to demonstrate a history of success with students who have low levels of literacy, disabilities (including learning disabilities), or are English language learners.

Eligible providers will need to clearly articulate how their instructional delivery model will be aligned to the needs of one–stop, postsecondary, and employer partners. This alignment at a minimum must include the ability to offer flexible scheduling so that adult education services coordinate with the students’ wrap–around support services and logistic needs. The delivery model must be of sufficient intensity and duration so that the students’ will exit with the necessary skills to attain their career goal. Existing providers will base intensity and duration of service on demonstrated past effectiveness (student skill gain and transition outcomes) and the latest research on the effectiveness of time and intensity.

It will be critical for each program to validate their commitment to an instructional delivery model that can support high school equivalency attainment, as well as preparation for entrance into postsecondary, a training program, or employment for adults with, or without, a high school diploma. This support must lead to preparation for a career pathway for all students, including the low–skilled and under employed, in need of increasing their knowledge and skills for the next career step. All eligible providers will assess the need for providing an English language acquisition and civics education program in their area, and provide services when there is a demonstrated need. 2. Content: Eligible providers will verify that adult education activities are conducted by licensed (or having relevant adult education experience) teachers, counselors, or administrators, and confirm that all staff will participate in high quality professional development offered by the state AE unit. Professional development activities will include face–to–face and electronic means, so all staff will be able to participate in a variety of delivery venues.

Providers will ensure that they will make available curriculum that supports high school equivalency attainment, measureable skill gains, and career pathways. Instruction in all content areas (reading, writing, speaking, mathematics, and English language acquisition) will be delivered by staff who are knowledgeable of the essential components of reading instruction, or who will participate in State leadership activities focused on the essential

components of reading. Providers must use scientific, effective research–based instructional delivery models for students in all content areas. Providers will articulate how distance learning, and other modes of technology, will be integrated into instruction to support digital literacy attainment and meet students' specific learning needs.

The overarching goal of instruction for all students will be a successful transition to employment, postsecondary, or training according to their chosen career pathway. This will require instruction be contextualized, and student pathways guided by labor market needs and data from collaborative partnerships (education, one–stop partners, and employer). Providers will submit an annual Work Plan documenting all partnership activities that support student career pathways.

The array of program activities that support the individual students' career pathway must be based on each student's career portfolio. Eligible providers will describe how they will assist all students in setting up their career pathway portfolio through a series of lessons in the Montana Career Information System (MCIS)/PEP Talk. Providers will detail how teachers will be assisting students in aligning their skills and interests with a career choice and helping them to create long–and–short term goals to enter their career pathway. Each program will share their protocol for linking student career pathways to academic lessons that are relevant and supportive of students' career goal. Providers will confirm that they are continually developing curriculum and providing learning activities that are contextualized, so students acquire the 21st century knowledge and skills needed for transition to their individual career pathway. Providers will apprise the state of the key partners who are involved in the development of the contextualized curriculum. Eligible providers will also articulate how they plan to share student career portfolios with other agencies and support services.

Providers will ensure that the teaching staff offer a variety of instructional strategies that engage students and promote student persistence and retention; this should include whole group instruction, peer tutoring, and individualized instruction along with distance learning. The variety of instructional strategies will integrate academics, career counseling, and soft skills to bolster the students' ability to gain employment, go to college, or enter a training program that could include an apprenticeship.

3. Organization: Providers must make available documented evidence that they have the capacity to support the high quality data information system necessary to report measureable participant outcomes and monitor program performance. The system must collect all data elements that will be required for the WIOA Annual Statewide Performance Report. Primary indicators of performance that will be reported include: participants in unsubsidized employment during the second quarter after exit, participants in unsubsidized employment during the fourth quarter after exit, median earnings from unsubsidized employment the second quarter after exit, the percentage of students who obtain a postsecondary credential or a high school equivalency diploma, the percentage of students who participate in an education or training program, and percent achieving a measureable skill gain.

Providers must provide evidence of activities with other education institutions, local workforce partners, and agencies that support student career pathways. The MCIS/PEP Talk will be the common career planner used in adult education programs in order to share student career pathway information across agencies. The common career planning tool will be a resource in every AE program.

Beyond assisting students for attainment of a measureable skill gain, achieving a high school equivalency or postsecondary credential, or entering a career pathway, eligible providers must demonstrate that they have established cross–agency partnerships to help students navigate system challenges (completing applications, writing resumes, scheduling campus visits, etc.) that can be barriers to success. Providers must be willing to cooperate with agency partners to provide the wrap–around services common clients will require.

Through ongoing labor market analysis all providers will have an awareness of regional labor market needs to provide teachers with a working knowledge of regional career opportunities. Providers must be able to disclose their methodology for ensuring that employer and labor market needs are helping drive their instructional practice.

Allocations for providers will be awarded by a funding formula that recognizes the components of an effective AE program (WIOA Statewide Performance Report). Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Cost per student will be a consideration in awarding eligible providers; eligible providers will provide documentation of cost per student to demonstrate program effectiveness. Grant award preference will be given to providers that can demonstrate that instructional services will be delivered cost effectively to a reasonable number of students, and that they can make themselves readily available to core partners for necessary core–partner wrap around services. Consortium applications are encouraged to assist providers in meeting the cost benefit expectations and core partner collaboration.

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:

u. Adult education and literacy activities;
v. Special education, as determined by the eligible agency;
w. Secondary school credit;
x. Integrated education and training;
y. Career pathways;
z. Concurrent enrollment;
aa. Peer tutoring; and
bb. 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 Montana Office of Public Instruction will use no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Corrections 225 funds will be targeted for adult education and literacy activities and career pathways. Grant funds may be awarded to any eligible provider that offers appropriate services to incarcerated or institutionalized individuals. Funds will be awarded using the same competitive application process outlined in the Common Elements-Multi-year Grants or Contracts; after which providers may request funds on an annual basis through an extension application.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

The state will award allocations to correctional institutions (prisons, jails, reformatories, work farms, detention centers, halfway houses, community–based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders). Providers will demonstrate their ability to provide adult education that includes career pathway curriculum, integrated education and training (if available), peer tutoring, and transition initiatives that may lead to reduced recidivism. The state will give priority to providers who will be serving individuals who will be likely to leave the correctional facility within five years of participation in the program. Providers will confirm their ability to support individual participant’s career plans through curriculum and activities that assist in not only an achieving an academic measurable gain, but transition to employment or postsecondary or training after exit.

Eligible providers must provide documentation on their capacity to support high school equivalency attainment and career pathways. Eligible providers will report on the WIOA primary performance indicators the same as all other AE provider. Additionally, they must report their progress in carrying out their identified program activities to support career pathways, as well as provide data on the rate of recidivism for offenders served.

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.

The state's application for 243 funds will require applicants to describe how they plan to provide English language acquisition and civics education in combination with integrated education and training activities. Eligible providers funded with 243 funds must design programs to prepare English language learners for placement in unsubsidized employment leading to economic self-sufficiency, and integrate with local workforce development to carry out the activities of the program.

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.

Adult Education providers in MT have provided English Language and Civics Education programs with great success under WIA. Montana AE will build on this success to continue to provide Integrated English Literacy and Civics Education (IELC) activities. Through an annual IELC meeting and ongoing conversation through a Wiki Website, teachers have continually shared best practice and cutting-edge material. These platforms will continue to provide the professional collaboration needed to meet the new requirements under WIOA and deliver the services students need. These services will focus on providing English language adult learners, including professionals with degrees and credentials in their native country, to achieve competency in the English language and acquire the skills needed to function effectively as citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

The IELC funds for sections 231 and/or 243 will be awarded to eligible providers through a competitively through the application process outlined the Common Elements-Multi-year Grants or Contracts; after which providers may request funds on an annual basis through an extension application.

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.

State leadership funds will support the alignment of AE activities with those of other core partners to promote career pathways that will provide student access to employment and training services. The state will ensure eligible providers' integration of pathway instruction through a variety of funded activities. First, the state will collaborate with core partners to provide regional and statewide conferences and trainings. The State AE Unit has already supported a 2015 WIOA Summer Kickoff that brought over 300 staff members from all the core partner agencies together to begin the discussion on how we can coordinate services to support a client's development of a career pathway and expedite his/her transition to employment or training services.

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways will be the manner in which leadership dollars will align with the work of our core partners. This collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. Secondly, the state will support the eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one–stop partners to help AE programs identify the components of job–driven training that needs to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands. Thirdly, the state will use funds to develop templates and identify resources that support a systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation.

State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction related to the specific needs of adult learners. Leadership activities in the components of reading will be used to create the foundation for adults to develop the skills for reading from complex text in postsecondary education and employment. Instruction in the essential components of reading will be made available to all programs through various venues depending needs of the individual program staff. Student information system data will be used to determine instructional needs in reading. The state will contract with reading experts to bring job–embedded professional development. Teachers will be required to participate in reading professional development that blends face–to–face and technology.

The state will also contract for services with individuals to bring research–based activities that support adult learners in other content areas and workforce learning activities. Program data will inform the state on promising instructional practices and effective instructional strategies. The state will use this information to disseminate information about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs having data

that shows successful student exit trends will be provided with funds for to prepare workshops and regional trainings to share instructional strategies and activities that are positively impacting student outcomes.

The state recognizes the importance of students' acquiring 21st century work place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance will be available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance will be offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor will be selected based on their ability to provided rigorous, research–based content that will promote program improvement.

Working with one–stop partners to provide student access to education and training services will be a priority. Technical assistance may also be available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state will require each program to conduct monthly audits to evaluate students' pre–posttest gains, retention, pathway activities, and student exit outcomes. The state will use the monthly audits to evaluate program effectiveness. As documented evidence indicates a programs' ability to meet the learner needs, the state will conduct further investigation to determine what unique factors are contributing to the programs' continued success. If there emerges a model that can be replicated by other programs the state will use leadership funds to disseminate information about the specific model that appears to be a promising practice.

The state will also conduct regularly scheduled on site monitoring to gather additional information about the eligible providers' successes in equipping students with skills needed for seamlessly transitioning from AE to employment, postsecondary, or training. A monitoring evalulation tool will be used to guide the onsite monitoring; an onsite monitor will review student files, data entry protocol, and overall adherence to WIOA requirements. The onsite monitor will also conduct student and staff interviews using a template designed to capture the providers' alignment with core partners and implementation of career pathways. The desk audit coupled with results from the onsite monitoring will be used to evaluate the quality and improvement of adult education and literacy activities across the programs. They will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who are implementing innovative practices that were not readily captured in the monthly desk audit.

Desk audits and onsite monitoring results will also be used to identify priorities for funding permissible activities. Combined these two activities will provide the state information on the eligible provider's implementation of the state–adopted content standards, teacher quality, and the systemic approach to student transition. These will be the high priorities for permissible funds if program analysis indicates providers are facing challenges.

In summary, the desk audits and onsite visits described above will be the primary methods to monitor and evaluate the quality of adult education and literacy activities. Additionally the state has always engaged in ongoing data monitoring which provides the opportunity for immediate technical assistance to promote local program success.

In the event that the desk audit, on site evaluation, or ongoing data conversations are not sufficient support for program success, the state will require a low-performing provider to complete a corrective action plan. The plan will include a description of required activities to improve performance, strategies to meet each activity, evidence of completion, projected date for completion, and assigned staff for each activity. The state will schedule regular conference calls and site visits to assist in local provider in their program improvement plan.

All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided MT AE Unit at the Office of Public Instruction. The state will provide continuing education units for teachers that will be tracked in the state student information system.

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

The state will work in collaboration with core partners to develop strategies for student retention and to provide assistance to eligible providers in developing and implementing the objectives of Title II of WIOA. Learner education gains and enhancement of employability skills will increase the success of clients across all core programs. This collaboration may require use of permissible funds.

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.

The state will assess the quality of providers through data analysis. The state will review data to track providers' success in meeting state targets in the following areas: learning gains, entry into employment in required quarters, obtaining a secondary credential and enrollment into postsecondary or training, obtaining a secondary credential and gaining employment, or gaining a postsecondary credential. Monthly desk audits will provide the state with information on which providers are challenged in meeting targets and in need of technical assistance beyond the state leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

At the end of a program year, providers not meeting targets will be required to participate in a state–determined technical assistance project that will continue throughout the next program year. If a program remains in a technical assistance plan for two years, they may be in jeopardy of not receiving AEFLA funds during subsequent years. When funds are not awarded to an existing provider, the state will run an RFP for a new eligible provider in the area, if there is no other ABE provider in the region.

Programs increasing student academic gains and outcomes cannot decrease in subsequent program years. Targets must be met or exceeded each year.

Allocations to eligible providers will be awarded according to the State performance–based funding formula. Points will be awarded for performance outcomes; programs not meeting outcomes will receive reductions in their allocation.

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The quality of professional development will be assessed with scrutiny similar to assessing the quality of local providers. Initially, the state will use a combination of program data and a statewide survey to determine professional development needs. Professional development providers and activities will be selected to meet the identified state needs, and they will be selected according to their past effectiveness. Special attention will be given when determining who and how we will select a professional development strategy to meet the research-based components of phonemic awareness, system phonics, fluency, and reading comprehension. This will be a priority for the state.

At the conclusion of each professional development activity, all participants will complete an evaluation, which will be aggregated at the state level to assess the impact of the activity and what follow-up activities may be needed to support program improvement. Additionally participants will be required to analyze student performance data prior to professional development, at the conclusion of the activity, and continue to evaluate the data overtime, until it has been determined the professional development has become job-embedded and is making the anticipated positive impact on student outcomes.

The programs self-analysis and student data will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership

funds to disseminate information about programs who have effectively implemented innovative practices based on professional development activities.

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 **MT Office of Public Instrction**

Full Name of Authorized Representative: **Denise Juneau**

Title of Authorized Representative: **Superintendent of Public Instruction**

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;

On September 11, 2015 the Montana State Rehabilitation Council provided the following input for the Federal Fiscal Year 2017 vocational rehabilitation portion of the Montana Combined State Plan. Responses to the input have been developed and were finalized at the December 9, 2015 VRBS leadership meeting. The following responses will be provided to the VRC prior to their scheduled March 3, 2016 meeting:

INTERNAL CONTINUOUS IMPROVEMENT

SRC INPUT: Review VRBS quality assurance procedures. The procedures should focus on measuring results.

VRBS RESPONSE: In the following response, it is reported that VRBS has initiated reorganization of supervision and state office responsibilities. Part of the reorganization will involve VRBS quality assurance procedures.

Currently, performance measures based on measurable data form the basis of most of the quality assurance practices. The agency will continue to assess additional ways to use the available data to measure agency effectiveness.

SRC INPUT: Reduce staff overload. Review staffing to see if assignments can be adjusted to be more efficient. While adding new staff does not seem to be an option in the near future. Perhaps there should be a review of potential staffing needs, which would allow the agency to act should the opportunity for new staff positions arise. Review the potential for temporary services options in staff overload areas.

VRBS RESPONSE: VRBS is in the process of doing a reorganization that is restructuring VRBS supervision and state office responsibilities. The reorganization eliminates a layer of supervision and spreads state office responsibilities to positions that can be located in any VRBS office in the state. VRBS is also reviewing caseloads across the state and is considering restructuring the territory responsibilities of various counselors in order to equalize caseload distribution.

It must be noted that the use of temporary services throughout state government is being restricted in response to the provisions in the Affordable Care Act.

Also, VRBS is establishing a Labor Management Council (LMC). The LMC will consist of an equal number of union and management members. The union will choose its members, and

management will choose its members. The LMC will discuss anything members wish to bring to the table and make recommendations to the program. Members solicit input from all VRBS staff with the union representing that part of VRBS and management representing leadership. Staff overload is a potential discussion topic for the LMC. LMC meetings will occur quarterly.

Also, VRBS is in order of selection and recently closed category 3. Closure of category 3 was primarily related to the impact of the funding reserve for pre-employment transition services; another factor was the high caseloads of VRBS counselors. Order of selection is related to lack of resources. Staff resources are taken into account as well as financial resources. VRBS is doing a review of caseload size. If the review deems it necessary, category 2 may be closed.

SRC INPUT: Make the problems related to the new case management system, Montana Accounting and Case System (MACS), a short term emergency priority and develop an action plan to alleviate impact on staff as much as possible.

VRBS RESPONSE:The MACS case management system proved to be defective in many ways after it was activated. While a great deal of testing was done with the system prior to implementation, significant issues went unidentified until the system went live.

The utilization of an alternative to MACS is not possible. Information Technology (IT) projects require approval by the legislature and governor. The earliest that such action could occur would be during the 2017 legislature. By that time, MACS will be functioning much better than it is now.

In addition, there are issues related to MACS interacting with the supports and systems that are part of the overall department and state IT infrastructure. These parallel issues make it more difficult to determine the exact root of problems. It is likely any other system would have similar issues adjusting to the capabilities of the existing IT.

MicroPact is the company that built MACS and continues to support MACS. Marvalee Christoferson leads the coordination with MicroPact to identify and correct problems with MACS. Marvalee has developed a team that assists with testing new builds of MACS. Also, Marvalee has significant experience working with DPHHS staff involved with the existing IT infrastructure. Marvalee's background and dedication have been critical in the coordination of the efforts to correct problems with MACS and working with issues related to the current IT infrastructure.

While dealing with MACs is a priority, VRBS is dealing with multiple high priorities at this time. WIOA presents many changes and multiple deadlines that demand staff attention. As mentioned in the previous set of comments, VRBS has also initiated measures to reduce staff overload. These efforts should assist with the tension of multiple priorities the agency faces, but will take time to implement.

Most importantly, MACS is functioning and critical operations are being carried out despite the problems. Staff dedication to carrying on despite the difficulties is commendable. Improvements are being implemented. Work-arounds are also being developed and distributed to staff. VRBS believes that MACS will get better, and staff are working hard to realize this faith in the system.

PROVIDE 21st CENTURY QUALITY SERVICE

SRC INPUT: Make sure consumers can financially benefit from going to work. Assist consumers in understanding the ramifications that working has on their various benefits in order for them to make an informed choice on whether to work and how much to work.

VRBS RESPONSE: VRBS has for many years emphasized referring consumers who are beneficiaries of Social Security to obtain benefits planning. The purpose of these referrals is to review the impact of work and wages on the benefits that the consumer receives. Benefits planning services look at the impact of work and wages on all benefits and not just Social Security benefits. The use of benefits planning has proved very helpful and will be continued.

If a person is not a Social Security beneficiary, counselors try to help the consumer to understand the impact of wages on their benefits. In many cases this involves referring the consumer to discuss the potential for work with the agency providing the benefits. It is very difficult for counselors to be aware of the regulations of all benefits packages, but they can counsel the consumer to get the information they need to make an informed choice.

SRC INPUT: Improve the VRBS image in electronic media. Consider quick reference codes and hash tags. Consider developing an app and utilizing social media networks. The agency should contract with someone with significant web development and social media experience to assist with the update.

VRBS RESPONSE: Part of the agency reorganization is expected to enhance the state office's efforts in the field of public relations. Therefore, it is expected the agency will be reviewing areas mentioned and have an increased emphasis in the area of public relations in the future.

It should be noted that DPHHS needs to be very concerned about the vulnerability to cyber - attacks. The protection of confidential information within the Department's electronic data infrastructure is a high priority. Due to these concerns, there are limitations on the amount and type of multi-media methods that VRBS is able to implement.

One idea that VRBS is considering is a scan bar on business cards. VRBS is interested in utilizing the developing opportunities that electronic media present and will explore the possibilities as they arise.

VRBS is currently engaged with a study through the University of Montana Rural Institute that involves teaching counselors and instructors on how to teach consumers to use social media for employment.

SRC INPUT: WIOA is a significant change in direction for VR nationally. VRBS needs to develop a clear set of statements on VRBS's plans related to the primary changes. The messages developed need to be used consistently in communication with the public and stakeholders. The messages should be made available on the agency website.

VRBS RESPONSE: VRBS recently completed four town hall style meetings around the state. As an introduction at each meeting VRBS's Administrator, Jim Marks, presented the primary components of WIOA as they are currently understood. In addition, the activities that VRBS is implementing to cover some aspects of the changes related to WIOA are described

in the introduction. It was also noted that the final regulations have not been released and in some areas VRBS is waiting for further clarification before proceeding with developing new procedures. The introductory remarks have received several compliments indicating that it does help to clarify the impact of WIOA.

A VRBS statewide training is planned once final regulations have been received and there has been adequate time for review of the regulations. The training will provide guidance to staff related to VRBS's plans for implementing the regulations.

There is a possibility that VRBS will again do town hall meetings next year related to the new regulations to help the public and stakeholders to understand and provide input on implementing the regulations.

NETWORK WITH OTHER AGENCIES & EMPLOYERS

SRC INPUT: If VRBS again closes categories of service due to Order of Selection, consumers should be given as much direction as possible on what other agencies may be able to assist them.

VRBS RESPONSE: Consumers determined to be in a closed category during order of selection are given a list of alternative resources for services specific to the region they live in.

Also, WIOA mandates partnership with many other agencies involved with the workforce service system. The relationships built through this stronger partnership are expected to provide new opportunities for consumers in closed categories during order of selection.

SRC INPUT: VRBS should partner more with education.

VRBS RESPONSE: VRBS is more involved with educational programs in Montana than ever.

VRBS is in the process of completing multiple contracts with educational programs to provide pre-employment transitions services.

VRBS is providing financial assistance to schools to provide group services to students with disabilities.

VRBS was previously only concerned with individualized services in schools.

For the services to groups, VRBS has expanded eligibility to students with a disability who may be eligible for regular VRBS services. This greatly increases the number of students VRBS works with in each school.

VRBS is now developing relationships with school district personnel in addition to the traditional reationships with local high school personnel.

The Adopt-the School model implemented in recent years has greatly increased the presence of VRBS counselors in the local schools

In some cases, VRBS counselors teach lessons on such things as being prepared for work.

SRC INPUT: Complete a brochure targeting employers in order to make them aware of employer services available to them through VRBS.

VRBS RESPONSE: VRBS intends to complete such a brochure. However, with WIOA mandating that state VR agencies develop services specifically for employers, it would be premature to develop such a brochure at this time. VRBS needs to complete the process of determining the services and delivery procedures for the new requirements in WIOA prior to developing such a brochure. VRBS also plans to develop a website for employers in addition to a brochure.

As mentioned, VRBS must begin to look at employers as a primary customer. VRBS plans an approach that will:

Gather information from employers to be used to enhance services to consumers.

Provide services to help employers see that Montanans with disabilities are solutions for their business needs, and VRBS is a portal for accessing highly qualified individuals to meet their needs.

In addition, VRBS will work with our service partners to end portraying the hiring of persons with disabilities as a philanthropic or charitable activity.

The reorganization mentioned previously will include a section chief that will form a statewide team that will focus on various projects to implement the activities described above. Also, additional activities will be developed that support the view that supporting employers in the understanding of Montanans with disabilities supports VRBS traditional services, and accessing information on the needs of businesses also enhances traditional services.

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

The responses follow each area of input. See previous section.

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

Each explanation was included immediately following the VRC comment. See previous section.

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

No waiver requested.

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

No waiver requested.

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.

No waiver requested

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

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

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

Vocational Rehabilitation and Blind Services (VRBS) presently has agreements with the following entities:

- Section 121 Vocational Rehabilitation Projects located in Montana
- Mental Health
- Developmental Disabilities (currently expired, but under negotiation)
- Montana Small Business Development Centers (SBDC)
- The Randolph-Sheppard/Business Enterprise Program
- Public Transportation Programs
- Social Security
- MonTECH (the State Assistive Technology Program)
- Non-educational agencies serving out-of-school youth

Section 121 Vocational Rehabilitation Projects

VRBS presently has cooperative agreements with all of the six Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, Northern Cheyenne Reservation and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the six reservations that currently have a tribal vocational rehabilitation project.

Mental Health

This cooperative agreement has provisions that include:

1. To make available the required supported employment/follow-along services from community rehabilitation programs (CRPs) that are certified mental health providers. Follow-along services may be provided through community based psychiatric rehabilitation and support, and through case management services.

2. To serve persons identified as eligible for mental health service under Medicaid or the Mental Health Service Plan.

3. To strengthen supported employment services to Montana citizens eligible for vocational rehabilitation's supported employment services and for community mental health services funded by the Addictive and Mental Disorders Division.

4. To provide cross-training and technical assistance between our agencies.

5. To establish and evaluate annual goals for our interagency work towards coordinated vocational and support services.

Developmental Disabilities Program (DDP)

This cooperative agreement has provisions that include:

1. To strengthen supported employment services to Montana citizens eligible for vocational rehabilitation's supported employment services and who receive services through the developmental disability (DD) provider organizations.

2. To contract with DD provider organizations to provide supported employment work services through funds made available to them from the state general fund and Medicaid home and community waiver.

3. To make available the required supported employment, extended/follow along services from CRPs enrolled with VRBS. Long-term follow-along services are made available by DD provider organizations through a long-term sign off cooperative agreement with VRBS. This sign off is between the provider organization and VRBS. It is incumbent upon DD provider organizations to negotiate and secure any approving authority from the DDP. VRBS agrees DD provider organizations will provide copies of the long-term, follow-along sign off cooperative agreement documents to the DDP regional managers. The DDP provider organization's sign off commits the provider to making available this service, but does not commit funds. In terms of funding source and availability, the DDP Regional Manager provides the sign off that funds are available to provide the service.

4. For those residing in the Montana Developmental Center (MDC) who have been identified as being in need of vocational/supported employment services, those needs must be included in the community placement plan. The costs for long-term follow-along needs to be included in the resources allocated, and need to be made available to reimburse an enrolled provider for long-term follow-along services after discharge from MDC.

The current agreement with DDP has expired and due to turnover in the VRBS Field Chief position the development of an updated agreement has been delayed. Also, because WIOA has such an impact on this relationship the delay in final regulations related to WIOA has also been a factor delaying completion of a new agreement. It is anticipated that a new agreement will be developed in the next year.

Montana Small Business Development Centers (SBDCs)

The purpose of this agreement is to establish guidelines and procedures to be used by the Montana Small Business Development Centers (SBDC) and VRBS in coordinating the services of both programs on behalf of individuals with disabilities who desire to pursue the goal of self-employment. This agreement outlines each party's role and responsibilities, referral procedures, information exchange methods, forms used, and implementation, evaluation, amendments and termination procedures.

The Randolph-Sheppard/Business Enterprise Program (BEP)

The BEP program continues with three vendors. The program is at a point where it can consider starting one or two part-time routes if an interest is expressed by BLVS consumers to become a vendor.

Public Transportation Programs

VRBS has MOUs with the public transportation programs in Great Falls and Billings, which are two of the larger cities in the state. The MOUs commit to procedures to assist VRBS's consumers to obtain documentation necessary to obtain transportation services at reduced fares.

Social Security Administration

VRBS works with the Social Security Administration to collaborate on employment incentives and supports and maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.

Cooperation in Training Activities:

VRBS routinely collaborates with other organizations to provide training opportunities for VRBS' staff. The following is a list of collaborating organizations:

- ? University of Montana - Rural Institute on Disabilities
- ? Montana State University - Billings Montana Center for Inclusive Education
- ? Centers for Independent Living
- ? Brain Injury Association of Montana
- ? Client Assistance Program
- ? Disability Determination Services
- ? Rocky Mountain Rehab

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

State Program under section 4 of the Assistive Technology Act of 1998 (MonTECH)

VRBS has a contract with MonTECH to provide the required services of the Assistive Technology Act of 1998. Also, the two program cooperate through:

1. Having a VRBS representative on the MonTECH advisory board,

2. Providing funds to MonTECH to provide equipment to VRBS offices to allow consumers access to trying out common assistive technology across the state.

3. Training VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.

4. The MonTECH director recently resigned and VRBS will have a member on the search and selection committee for the new director.

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

Department of Agriculture

There is no Department of Agriculture project related to disabilities serving Montana at this time.

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

Non-educational agencies serving out-of-school youth:

VRBS has contracts with the Montana Youth Leadership Forum (MYLF) and the Montana Youth Transitions Program. Both of these programs serve in-school and out-of- school youth.

MYLF provides a one-week intensive training for youth with disabilities in the area of:

1. Disability history and culture

2. Disability services such as vocational rehabilitation, independent living and social security benefits planning

3. Leadership Skills

4. Disability awareness and pride

The ultimate outcome of the program is that each youth has a personal plan for development and future plans to contribute to their community.

The Montana Youth Transitions Program is the comprehensive program for all information and coordination of services related to the transition of youth from high school to the adult world. The program has four major components:

- The Montana Youth Transition Website brings together all information related to transition activities and supports. The information is sorted into sections for:

o Youth

o Parents

o Service providers

- The Montana coordinator for the National Mentoring Day initiative that provides job shadowing activities for youth with disabilities throughout the state of Montana.
- The yearly transition conference that has grown to be one of the largest human service conferences in Montana with over 200 participants at the most recent conference. The conference provides sectional tracts for youth, parents and teachers/service providers. The project provides scholarship assistance to attend the conference for youth and parents.

- Coordination of five regional transition teams that provide a platform for the development of transition networks at the local level.

5. STATE USE CONTRACTING PROGRAMS.

State Use Contracting Programs Montana

State agencies may purchase supplies and services from sheltered workshops or work activity centers. Such purchases are exempt from competitive bidding laws and rules. The Montana Department of Administration maintains a list of certified sheltered workshops or work activity centers located in the state. The list includes the supplies and services provided by each sheltered workshop or work activity center. (Administrative Rules of Montana 2.5.607).

VRBS does not currently make purchases related to this agreement.

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.

VRBS' transition coordinator will coordinate with Montana OPI transitions specialists to develop and promote a seamless transition system. VRBS' transition coordinator oversees the implementation of VRBS' "Adopt a School" program. Adopt a School builds relationships between local schools and VRBS by establishing regular office hours at larger high schools for vocational rehabilitation counselors. These counselors connect students with disabilities to VRBS and establish collaborations with special education and 504 coordinators, teachers, school administration, parents, advocacy groups and others regarding the role of VRBS in the transition process. The

VRBS assigns a vocational rehabilitation counselor to each high school in the state. Counselors shall inform student, families special and regular education teachers, school administrators, advocacy groups, and others about VRBS. Counselors will distribute both print and electronic materials that explain transition and rehabilitative services, and they will maintain monthly contact with local school authorities

Local School Districts: In the last year, VRBS has initiated multiple contracts with local school districts to provide pre-employment transition services (Pre-ETS). School districts develop work plans on how they will provide the five required components of Pre-ETS and are reimbursed quarterly based on the number of students involved in Pre-ETS activities. The school districts are required to provide VRBS with the documentation of students participating in Pre-ETS.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The following is from the MOU with the Office of Public Instruction that details the technical assistance responsibilities of each agencies.

The OPI shall provide technical assistance to local school districts concerning the provision of free, appropriate, public education, including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.

The VRBS' transition coordinator shall meet with staff and other interested parties in other school districts when invited to share best practices and facilitate communication between the parties. VRBS' staff will also be available to provide information on changes in the law or policy regarding transitions services.

In addition VRBS has an MOU with Office of the Commissioner of Higher Education (OCHE). The purpose of this MOU is to develop and adopt principles which will guide the planning and delivery of support services to individuals with disabilities who are mutual clients of Vocational Rehabilitation and Blind Services (VRBS) and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

1. VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.

2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).

3. VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.

4. The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.

5. VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.

6. The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.

7. VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.

8. The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided,

the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.

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

The following are sections of the MOU with the Office of Public Instruction related to related to the development and implementation of individualized education programs (IEPs).

The VRBS counselor shall assist school districts in planning for the transition of students with disabilities from school to post school activities. The VRBS counselor shall act as a consultant for the school district. VRBS may provide consultation services to students and families only after VRBS takes an application from the student. When requested by the local school district, VRBS shall ensure that the VRBS' counselors/staff participate in the evaluation process of students who have applied for VRBS, and in the development of the IEP's for eligible students.

While not part of the MOU with the OPI, VRBS commits to the development and approval of an IPE before each eligible student able to be served under the order of selection leaves the school setting. Should Montana come out of order of selection, VRBS is committed to development and approval of an IPE before each student determined to be eligible for vocational rehabilitation services leaves the school setting.

The OPI shall assist school districts to inform VRBS of students with disabilities who are on an IEP and may be in need of assistance through VRBS. The notice to VRBS shall occur no later than the first IEP at which transition services are considered in order for VRBS to participate in the future development of the student's IEP. For students enrolling closer to graduation or age 21, school districts are urged to inform VRBS as soon as those students are identified.

For all IEP meetings subsequent to the first meeting, the OPI shall encourage school districts to schedule IEP meetings for eligible students with disabilities in a timely manner, and to include notice to VRBS and the invitation for the VRBS counselor to participate subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP team.

For the first IEP meeting following the initial notice to VRBS, the OPI shall encourage school districts to inform VRBS of the meeting in advance to allow sufficient time for VRBS to acquire the necessary diagnostic data to determine the student's eligibility. The notice to VRBS should include an invitation to the VRBS counselor to participate, from then on, in transition planning within the IEP process. VRBS participation in IEP meetings is subject to parental approval.

The OPI shall assist local school districts with referrals of students with disabilities who do not receive special education services and related services and may be in need of services through VRBS. The notice to VRBS should occur at least one year before the student's anticipated graduation date.

While not part of the MOU with the OPI, VRBS commits to the development and approval of an IPE before each eligible student able to be served under the order of selection leaves the school setting. Should Montana come out of order of selection, VRBS is committed to development and approval of an IPE before each student determined to be eligible for vocational rehabilitation services leaves the school setting.

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

The following are sections of the MOU with the Office of Public Instruction that deal with financial responsibilities of each agencies and related matters.

The OPI shall assist local school districts with coordination of vocationally related services with VRBS for eligible students. Coordination should commence in the early stages of transition. Vocationally-related service coordination

and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.

VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.

Montana is a local control state in which local school districts are financially responsible for the costs of services they are mandated to provide under the IDEA, and Section 504. OPI shall encourage and promote financial agreements between LEAs and VRBS.

Such agreements may be made on an individual basis and in consultation with all parties including students, their families, school officials, and vocational rehabilitation professionals.

If there is a dispute as to which entity is responsible for providing a necessary service, consultation will occur between the entities. Services or payments will be based on the rights of the student, availability of funds, and which agency is best positioned to provide the particular service at the time. Should the local school district and VRBS be unable to resolve the dispute after consultation with one another, the Dispute Resolution Procedure outlined in the Interagency Agreement between the Department of Public Health and Human Services and the OPI shall apply.

The previously mentioned MOU with the OCHE also deals with financial responsibility.

VRBS' clients who attend a unit of the MUS may need reasonable accommodation, including auxiliary aids or services in order to have equal access to the programs and services offered at that particular institutio

The provision and cost of reasonable accommodations are the responsibility of the particular unit of the MUS. For individuals with disabilities who are mutual clients of VRBS and students at a unit of MUS, and are otherwise qualified for such aids or services, the funding source for auxiliary aids and services will be determined on an individual case-by-case basis.

-
- The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.
- ?
- The VRBS' office must authorize payment for the interpreter services prior to the start of services.

? VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

In addition:

? Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.

? Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.

? Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

Additional guidelines relative to interpreter services for eligible clients/students:

- The MUS unit will be responsible for procuring and paying interpreters. VRBS will reimburse for its share of the cost.
- The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.
- The VRBS' office must authorize payment for the interpreter services prior to the start of services.
- VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

In Addition:

- Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.
- Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.
- Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

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

The following section of the MOU with the Office of Public Instruction describes procedures of outreach and identification of students with disabilities needing transition services.

VRBS assigns a vocational rehabilitation counselor to each high school in the state. Counselors shall inform student, families special and regular education teachers, school administrators, advocacy groups, and others about VRBS. Counselors will distribute both print and electronic materials that explain transition and rehabilitative services, and they will maintain monthly contact with local school authorities

OPI shall assist the local school districts with methods and procedures for outreach and identification of students and families who may benefit from VRBS. Assistance with the methods and procedures should include actions needed to engage those who are not aware of VRBS, including how the school districts identify and work with transition aged students who may be in alternative high schools, residential facilities, or are incarcerated.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The designated state unit contracts with for-profit and non-profit providers of vocational rehabilitation services. Vocational Rehabilitation and Blind Services (VRBS) operates on a purchase-of-service basis. We have identified and enrolled rehabilitation providers who meet qualification standards established by the designated state unit. VRBS' staff communicates regularly with the providers regarding fee structures, services provided, and consumer satisfaction.

VRBS requires Community Rehabilitation Providers (CRP) to accept a set fee for service, but does not guarantee a minimum level of consumers to be referred. The contract used with CRPs follows the master contract developed by the Department of Public Health and Human Services (DPHHS) legal unit to cover liability and related I

ssues. Services purchased by VRBS from CRPs are directly approved from the VRBS' counselors utilizing an authorization process. The amount of services purchased depends upon the amount and type of services needed by the consumer. Agencies eligible to receive authorizations must be enrolled vendors and must be current service providers of DPHHS; or have accreditation from the Commission on Accreditation of Rehabilitation Facilities (CARF) or Rehabilitation Services Accreditation System (RSAS). In a limited number of cases, individuals with appropriate backgrounds are authorized to provide services in remote rural areas where a DPHHS, RSAS or CARF provider is not available.

VRBS has collaborated with the Developmental Disabilities Program (DDP) to develop a training program for direct line staff of CRPs that provide vocational services. The provider responsible to develop the training has been identified and in the upcoming year an on-line training will be developed and available to all CRPs working with VRBS and/or the DDP. Satisfactory completion of the training will be mandatory for staff involved with vocational services for the two sponsoring agencies. There will be a test that can be taken to demonstrate competency related to the skills covered by the training. If the test is passed, then the person can opt out of the training.

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.

Mental Health and Developmental Disabilities are important stakeholders in providing supported employment services. Their contributions are described later as they have their own sections below.

Enrolled CRPs: VRBS works with a number of community based organizations across the state. Many are enrolled as extended support service providers to assure quality in service delivery for consumers. VRBS has enrolled programs in mental health services, developmental disabilities, as well as other disability organizations to provide these services at the local level.

Extended Employment Services: The extended employment service program is the state of Montana's long-term support services program available to individuals who cannot be funded through federal sources. The program provides sheltered, crew or community-based employment services. In many of the past legislatures there have been generous increases in funding recognizing the unmet needs for these services. However, the most recent legislature provided level funding. The extended employment services program is administered and managed by Rocky Mountain Rehab, p.c. (RMR) of Billings, Montana through a contract with the Department of Public Health and Human Services, Disability Employment and Transitions Division. In the last two years, VRBS and RMR have beenworking to transition some of the extended employment's sheltered employment and crew resources to competitive integrated community placement supports. These efforts have been successful, but a larger shift in resources will be necessary to meet the needs of consumers for long-term supports in competitive integrated settings if level funding of the program continues.

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

Coordination with Employers

VRBS coordinates with employers through several avenues, including new initiatives that are in the planning stage, all of which are designed to enhance efforts to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services and transition services, including pre-employment transition services.

These initiatives include:

- A VRBS website for businesses to use to learn about hiring individuals with disabilities, which will include a best practice guide regarding the areas a business should address to recruit and employ individuals with disabilities;
- ·VRBS is undergoing a reorganization of administrative staff and there will be a Section Chief charged with improving VRBS's knowledge about the availability of jobs across the Montana and how to improve VRBS's ability to match employment opportunities to job seekers;
- The development of a business tracking tool, which allows VRBS to document ongoing relationships with businesses and ensure deliverables and services are provided; and
- Using the Talent Acquisition Portal through the National Employment Team to open further opportunities for employment in Montana and the country.

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

Agreements with private and non-profit providers related to transition include the following

Montana Youth Transition (MYTransition): VRBS provides funding and collaboration with MYTransitions to provide:

- The statewide comprehensive website on all aspects of transition, http://montanayouthtransitions.org/
- An annual conference on Montana Transition activities with separate tracks for school personnel, adult service personnel, parents, and youth, along with combined sessions for developing coordination.
- Coordination of statewide job shadowing activities.
- Coordination and funding for five regional transition teams to work on local collaboration and transition projects

Montana Youth Leadership Forum (MYLF {pronounced my life}) VRBS provides funding and collaboration for the week long forum for approximately 20 youth with

disabilities. The forum focuses on developing a plan for contributing to the community, self advocacy, soft skills, adult resource identification and a variety of other skills and abilities related to transition.

Moving On: VRBS provides funding and coordination for a week long activity on a college campus for approximately 20 youth with disabilities to explore post-secondary education as a transition option. The program exposes participants to the college campus, college type classes, disability services and other topics.

Project Search: A 9 month intensive program for youth with disabilities who have recently graduated from high school. The program includes soft skills training, job exploration, and career exploration. Note: in most states Project Search is a program conducted in high school, but in Montana this is not feasible for most high schools because students are exited at age 18 or 19. This is explained previously in this document.

VRBS contracts with Easter Seals Goodwill to provide youth with disabilities a variety of work like exper

iences in community volunteer programs. The programs exposes the youth to working in the public, basic vocational skills, and teamwork.

VRBS contracts with the Montana Center for Community Inclusive Education to provide virtual peer support program for students with disabilities a Montana State University - Billings to interact with high school students with disabilities in small towns about the experience of transitioning to post secondary education.

VRBS is also working with Montana's centers for independent living on a variety of transition activities.

As mentioned before VRBS also contracts with local school districts on developing and providing pre-employment transition services based on the individualized needs of the local area. The pre-employment transition work plan is developed by the local schools, VRBS personnel and other stakeholders.

VRBS also contracts with the Rural Institute on Disabilities of the University of Montana to provide school with technical assistance related to pre-employment transition services.

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;

Interagency Cooperation

VRBS will continue to collaborate and work towards a cooperative agreement with the Department of Public Health and Human Services, the state agency responsible for administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.) that outlines the roles and responsibilities of all parties regarding the delivery of VR services and long-term support services for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program.

Specific examples of collaboration include:

- Working collaboratively with VRBS and the Developmental Disability Program's Medicaid waiver to develop long-term supports needed for supported employment consumers
- Working with the Supported Employment Leadership Network in order to assist the Developmental Disability Program to adjust their Medicaid waiver services to increase services related to employment

Also, VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance project in Montana to assist consumers to understand the impact of working on their benefits, including Medicaid.

It is anticipated that additional cooperative agreements with the state Medicaid agency and service agencies funded through Medicaid will be developed in the upcoming year to respond to changes made in WIOA legislation.

The description of how VRBS will collaborate with the Developmental Disabilities Program's Medicaid Waiver Program and the Medicaid services through Mental Health are described in a future section.

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

VRBS has had a long and productive relationship with the Developmental Disabilities Program (DDP), and that program continues to sign off for long-term support services for many individuals with significant disabilities. As mentioned previously, the current cooperative agreement has expired and is currently in renegotiation to include issues related

to implementation of WIOA. However, the agencies have continued to work under the conditions of the past agreement which include guidance for:

- Cross-training and technical assistance between our agencies to make available the required supported employment services.
- The short-term services to be provided through CRPs enrolled by VRBS.
- The long term follow-along services to be provided by DDP through developmental disability providers. DDP services are funded through the state general fund and the Medicaid home and community waiver.

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

VRBS has a negotiated cooperative agreement with the Addictive & Mental Disorders Division. The cooperative agreement provides guidance for: cross-training and technical assistance between our agencies, establishment and evaluation of annual goals for interagency work towards coordinated vocational and support services, and makes available the required supported employment/extended support/follow-along services from enrolled community rehabilitation programs (CRPs) and certified mental health providers.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

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

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

Comprehensive System for Personnel Development (CSPD) information is managed by the Human Resource Development (HRD) Specialist of the Vocational Rehabilitation and Visual Services (VRBS). This position keeps track of trainings offered, staff attending training, CRC credits for qualified counseling staff and their support team members.

VRBS staffing by type of staff (data from RSA 2):

Note: some positions were reclassified in 2014. Therefore some categories show big shifts that year and subsequent years.

Administrative: 2010 - 6 2011 - 6 2012 - 5 2013-5 2014 - 38 2015 - 38

Counselor: 2010 - 37 2011 - 39 2012 - 39 2013-41 2014 - 47 2015 - 47

Support/Other: 2010 - 40 2011 - 41 2012 - 45 2013-45 2014 - 2 2015 - 2

Total Staff 2010 - 83 2011 - 86 2012 - 89 2013-91 2014 - 87 2015 - 87

NOTE: The RSA2 looks at positions and what part of the year they are filled. It is not the same as the number of bodies or the numbers of FTE.

In fall 2015, VRBS reorganized to become "flatter" organizationally. Three regional managers were converted to section chiefs dealing with statewide issues: Youth, Employers, and Quality Assurance. One regional manager position was vacant at the time and was converted to a counselor supervisor position. VRBS leadership believes this will make the organization more responsible for federal changes.

In FY2014, VRBS served 7,755 Montanans with disabilities, which means that each counselor served approximately165 consumers. In FY2015, VRBS served 7,419 Montanans with disabilities, which means that each counselor served approximately 158 consumers. The calculation is based on using the RSA data reported above

The population in western Montana continues to grow, while the population in eastern Montana decreases. Eastern Montana has such large travel distances for counselors to meet with consumers that a reduction of staff in less populated parts of the state is not possible. However, one counselor positon from Billings was moved from the Billings office to the Havre office and another was moved from the Butte office to the Bozeman office. The increase in the Havre office staff was due primarily to the new emphasis in dealing with students with disabilities and the fact that the Havre office serves many small schools in a very large geographic area (travel distances can be over 200 miles). The increase in the Bozeman staff was related to the rapid increase in population in the Bozeman area in recent years.

When all the positions are filled, VRBS has enough staff to provide vocational rehabilitation services to the state. In the next five years, VRBS will continue to investigate the feasibility of increased counselor staffing to meet the transitions needs of Montana's youth with disabilities. VRBS would like to see a transitions counselor in each of its four regional offices. Of course, population growth and client demographics will be closely monitored. If our counseling staff increases, it is possible that additional support staff would also be necessary.

In recent years, VRBS experienced significant turnover in upper management positions, including the state director, and several regional administrators. Even though VRBS management has stabilized, VRBS continues to prepare for succession through its VRBS' Futures Program, which is discussed elsewhere in this plan.

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

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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.

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Division Administrator	1	0	0
2	Bureau Chiefs	2	0	1
3	Prog Mgrs (IL, Deaf; Soc Sec; HRD; Transportation, 3 section chiefs, and BLVS Admin)	9	0	3
4	Central Office Administrative Support Staff	2	1	0
5	Counseling Staff(BLVS, Gen Prog, & counselor sups)	48	3	5
6	Orientation and Mobility Specialists	4	0	0
7	Vision Rehabilitation Therapists	5	0	0
8	Field Administrative Support Staff	28	0	5
9	Tech Sup (Bud Anly; Bud Anly Sup; Prog An; AT SP)	4	0	2

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;

VRBS continues to review, on a yearly basis, the reported training needs of its entire staff. This is part of our overall maintenance of the comprehensive system for personnel development. Of particular concern to VRBS is the implementation of a system of personnel development that will ensure an adequate supply of qualified rehabilitation personnel for the designated state unit. VRBS developed a new CSPD policy that clarifies requirements and expectations of employees engaged in CSPD plans. Additionally, a "tip sheet" was developed to notify counselors of institutions of higher education that offer RSA scholarships. The State Rehabilitation Council has had an opportunity to review and make comments on the development of the plans and policies regarding qualified personnel.

Currently 94% of VRBS's professional counseling and supervisory staff are identified as Certified Rehabilitation Counselors (CRC), which are qualified to sit for the CRC, or are under a CSPD Plan (including actively researching graduate schools). At this time, six counselors are engaged in graduate studies and four counselors are researching and/or applying to graduate schools. Two counselors who have Masters in related fields are

researching graduate programs to satisfy the requirements to sit for the CRC exam. Currently, VRBS has three counselor vacancies. As vacancies open, the new counselors may require graduate school preparation. In the last year, four counselors have been hired that have a Masters in related fields and have begun classes or are researching programs that provide the educational requirements to sit for the CRC exam. In addition, two counselors hired in the last year had the ability to sit for the exam and were successful in obtaining a CRC credential.

Montana's personnel policy has been rewritten so applicants who have achieved the CRC status receive a higher priority for hiring than those without it. In addition, Montana vigorously recruits applicants with a Masters in rehabilitation counseling when there are vacancies. Montana State University - Billings (MSU-B) is Montana's only institution of higher education that offers instruction (BA or MA) in rehabilitation counseling. VRBS has a good working relationship with MSU-B. Additionally, VRBS has fostered good working relationships with out-of-state institutions such as Utah State University. Both MSU-B and Utah State have sought input from VRBS related to curriculum development and how to best prepare students to work in the public VR program. VRBS has successfully recruited and hired graduates of these programs, all of whom were well prepared to sit for the CRC examination. VRBS is also working with West Virginia University and the University of Kentucky to qualify its employees. The following table illustrates the education status of employees of VRBS preparing for CRC qualification.

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

Row	Institutions	Students enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
1	Utah State University	1	1	0	0
2	West Virginia University	3	3	0	0
3	University of Wisconsin – Stout	0	0	0	1
4	Montana State University – Billings	1	0	0	1
5	University of Kentucky	2	2	2	1

iii. the number of students who graduated during the prior year from each of theose institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

this is reported in the previous chart.

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.

VRBS continues to recruit the highest quality staff available. Individuals coming to VRBS without a Master's degree in rehabilitation counseling will be hired on the condition that they will develop a CSPD plan to meet the standard.

Through the extensive outreach efforts of the Blind and Low Vision Services (BLVS) staff and the HR staff within the department, BLVS can sometimes attract candidates from across the country for Vision Rehabilitation Therapists and Orientation and Mobility Specialists. In other cases, BLVS must hire someone locally on a training assignment and pay for their schooling.

Montana has no state university training for either Vision Rehabilitation Therapy or Orientation and Mobility. Therefore, attracting highly qualified professionals in these areas will continue to be a problem for BLVS. Training positions have been developed to address this dilemma.

VRBS maintains contact with Montana State University-Billings to update them on VRBS. The agency gathers information on degree requirements, and works with rehabilitation counseling instructors to ensure that university requirements are compatible with those needed to qualify counselors to effectively and efficiently serve Montanans with significant disabilities who are eligible for vocational rehabilitation services.

VRBS works with Montana colleges to recruit individuals from minority backgrounds and persons with significant disabilities. VRBS takes affirmative action to employ and advance in employment, qualified individuals with significant disabilities.

In Montana, Native Americans make up the largest minority population. Six Native American Section 121 projects are located on reservations and employ Native Americans as rehabilitation counselors. However, with the CSPD standard requiring education at the graduate level, the general VRBS program has difficulty recruiting qualified Native Americans for employment within the agency.

By developing a plan to assure adequate numbers of CRC counselors and by providing leadership training at all levels, VRBS is working to develop future leaders who will be ready to take over key positions as they are vacated. Towards this effort, VRBS has formed the VRBS Futures Group that will work directly with the current management staff of VRBS in the design and implementation of the process and format for case services to consumers. Staff participating on the VRBS Futures Group, will obtain the skills necessary to take VRBS into the future. The VRBS Futures Group is facilitated by a member of the VRBS leadership team.

The VRBS' Futures Group is composed of current staff who have been successfully employed by the agency for a minimum of two years, have completed specific prerequisite training in supervision and/or management and who are or have been, enrolled in approved leadership training, as finances allow.

Participation in the VRBS Futures Group involves a competitive application process and involves a three-year term for participants and two-year term for the leadership team facilitator. Successful completion of a three-year term in the VRBS Futures Group has a proposed equivalency of two years of management experience within VRBS. Allowing staff to participate in real-life problem solving and real-life improvements to our current service delivery system serves the agency well and provides a mechanism for honing the skills of future leaders within the agency.

Presently, staff members are taking advantage of regularly offered video conference training on a variety of pertinent topics.

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

VRBS has a system for ensuring the yearly evaluation of each counselor’s CSPD status (to determine percentage of “qualified” staff") and performance of each staff member. The performance evaluation of rehabilitation counselors and other professionals is paramount to our efforts to ensure quality services to Montanans with disabilities. Our evaluations are tied to specific performance activities leading to those quality services.

The standard for counseling staff in Montana is to qualify to sit for the CRC examination or to have qualified to sit in the past, with the completion of additional coursework---and then to completed such coursework. Initially, VRBS had targeted 2007 as the year in which we would meet our CSPD goal of having 100% of its counselors meet the standard of qualifying to sit for the CRC examination. Unfortunately, as more experienced employees retire, there is not a ready pool of qualified professionals to hire into those vacated positions.

In "difficult to recruit for positions" VRBS will hire individuals with a baccalaureate degree in a related field (at the minimum) and develop a CSPD plan to ensure that the employee moves toward qualifying to sit for the CRC examination. It typically takes an individual hired with a baccalaureate degree three years to meet the standard. Blind and Low Vision Services instructional staff must be eligible to hold certification from the Academy for Certification of Vision Rehabilitation and Education Professionals.

In fiscal year 2015, VRBS identified 13 rehabilitation counselors who require graduate level training to qualify to sit for the CRC examination. Currently, four are researching and applying to graduate schools, two have related Masters and are researching schools, and six are fully matriculated students engaged in graduate studies. One counselor has chosen not to pursue training. The following is the status of the 12 counselors mentioned above:

- Six are in the process of determining their school choice
- One should complete training in June 2016
- Four should complete training in 2017
- One will complete training in 2018

VRBS anticipates that the distance education graduate programs will take the average rehabilitation counselor two to three years to complete. Without the distance-learning component, VRBS would be unable to set this plan in motion, as this allows for the counselor to complete their graduate education while remaining on the job. Through continued use of the distance education programs, VRBS anticipates maintaining/ increasing the numbers of CRCs over the next several years. The average number of VRBS' counselors who complete a graduate program in rehabilitation counseling is three per year. This trend has been observed over the last decade.

CSPD requirements dictate graduate level coursework. CSPD funds are also written into the current in-service training grant; however, Rehabilitation Services Administration scholarships are utilized whenever available. The RSA In-Service grant has been terminated under the WIOA of 2014 and will not be available for graduate training in the future. VRBS comprehensive efforts to meet the staff training needs prove to be of significant benefit in terms of recruitment of new staff and retention of existing staff.

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.

VRBS believes that WIOA provides significant guidance on what constitutes 21st century VR practice. There are three new pillars to VR practice that counselors need to develop skills in:

• skills to address the evolving needs of employers and labor force to meet the demands of a changing society and work place.

• skills to assist the persons with the most significant disabilities find jobs in competitive integrated settings. • skills to work youth and high school students with disabilities to be prepared to competitively enter the world of work and post-secondary education.

VRBS understands that current and past training programs do not adequately address the new VR priorities of WIOA. Most of the current staff were not adequately prepared to address these priorities. It will take years for the traditional pre-service programs to adequately integrate these areas into their curriculum. Therefore, new staff will not be coming with these skills in the near future. Therefore, VRBS recognizes that for the foreseeable future in-service training needs set these issues as a priority. Also, close relationships must be built with the new national technical assistance centers that will be the leaders in identifying and disseminating the sources of information and best practices to address the new priorities. VRBS has bi monthly videoconferencing to provide in-service training and annual all staff trainings. VRBS plans to focus in-service resources on the new priorities and to utilize the national technical resource centers and other resources to obtain the emerging 21st century content and resources for these trainings.

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

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

VRBS performs a complete training needs assessment on all employees each year. VRBS identifies, through this process, major themes for training large groups as well as individualized training topics identified by staff and their supervisors. This assessment provides for a comprehensive set of training topics that remain fluid as emerging priorities are developed either at the national level or within the state. It is also used to provide information for conference planning purposes to associations such as the Montana Association for Rehabilitation, Montana Youth Transitions and the Association for Education and Rehabilitation of the Blind and Visually Impaired.

The VRBS HRD Specialist has responsibility for in-service training, the preparation of Montana’s in-service training grant, and for overall coordination of the agency’s comprehensive system for personnel development. VRBS also completes CSPD assessments on all counselors in a plan to meet the standard. Each year, staff who do not meet the standard are counseled and their annual course of action is determined and documented. Of course, the purpose of this annual review is to continue to move counselors toward meeting the standard. Once counselors meet the standard by qualifying to sit for the CRC examination they receive a pay raise, with an additional raise successful at completion of the CRC exam.

VRBS places a heavy emphasis on leadership at all levels and continuous improvement of staff skills at all levels. Leadership and training related to succession planning are available to all staff in one form or another. VRBS currently utilizes the Emerging Leaders Series through the Center for Continuing Education in Rehabilitation at Western Washington University and the state’s leadership program for staff development. Building on the formalized leadership/management training available to staff through the aforementioned programs, VRBS helps future leaders hone their skills through participation in the VRBS Futures Group. Additionally, there is emphasis on training in the areas of rehabilitation technology, informed choice, cultural diversity, current rehabilitation trends and disability information, and the Rehabilitation Act with its amendments. Training on topics such as rehabilitation technology, assessment, vocational counseling, and job placement is held at annual meetings such as the annual spring conference and Montana Association for Rehabilitation conference. Also, VRBS has initiated web based trainings on areas where training has been identified as a need. For the web-based trainings, either agency personnel or Montana based resources are utilized to provide the training. In addition, staff frequently participate in online trainings offered by a variety of resources. Often a representative of the agency is sent to out-of-state training to bring back and disseminate significant knowledge from research and other sources.

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.

As mentioned previously, VRBS intends to develop good working relationships with the new national technical assistance centers to keep up with emerging knowledge and best practices in their focus areas.

VRBS has contracted with the Rural Institute of the University of Montana to provide technical assistance to VRBS staff and Montana school districts on pre-employment transition services. The Rural Institute has staff with national reputations in this area.

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.

VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers have fluent sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication.

Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with Ubi-Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers.

The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with Native American consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six Native American vocational rehabilitation projects (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the Native American projects and they are an excellent resource for assisting Native Americans who are not English speakers.

The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish.

In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the

consumer to interpret. Also, Montana has colleges and universities that offer a variety of foreign languages and if necessary it may be possible to utilize instructors or students from these programs to assist with interpreting or identifying community resources to assist with communication.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The VRBS CSPD coordinates with the requirements of the CSPD under the Individuals with Disabilities Education Act in that both necessitate the following.

77. A description of the procedures and activities that the State of Montana will take to ensure an adequate supply of qualified personnel.
78. Detailed in-service training procedures to ensure that all personnel have access to training resources to enhance their professional skills, ultimately improving service delivery to consumers
79. In-service training of all personnel.
80. A system for determining, on an annual basis:
    - The number and type of personnel needed
    - Which institutions of higher education in the state are preparing vocational rehabilitation personnel, the number of students enrolled in the programs, the number who graduate with credentials to qualify for employment with the agency, and
    - When to recruit, prepare, and retain qualified personnel, including personnel from minority backgrounds, and personnel with significant disabilities.

The HRD Specialist continues to explore ways of coordinating training between VRBS, OPI, and the schools. Across the state, there are a number of transition fairs held annually at the high schools. VRBS presents at the transition fairs, and provides information regarding VRBS and how to access those services.

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;

Each VR program is required to conduct a statewide assessment every 3 years. The currently completed 3 year Needs Assessment was a statewide assessment, jointly conducted by Vocational Rehabilitation and Blind Services (VRBS) and the State Rehabilitation Council (SRC). This assessment examined the need to establish develop or improve community rehabilitation programs, and the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation needs of:

84. Individuals with the most significant disabilities including their needs for supported employment services;
85. Individuals who are minorities and individuals with disabilities who have not been served or are underserved by VRBS;
86. Individuals with disabilities served through other components of the statewide workforce investment system;

Three types of input were analyzed:

87. Direct inputs such as the consumer satisfaction survey, VRBS counselor survey, focus forums (small regional groups of consumers), consumer survey related to status 30 contacts, and the public hearings.
88. Other indicators such as the Client Assistance Program report of needs, SRC input, demographic trends, involvement with the State Employment Leadership Network (SELN), program evaluation tools (such as the standards and indicators and federal annual report), and our current strategic plan summary.
89. Priorities from other programs such as the federal priorities, and legislative priorities.

Method:

The most recent complete assessment took place between **October 1, 2010 and June 14, 2013**. As indicated above, the assessment sought information from a number of sources.

A consumer satisfaction survey was sent to consumers of VRBS **each of three years of the assessment**: approximately 1,750 surveys were sent out each year. The survey response rate was between 20 and 25 percent each year.

A **public hearing was held each of the three years of the assessment**, with each providing general input on improving the VRBS program and input on the draft goals, activities and performance measures of the VRBS' strategic plan. Teleconferencing sites were located in Billings, Bozeman, Butte, Great Falls, Helena, Kalispell, Miles City and

Missoula for all of the hearings. For the 2012 hearing, a rural site (Glasgow) was added. For the 2013 hearing again a rural site (Havre) was added. In addition, during the 2012 and 2013 hearings a call in option was available to join the hearing. During 2013, a link to provide public comment was added to the Disability Employment and Transitions website. Also, during FY 2012, public hearings separate from the statewide public hearing were held on 4 of the reservations located in Montana (Blackfeet, Fort Peck, Fort Belknap, and Northern Cheyenne.) Participation at the statewide public hearing each year ranged from about 60 participants to over 100 participants. Written comments were also accepted. From 10 to 100 written comments were received each year.

In **May of 2012**, VRBS' counselors were surveyed to gather input on their perceived needs of the consumers that they serve and 13 counselors responded.

In FY 2013, Six Section 121 tribal vocational rehabilitation projects were surveyed and VRBS received responses from four of the project directors.

In FY 2013, VRBS conducted phone interviews with 69 consumers who were closed in status 30 as either refused services or failure to cooperate in order to assess the reason for leaving services in more detail.

Throughout fiscal year 2012 and 2013, VRBS was involved with the State Employment Leadership Network (SELN), which is a group of agency personnel, community rehabilitation providers, and consumers that are planning to make integrated competitive community placement a goal for all Montanans with intellectual disabilities.

VRBS' management staff and the SRC met on **January 17th, 2013** to discuss the results of the comprehensive needs assessment, and to provide further input on the needs of Montanans with disabilities. Following that meeting a draft of the strategic plan was developed. On **May 10, 2013**, the management staff, SRC the Statewide Independent Living Council, and Client Assistance Program representative met to review the draft plan and provide additional input. On **June 14, 2013**, VRBS' management team met and finalized the strategic plan.

The new comprehensive needs assessment process has begun. The process is similar to the process of the last three year assessment. The following is an outline of the planned activities that will make up the comprehensive statewide assessment:

The next comprehensive statewide needs assessment will be completed before FY 2017. The process for this needs assessment is actively underway. The assessment method is very similar to the one described above. However, the new assessment includes methods for assessing the needs of youth and students with disabilities related to pre-employment and transition services, and 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.

Procedures related to the above include surveys of youth and students with disabilities and other stakeholders involved with transition services and focus groups related to these issues.

- Each year there will be a customer satisfaction survey conducted and an analysis of the survey results.
- A statewide town hall meeting will be held each of the three years to gather input from consumers and other stakeholders.
- In FY 2016 VRBS' counselors will be surveyed to gain their input on the needs of consumers.
- VRBS will continue to be involved with the State Employment Leadership Network to gather information on how VRBS can assist with the Employment First initiative activities.
- In FY2016 the input that has been obtained from the previous activities will be presented to the VRBS' leadership team to assess and develop priorities for the upcoming strategic plan.
- After a draft of priorities are developed, input on the priorities and potential strategies for achieving the priorities will be obtained from the SRC and if possible the SILC.
- In FY 2016 a final draft of the strategic plan will be presented to the SRC for any final recommendations.

Needs of individuals with disabilities who have the most significant disabilities, including their need for supported employment services:

An individual with a "most significant disability" means an individual with a disability who meets the criteria for having a significant disability and in addition has serious limitations in three or more functional capacities (such as, but not limited to, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of employment outcome. In addition, the person will require multiple services over an extended period of time. Findings of the comprehensive statewide needs assessment for individuals with the most significant disabilities indicate needs for:

- Expansion of services in rural areas
- Reduction of the extended support services waiting list for supported employment
- Assistance with Social Security work incentives and protection of current SSI/SSDI benefits
- Increases in earnings and benefits
- Better transportation services
- Contact with mental health centers and promotion of supported employment services
- Assistance at the high school level with independent living and social skills
- Increased services for individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved
- The need for a separate advisory group for persons with low vision or blindness.
- Concern about persons with disabilities being paid below minimum wage

Needs of individuals with disabilities who have the most significant disabilities, including their need for supported employment services:

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period of time. Findings of the comprehensive statewide needs assessment for individuals with the most significant disabilities indicate needs for:

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- The need for a separate advisory group for persons with low vision or blindness.
- Concern about persons with disabilities being paid below minimum wage

B. WHO ARE MINORITIES;

According to 2010 census data 89.4% of Montana's population is white and 6.3% is American Indian or Alaska Native persons. Persons reporting two or more races made up 2.5% of the population. In Montana, for most persons reporting two or more races, at least one of the races would be American Indian. Other minorities make up the remaining 1.8% of the population. Six Section 121 American Indian VR projects are located in Montana, covering six of the seven reservations located in Montana. Although most American Indian on or near the reservation prefer to be served by their Section 121 project, a number are served by VRBS or by both VRBS and the Section 121 project. In FY 2013, VRBS served 1,425 minority consumers (17.6% of the caseload), of which 719 were American Indian, 326 were of two or more races, 81 African Americans, 29 were Asian American, 250 were Hispanic/Latino and 20 were Hawaiian or Pacific Islander. The majority of American Indian Montanans live on reservations. Many more live just outside the reservation. However, Montana does have a number of urban areas that have significant numbers of American Indian residents. This population is served by American Indian service centers (Billings, Butte, Helena, Missoula, and Great Falls). Staff of VRBS maintain contact with the American Indian Services Centers to seek appropriate referrals and to obtain information on the needs of American Indians with disabilities residing away from reservations. Input on issues related to serving American Indians with disabilities was received from Section 121 Directors and public hearings conducted on reservations. Input received included:

- The Crow Nation should be encouraged to apply for a tribal vocational rehabilitation project
- There is a need for independent living services on the reservations
- There is a need for assistance related to the Ticket to Work Program
- Montana VRBS' counselors need to make appropriate follow up when there are referrals from a tribal vocational rehabilitation project
- There is a need for assistance related to assistive technology
- Transportation difficulties limit access to employment on reservations
- It is difficult to develop plans for employment due to lack of resources on the reservation
- There are problems getting good documentation of disability. Indian Health records are available, but often there is a wealth of information that is provided with little of

the information relevant to the person's disabling conditions, particularly impediments to employment. Setting up appointments to get adequate documentation is difficult. Psychological testing and other specialty testing often requires going to a site off the reservation

- There is a lack of job opportunities on the reservations and many of the consumers are not interested in leaving the reservation
- There is a lack of sheltered and supported employment opportunities on reservations
- There is also some difficulty serving hearing impaired persons on the reservations, but on the Blackfeet reservation there have been some procedures developed that have been successful
- There needs to be assistance for helping tribal members develop their own businesses
- It is difficult to identify tribal members who have hidden disabilities

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

In recent years, the disability makeup of the VRBS caseload has significantly changed. In 1986, 69% of the consumers had physical disabilities, 19% had mental disabilities, and 12% had sensory disabilities. In 2013, 34% of the consumers had physical disabilities, 54% had mental disabilities, and 12% had sensory disabilities. The number of cases with mental disabilities has significantly increased, especially in areas like severe and persistent mental illness, learning disabilities and attention deficit hyperactivity disorder. While the numbers served have grown, the fact that many of the VRBS' staff have had less experience working with this population has led to the SRC considering consumers with mental disabilities an underserved group because VRBS counselors may not be able to provide the same level of quality with this group of consumers. Findings of the comprehensive statewide needs assessment for individuals with mental disabilities including severe and persistent mental illness include:

- The need for more mental health centers to provide job placement and supported employment services
- More information regarding Social Security Work Incentives
- Improved transportation options
- Better communication between VRBS and the Addictive and Mental Disorders Division
- The need for a statewide task force to work on improving long-term follow along services for persons with mental disabilities

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

Currently these efforts have been focused at the local level. VRBS staff are members of the local community management teams (CMTs). As members of these teams, VRBS staff offer consultation and technical assistance on disability issues as needed. Also, most of the enrolled CRPs are active members of the CMTs.

One need that VRBS provides the system is information on Social Security Work Incentives when the workforce development system has consumers receiving Social Security benefits.

Through the planning process for developing the WIOA state plan more strategies in this area will be developed.

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

While, assessing the needs of youth and students with disabilities, particularly in the pre-employment and transition services (Pre-ETS) area has been occurring to some degree. The new priority for this to be an area of assessment is new and comprehensive need assessment methods are still be developed.

However, the following needs are very apparent with what information has been gathered.

- Montana has a very unique school funding structure compared to other states. In Montana, most students with disabilities graduate at age either 18 or 19. There are very few school districts that serve students to age 21. Therefore, in Montana there is a need for developing a service structure outside the schools for youth with the most significant disabilities ages 19-21. In other states these are being provided in the schools for that age range. Unfortunately, Pre-ETS funding cannot be used for these services in Montana because the students are no longer in school.
- Further development and refinement of the Pre-ETS program is a very high need. Most of mechanisms for delivering theses services were developed rapidly and full implementation and refinement is going to be an ongoing process over the next few years.
- VRBS has been approached by tribal VR projects in Montana that there are specialized Pre-ETS needs for American Indian students. VRBS is in the process of meeting with tribal VR representatives and developing an approach to meet this need.
- VRBS counselors are not used to being as intensely involved with students with disabilities prior to the senior year of high school. Counselors need training on working with younger students and the different perspective of the VR process for younger students.
- In a survey of participants at the most recent statewide transition conference, the Pre-ETS area that seemed to be least meet at the present time was the development of self advocacy skills. Therefore there appears to be a need to focus in this area.

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

Supported employment services are the primary emphasis of the VRBS and CRP relationship and were the focus of the needs assessment.

Issues identified to improve supported employment services include:

1) Expansion of services to rural and remote areas by the continued certification of private providers who meet VRBS' qualification levels for job assistance and supported employment services

2) Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness

3) Planning for the needs of consumers requiring higher level of long-term supports was identified through participation with the Supported Employment Leadership Network (the employment first network of Montana.

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

As mentioned previously the development and refinement of a comprehensive Pre-ETs delivery system is the greatest need for addressing these issues.

The main focus of the Pre-ETS system is contracts with individual school districts to carry out an individualized Pre-ETS work plan to meet the needs of the local area. Therefore, most Pre-ETS are going to be an integral part of the school's delivery of services provided under the Individuals with Disabilities Act.

It should be noted that the contracts with school districts clearly define the population of Pre-ETS is all students potentially eligible for VRBS services not just those served through the Individuals with Disabilities Act.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

According to data provided by the 2014 American Fact Finder, the latest data available, there are approximately 68,927 people with disabilities who are between the ages of 18 and 64 years of age residing in Montana.

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

A. THE VR PROGRAM;

From this population data set, in FFY 2917 VRBS anticipates serving 4,300 clients at a case cost of $11.1 million using Title I funding, with 816 consumers becoming employed.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Our program also anticipates that a total of 200 consumers will receive Title IV-B Supported Employment services at an overall case cost of around $300,000 with an estimated 34 consumers employed in FFY 2017.

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

FFY 2017 Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Priority Category One	Title I	$8,246,836	2,736	$3,014
Priority Category Two	Title I	$2,051,726	1,048	$1,958
Priority Category Three	Title I	$755,240	316	$2,390
Priority Category One	Title VI	$300,000	200	$1,500
Totals		$11,353,802	4,300	$2,640

For Federal Fiscal Year (FFY) 2017 VRBS estimates that total projected program costs for both administrative and client services funded under Title I and Title VI-B will be $17,425,779 including both federal and non-federal funds, assuming additional Title I reallotment funds will be available to be requested by the state. VRB Services projects an estimated overall deficit of $(2,057,113)for FFY 2017 in Title I funds and, as such, will continue to operate under an order of selection.

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

It is estimated that at the end of FFY 2017 250 individuals will be eligible for VR services, but will be on the waiting list for services because of order of selection.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

This information for FFY 2017 can be found in the table in Section 3.

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.

VRBS and the State Rehabilitation Council (SRC) have developed the goals and priorities, which are listed below. As stated previously, VRBS and the SRC met on January 17, 2013 to look at the results of the statewide needs assessment, and to begin development of the State Plan. VRBS' management staff, SRC, the Statewide Independent Living Council, and the Client Assistance Program representative met again in May 2013 to discuss the draft of the strategic plan, and to make final recommendations. Each of the preceding reviews included a review of the standards and indicators and yearly performance related to the standards and indicators.

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

Goal 1: Assure high quality employment for Montanans with disabilities through the vocational rehabilitation program.

Goal 2: Improve the infrastructure that supports VRBS in order to increase the agency's potential to promote work and independence for Montanans with disabilities.

In order to achieve the preceding goals the following priorities were established:

Priority 1: The VRBS' delivery process will become more seamless through reducing procedures and practices that create unnecessary delay in the development of plans and delivery of services.

Performance Measure 1.1: Individualized Plans for Employment (IPE) will be developed within 120 days of a person becoming eligible or the counselor will obtain an approved waiver for a limited time extension.

Target: At least 90% of IPE extensions will be in the case file and valid.

Performance Measure 1.2: Reduce the number of status 30 closures.

Target: The number of status 30 closures will decrease each year of the plan.

Performance Measure 1.3: Decrease the number of pre-plan assessments (excluding assessments to determine eligibility).

Target: The number of pre-plan assessments (excluding assessments to determine eligibility) will decrease by 2% each year of the plan.

Priority 2: Employees of VRBS will be satisfied with their jobs.

Performance Measure 2.1: High satisfaction will be expressed on the annual employee satisfaction survey.

Target: Positive responses on the survey for each question will be 85% or higher.

Performance Measure 2.2: Staff turnover will not be excessive.

Target: The number of VRBS' staff leaving for non-retirement reasons will be less than 10 persons each year.

Priority 3: VRBS will have a quality community rehabilitation provider (CRP) network.

Performance Measure 3.1: There will be an increase in CRP job placement or job search referrals that lead to a successful placement.

Target:

The following percentages will be the targets for each year of the plan:

2014: above 30% 2015: above 31% 2016: above 32%

Performance Measure 3.2: The procedures for dealing with CRP compliance with contract and performance expectations will be implemented.

Target: Each report of issues related to CRP compliance will be investigated by regional personnel and a report of findings will be on file. Actions related to the report will have been implemented.

Performance Measure 3.3: There will be an increase in the weekly wages at closure earned by consumers served by CRPs.

Target: The weekly wages at closure earned by consumers served by CRPs will increase each year of the plan.

Performance Measure 3.4: Consumer satisfaction with CRP services will be monitored.

Target: A procedural guidance related to measuring consumer satisfaction with CRP activities will be completed by October 1, 2015 and performance measures and targets will also be developed.

Performance Measure 3.5: CRP vocational direct service staff will complete appropriate training or otherwise demonstrate competency.

Target: When the DPHHS training program is developed, CRPs will be required to have vocational direct service staff successfully complete the training within a specific period of time or complete a competency exam. If this is not done, the CRP's enrollment as a VR provider will be jeopardized.

Priority 4: VRBS will increase its capacity to serve un-served and underserved populations.

Performance Measure 4.1: VRBS will utilize caseload based data and census data to identify specific issues related to unserved or underserved populations.

Target: Issues identified by the caseload research and census research will generate guidance addressing issues that are impacting unserved or underserved populations.

Priority 5: VRBS will increase its capacity to serve transition age (14-24) youth with disabilities.

Performance Measure 5.1: VRBS will increase the number of IEPs completed with transition youth before they graduate from high school.

Target: The number of IEPs completed with transition youth before they graduate from high school will increase each year of the plan.

Performance Measure 5.2: VRBS will increase the number of 26 closures for transitions age (14-24) youth.

Target: The number of 26 closures for transitions age consumers will increase by 3% each year of the plan.

Performance Measure 5.3: VRBS will increase the number of transition age youth (14-24) served.

Target: The number of transitions age youth served will increase by 5% each year of the plan.

Priority 6: VRBS will increase the quality of successful closures by placing more consumers in positions that pay a living wage and have employee benefits.

Performance Measure 6.1: On the consumer satisfaction survey, 26 closures will indicate VRBS assisted them in meeting their needs.

Target: For the question "I believe the program has met most of my needs." 90% of the responses from 26 closures will be positive.

Performance Measure 6.2: Real income for 26 closures will increase.

Target: Wages at closure combined with benefits income for 26 closures will increase faster than the rate of inflation for each year of the plan.

Performance Measure 6.3: The number of 26 closures with health benefits will increase.

Targets: The percentage of 26 closures that have health benefits provided by employers will increase each of the three years of the plan.

The percentage of 26 closures that have employer provided health insurance, Medicaid, or Medicare will increase each year of the plan.

Priority 7: VRBS will become a model of an accessible work place for individuals with disabilities.

Performance Measure: 7.1: VRBS will address identified barriers to accessibility in VRBS' offices.

Targets: Each year of the plan, VRBS will address barriers to accessibility identified in accessibility studies conducted in 2012. When all the identified barriers are removed the target will be met.

When VRBS changes to or adds a new office, an accessibility study will be completed within a year and a plan will be developed to address identified accessibility barriers. When all identified barriers are removed the target will be met.

When individual employees have a specific accessibility barrier not addressed in the preceding surveys, they will report the barrier to their supervisor, and the issue will be assessed and a plan for removal developed. When all individualized barriers are removed the target will be met.

Performance Measure 7.2: VRBS will work to be a resource for making the network of services for persons with a disability accessible.

Target: VRBS will develop and provide guidance procedures for staff on information that can be provided to other agencies in the network on resources available for addressing the workplace for accessibility.

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

See comments in each specific section.

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

VRBS and the SRC met on January 17, 2013 to look at the results of the statewide needs assessment, and to begin development of the strategic plan for inclusion in th state pan.

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

VRBS management staff, SRC, the Statewide Independent Living Council, and the Client Assistance Program representative met in May 2013 to discuss the draft of the strategic plan, and make final recommendations.

This meeting and the January meeting noted above included a review of the standards and indicators and yearly performance related to the standards and indicators

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.

Multiple reports and the finding and recommendations of RSA monitoring were presented to the council over the course of meetings preceding the development of the strategic plan and were considered by the council when providing input to the state plan.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

VRBS has established the following three priority categories under order of selection:

Priority Category One - Most Significantly Disabled (MSD): Eligible individuals with serious functional limitations in three or more functional capacities, and who will require multiple services over an extended period of time.

SD Priority Category Two: Eligible individual(s) with serious functional limitations in one or more functional capacities, and who will require multiple services over an extended period of time.

- OR - The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability or blindness.

NSD Priority Category Three: All other eligible individuals with disabilities.

B. THE JUSTIFICATION FOR THE ORDER.

Since Montana's Vocational Rehabilitation and Blind Services program (VRBS) does not believe it will be able to serve all eligible individuals with the available financial resources, it has implemented an order of selection.

VRBS first entered into order of selection in March of 2014. It did so believing that it may not be able to serve all eligible individuals with the available financial and/or personal service resources. This belief remains in place as well for Federal Fiscal Year (FFY) 2016.

Accordingly, effective October 19, 2015, VRBS closed Priority Category Three.

The following paragraphs below present our justification by describing the factors that impact our belief that remaining in an order of selection is necessary.

The Workforce Innovation and Opportunity Act (WIOA) requires a 15 percent reserve for pre-employment transition services. As such, VRBS anticipates the required service to students with disabilities who are eligible or potentially eligible for services will necessitate VRBS to focus its efforts to provide services to local school districts. These efforts, both in terms of financial and staff resources, will be above and beyond the services that were historically provided solely through case services in years past.

Specifically, according to the Montana Office of Public Instruction's data, the State of Montana has 413 public school districts which contain 171 high schools. In order to create

the necessary infrastructure to provide pre-employment transition services, which previously has not existed prior to WIOA, members of the VRBS field staff travel to varying high schools or district offices to meet with school personnel, many of whom are located in rural environments. We anticipate that this will result in a higher backlog of traditional case services in order to meet the requirement of pre-employment transition services for students with disabilities for FFY 2016 and future years.

Additionally, the trend of the availability of reallotment Title I funds nationally may indicate that additional federal funds might not be available in the full amount requested by the state even if the non-federal matching funds are sufficient and available. This assumption is based on the national data provided by RSA when comparing year-over-year the net amount relinquished versus requested in aggregate for all grant recipients through FFY 2015's reallotment period. This is another indicator to VRB Services that remaining in an order of selection status is merited.

Finally, political unrest, both nationally as well as statewide, regarding budget reductions, deficits, funding limitations (i.e. the national debt ceiling) and other potential detrimental factors beyond our direct control in delivering of the program's services to recipients necessitates VRBS to exercise caution in managing and planning its resources. An order of selection is a valid mechanism in which to do so.

C. THE SERVICE AND OUTCOME GOALS.

The time frames for achieving these goals by priority category are depicted in the table below:

Priority Category	Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Estimated number of individuals who will exit without employment after receiving services	Time within which goals are to be achieved	Cost of services
1	2,936	509	533	Immediately to one year	$8,546,836
2	1,048	266	212	Immediately to two years	$2,051,726
3	316	75	100	Suspended indefinitely	$755,240

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

This information is provided in the previous section.

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

Those individuals in Priority Category One will have the highest priority and will be served first, followed by individuals in Priority Category Two, and finally by those individuals in

Priority Category Three. All individuals within a higher priority category will be served before any individual in the next lowest priority category.

Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, highest to lowest; and then by order of application date, oldest to newest.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

The DSU has chosen to serve eligible individual, regardless of any established order of selection, who require specific services or equipment to maintain employment.

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 goal of the state's supported employment program is to maintain a system whereby individuals with the most significant disabilities are afforded the opportunity to participate in integrated competitive employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Supported employment in competitive/integrated work settings with ongoing support services for individuals with the most significant disabilities for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of a significant disability. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber TitleVI, Part B funds on a fee-for service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload, then the first priority for supported employment services will be on the job supports. The second priority will be services such as transportation and work clothing.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. VRBS does not support the use of segregated bench work, sheltered, enclave or segregated crew models. VRBS has been aware of and used customized employment techniques for some time, however with the passage of WIOA, VRBS plans to emphasize these techniques to a greater degree.

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

At this time the planned activities for utilization of funds reserved for youth with disabilities is expected to mirror the past planned activities for utilization of the funds in general. A review of previous year's expenditures indication that the youth reserve would have been appropriately expended if such a reserve had been in place at that time. Therefore, there are no special plans for the utilization of the reserve.

In the future, the option of extended services for youth may be utilized, but at this time there are other long term funding options for all youth needing those services without VRBS utilizing the new option.

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.

VRBS has identified the following sources of funding for long-term support services. Each funding source has a different group of providers for the services, but most of the extended services providers are CRPs enrolled with VRBS:

A. Extended Employment Services - Rocky Mountain Rehab

B. Mental Health cooperative agreement

C. Developmental Disabilities cooperative agreement

D. Private pay to CRP (CRP is signoff)

E. Natural supports

F. Medicaid waiver program

G. Utilize employment work expenses as an option for Social Security recipients.

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 comprehensive needs assessment is the primary process for identifying areas related to innovation. Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

Other activities related to expanding services are detailed in below in activities to achieve goals and priorities.

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.

MonTECH (the Montana State operator for the state grant AT program) implemented a process of demonstrating equipment and assessing technology needs through the use of video conferencing. VRBS hopes to assist with expansion of these efforts through expanding the computer communication technology available in VRBS offices. Each VRBS office has been provided with a variety of assistive technology items that are commonly used by persons with disabilities. MonTECH will be able to assist with the demonstrations of this equipment through the video conferencing systems.

Each BLVS regional office has a rehabilitation teacher who has background in technology related to blind and low vision and each regional office has some demonstration equipment available for consumers to test equipment before purchase. MonTECH provides additional demonstration equipment to the three BLVS offices outside of Missoula (MonTECH is located in Missoula and their office supplements the BLVS resources for that region).

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.

American Indians represent the only significant minority group in Montana. Montana has seven reservations and some of the reservations are home to more than one tribe. Each reservation has an autonomous governing body. In addition, the Little Shell Chippewa Tribe is granted Montana recognition, but not federal recognition and does not have a reservation. VRBS has counselors who serve consumers on each reservation. These counselors

coordinate with Section 121 project staff to identify potential referrals and resources. American Indians with disabilities living on reservations face unique challenges.

- First, they are eligible for a combination of tribal, federal, and state programs to meet their vocational and health needs. This requires extensive coordination and cooperation between agencies.
- Secondly, they are faced with significant cultural and economic barriers. Unemployment on these reservations varies from 4.7%% to 11.7%, while Montana's statewide unemployment rate is 3.7% (Montana Department of Labor and Industry website). Today there are very few private or self-employment opportunities on reservations; most employment comes through tribal and federal programs.

Six Section 121 vocational rehabilitation projects (Confederated Salish & Kootenai, Blackfeet, Chippewa Cree, Assiniboine Sioux, Fort Belknap, and Chief Dull Knife College) are located in Montana. This gives improved access to vocational rehabilitation services for American Indians with disabilities residing on or near reservations served by the projects. Section 121 projects have a better grasp of the cultural and service delivery barriers that exist on reservations and can help support VRBS counselors as needed.

VRBS' counselors assigned to these six reservations coordinate with each project staff as needed. In addition, the VRBS program manager visits each 121 project annually and provides technical assistance when requested.

In some cases, VRBS has access to specialized programs, or services, which are not always found on reservations. VRBS works to network, coordinate, offer technical assistance, and provide training opportunities for Section 121 project staff to ensure consumers with disabilities have access to the full range of vocational rehabilitation services. Cooperative agreements have been completed with each of the Section 121 projects and are monitored on an annual basis.

Another example of VRBS and Section 121 coordination relates to a recent unfortunate set of circumstances. The Blackfeet Vocational Rehabilitation Project recently received word that they would not be refunded effective October 1, 2015. VRBS met with the Blackfeet Project and it was determined that the Blackfeet Project had adequate carryover funds to operate for an additional year in a more limited fashion. VRBS and the Blackfeet Project were able to work out arrangements so that VRBS could expand services on the Blackfeet Reservation and a quality service delivery system could be maintained, despite the funding limitations of the Blackfeet Project. It is hoped that the Blackfeet Project will be refunded in October 2016.

In order to ensure that VRBS is meeting the needs of American Indians that do not live on or near the reservation, VRBS staff meet with: Missoula Native American Center, Helena Indian Alliance, Great Falls Indian Family Health Center, Butte - North American Indian Alliance, and the Indian Health Board of Billings Clinic. VRBS provides program referral information regarding VRBS and the transitions services for youth. During the fall 2013 SRC meeting a group from the Helena American Indian Pow Wow organization provided a presentation on issues related to urban American Indians.

Identification of Outreach Procedures Used to Identify and Serve Individuals with Disabilities who have been Unserved or Underserved by VRB

For several years VRBS has considered Native Americans as the unserved/underserved population of the state. In addition, VRBS conducted an assessment of case work data to determine other potential unserved/underserved populations and will be developing outreach strategies for the groups identified.

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 primary method of improving and expanding VR services to students with disabilities have been described elsewhere in this document. The main method has been contracting for Pre-ETS services with school districts. There also have been additional contracts with programs like Montana Youth Transitions, Montana Youth Leadership Forum, Moving On, Project Search, Easter Seals volunteer experience program, Montana Center for Inclusive Education's Virtual college peer mentoring program, and exploring specialized Pre-ETS collaboration with the tribal VR programs located in Montana.

In addition, VRBS counselors have been encouraged to take applications with students with disabilities at a younger age and provide IPE services that are focused on vocational and career exploration rather than a specific vocational goal.

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

VRBS continually assesses the need to establish, develop and improve community rehabilitation programs through town hall meetings, break out listening session at the Montana Association for Rehabilitation Conference, the State Employment Leadership Network meetings and ongoing informal communication. The need areas being addressed at this time include:

1. Expansion of services to rural and remote areas by the continued certification of private providers who meet VRBS qualification levels for job placement and job coaching services

2. Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness

In the past six years, through the collaboration with multiple agencies, CRPs, and consumers involved with the State Employment Leadership Network many initiatives are under consideration that will increase the number of persons with significant intellectual disabilities to be placed in competitive community employment. A significant number of the initiatives under consideration include assisting CRP services to be prepared to serve this population. One initiative that has been started is to develop web based training for vocational services staff of CRPs that is required by VRBS.

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

Many of the strategies developed to meet the goals established by the comprehensive needs assessments are aimed at improving the long range outcomes of persons exiting VR. Those strategies are detailed below in the section on activities to achieve goals and objectives.

Also,. VRBS and the SRC will continue to monitor the performance outcomes throughout the year to assure compliance in meeting the required indicators.

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

As a core partner, VR will be aligned with the workforce system through:

- Representation on the state and local boards.
- Collaborative case management and co-enrollment when needed by the services from more than one system partner. Partners will make referrals to initiate co-enrollment if/when the consumer could benefit from the services of another partner program, if the consumer agrees, and/or if the consumer so requests. Referrals will be made on an individual consumerby-consumer basis, and not as a blanket referral throughout the workforce system.
- Co-enrollment occurs when consumers are actively participating i
- Collaboration with other core partners on targeted outreach activities.
- Enhanced consumer referrals among core partners.
- Participation in evaluation and continuous improvement strategies.
- Specific strategies to strengthen communications among core partners.
- Collaboration among core partners for business outreach activities.

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

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

In May 2013, the management staff of VRBS met with representatives of the SRC to discuss comprehensive needs and priorities for the upcoming year. The group looked at formal input from public hearings, focus forums, VRB staff, consumer satisfaction survey, Client Assistance Program, SRC, state and national sources (CSAVR, RSA policy changes, legislative activities, umbrella agency activities), and other surveys. Information from this meeting is used to plan for the next three years and for the legislature. VRBS and the SRC have developed the goals, objectives, and strategies. In addition performance measures have also been identified and will be used over the three years of the plan to measure progress.

For the strategic plan covering FFY 2014 through FFY2016, the format of strategies was changed. In past plans, strategies were connected to specific priorities or objectives. In reviewing this plan’s strategies, it was determined that several strategies applied to multiple

priorities. Therefore, the strategies will not be listed with specific priorities. Rather, the priorities will be listed numerically and then after the strategy, the priorities that are expected to be impacted will be listed.

VRBS' STRATEGIC PLAN 2014-16

Goal 1: Assure high quality employment for Montanans with disabilities through VRB.

Goal 2: Improve the infrastructure that supports VRB in order to increase the agency's potential to promote work and independence for Montanans with disabilities.

Priority 1: The VRBS' delivery process will become more seamless through reducing procedures and practices that create unnecessary delay in the development of plans and delivery of services.

Priority 2: VRBS' employees will be satisfied with their jobs.

Priority 3: VRBS will have a quality community rehabilitation provider network.

Priority 4: VRBS will increase its capacity to serve un-served and underserved populations.

Priority 5: VRB will increase its capacity to serve transition age (14-24) youth with disabilities.

Priority 6: VRBS will increase the quality of successful closures by placing more consumers in positions that pay a living wage and have employee benefits.

Priority 7: VRBS will become a model of an accessible work place for individuals with disabilities.

Strategies to Address Priorities

Expand options in areas such as self-employment, online and home employment, including expanding the Business Enterprise Program.

Priorities addressed: 1, 4, and 6

Develop additional consumer support and input mechanisms for the Blind and Low Vision Services (BLVS) program, such as establishing an advisory group.

Priorities addressed: 1, 4, 5, and 6

Be able to provide more assistance to consumers related to assistive technology.

Priorities addressed: 4, 5, and 6

Use technology to assist counselors in having more time to work with consumers and less time doing paper work.

Priorities addressed: 1, 2, and 7

Improve VRBS counselor's relationships with employers.

Priorities addressed: 1, 3, 4, 5, and 7

Develop and provide guidance on transition age timelines.

Priorities addressed: 1, 2, and 5

Implement new CRP compliance procedure.

Priorities addressed: 1, 2, and 3

Develop procedures to increase quality/quantity of services in rural areas.

Priorities addressed: 1, 2, and 4

Review wait time for supported employment and provide guidance on reducing the time involved or approaches for adding value to the wait time.

Priorities addressed: 1, 2, 3, 4, and 5

Develop a paperless case management and vendor payment system.

Priorities addressed: 1, 2, 3, and 7

Improve working relationship with mental health agencies.

Priorities addressed: 3, 4, and 5

Improve working relationships with Development Disabilities Program.

Priorities addressed: 3, 4, and 5

Provide training and ideas for serving individuals with autism.

Priorities addressed: 4 and 5

Explore alternatives for job placement services.

Priorities addressed: 1, 3, 4, 5, and 6

Support initiatives and procedures that increase opportunities for persons with disabilities to obtain state and federal government jobs.

Priorities addressed: 4, 5, and 6

Encourage regular meetings between VRBS and Section 121 Project staff.

Priorities addressed: 1, 4

Review potential of streamlining eligibility process for dual cases with Section 121 projects.

Priorities addressed: 1, 4

Utilize counseling techniques that are less-directive. This will increase consumer motivation to participate in the process.

Priorities addressed: 1, 2, 4, 5, and 6

Review supports and orientation procedures for new counselors to ensure their start with VRBS is a positive and productive period.

Priorities addressed: 1, 2, 3, 4, 5, 6, and 7

Continue to explore methods to facilitate increased productive and supportive communication between counselors. The emphasis should be on supporting the counselors in smaller offices. Utilize tools such as interactive video to facilitate such activities.

Priorities addressed: 1, 2, 3, 4, 5, 6,

Explore methods and techniques for an ongoing consistent approach to providing feedback to counselors and obtaining feedback from counselors.

Priorities addressed: 1, 2,

Ensure that staff are aware of training requirements and opportunities for possible advancement in the agency.

Priorities addressed: 2

Encourage CRPs to be active in Community Management Team activities.

Priorities addressed: 3, 4, and 6

Encourage staff participation in activities and conferences related to minority groups and other potentially unserved and underserved populations.

Priorities addressed: 2, 4

Explore providing training for counselors on how to effectively participate in the Individualized Education Plan process.

Priorities addressed: 1, 3, and 5

Build relationships with other youth oriented programs that can be contacted to increase the connections with transition age youth.

Priorities addressed: 4, 5

Explore methods for outreach to businesses on the benefits of working with VRBS to gain employees.

Priorities addressed: 1, 6

Provide counselor training on new health care law.

Priorities addressed: 1, 2, and 6

Explore increased use of Working Well with a Disability, Living Well with a Disability classes and other programs that help consumers to prepare for employment.

Priorities addressed: 1, 4, 5, and 6

Explore partnerships to allow continued availability of Newsline provided through the National Federation of the Blind.

Priorities addressed: 4 and 6

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

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.

Northeastern Montana is a very expansive, but thinly populated area. With the new emphasis on serving youth in high school the one office (two counselors) that covers the area had 30 high schools to cover, with only 1 high school in the town the office was located and the other 29 high schools involving commutes of up to 303 miles one way. The strategy to solve this was to move a counselor position from another office to the Northeastern Montana office.

All Montana offices have rural areas to cover and attending IEP meetings was difficult throughout the state and now counselors are working with schools to attend the meetings by teleconferencing.

It is very difficult for Montana to add new positions in a state agency. Therefore, with the new requirement for comprehensive Pre-ETS services statewide the strategy of contracting with school districts was developed.

When an enrolled CRP is not available to provide supported employment services in a remote area, VRBS contracts with a local person with appropriate skills such as retired teachers and human service professionals to provide the service in the local area.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

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

The following is the complete evaluation report and within the report there are strategies identified that contributed to achievement of various priorities.

Priority 1: The VRBS delivery process will become more seamless through reducing procedures and practices that create unnecessary delay in the development of plans and delivery of services.

Performance Measure 1.1: Individualized Plans for Employment (IPE) will be developed within 120 days of a person becoming eligible or the counselor will obtain an approved waiver for a limited time extension. .

Performance Measure 1.1: Individualized Plans for Employment (IPE) will be developed within 120 days of a person becoming eligible or the counselor will obtain an approved waiver for a limited time extension. After initiation of the measurement, it was determined that the wording did not reflect the original intent. The wording was changed to: At least 90% of cases that enter plan development will have anIPE completed within 120 days or have a valid extension placed in the case file.

Target: At least 90% of IPE extensions will be in the case file and valid. After initiation of the measurement of this measure, it was determined that the wording did not reflect the original intent. The language was changed to: At least 90% of cases that enter plan development will have an IPE completed within 120 days or have a valid extension placed in the case file.

2014: 89.2% of cases that entered plan development will have an IPE completed within 120 days or have a valid extension placed in the case file.

It should be noted that a significant number of cases that did not have an extension had an IPE completed or the case was closed within a month of the 120 day target. It is possible that in many of these cases the counselor was aware the IPE was near completion or the case was near closure and did not feel obtaining an extension was an efficient use of counselor and supervisor time.

Taking those cases into account 92.2% of the cases that entered plan development will have an IPE completed within 120 days or have a valid extension placed in the case file.

The target was not met for fiscal year 2014. However, VRBS came very close to the target and the consideration of possible reasoning that some extensions were not completed would indicate the measure was meet.

2014 analysis: It is expected that in the upcoming year a significant improvement will occur as staff are becoming more familiar with procedures. In addition, guidelines for completion of the IPE have changed. The new guideline for completion of the IPE is within 90 days of entering plan development. Therefore, a much smaller percentage should exceed the 120 day target.

2015 The most recent data available was through the 3rd qtr. of FY 2015. At that time, 94.4% of cases that entered plan development will have an IPE completed within 120 days or have a valid extension placed in the case file.

The target was met for fiscal year 2015.

2015 analysis: Staff are following current guidelines more closely and it is expected that there will be even more improvement in the upcoming year.

Performance Measure 1.2: Reduce the number of status 30 closures Target: The number of status 30 closures will decrease each year of the plan.

Baseline 2013 Status 30 closures: 1,327

2014: 1010 status 30 closures

The target was met for fiscal year 2014.

2014 analysis: Staff have become aware of moving consumers into active plans more quickly and this has resulted in decreases in status 30 closures. No changes are necessary at this time.

2015: The most recent data available was through the 3rd qtr. of FY 2015. At that time there were 578 status 30 closures. It is believed that the target will be met given the third quarter reading is almost half of the target amount of status 30 closures.

2015 analysis: Staff continue to be aware of moving consumers into active plans more quickly and this has resulted in decreases in status 30 closures. No changes are necessary at this time. It is believed the use of available data to determine eligibility, rather than requiring new assessments has been a key component in the improvement in this area.

Performance Measure 1.3: Decrease the number of pre-plan assessments (excluding assessments to determine eligibility).

Target: The number of pre-plan assessments (excluding assessments to determine eligibility) will decrease by 2% each year of the plan.

Baseline 2013 pre plan assessments: 1,657

2014: 1323 pre plan assessments Target with 2% decrease: 1624

The target was met for fiscal year 2014.

2014 analysis: Training was provided on this issue and staff have developed strategies for gathering information necessary for plan development without consumers needing to complete assessments. No further action is required.

2015: 652 pre plan assessments through June 30, 2015 (most recent data available data)

Target with 2% decrease: 1296 pre plan assessments 75% of target would be 972.

Based on data reflecting 75% of the fiscal year, the target was met.

2015 analysis: Staff continue to acquire information necessary to complete IPEs without utilizing pre plan assessments. It is believed that staff are particularly utilizing school background information to determine eligibility more frequently than in the past. No further action is required.

Priority 2: VRBS employees will be satisfied with their jobs.

The target for fiscal year 2015 was met.

20145analysis: The procedures seem to be understood and have been implemented. No changes are necessary.

As part of the recent reorganization, the regions have been done away with. Therefore, from this point on it will be local supervisory personnel that will complete investigations with assistance from state office personnel.

Performance Measure 3.3: There will be an increase in the weekly wages at closure earned by consumers served by CRPs.

Target: The weekly wages at closure earned by consumers served by CRPs will increase each year of the plan.

of the plan. We were not able to get weekly wages, but do have hourly rate.

Baseline 2013 Average hourly wage for consumers placed with CRP assistance: $9.55

2014: Average hourly wage for consumers placed with CRP assistance: $9.69

The target for fiscal year 2014 was met.

2014 analysis: Because the target was met no changes are planned at this time.

2015: Average hourly wage for consumers placed with CRP assistance: $10.61

The target for fiscal year 2015 was met.

2015 analysis: Because the target was met no changes are planned at this time.

Performance Measure 3.4: Consumer satisfaction with CRP services will be monitored.

Target: A procedural guidance related to measuring consumer satisfaction with CRP activities will be completed by October 1, 2015 and performance measures and targets will also be developed.

2014: Discussions have started on developing the guide. A request for samples from other states has been made, but no useful information was obtained. Also, satisfaction surveys utilized by CRPs in relation to CRP services have been gathered and are under review.

Progress toward target is adequate for fiscal year 2014.

2014 analysis: Activities in this area have been adequate and it is anticipated that the survey will be finalized in the next year and procedures for completing the survey can be worked on at that time.

2015: The survey has been developed and the process for conducting the surveys is being developed.

The target was not met for 2015

2015 analysis: A priority of the CRP liaison group for the next year should be to complete the procedures related to the survey and implement the procedures.

Performance Measure 3.5: CRP vocational direct service staff will complete appropriate training or otherwise demonstrate competency.

Target: When the DPHHS training program is developed, CRPs will be required to have vocational direct service staff successfully complete the training within a specific period of time or complete a competency exam. If this is not done, the CRP's enrollment as a VR provider will be jeopardized.

2014: The target was met in 2014. Feedback from the CRPs has been that they do not agree with making the training mandatory before a person can provide VRBS service, but they have found the training to be a good starting point for new employees.

2014 analysis: The requirement has been implemented and no further changes are planned at this time.

2015: There was some difficulties for a short time when the organization that maintains the CRP exam reorganized, but those difficulties are over and the process continues.

The target was met in 2015.

2015 analysis: While the target has been met, VRBS is considering putting the course enrollment information on the agency website in the upcoming year. It is also being considered that staff of agencies and schools providing work based learning experiences as

part of pre-employment transition services will be required to take the training. If they are not required, it will be a recommendation that they take the training.

Priority 4: VRBS will increase its capacity to serve un-served and underserved populations.

Performance Measure 4.1: VRBS will utilize caseload based data and census data to identify specific issues related to unserved or underserved populations.

Target: Issues identified by the caseload research and census research will generate guidance addressing issues that are impacting unserved or underserved populations.

2014: It was decided to review subsequent years of data to determine that there was consistency over time. At this time the additional reviews have not been completed.

The target was not met for fiscal year 2014.

2014 analysis: While there may be some significant issues that have been identified in the research there has not been any progress towards addressing the issues. Also, there has been inadequate time to do additional review of the data to confirm that the original findings are valid.

2015: No progress was made on this measure and the target was not met.

The target was not met for fiscal year 2015.

2015 analysis: The issue should be addressed by management to determine how time can be allocated to conduct this type of research and implement plans to address issues that are identified.

Priority 5: VRBS will increase its capacity to serve transition age (14-24) youth with disabilities.

Performance Measure 5.1: VRBS will increase the number of IPEs completed with transition youth before they graduate from high school.

Target: The number of IPEs completed with transition youth before they graduate from high school will increase each year of the plan.

Baseline 2013 transition age youth with disabilities completing IPE before graduation: 117

2014: 99 youth with disabilities completed IPEs before graduation.

The target was not met for fiscal year 2014.

2014 analysis: Completing IPEs prior to graduation is a major change in philosophy for VRBS staff. Of particular concern is establishing a vocational goal at this stage of the consumer’s development. Training was provided related to this issue and staff are becoming more accepting of initial broad vocational objectives. In addition, concepts of the "adopt the

school" program are being utilized in more schools. These factors should help to meet the goal in the upcoming year.

2015: The most recent data available was through the 3rd qtr. of FY 2015. 155 youth with disabilities completed IPEs before graduation. There may have been additional students who completed during the 4th quarter of the fiscal year. However, because this quarter is made up of primarily summer months following graduation the numbers were probably small as only students enrolling in additional years of high school would meet the criteria.

The target was met for fiscal year 2015.

2015 analysis: The target was met this year. With the advent of Pre-Employment Transition Services (Pre-ETS) it is expected that even greater improvement will be seen in this measure.

Performance Measure 5.2: VRBS will increase the number of 26 closures for transitions age (14-24) youth..

Target: The number of 26 closures for transitions age consumers will increase by 3% each year of the plan.

Baseline 2013 transition age youth with disabilities were closed 26: 184

2014: 190 transition aged youth with disabilities were closed 26. Target with 3% increase: 190

The target was met for fiscal year 2014.

2014 analysis: While the target was met, it was not exceeded. VRBS should give consideration to developing additional strategies to address this issue.

2015: 129 transition aged youth with disabilities were closed 26. (this is the total as of June 30, 2015, which was most recent available.)

Target with 3% increase: 196 transition aged youth 26 closures 147 would be 75% of total

Based on VRBS achieving 75% of the target based on data for 75% of fiscal year, the target was not met for fiscal year 2015.

2015 analysis: While it appears that the target was not met, it should be noted that the 4th quarter is often a quarter with the highest numbers of 26 closures. Therefore, it is possible that VRBS was close to or may have met the target once 4th qtr. information is included. However, again even if the target was met, it is unlikely that it was exceeded in a significant way and VRBS should consider additional strategies related to this performance measure. Increased activity with Pre-ETS should increase success with this measure in the future. Also, VRBS is in the process of developing a model for providing services similar to Pre-ETS services to youth with disabilities that are no longer in school. It is hoped this model will be operational sometime in the upcoming year and increase the number of 26 closures of youth with disabilities.

Performance Measure 5.3: VRB will increase the number of transition age youth (14-24) served.

Target: The number of transitions age youth served will increase by 5% each year of the plan.

Baseline 2013 The number of IPE's completed on transition age youth with disabilities was 2,002

2014: The number of IPE's completed on transition age youth with disabilities was 1,965. Target with 5% increase: 2,102 transition age youth served.

The target was not met for fiscal year 2014.

2014 analysis: It was expected that with the expansion of the Adopt a School model that this target would have been met. It is anticipated that with additional expansion of the Adopt a School model and initiation of Pre-ETS that the target should be met next year.

2015: The number of IPE's completed on transition age youth with disabilities through June 30, 2015 (most recent data available) was 1,980.

Target 2,060 transition age youth served. 75% of target is 1,545.

Based on VRBS achieving 75% of the target, the target was met for fiscal year 2014.

2015 analysis: As anticipated the initiation of Pre-ETS has assisted in meeting the target this year. It is anticipated that with expansion of Pre-Employment Transition Services VRBS will be even more successful in this area next year. Because Pre-ETS includes services to groups, it is expected that recruitment of youth eligible for VRBS will be enhanced and students that would have been missed in previous out-reach efforts will be applying and will be completing IPEs. Also, in the upcoming year VRBS will be contracting with the Rural Institute Research and Training Center to work with schools on how to initiate and implement Pre-ETS, which should increase the effectiveness of the Pre-ETS initiative.

Priority 6: VRBS will increase the quality of successful closures by placing more consumers in positions that pay a living wage and have employee benefits.

Performance Measure 6.1: On the consumer satisfaction survey, 26 closures will indicate VRBS services assisted them in meeting their needs.

Target: For the question "I believe the program has met most of my needs." 90% of the responses from 26 closures will be positive.

2014: 93.4% positive responses on the target question.

The target was met.

2014 analysis: No changes were recommended.

2015: The surveys for 2015 have not been completed at this time as the survey is conducted on the calendar year. Also, there has been a hold on the survey process for a couple of months as the agency is contemplating a different method for distributing the surveys.

Performance Measure 6.2: Real income for 26 closures will increase.

Target: Wages at closure combined with benefits income for 26 closures will increase faster than the rate of inflation for each year of the plan.

2013:

Monthly Wages only: $1,334.20

Monthly Wages + monthly income: $1,576.37

2014:

Monthly Wages only: $1,345.05; $1,334.20 + inflation (1.5%) $20.01 = $1,354.21

Monthly Wages + monthly income: $1,591.41; $1,576.37 + inflation (1.5%) $23.65 = $1,600.02

The target was not met for fiscal year 2014

2014 analysis: VRBS is very close to meeting this target. It is anticipated that the required CRP training should assist with better placements in that sector. Also, the improving Montana economy should assist consumers obtain better paying vocational outcomes.

2015 (October 1, 2014 to June 30, 2015)

Monthly Wages only: $1,322.46 $1,354.21 + inflation (0%) $0 = $1,354.21

Monthly Wages + monthly income: $1,619.02 $1,600.02 + inflation (0%) $0 = $1,600.02

The target was not met for fiscal year 2015 in relation to monthly wages, but was met with regard to monthly wages + benefits.

2015 analysis: Unfortunately VRBS consumers lost ground with regard to monthly wages in the last year. However, the target with regard to wages + benefits was met. It should be noted that there was an increase in the number of transition age youth that were placed in 26 during this time span. An increase in this age group could decrease the average wage because this age group tends to receive entry level wages. Also, this age group may be retaining their benefits while they develop increased skill development and experience necessary for higher wages.

Performance Measure 6.3: The number of 26 closures with health benefits will increase.

Targets: The percentage of 26 closures that have health benefits provided by employers will increase each of the three years of the plan.

Baseline 2013: 31.3% of 26 closures have health benefits provided by employers

2014: 33.7% of 26 closures have health benefits provided by employers.

The target was met for fiscal year 2014.

2014 analysis: The target was met and no changes are planned.

2015: Through June 30, 2015 27.4% of 26 closures have health benefits provided by employers.

The target was not met on June 30, 2015.

2015 analysis: The target was not met. One change that may have occurred during this time period was the initiation of market place insurance and consumers may be obtaining insurance through the market place rather than through employers. This may have a particularly high impact in Montana due to the high percentage of small businesses.

The percentage of 26 closures that have employer provided health insurance, Medicaid, or Medicare will increase each year of the plan.

Baseline 2013: 61.8%% of 26 closures have employer provided health insurance, Medicaid, or Medicare.

2014: 62.0% of 26 closures have employer provided health insurance, Medicaid, or Medicare.

The target was met for fiscal year 2014.

2014 analysis: The target was met and no changes are planned.

2015: Through June 30, 2015 59.8% 0f 26 closures 26 closures have employer provided health insurance, Medicaid, or Medicare..

The target was not met on June 30, 2015, but is close enough that it may be met by September 30, 2015.

2015 analysis: The issue of market place insurance is again an issue for this measurement. It is believed that overall consumers with health insurance after placement has increased due to the availability of market place insurance, but that cannot be measured at this time.

Priority 7: VRBS will become a model of an accessible work place for individuals with disabilities.

Performance Measure: 7.1: VRBS will address identified barriers to accessibility in VRB offices.

Targets: Each year of the plan, VRBS will address barriers to accessibility identified in accessibility studies conducted in 2012. When all the identified barriers are removed the target will be met.

2014 Local offices report that identified barriers are being addressed.

2014: The target was met this fiscal year.

2014 analysis: The target was met and no changes are planned.

2015 Local offices report that identified barriers are being addressed.

2015: The target was met this fiscal year.

2015 analysis: The target was met and no changes are planned.

When VRBS changes to or adds a new office, an accessibility study will be completed within a year and a plan will be developed to address identified accessibility barriers. When all identified barriers are removed the target will be met.

2014: No new offices were added.

2015: One office was added an accessibility study was completed and issues identified are being addressed by the landlord involved.

2015: The target was met this fiscal year.

2015 analysis: The target was met and no changes are planned.

When individual employees have a specific accessibility barrier not addressed in the preceding surveys, they will report the barrier to their supervisor, and the issue will be assessed and a plan for removal developed. When all individualized barriers are removed the target will be met.

2014: No accessibility barriers were reported by staff.

2015: No accessibility barriers were reported by staff.

Performance Measure 7.2: VRBS will work to be a resource for making the network of services for persons with a disability accessible.

Target: VRBS will develop and provide guidance procedures for staff on information that can be provided to other agencies in the network on resources available for addressing the workplace for accessibility.

2014: There was a lengthy turnover in the position that was to develop the procedures described above and no progress has been made on this performance measure.

2014: The target was not met this fiscal year.

2014 analysis: Now that the position is filled the person in the position should be notified of this responsibility and work on the task should be initiated.

2015: There were other high priority issues that needed to be addressed and this task was not addressed.

2015: The target was not met this fiscal year.

2015 analysis: This task should be made a priority for completion in the upcoming year. VRBS will include this activity as part of the responsibilities under a contract to review the assistive technology practices of the agency and update those practices.

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

Factors that impeded the achievement of goals are imbedded in the report in the previous section.

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.

VRBS continually assesses the need to establish, develop and improve CRPs.. Among the need areas being addressed at this time are:

- Expansion of services to rural and remote areas by the continued enrollment of private providers who meet VRBS qualification levels for job placement and job coaching services. New providers are being developed in the northern Montana and in other remote areas of the state. Increasing the number of counselors serving the north east section of the state has be a strategy that contributed to improvement in this area.
- Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness VRBS continues to work on this issue, but there has been no new providers added in the last year. VRBS is working with an initiative of the Addictive and Mental Disorders Division to improve employment of persons with significant mental health disabilities. Some of the providers that the Addictive and Mental Disorders Division are developing as part of this initiative may become VRBS enrolled CRPs in the future. The project coordinator was a past IL program manager of this initiative was a past IL program manager and her understanding of VR contributed to this initiative working well with VR.
- VRBS in collaboration with the Developmental Disabilities Program developed an on-line training to be required of all providers. This provides a core set of information

and techniques for all providers in the state. The collaboration and communication by being involved in the Supported Employment Leadership Network was a strategy that contributed to success of this activity.

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

The primary factor that impedes success in the priorities mentioned above is the rural nature of Montana. Large areas with small populations make it difficult to develop supported employment resources.

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

The following are baseline data for the performance accountability indicators.

- FY 2014 data is:
- Employment rate 2nd quarter after exit: 71.0%
- Employment rate 4th quarter after exit: 66.0%
- Median Wage 2nd qtr. after exit: $3,540
- Credential Rate 11.6%
- Measurable Skill Gains 21.2%
- Effectiveness in Serving Employers

This information is baseline and actual performance levels will be set when further guidance is received.

In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, WIA data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best-guess estimates and will likely change as more guidance is received.

Without any precedent for gauging the effectiveness of employer services, Montana will use employment retention for the Effectiveness in Serving Employers measure (retention of employment 4 quarters after program exit). This measure is being used by all the other partners involved with the Combined Plan and allows for comparison across programs. In the upcoming low-unemployment environment we will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana’s businesses, including individuals with disabilities.

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

- Support the Statewide Independent Living Council and the State Rehabilitation Council, which each meet four times during the year to conduct business. Expenditures included travel, stipends, supplies, meeting room rental, interpreters, and facilitation services.
- To pay some costs related to the consumer satisfaction survey.

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.

Section 17: Quality, Scope, and Extent of Supported Employment Services

Quality of Supported Employment Vocational Rehabilitation and Blind Services (VRBS) enrolls providers who will be making supported employment time limited services available. The enrollment process requires that providers have met a set of standards described in administrative rules. This enrollment process ensures that the providers maintain the necessary education, skills, and degree of professional expertise to provide a level of service commensurate with VRBS work service standard. VRBS values its priority partners who have met the required standards. Supported employment providers evaluated by the developmental disability system or mental health system represent the majority of our providers. The Commission on Accreditation of Rehabilitation Facilities (CARF) and Rehabilitation Services Accreditation System (RSAS) are also utilized by providers. Other providers are individuals who have been selected to provide services for a limited number of consumers in a rural area where there are no established providers.

As mentioned previously, VRBS and the Developmental Disabilities have collaborated to develop training for CRP vocational services staff. The training will be required. It is felt this will significantly improve the quality of CRP supported employment services.

Scope of Services

The scope of services available may include one or more of the following services depending on the individual's needs:

- Vocational Evaluation
- Community Based Assessment
- Supported Employment
- Job Readiness Service
- Job Placement Services

Also, services such as transportation to work place, work clothing, etc. are provided when necessary.

Extended support services are available through a variety of programs following closure of the VR case. These services are described previously in this document.

VRBS will be reviewing the opportunity to provide extended services for youth as allowed under WIOA. Guidelines for this service are likely to be developed in the next year.

Extent of Supported Employment:

An individual shall be eligible to receive supported employment services using Title VI Part B funds if:

167. The individual is eligible for vocational rehabilitation services.
168. The individual is determined to be an individual with the most significant disabilities; and
169. There is comprehensive assessment of rehabilitation needs of the individual including an assessment of rehabilitation career and job needs, and identifies supported employment as the appropriate rehabilitation objective for the individual.

Cooperative Agreements:

When a goal requiring supported employment is identified in the IPE, a document (cooperative agreement) signed and dated by the extended service provider reflecting the commitment of extended service provisions will be placed in the file prior to closure. A similar commitment is obtained from the fund provider when appropriate.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Funding Extended Support Services Prior to Closure:

VRBS provides time-limited services needed to support an individual in employment (with the exception of extended services for youth with the most significant disabilities between the ages of 14-24). VRBS can fund a maximum of 24 months of job coaching and follow-along services unless the Individualized Plan of Employment (IPE) indicates that more than 24 months of services are necessary for the individual to achieve job stability prior to transitioning to extended support services. Prior to the purchase of supported employment services, the need for services, the appropriate extended support services, funding, and the appropriate agency to provide the services are established and identified on the IPE. Supported employment services are available statewide.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate

Name of designated State agency

Full Name of Authorized Representative:

Title of Authorized Representative:

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

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

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

FOOTNOTES

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Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

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

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

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

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

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

Applicant's Organization **Disability Employment and Transitions Division**

Full Name of Authorized Representative: **Jim Marks**

Title of Authorized Representative: **Administrator Disability and Transitions Division**

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.

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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 **Disability Employment and Transitions Division**

Full Name of Authorized Representative: **Jim Marks**

Title of Authorized Representative: **Administrator Disability Employment and Transitions Division**

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

ASSURANCES

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

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

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

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

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

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

Agency will provide the full range of services described above **No**

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

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

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

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

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14)OF THE REHABILITATION ACT.

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

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

CLXX. 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

CLXXI. 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:

CLXXII. 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

CLXXIII. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

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

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above? Yes

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

(A) ECONOMIC PROJECTIONS AND IMPACT

States must:

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D))(MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

According to the Research and Analysis Bureau in the Department of Labor and Industry the State of Montana WIOA Combined Plan Montana is expected to add roughly 7,800 jobs per year in 2015 and 2016 at a rate of 1.6%, then slow to job growth of 5,950 jobs per year from 2017 to 2024. The faster growth in the near term is expected as a continuation of the strong job growth Montana has experienced in recent years, with the worker shortage slowing growth in the long–term to only 1.1%. Although slower than recent years, the 1.1% pace in the long term is just slightly above the long–term employment growth average of 1% annually since 1980. The health care industry is expected to have the highest job demands, requiring 1,300 jobs per year through 2024. Mining, professional and technical services, and construction are expected to grow the fastest in percentage terms. Professional and technical services is expected to be Montana's fastest growing industry in percentage terms, adding an average of 600 jobs per year for the next ten years. The growth of Montana's professional and technical service industry represents the emergence of a knowledge–based service sector, which generally provides higher wage, professional jobs with good benefits. New business startups occur in every industry in Montana, with business activities and construction having the largest number of business startups among industries. Figure 8 New Business Startups in Industry is from Section II. A. Economic, Workforce and Workforce Development Activities Analysis of the Combined State Plan and illustrates the business startups by industry, showing both in the average number of new businesses per year from 2006 to 2013 and the startup rate as a percentage of existing businesses. Even though construction has an average of 611 startups per year, there are a large number of construction firms, placing this industry in the middle for startups as calculated as a percent of existing businesses. The highest startup rates are found in the business activities, transportation, and mining sectors.

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

Montana's SCSEP sub–recipient will continue to coordinate with one–stops and community sources as well as stepping up the communication and coordination with employers to identify training opportunities and subsequent unsubsidized employment based on the economic analysis by Research and Analysis. While Montana is challenged with an aging workforce and the lack of young people to replace retiring workers, some of those in the aging workforce are finding that they need to work to supplement their social security or their retirement. Priority will be to identify opportunities in the emerging businesses linked to

health care and support services and to place program participants into long–term, economically stable employment on a regular basis

3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))

Montana's economy outperformed the nation again in 2014, with rapid wage increases, strong employment growth, and declining unemployment. Wage and employment growth has occurred throughout Montana, with the western half of Montana strengthening growth to rebalance the economy geographically. The decline in oil prices has impacted our state, slowing growth in the Eastern region of Montana in particular, but the economy is resilient and diversified enough to withstand these changes. Data from the first half of 2015 suggests Montana's economy has already overcome the challenges of low commodity prices, and is finding opportunity in other industries and areas. The Montana DLI continues to take the lead in addressing the worker shortage and other issues faced by the Montana economy. The department will continue to partner with businesses to address worker shortages, developing apprenticeships and other programs to ensure workers are quickly trained with the right skills for today's economy. Workers will need to take advantage of these training programs to continuously upgrade skills. Generally SCSEP participants have little or poor work history with very little skills, therefore the types of skills available among the eligible populations will have direct implications for recruiting host agencies; the types of training positions available at host agencies; skill training offerings that the grantees can locate or develop; and other training linkages. The focus is to prepare older workers for these jobs through community service placements as well as coordinating and co–enrolling, as appropriate, with WIOA Title I programs or other programs such as Vocational Rehabilitation in order to provide older workers the opportunity for the occupational skills training to help participants obtain the skills needed for these jobs. SCSEP participants also register at Job Service Workforce Centers where they can benefit from Wagner–Peyser job search and placement programs.

(B) SERVICE DELIVERY AND COORDINATION

States must:

1. PROVIDE A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS

This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

The SCSEP Plan guides the strategies that for helping older workers obtain meaningful community service assignments and training leading to unsubsidized employment. SCSEP subrecipient (Experience Works) staff works to achieve integration of SCSEP with WIOA Title I adult and dislocated worker programs, Wagner–Peyser programs, local employers, Montana Chamber of Commerce, and other partners to ensure that training and employment strategies are based on local market conditions. Experience Works staff works to achieve equitable distribution requirements; promote the benefits of hiring older workers; improve the availability of employment and training options; and increase placement and retention of older workers. Experience Works currently maintains a collocated office location within the Helena Workforce Center and ETCs provide SCSEP services via regularly scheduled hours at Montana Job Service Workforce Centers. Experience Works maintains Memorandums of Understanding (MOU's) include WIA Title I service providers in Billings, Lewistown, Havre, Great Falls, and the Rocky Mountain Front. As a required partner of the one–stop system SCSEP coordinates with the one–stop centers and programs under WIOA in their areas and works closely with their one–stop partners to ensure older individuals are receiving services. One–stop centers provide a great opportunity for older individuals to explore the many options available to them including career services, referral to employment opportunities or other services such as training services offered through WIOA Title I programs and help prepare them for employment. Participants are required to register at the one–stops and co–enrollment of SCSEP participants in WIOA Title I programs is encouraged when appropriate. Participants are encouraged to take advantage of job search and resume writing workshops and other courses held at Job Service Workforce Centers. Staff in the workforce centers can offer their expertise in assisting seniors search for job openings where the job requirements are consistent with their knowledge and skills; and by providing referrals to employment opportunities. Partners are asked to assist with outreach and recruitment efforts to targeted and hard to serve populations. SCSEP subrecipient staff and participant openings are advertised with the Montana Job Service Workforce centers. The centers also provide referrals to public assistance programs, vocational rehabilitation, and veterans' programs. Job Service Workforce Centers also serve as host agencies for training SCSEP participants.

(B) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))

Montana's SCSEP grantees will continue partnerships with programs under OAA and USDOL to help older workers including: AARP–pedometer program AARP–grandparents raising grandchildren, particularly helps American Indians Information, Assistance and Referral Program links Montana seniors, their family members, caregivers, and local professionals Adult Protective Services Transportation Advisory Councils–Ticket to Work Office on Aging provides meals on wheels, health services, transportation, information referral and assistance services Community Services – sharing job site information Area Agencies on Aging–job site information Department of Labor – program guidance, help with performance measurements Job Service Workforce Centers pre–testing and registration for Wagner–Peyser services Possible job opportunities at Area Agencies on Aging, Walgreens, and U.W. Census State Workforce Investment Board MT Association of County Commissioners Montana Commissioner of Labor AFL/CIO HRDC Directors Rocky Mountain Development Council Job Service Workforce Centers Public and Private nonprofit agencies providing employment services (Helena Industries and WESTAFF) Communities – independent living centers plus state (SLIC), host agencies Senior Centers AARP Community Services Bureau, SLTC Working for Equality and Economic Liberation (WEEL) Veterans Services Department of Corrections – prerelease centers Vocational Rehabilitation Services for the Blind American Indian Tribes Planned activities to coordinate with OAA: Health fairs and senior wellness activities throughout the state Continued partnerships with Aging Services Attend and/or participate in Governor's forum on aging Attend conferences and seminars that pertain to aging services Connect homeless with services available

(C) ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH-BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

Aging often decreases people's ability to remain independent. Montana's SCSEP subrecipient works with host agencies and employers to develop reasonable accommodations that will allow those with disabilities to work and be successful in the SCSEP training assignment or in an unsubsidized job following training. The SCSEP provider will continue to work with the Aging/Disability Resource Centers. Front–line staff is provided training to sensitize them to the needs of those with disabilities. Recruitment methods are carefully worded so as not to discourage the older person with a disability from making application for SCSEP services. There have been many years of coordination between the Rehabilitation Services, State Services for the Blind, and Veterans services for referrals and providing of services to help the older Montanans succeed in the job market. The staff will also provide technical assistance to employers on ADA (Americans with Disabilities Act) requirements and available tax credits for hiring older workers. SCSEP participants have access to Disability Resource Coordinators that are located in each Job Service Workforce Center to help them navigate the system. The Ticket–to–Work program will also be used as appropriate. Medicaid waivers are another venue for the SCSEP participants. The waivers allow people to remain in their homes rather than live in an institution. Various services from respite to transportation and personal care are offered. The

care giver can be paid if the care giver is not the legal guardian of the recipient. This could be especially beneficial on the Indian reservations.

(D) ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

SCSEP has not participated in planning processes to apply for DOL–funded industry training initiatives but is certainly open to collaborating and participating in planning efforts for grant applications and regional initiatives should those opportunities arise.

(E) ACTIONS THE STATE WILL TAKE TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)

Community Management Teams (CMTs) play a vital role in ensuring that SCSEP is connected to the broader Montana workforce system. Experience Works actively participates in CMTs to improve coordination of services among the various organizations engaged in older worker initiatives that result in employment for older workers. Plays a lead role in Montana's workforce system and in the development and implementation of Montana's strategies to address the issues of older workers. The Experience Works' participation in CMTs ensures that SCSEP activities are aligned with Montana's workforce system priorities for older workers. Experience Works, uses the one–stop centers for office space, referrals, training, and computer access wherever possible. Experience Works maintains a collocated office location within the Helena Workforce Center and ETCs "hotel" via regularly scheduled hours at the following Montana Job Service offices: Billings, Miles City, Glendive, Sidney, Wolf Point, Helena, Bozeman, Butte, Livingston, Dillon, Anaconda, Great Falls, Kalispell, Glasgow, Cut Bank, Havre, Lewistown, Shelby, Missoula, Hamilton, Libby, Thompson Falls and Polson. Both the federal and state SCSEP programs are integrated with the workforce centers in Montana and are able to provide timely access and information regarding employment and training resources designed specifically for seniors. Employment and Training Coordinators share information and ideas with public and private social service providers to increase the seamless integration of older workers into Montana workforce investment system and workforce. Experience Works currently has an office in the Helena Job Service Workforce Center. The value of each entity within the One Stop system working to assist and improve the lives of SCSEP participants clearly enhances the likelihood of employment when training is complete. Additionally, networking within the One–stop system increases the understanding of how each program can benefit all workers.

(F) EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Community service includes worksites in economic development. Economic development is part of the one–stop system and are often members of the Community Management Teams in several areas across the state including the more rural locations in Montana. SCSEP staff are also part of the Community Management Teams in this areas which presents them the opportunity to provide information to and recruit community service worksites through local economic development.

2. DESCRIBE THE LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)

Montana's Job Service Workforce Centers have a close connection to employers which is beneficial for SCSEP when recruiting employers. Employer recruitment is a priority the same as training site recruitment and participant recruitment. Recruitment efforts include educating employers about the value in hiring older workers and the cost benefits to the employer's business/organizations. Employers are encouraged to take part in a multitude of activities to assist older workers in their job search such as serving as trainers at job clubs and explaining the expectations and skills needed to work for their business or organization. Building trust between the employers and SCSEP will result in benefits for both organizations but particularly for the older workers. In addition to networking with the one–stop centers and membership on Community Management Teams, Experience Works Coordinators are involved with local Chambers of Commerce in order to reach out to the business community. Building relationships through networking leads to jobs for participants.

3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))

Montana SCSEP continues to focus on increasing American Indian enrollments and placements. Experience Works, will continue its efforts to recruit participants from the minority groups by: Identifying and working closely with community agencies, minority churches and organizations that serve multi–cultural populations Assigning participants to host training sites which serve to communicate with the minority population Inviting guest speakers from the minority community to participate in SCSEP workshops Asking participants, including minority individuals to make program referrals for family, friends and other contacts Advertising in local newspapers (including tribal newspapers whenever possible) and senior publications and classified ads Placing brochures and posters in One–Stop Centers, Post Offices, libraries, senior centers, social service agencies and other public places which older minority individuals frequent

4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

Whenever demographic and economic data are made available SCSEP works with other Montana agencies to ensure they are serving those populations most in need. There are 217 authorized national positions and 56 authorized state positions in Montana for PY'15. Both national and state SCSEP services are available in 10 Montana counties. The Montana localities/populations where SCSEP services are most needed are those that are often the hardest to serve: remote, rural, counties which have limited commerce, and, thus, limited prospects for employment. These counties make up the vast majority of the state, and the current variance situation for national and state grantees reflects this fact. Collecting, monitoring and analyzing community service needs is an ongoing process. SCSEP's service

to a community is based primarily on the social and economic needs of the participants entering the program; and on the demand of the services within local communities. Seniors with limited fixed income in good health and a willingness to work could benefit from doing community service, according to those who work with SCSEP. Specific senior populations that would benefit from community service work are those with time and energy, seniors over 65, ex–convicts, retired people especially farmers and ranchers, all age groups if capable of physical work, the unemployed and economically disadvantaged older persons. Local community service needs include: mentoring in schools, working in prisons, jobs in tourist areas, cleaning road ditches, providing office support services, making signs, serving as job developers, doing flower enhancements along streets or in parks, serving as advisors to local businesses, cleaning rest areas, providing after–school programs for children and providing day care, receptionist for nonprofits, gift–shop attendants, service attendants for food pantries, jobs at clothing give–away programs and doing yard work. Community service requests also includes: clerks, janitors, cooks or teacher's aides in schools; clerical help (with some computer knowledge) for city, county, state and federal public agencies; cooks for nutrition sites; clerical assistants for small nonprofits (again with some computer skill); librarians in schools and towns; docents, historical researchers (again with some computer knowledge);custodians for museums in smaller communities; and maintenance workers for cities and towns and park and recreation areas. The delivery of community services in rural locations is more difficult due to the low population density and large distances between participants in each county. The more remote or economically depressed the county, the more barriers exist. Additionally rural areas often have limited opportunities for community service assignments, training, and jobs. SCSEP will continue to work with the Office of Senior Long Term Care/Aging Services, Montana's Workforce system, groups that provide services to people with disabilities and veterans, and other interested agencies as well as the business community to identify local community service project needs and the specific populations that will work on these projects. Local community needs will be addressed in an ongoing manner. Utilization of a marketing and recruitment strategy is organized early in each grant year to identify potential host agencies to meet the training needs that match job openings in the communities and match with participant's needs and interests in training to gain employment.

5. DESCRIBE THE LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

The overall goal of SCSEP in Montana is to serve the eligible clientele by providing training opportunities that both improve or build skill levels and provide the training needed for jobs available in the community. The long–term goal is to assure that job matching is appropriate for both the employer and older worker so that the relationship will be retained to the benefit of the employer, the older worker and the state's economy. Partnerships for integrating services are a key to these strategies. Attainment of negotiated goals for serving Montana's older worker population, increasing services within the network of nonprofits and public agencies within communities, and providing skilled workers for employers is a measure of successful service from the older worker program. Recommendations include the following: Help SCSEP participants attain the skills (such as computer and healthcare–related skills) to better fill the employment needs in the state Work with and expand on the nonprofit agencies

to provide meaningful community service assignments that fill a current need within the community; Work with businesses and nonprofit agencies to develop good training assignments where today's skills are learned on–the–job and unsubsidized employment will be the end result in more situations; Assist the business community in finding ways to attract and employ the older worker; Show businesses why this is beneficial to hire the older worker; Continue to be an active partner in Montana's one–stop systems; House SCSEP field personnel within the Montana One Stop Centers, wherever possible, throughout the state; Coordinate activities with WIOA programs and Montana One Stop Centers; Target services to American Indians; Work more closely the WIOA 166 grantees such as the Blackfeet Manpower in Browning; Expand Area Agencies on Aging referrals; Place additional emphasis on creative partnerships with groups that advocate and provide services to people with disabilities and veterans; Expand coordination with the Ageing and Disability Resource Center (ADRC) program throughout the state; Expand relationships with Montana Chambers of Commerce

6. DESCRIBE A STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

Targeting Jobs: Montana's SCSEP has been successful in placing participants in unsubsidized employment with community service agencies and especially with host agency training sites. A significant portion of SCSEP's unsubsidized placement can occur when the community service training sites hire SCSEP participants that have been training at the sites with emphasis on the value and benefits of hiring trained participants. Continued partnerships with Montana's One–Stops: Experience Works monitors information on job opening and trends, through partnerships with the one–stops, that will help identify current and future regional job opportunities; establishes and maintains with Job Service Workforce Centers, Vocational Rehabilitation Services, Social Services, Adult Services and Aging, and the Department of Education. Title V participants are assigned to these agencies as office assistants, resource room attendants, and custodial workers whenever possible. Upgrading and maintaining participant skills: Participant training is a key ingredient to successful program performance as often the skills of the SCSEP participants are outdated and need to be upgraded to meet today's employment requirements. Qualities valued in the older worker such as work ethic and reliability are valued by most employers, but the need for specific skills in today's job market are crucial for success. The need for specific skills leads to training and retraining for SCSEP participants to help them become employable. In PY'14, the Montana Department of Labor and Industry, Montana's SCSEP Grantee, through coordination with the National Grantee Experience Works received Limited Competition funding to provide expanded training services to participants. Through the Limited Grant Opportunity funding, Montana provided more in–depth training to participants to increase computer literacy skills, soft skills, and occupational skills that gives them the opportunity to obtain industry recognized certifications needed for employment in today's high demand industries in order to market their skills effectively to employers and be in a position to negotiate for better paying jobs. The additional funding also allowed Experience Works staff to set up traveling computer labs and the software needed to provide training to a total of 40 State SCSEP participants during the grant period of July 1, 2014 through June 30, 2015. The expected outcomes are increased entered employment; employment retention; and increased salaries. In addition to the training opportunities through the grant, the funds allowed for more access to supportive services by participants such as transportation so they

may participate in training and work towards successful program completion. Montana received an extension through September 30, 2015 for the Limited Competition grant and the expectation is that Montana's performance will see an increase in entered employment and retention. Ongoing Assessments of Skills: Experience Works uses an assessment tool called JobReady which includes on–line assessment and the Individual Employment Plan as well as training in a variety of skills, some at no cost to the individual and some for a fee. Completing these training courses can result in certification of skills following successful testing of the subject matter. A large number of participants have taken advantage of this training as it can be done at any time from any computer. Truck driver certification is made available to SCSEP participants that are willing and able to drive trucks, especially doing daily runs. There is an increased need for nursing and residential care providers, hospital workers, and ambulatory health care providers. The continued need for Certified Nurse's Aides (CNAs) is recognized by the SCSEP grantees. An assessment is made on each potential applicant for their interest and current skill level. Those that indicate an interest and limited skill level in doing the CNA work are further assessed on their physical ability to perform the job with additional training. Maintaining partnerships with the business community: There is increased effort to gather input from the business community, community leaders, and host agency supervisors on the job skill needs within their organizations and participants themselves on the types of job openings they see in their communities. This input enables SCSEP grantees and the workforce community to provide more meaningful training opportunities for the older worker and find appropriate matches for unsubsidized job placement with a higher degree of retention. Montana's SCSEP grantee monitors performance quarterly and provides technical assistance and training in areas needing improvement. DLI expects to see continuous improvement in the performance areas of entry into employment and retention due in part to SCSEP's continued use of the computer labs, software and other training resources that continues to be made available to participants after the Limited Grant Opportunity funding period was over on September 30, 2015. The benefits to participants beyond the end of the Limited Grant Opportunity funding period include an already established training plan in place along with the established computer labs, training materials and increased staff expertise.

(C) LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

States must:

1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

Montana's SCSEP sub–recipient has three ETC positions, one of which is currently vacant but the expectation is to fill that position as soon as possible. ETCs are located in Missoula, Billings and Great Falls. Each ETC has expertise in serving both urban and rural, to the very rural areas of the state. The coordinators are responsible for outreach and providing services to both state and national grantee participants within the counties in their area. Cascade, Flathead, Lewis and Clark, Missoula, Gallatin and Yellowstone counties are the most largely populated areas in the state. Montana also has seven reservations which presents a challenge due to their high unemployment and few opportunities for jobs. However three of them are located in or very near the most heavily populated counties which could be on the positive side for accessing jobs in those counties with larger cities. With the exception of Yellowstone County the largely populated counties are located in the western portion of the state. These heavily populated counties are also the most diverse in population. SCSEP Grantees work with other agencies within the state to ensure compliance in connecting localities and populations with projects authorized by Title V.

Montana's SCSEP works with other Montana agencies to ensure they are serving the most-in-need populations. The state collects, monitors and analyses community service needs on an ongoing process and has found that while it is more difficult to deliver community service needs in the more rural remote counties such as Carter, Custer, Fallon, Fergus, and Judith Basin the more populated counties including Flathead, Lewis and Clark, Gallatin and Yellowstone have the majority of harder-to-serve seniors which makes it imperative that SCSEP work closely with the partners listed below and in B.1.b. of the SCSEP State Plan. The delivery of community services in rural locations such as Carter, Custer, Fallon, Fergus, Dawson, Choteau and Judith Basic counties is more difficult due to the low population density and large distances between participants in each county. The more remote or economically depressed the county, the more barriers exist and more limited opportunities for community service assignments, training, and jobs. Montana SCSEP partners with and works closely with the Office of Senior Long Term Care/Aging Services, Veterans Services, Department of Corrections (pre-release centers) Vocational Rehabilitation and Blind Service (VRBS), American Indian Tribes, AARP, county extension offices, Good Will, Good Samaritan, St. Vincent DePaul and Salvation Army ministries, Habitat for Humanity, independent living centers, existing host agencies, senior community centers, Rocky Mountain Development Council, Job Service Workforce centers, Montana's Human Resource Development Councils (now referred to as Community Action Partnerships), and other interested agencies that work on these projects. Examples of community services needed for all of Montana include: Utility assistance; food bank; clothing assistance; and commodities; weatherization assistance; food pantry; day care; household items, Meals on Wheels or other meal assistance programs; energy assistance; economic self-sufficiency training/case management; water utility assistance; senior transportation; senior activities/exercise program; legal assistance; Literacy assistance, ESL and tutoring; Disability services including services for the blind. Community services needs have been identified in

every one of Montana's counties however due to the equitable distribution for state-funded SCSEP only ten counties may be served which are: Big Horn, Cascade, Custer, Flathead, Gallatin, Lake, Lewis and Clark, Missoula, Ravalli, and Yellowstone. However the state-funded SCSEP opportunities may only be offered in the ten counties where there are authorized state positions.

2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

Big Horn Pryor, Harden, Lodge Grass 2 Cascade Great Falls, Cascade, Belt 5 Custer Miles City, Lame Deer, Ashland 2 Flathead Kalispell, Whitefish, West Glacier, Big Form, Coram 8 Gallatin Bozeman, Belgrade 3 Lake Polson, Elmo, Ronan, Pablo 5 Lewis & Clark Helena, East Helena, Augusta, Lincoln 6 Missoula Missoula, East Missoula, Frenchtown 11 Ravalli Hamilton, Stevensville, Corvallis, Darby, 5 Yellowstone Billings, Park City, Ballantine 9 TOTAL AUTHORIZED STATE SCSEP POSITIONS 56 There are a total of 273 authorized state and national positions in Montana for PY'15. Both State and National SCSEP authorized positions steadily decreased over the last few years however authorized positions remained the same for both programs in Program Years 2014 and 2015. Ten Montana counties have both national and state SCSEP services. Following the 2010 Census, there are five counties that are now authorized for zero positions to be served: Garfield, Golden Valley, Petroleum, Treasure and Wibaux counties. The following chart shows the State and National SCSEP grantee equitable distribution for PY'14 and PY'15.

COUNTY STATE POSITIONS 2014 STATE POSITIONS 2015 NATIONAL POSITIONS 2014 NATIONAL POSITIONS 2015 Beaverhead 0 0 3 3 Big Horn 2 2 3 3 Blaine 0 0 3 3 Broadwater 0 0 2 2 Carbon 0 0 4 4 Carter 0 0 1 1 Cascade 5 5 15 15 Chouteau 0 0 1 1 Custer 2 2 3 3 Daniels 0 0 1 1 Dawson 0 0 2 2 Deer Lodge 0 0 3 3 Fallon 0 0 1 1 Fergus 0 0 4 4 Flathead 8 8 13 13 Gallatin 3 3 10 10 Garfield 0 0 0 0 Glacier 0 0 4 4 Golden Valley 0 0 0 0 Granite 0 0 2 2 Hill 0 0 4 4 Jefferson 0 0 3 3 Judith Basin 0 0 1 1 Lake 5 5 5 5 Lewis and Clark 6 6 8 8 Liberty 0 0 1 1 Lincoln 0 0 10 10 Madison 0 0 1 1 McCone 0 0 1 1 Meagher 0 0 1 1 Mineral 0 0 2 2 Missoula 11 11 15 15 Musselshell 0 0 1 1 Park 0 6 6 Petroleum County 0 0 0 0 Phillips 0 0 1 1 Pondera 0 0 2 2 Powder River 0 0 1 1 Powell 0 0 3 3 Prairie 0 0 1 1 Ravalli 5 5 11 11 Richland 0 0 3 3 Roosevelt 0 0 3 3 Rosebud 0 0 3 3 Sanders 0 0 7 7 Sheridan 0 0 2 2 Silver Bow 0 0 11 11 Stillwater 0 0 2 2 Sweet Grass 0 0 1 1 Teton 0 0 3 3 Toole 0 0 2 2 Treasure 0 0 0 0 Valley 0 0 3 3 Wheatland 0 0 2 2 Wibaux 0 0 0 0 Yellowstone 9 9 19 19 TOTAL 56 56 217 217 Counties with no State Authorized Positions in PY'15 Counties with no State or National Authorized Positions for PY15

Montana's SCSEP state-funded program has 56 authorized positions (refer to chart that immediately follows this section). The number of authorized positions in each county (refer to chart that immediately follows this section for the counties, cities served and authorized positions for each county). The following chart has been updated to show the cities and counties that have state-funded-SCSEP projects any changes in authorized positions from the previous program year. (1) County Big Horn: Cities - Pryor, Harden, Lodge Grass; State Authorized Positions PY'15 2; No Change in authorized positions from PY'14. (2) County Cascade: Cities – Great Falls. Cascade, Belt; 5 State Authorized Positions PY'15; No Change in authorized positions from PY'14. (3) County Custer: Cities – Miles City, Lame Deer, Ashland; 2 State Authorized Positions PY'15; No Change in authorized positions from

PY’14; (4) County Flathead: Cities – Kalispell, Whitefish, West Glacier, Big Fork, Coram; (5) County Gallatin: Cities - Bozeman, Belgrade; 3 State Authorized Positions PY’15; No Change in authorized positions from PY’14. (6) County Lake: Cities - Polson, Elmo, Ronan, Pablo; 5 State Authorized Positions PY’15; No Change in authorized positions from PY’14. (7) County Lewis & Clark; Cities - Helena, East Helena, Augusta, Lincoln; State Authorized Positions 6 PY’15 ; No Change in authorized positions from PY’14. (8) County Missoula: Cities - Missoula, East Missoula, Frenchtown; 11 State Authorized Positions PY’15; No Change in authorized positions from PY’14 (9) County Ravalli; Cities - Hamilton, Stevensville, Corvallis, Darby; 5 State Authorized Positions 5 PY’15 ; No Change in authorized positions from PY’14. (10) County Yellowstone: Cities - Billings, Park City, Ballantine; 9 State Authorized Positions PY’15 ; No Change in authorized positions from PY’14.

3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

The SCSEP grantees continues to work toward equitable distribution in each county. There are no counties that are significantly over–served or under–served with a variance of 1–5 of their equitable share based on U. S. Census 2010 data. However, the population shifts in PY’12 continues to be of concern for those counties in which equitable distribution has eliminated positions.

There are currently no counties served by the State Grantee that are showing slot imbalances or that are significantly over-served or under-served with a variance of 1-5 of their equitable share based on U. S. Census 2010 data. (1) Big Horn County; Authorized Positions 2; Enrolled Positions 2; No variances. (2) Cascade County; Authorized Positions 5; Enrolled Positions 8; variance of 3. (3) Custer County; Authorized Positions 2; Enrolled Positions 2; No variances. (4) Flathead County; Authorized Positions 8; Enrolled Positions 7; variance of -1. (5) Gallatin County; Authorized Positions 3; Enrolled Positions 3; no variances. (6) Lake County; Authorized Positions 5; Enrolled Positions 5; no variances. (7) Lewis & Clark County; Authorized Positions 6; Enrolled Positions 4; variance of -2. (8) Missoula County; Authorized Positions 11; Enrolled Positions 11; no variances. (9) Ravalli County; Authorized Positions 5; Enrolled Positions 4; variance of -1 (10) Yellowstone County; Authorized Positions 9; Enrolled Positions 7; variance of -2. The State SCSEP grantee will utilized the current tables for equitable distribution reports that are provided on the SCSEP Equitable Distribution website. The State Grantee will continue to develop strategies with the sub-grantee to address any over and/or underserve areas. Strategies will include: Increased efforts to recruit agencies in underserved counties; Continue outreach efforts to participants in underserved areas through workshops, career fairs and other opportunities to present SCSEP in underserved counties; Close enrollments timely and as appropriate in overserved areas; and Increase specialized training and job development activities intended to help participants achieve employment goals in the overserved areas. The State SCSEP grantee in coordination with its sub-grantee will continue working closely within the service communities to reduce or eliminate slot imbalances by: advertising in local community papers, provide flyers/pamphlets and other marketing tools that will aid in educating city/county government agencies; holding face-to-face presentations and discussions with non-profit and for-profit agencies/employers and city/county officials, community clubs and organizations that focus on community improvement and employment of the older population; and continuing to open host agencies within those communities which serve the most-in-need and serve as referral sources.

4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

a. Strategy that moves positions from over–served to under–served locations within the State in compliance with 20 CFR 641.365. The Montana Department of Labor and Industry (DLI) is the State SCSEP grantee. In Montana, DLI is the State Grantee and contracts with Experience Works, Inc. to provide services for the State SCSEP program. Experience Works, Inc. contracts with USDOL to provide services in the state at the National level. The common goal for both SCSEP grantees is to distribute the workers served by the program in accordance with the equitable distribution of positions per county. Montana's SCSEP grantees continue to work toward the goal of having equitable distribution of the SCSEP slots within the counties so that all older individuals have access to services under the program.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

b. Equitably serves rural and urban areas. The SCSEP grantees are consistently working toward equitable distribution in each county. There are no counties that are significantly over–served or under–served based on U. S. Census 2010 data. Under–enrollment in some counties may be due to the large, rural and sparsely populated rural areas that also have a higher unemployment rate than the state's average unemployment rate. Over–enrollment in some counties may be due to those counties being more urban in nature with one of them being the largest city in the state. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers. SCSEP grantees work closely to coordinate recruitment and enrollment efforts and to determine the potential to move authorized positions at some point. If positions become vacant through attrition, the position will be filled from the current waiting list. This will ensure Montana's counties are served appropriately so that authorized positions in the counties more closely align with equitable distribution. The national SCSEP grantee has authorized positions in fifty–one counties out of the total fifty–six counties in Montana. Ten of these counties also have state–designated positions as well. Even with population shifts each year that cause some counties to be over–served and some to be under–served, the authorized numbers meet the Census figures.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

c. Serves individuals afforded priority for service under 20 CFR 641.520. Montana State SCSEP priority for service is provided to eligible individuals who meet one or more of the following criteria: Aged 65 years or older; have a disability; have limited English proficiency or low literacy skills; Reside in a rural area Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act; Have low employment prospects; Have failed to find employment after using services provided though the one–stop delivery system; Are homeless or at risk of homelessness Montana's SCSEP goal is to serve these populations at least in proportion to their percentage of the population. Program activities will be provided to ensure successful participation of these groups. Each applicant's eligibility will be determined by an interview and documented on an intake form.

5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

Montana uses the most current Equitable Distribution Report to reflect the number of eligible individuals in each county to the total eligible population in the state. had numbers but couldn't post...

Montana uses the most current Equitable Distribution Report to reflect the number of eligible individuals in each county to the total eligible population in the state. Montana is primarily rural in nature and according to the Montana 2010 Census there are three counties classified as urban areas; Cascade County whose total population 81,327 - 80.2% of the population considered as being in an urban cluster and 19.8% rural; Missoula County, whose total population is 109,299 - 77.7% of the population considered as being in an urban cluster and 22.3% rural; and Yellowstone County, population 147,972 - 83.3% of the population considered as being in an urban cluster 16.7 of the population are rural. The remainder of Montana's counties are rural. (1) Big Horn County; Population 13,242; 10% of Eligible Population; 2 Authorized Positions; Ratio 671:1. (2) Cascade County; Population 82,384; 45.4% of Eligible Population; 5 Authorized Positions; Ratio 7480:1. (3) Custer County; Population 11,951; 17.5% of Eligible Population: 2 Authorized Positions; Ratio 1045:1. (4) Flathead County; Population 93,068; 17.7% of Eligible Population; 8 Authorized Positions; Ratio 2059:1. (5) Gallatin County; Population 94,720; 9.5% of Eligible Population; 3 Authorized Positions; Ratio 2999:1. (6) Lake County; Population 29,017; 16.8% of Eligible Population; 5 Authorized Positions; Ratio 975:1. (7) Lewis and Clark County; Population 65,338; 13.8% of Eligible Population; 6 Authorized Positions; Ratio 1503:1. (8) Missoula County; Population 111,807; 11.4% of Eligible Population; 11 Authorized Positions; Ratio 1159:1. (9) Ravalli County; Population 40,823; 19.2% of Eligible Population; 5 Authorized Positions; Ratio 1567:1. (10) Yellowstone County; Population 154,162; 14.1% of Eligible Population; 6 Authorized Positions; Ratio 3,623:1.

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

a. Residing in urban and rural areas within the State The SCSEP Equitable Distribution report is the primary means for ensuring that the State distributes SCSEP so that all eligible populations and target groups are properly served. This formula dictates our service level to individuals residing in urban and rural areas within the state, those that have the greatest economic need, minorities, individuals with limited English proficiency, and those who have the greatest social need. Montana is a very large, rural state with ongoing challenges and significant barriers most significantly in the more rural areas of the state. Challenges and barriers include: shortages of quality host agencies that can provide the training that matches the employment goals for participants; shortages of employers that have a presence in the rural areas that are seeking new employees in general; the economy in some of the counties is depressed; public transportation is available in the larger communities but is non–existent in the very rural areas. It is very difficult, in the most rural areas of Montana, to recruit both eligible participants and develop host agencies due to distance, language, transportation, etc. These challenges make it essential that both rural and urban areas are served equitably and that older workers living in rural areas have access to the same training and employment resources equivalent to those living in urban areas. Experience Works makes every effort possible to accommodate enrollees whenever suitable arrangements can be made including

flexibility in scheduling training. Experience Works coordinates and works with organizations within communities to: Address rural needs using small scale methods appropriate to the uniqueness of each community; Identify the inequities in resources to equitably serve SCSEP participants in both rural and urban counties across the state; Identify those inequities specific to rural areas that can be changed or addressed and promote the development of new training sites and employment opportunities for participants by December 2012 and ongoing thereafter; and Identify tools and resources to rally communities to help with the needs of the eligible population.

B. HAVE THE GREATEST ECONOMIC NEED

There are many older persons that need to work in order to pay for the necessities of life: food, housing, transportation and medical care. Social Security benefits alone cannot meet their needs and they must subsidize this with employment. A large number of the participants are working to pay for prescriptions or to cover the cost of health insurance. Of the current enrollment approximately 61% are below the age of 65 and may not receive any Social Security benefits (unless they have opted to draw their benefit at age 62 or receive Social Security Disability benefits.) Low income older workers want and need to work. The number of older workers is growing in Montana along with the rest of the country. According to the US Census Bureau's 2006 to 2010 American Community Survey (ACS), 12.7 percent of the 2006 to 2010 population is at least 65 years old. The 2006 to 2010 ACS data also indicates that Montana has a population that includes 134,588 people that are 65 years old and older. Of this population, 11,916 (8.9%) are the men and women that have an income that is at or below the HHS poverty levels. Currently, SCSEP grantees in Montana have an enrollment of participants that include almost 90% who are living in poverty. According to the American Community Survey, an annual survey performed by the U.S. Census Bureau, 14.8% of the entire population in 2014 lived in poverty.

C. ARE MINORITIES

In Montana American Indians are the main minority population and are served at approximately 19% of total enrollments. This minority population is showing as underserved in the SCSEP program based on the numbers of the eligible population. Montana has seven reservations with three of them located in or very near the most heavily populated counties. Montana also has one State Workforce Investment Board certified American Indian One–Stop. The SCSEP sub–recipient works closely with local agencies and representatives in areas on or near the reservations to target recruitment activities to under–served areas, the areas of higher concentrations of this minority population and to others who are most in need. The total minority population within Montana's SCSEP program is approximately 26% of the total enrollments. The following are minority statistics of participants pulled from the PY'14 year end performance report: American Indian 19% Asian/Native Hawaiian/Pacific Islander 0% Black or African American 2% Hispanic, Latino or Spanish Origin 4% Experience Works, through constant and ongoing personal and community networking, are made aware of individuals who are new to communities and may be in need of SCSEP training opportunities. The outreach by ETCs allow them to be proactive and identify those within these minorities who may be in need of and benefit from SCSEP services.

D. ARE LIMITED ENGLISH PROFICIENT.

Individuals with limited English proficiency are included in the priority of service, most–in–need group with barriers to employment. As of PY'14 final quarter report one percent of the participants served were showing as limited English proficient. Experience Works staff will use the same techniques of recruitment of eligible individuals who are limited English proficient as the other most–in–need populations including: recruitment through the one–stop systems; advertisements; and working closely with local community and business leaders who are members of local ethnic or cultural groups that include minorities or limited–English speaking individuals; and networking with organizations that share SCSEP's priority in helping those most in need. Experience Works ETCs recruit these individuals for SCSEP, develop community service assignments and help minority older individuals seek unsubsidized employment.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Recruitment of eligible participants in rural areas requires more innovative methods than in more urban areas due to the greater distances between participants, high transportation costs, and increased time needed to serve the participants. Experience Works, links with the mature population in rural areas through newspaper advertisement; utilizing posters in high senior traffic areas; television and radio appearances; networking with senior citizen centers, aging organizations, disabilities advocacy and service groups, veteran's organizations, religious centers, city government officials, tribal leaders, and other community–based organizations. Experience Works also works closely with Montana's Job Service Workforce Centers who helps with recruitment and solicit referrals from them. Many of the same techniques are used to recruit participants in urban areas, but with much reduced travel costs and with less time involved. Aging will often decrease people's ability to remain independent. Experience Works networks with host agencies and employers to develop reasonable accommodations that will allow those with disabilities to work and be successful in the SCSEP training assignment or unsubsidized job following training. The PY'14 fourth quarter end report showed that 21% of enrolled participants had some form of disability. Currently anyone who is eligible and suitable for SCSEP in Montana is served and currently there is no one on a waiting list.

7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR PARTICIPANTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

Census data is used to determine equitable distribution. The population shifts each year causes some counties to be over–served and some to be under–served even though the authorized numbers for these counties meet the Census figures. There may need to be an adjustment in the numbers that differ from the Census 2010 figures in order to adequately serve these areas of the state. Montana's SCSEP will adhere to any recommendation from the U.S. Department of Labor whenever new census data indicates a shift in the location of eligible population or over–enrollment for any other reason. Current SCSEP participants in subsidized community service assignments are encouraged to move into unsubsidized employment positions and ensure compliance with the Older Americans Act time limits. Ten

Montana counties have both federal and state SCSEP services. All other counties have federal SCSEP services. The State of Montana continually works toward the goal of equitable distribution of the SCSEP slots within the counties so that all people have access to services under the program. Changes in services to counties with population changes will be handled through attrition to avoid any disruption in service. The challenges that face Montana continue to grow as the work force continues to age.

SCSEP ASSURANCES

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

STATE COMMENTS ON SCSEP ASSURANCES

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Include the State's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

Instructions:Performance Goals for the Core Programs

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the first two years of the plan.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	71.00	71.00	71.00	71.00
Dislocated Workers	60.00	71.20	60.00	71.20
Youth	50.00	64.90	50.00	64.90
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	71.00	70.90	71.00	70.90
Vocational Rehabilitation	71.00	71.00	71.00	71.00

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	67.00	71.00	67.00	71.00
Dislocated Workers	67.00	67.20	67.00	67.20
Youth	56.00	55.70	56.00	55.70
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	67.00	66.70	67.00	66.70
Vocational Rehabilitation	66.00	66.00	66.00	66.00

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	5,913.00	5,913.00	5,913.00	5,913.00
Dislocated Workers	7,192.00	7,192.00	7,192.00	7,192.00
Youth	2,727.00	Baseline	2,727.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,384.00	5,028.00	5,384.00	5,028.00
Vocational Rehabilitation	3,540.00	3,540.00	3,540.00	3,540.00

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	52.00	63.00	52.00	63.00
Dislocated Workers	53.00	63.00	53.00	63.00
Youth	50.00	59.60	50.00	59.60
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	12.00	12.00	12.00	12.00

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	37.00	Baseline	37.00	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	21.00	Baseline	21.00	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

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

User remarks on Table 6

TABLE 7. COMBINED FEDERAL PARTNER MEASURES

Measure	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

APPENDIX 4 STATE PLAN COMMENTS RECEIVED

Public Comment The following comments on the state plan were received during the public comment period ending February 19, 2016. These comments were reviewed and share with Montana's SWIB. All comments were considered in the development of Montana's 2016 State Plan.

Comment 1: Montana State independent Living Council (SILC) encourages the state of Montana in moving forward with activities to implement Section–511 Limitations on Use of Subminimum Wage. Montana SILC provides its full support in the direction that VRBS has identified within Number VIII Section N. Goals and Plans for Distribution of Title VI funds in that VRBS does not support the use of segregated bench work, sheltered, enclaved or segregated crew models as viable supported employment/employment models. Response: DPHHS appreciates the comment. SILC comment did not have changes to the plan but they will be kept up to date on implementation of Section–511.

Comment 2: Career Training Institute (CTI) commented on state plan's Workforce System Vision and Goals, Performance Goals for each of the Core Programs, Implementation of State Strategy, State Program and State Board Oversight, and Distribution of funds for core programs. The State strategic vision and goals section is all–inclusive, however; the workforce system vision and goals section focuses primarily on the Job Services programs and overlooks other workforce system partners and programs. Consistency use core partners at local, division or department level. Response: We appreciate the comments. Sections in the state plan were updated to reflect CTIs comments. Montana is excited to continue to work with CTI and other Community–Based Organizations. Language regarding core partners will be reviewed and considered when updating.

Comment 3: AFL–CIO recommended language for the state plan by engaging employers to meet their skills needs. The state shale consider job quality in providing services to employers, setting standards for providing products and services to employers, working with leaders in the employer and labor communities, encourage employers to participate in balanced partnerships, build and strengthen partnerships, understanding rights, provide training and technical assistance, and identify opportunities for pilot projects. Response: We appreciate the comments. DLI and other core programs will work together to insure these recommendations will continue if already happening and will apply these recommendations to areas that strength the workforce. Sections were updated and approved by the SWIB in the state plan from AFL–CIO comments.

Comment 4: BillingsWorks encourages the state workforce to continue to focus on methods funding directly to employees, potential employees and employers by scholarships or job training programs. BillingWorks comments throughout the plan suggested language to include local workforce organizations outside the State's Workforce Development System. Response: We appreciate the comments. BillingsWorks comments have been included in the state plan and SWIB approved the suggestions.

Comment 5: RespectAbility encourages Montana to continue to improve in terms of competitive, integrated employment for people with disabilities. Examples of programs that will benefit Montana's people with disabilities were provided along with ideas in

strengthening sector strategies. Response: DPHHS recognizes RespectAbility comments and will continue to utilize their expertise in the improvement of people with disabilities.

Comment 6: North Central Independent Living Services, Inc. (NCILS) urge the state to implement policies, procedures, and practices which will benefit all Montanans to receive a fair and competitive wage within an integrated work setting throughout Montana by working with Montana VRBS Section 511. NCLIS supports VRBS in the expanded use of customized employment. NCILS mentions the importance of continuum of services that leads to competitive and integrated employment for all Montanans, including those with disabilities. Response: DPHHS–VRBS appreciates the comments and they will be kept up to date on the implementation of Section–511.

Comment 6: Career Transitions (CT) encourage the language of community–based organizations with the alignment of education, workforce and economic development. CT has concerns with WIOA funding on how funding for realignment with core partners will impact current funds and if there will be an RFP through CMT's, regions, individual agencies. Response: We appreciate the comments. Language has been included throughout the plan to include community–based organizations.

Comment 7: Casey Blumenthal SWIB member mentioned lack of including other providers within the plan and a question regarding that Adult and Dislocated Worker Requirements do not mention the need for a RFP process but Youth Programs Requirements do. Response: We appreciate the comments. Language has been included throughout the plan to address Casey's mention of including other providers, this will be found throughout the plan using community–based organizations language.

Comment 8: Tanner Woodward with MT DLI suggested removing language in the plan that referenced training WSD does not use anymore. Updating language from Native American(s) to American Indian(s) where appropriate. Response: Updates were changed and approved by the SWIB.

Comment 9: Easter Seals–Goodwill Northern Rocky Mountain, Inc. (ESGW) appreciates the cooperative agreements indicated, notably with DDP, CRPs and nonprofit organizations, among others. ESGW looks forward to working with the agency's to support efforts with the 15% set–aside of federal funds targeted to youth under age 24, as well as special efforts, including in–school and out, to assist youth with disabilities transitioning to integrated, competitive employment. ESGW is an enthusiastic supporter of WIOA, is generally in support of this proposed State Plan, and is committed to assist individuals achieve competitive, integrated community employment as defined in the law. Response: We appreciate the comments.

Comment 10: Disability Rights comments were regards to VRBS, OPI and the University System. The understanding that the Montana Accounting and Case System used by VRBS staff has some shortcomings the impact of those shortcomings does not have an impact on clients served. Disability Rights applaud OPI and RBS for establishing an agreement to ensure that students with disabilities receive the transition services to which they are entitled. They mention adopt the school program and wonder why it can't also be implemented for school districts with smaller populations who are served by educations co–ops. Disability Rights believe it is important to establish that all units of the Montana University System (MUS) have duties under federal and state law to provide reasonable accommodations

including auxiliary aids and interpreters to qualified post–secondary students with disabilities. Response: We appreciate the comments. Some of the edit suggestions refer to summary statements of Cooperative Agreements or MOUs that are in place and would be inaccurate to make the edits in the combined plan at this time. Each agreement referred to will be reviewed and revised in the near future and suggestions will be taken into considerations.

Comment 11: Career Futures mentioned Community–Based Organizations (CBO's) are not mentioned in the plan and they need to be included when refereeing to partners. CBO's operate and provide a lot of same services as Local Job Services and need to be mentioned. Response: We appreciate the comments. CBO's have been added throughout the plan as a valuable partner and an important organizations in the communities to improve the workforce system.

Comment 12: Pam Watson with MT DLI requested SCSEP be added the Montana's WIOA State Plan. Response: SCSEP was approved by SWIB and added to the plan.

Comment 13: Fred Kellogg SWIB member mentioned how the whole thing is huge and cumbersome and unwieldy. Seems like it is hard to figure out what it is supposed to be all about. Can it be smaller and how it would make sense to have an executive summary. Response: Adding multiple plans has increased the overall size of the plan and this is something that can be looked at in the future to possible shrink the overall size. The SWIB can work with their committees to possibly have an executive summary issued for their members.

Comment 14: Loren Rose member of the SWIB posted comments were interpret as general question regarding clarification with not requiring changes within the plan. Expect, for request to remove duplicate paragraphs. Response: We appreciate the comments.