

WIOA STATE PLAN FOR THE STATE OF COLORADO FY-2018

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## OVERVIEW

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

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### OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))\*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

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### HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

- The **Strategic Planning Elements** section includes analyses of the State’s economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State’s workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State’s efforts to support the State’s strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances, and
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce and Innovation Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.\* States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

\* 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

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

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### COMBINED PLAN PARTNER PROGRAM(S)

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

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

Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.) Yes

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

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

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## II. STRATEGIC ELEMENTS

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

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### A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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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.

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#### 1. ECONOMIC AND WORKFORCE ANALYSIS

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##### A. ECONOMIC ANALYSIS

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

##### I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

##### II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATION

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

##### III. EMPLOYERS' EMPLOYMENT NEEDS

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

**In 2014, the Colorado Workforce Development Council (CWDC) convened a data team consisting of data analysts from multiple state agencies. This team included staff from the Labor Market Information unit within the Colorado Department of Labor and Employment along with representatives from the Department of Higher Education, the Department of Education, the Office of Economic Development and International Trade, the Office of State Planning and Budgeting and the State Demography Office at the Department of Local Affairs. The data team spearheaded the development of the first Colorado Talent Pipeline Report and created a common definition for a "top job" in Colorado. Relevant data points from both the first and second Talent Pipeline Reports are included in the responses below.**

#### **Existing Demand Industry Sectors and Occupations**

**The table below shows the preliminary distribution of current employment, not seasonally adjusted, by industry for Colorado for December, 2017. Trade, Transportation, and Utilities comprise the largest industry in Colorado, employing 476,000 individuals, accounting for 17.7% of total employment. The second largest industry in the state is Government, employing 434,500 individuals, accounting for 16.2% of total employment. Professional and Business Services combine to form the third largest industry sector in Colorado, employing 424,300 individuals, accounting for 15.8% of the state's total employment.**

Industry	Employment
Total Nonfarm	2,689,200
Total Private	2,254,700
Goods Producing	328,400
Service-Providing	2,360,800
Private Service Providing	1,926,300
Mining and Logging	21,700
Construction	162,900
Manufacturing	143,800
Durable Goods	89,200
NonDurable Goods	54,600
Trade, Transportation, and Utilities	476,000
Wholesale Trade	106,800
Retail Trade	280,600
Transportation Warehousing and Utilities	88,600
Information	75,200
Financial Activities	167,400
Professional and Business Services	424,300
Educational and Health Services	339,500
Leisure and Hospitality	335,900
Other Services	108,000
Government	434,500

**Source: Colorado LMI Gateway; Data sourced from CES Unit Transfer File**

**The top ten occupations by employment in the following table account for 73% of all jobs and total 1,830,460 jobs in Colorado. While the top four categories have not changed since 2015, there are shifts in the list overall. Office and Administrative Support Occupations employ 14% of total state population. Sales and Related Occupations as well as Food Preparation and Selling Related Occupations account for 12% and 10% of the state's employment respectively**

Employment by Occupation

## Employment by Occupation

SOC	Description	2016 Jobs	2016 Avg. Hourly Earnings
43-0000	Office and Administrative Support Occupations	359,720	\$18.71
41-0000	Sales and Related Occupations	291,380	\$21.58
35-0000	Food Preparation and Serving Related Occupations	244,780	\$11.74
13-0000	Business and Financial Operations Occupations	169,260	\$36.93
25-0000	Education, Training, and Library Occupations	144,710	\$25.23
53-0000	Transportation and Material Moving Occupations	140,430	\$19.32
29-0000	Healthcare Practitioners and Technical Occupations	136,200	\$39.43
47-0000	Construction and Extraction Occupations	130,190	\$22.28
11-0000	Management Occupations	109,620	\$61.04
15-0000	Computer and Mathematical Occupations	104,710	\$45.35
51-0000	Production Occupations	103,290	\$18.26
49-0000	Installation, Maintenance, and Repair Occupations	97,010	\$23.37
39-0000	Personal Care and Service Occupations	83,330	\$13.50
37-0000	Building and Grounds Cleaning and Maintenance Occupations	83,310	\$13.78
31-0000	Healthcare Support Occupations	63,140	\$16.07
17-0000	Architecture and Engineering Occupations	61,700	\$43.07
33-0000	Protective Service Occupations	55,520	\$22.56
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	39,060	\$25.20
56,492	\$21.97		
21-0000	Community and Social Service Occupations	35,150	\$23.09
19-0000	Life, Physical, and Social Science Occupations	30,100	\$36.23
23-0000	Legal Occupations	20,370	\$50.29
45-0000	Farming, Fishing, and Forestry Occupations	5,260	\$13.72
<b>Total</b>	2,507,680		

**Source: Occupational Employment Statistics Program, Colorado Labor Market Information**

### Emerging Demand Industry Sectors

The table below shows the top 10 industries with the highest annual percent change in Colorado for the 2016-2026 time period.

Industry	2016 Estimated Employment	2026 Projected Employment	Total Annual Percent Change	Total 2016-2026 Employment Change
Social Assistance	54,371	75,784	3.38%	21,413
Specialty Trade Contractors	103,561	141,839	3.2%	38,278
Hospitals	91,297	123,680	3.08%	32,383
Support Activities for Mining	10,491	14,098	3.00%	3,607
Ambulatory Health Care Services	126,307	169,587	2.99%	43,290
Professional, Scientific, and Technical Services	209,989	277,710	2.83%	67,721
Couriers and Messengers	10,849	14,288	2.79%	3,349
Construction of Buildings	30,092	39,466	2.75%	9,374
Museums, Historical Sites, and Similar Institutions	3,128	4,081	2.70%	953
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	21,736	27,725	2.46%	5,989

*Source: Colorado Dept. of Labor and Employment, Labor Market Information*

To assess the emerging demand industry sectors, a 10-year projection (2016-2026) was utilized. Of the highest expected growth sectors, the five sectors with the largest gains in total projected employment are:

- Professional, Scientific, and Technical Services (+67,721 )
- Ambulatory Health Care Services (+43,290 )
- Specialty Trade Contractors (+38,278 )
- Hospitals (+32,383)
- Social Assistance (+21,413 )

#### Emerging Demand Occupations

Using a ten year projection to assess emerging demand occupations reveals that the top ten occupations are expected to shift similar to the year 2015 the top ten occupations remains the same for the year 2025. Outside of the top ten, significant job increases take place within the following occupations:

Healthcare Support Occupations

Computer And Mathematical Occupations

Installation, Maintenance, and Repair

*Source: Colorado Labor Market Information*

**More specifically, the Colorado Talent Pipeline Report identified a Top Jobs list for Colorado. The 2017 report uses labor-market projections from the CDLE Office of Labor Market Information to identify jobs that meet three criteria: projected high annual openings (>40), above-average growth rates (>2.05%), and a good wage. The jobs in this report are categorized into two earnings tiers, recognizing that there are**

many essential jobs that may not typically pay a high wage but are in high demand and/or could lead to a higher-paying in-demand job.

- TIER 1 INCLUDES JOBS THAT HAVE MEDIAN EARNINGS AT OR ABOVE A LIVING WAGE FOR A FAMILY WITH TWO ADULTS (ONE WORKING) AND ONE CHILD (\$24.19/HR.). THIS IS AN INCREASE OF \$1.29 OVER THE PREVIOUS YEAR'S LIVING-WAGE BENCHMARK.
- TIER 2 INCLUDES JOBS THAT MEET A LIVING-WAGE BENCHMARK FOR AN INDIVIDUAL (MEDIAN EARNINGS OF \$11.82/HR.). THIS IS AN INCREASE OF 49 CENTS OVER THE 2016 BENCHMARK.

As the cost of living increases in Colorado, it is important to consider not just jobs, but jobs that pay a sustainable wage. Overall, these Top Jobs represent 41 percent of all annual job openings in Colorado. In addition, this report recognizes the clear value in identifying occupations with momentum and demand that could lead to jobs that do not exist today, but will be in high demand in the future.

Tier 1 Top Jobs List, Organized by Occupation Cluster

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
<b>Management</b>												
11-1021	General and Operations Managers	\$51.96	\$108,084	20.58	2,002	5,444	Bachelor's degree	None				
11-2021	Marketing Managers	\$70.10	\$145,800	21.08	144	426	Bachelor's degree	None				
11-2031	Public Relations and Fundraising Managers	\$60.60	\$126,047	20.69	63	39	Bachelor's degree	None				
11-3021	Computer and Information Systems Managers	\$71.84	\$149,425	29.88	272	1,103*	Bachelor's degree	None	x	x		
11-3121	Human Resources Managers	\$60.58	\$126,008	23.39	78	391	Bachelor's degree	None				
11-9021	Construction Managers	\$40.08	\$83,360	22.47	393	114	Bachelor's degree	Moderate-term on-the-job training	x			
11-9033	Education Administrators, Postsecondary	\$37.74	\$78,496	23.28	128	793	Master's degree	None				

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
11-9051	Food Service Managers	\$28.04	\$58,323	29.00	332	322**	High school diploma or equivalent	None	x	x		
11-9111	Medical and Health Services Managers	\$50.11	\$104,231	30.38	262	2,291	Bachelor's degree	None	x			
11-9141	Property, Real Estate, and Community Association Managers	\$37.57	\$78,149	25.80	166	113*	High school diploma or equivalent	None				
11-9151	Social and Community Service Managers	\$33.93	\$70,570	26.35	88	460	Bachelor's degree	None				
<b>Business</b>												
13-1051	Cost Estimators	\$30.52	\$63,487	25.50	258	983	Bachelor's degree	None	x			
13-1111	Management Analysts	\$41.03	\$85,337	27.41	462	5,417	Bachelor's degree	None				
13-1131	Fundraisers	\$25.56	\$53,174	24.16	107	N/A	Bachelor's degree	None				
13-1151	Training and Development Specialists	\$31.48	\$65,471	20.91	256	391	Bachelor's degree	None				
13-1161	Market Research Analysts and Marketing Specialists	\$31.09	\$64,669	31.17	691	340	Bachelor's degree	None				
<b>Finance</b>												
13-2011	Accountants and Auditors	\$33.20	\$69,062	24.75	1,920	1,485*	Bachelor's degree	None	x	x		
13-2021	Appraisers and Assessors of Real Estate	\$30.71	\$63,868	27.78	102	113*	Bachelor's degree	Long-term on-the-job training	x	x		
13-2051	Financial Analysts	\$41.29	\$85,887	22.75	163	461*	Bachelor's degree	None	x			

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
<b>13-2052</b>	Personal Financial Advisors	\$41.49	\$86,290	35.76	308	445*	Bachelor's degree	Long-term on-the-job training	x			
<b>Computer-related</b>												
<b>15-1121</b>	Computer Systems Analysts	\$43.66	\$90,805	33.82	435	260*	Bachelor's degree	None	x	x		
<b>15-1122</b>	Information Security Analysts	\$48.53	\$100,952	32.96	106	305*	Bachelor's degree	None	x			
<b>15-1132</b>	Software Developers, Applications	\$49.95	\$103,904	31.06	1,196	382*	Bachelor's degree	None	x	x		
<b>15-1133</b>	Software Developers, Systems Software	\$54.58	\$113,519	30.06	632	382*	Bachelor's degree	None	x			
<b>15-1134</b>	Web Developers	\$27.18	\$56,534	42.03	183	291*	Associate's degree	None	x			
<b>15-1141</b>	Database Administrators	\$46.36	\$96,439	25.25	121	295*	Bachelor's degree	None	x	x		
<b>15-1151</b>	Computer User Support Specialists	\$27.07	\$56,301	26.56	564	13	Some college, no degree	None	x	x		
<b>Mathematical</b>												
<b>15-2031</b>	Operations Research Analysts	\$39.62	\$82,400	42.38	64	148	Bachelor's degree	None	x			
<b>Architecture and Engineering</b>												
<b>17-1011</b>	Architects, Except Landscape and Naval	\$29.58	\$61,523	23.45	162	213	Bachelor's degree	Internship/residency	x	x		

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
17-1021	Cartographers and Photogrammetrists	\$32.77	\$68,172	41.30	63	95	Bachelor's degree	None	x			
17-2051	Civil Engineers	\$39.38	\$81,903	23.32	484	448	Bachelor's degree	None	x	x		
17-2081	Environmental Engineers	\$44.29	\$92,120	33.30	114	120	Bachelor's degree	None	x	x		
17-2171	Petroleum Engineers	\$67.89	\$141,221	26.10	86	235	Bachelor's degree	None	x	x		
<b>Life, Physical, Social Science</b>												
19-1031	Conservation Scientists	\$30.63	\$63,707	22.72	101	467	Bachelor's degree	None	x			
19-1042	Medical Scientists, Except Epidemiologists	\$25.43	\$52,891	24.07	64	820	Doctoral or professional degree	None	x			
19-2021	Atmospheric and Space Scientists	\$46.36	\$96,419	34.27	87	45	Bachelor's degree	None	x	x		
19-2031	Chemists	\$35.98	\$74,831	20.98	83	305	Bachelor's degree	None	x			
19-2041	Environmental Scientists and Specialists, Including Health	\$39.27	\$81,683	24.14	181	442	Bachelor's degree	None	x	x		
19-2042	Geoscientists, Except Hydrologists and Geographers	\$48.00	\$99,844	25.73	125	238	Bachelor's degree	None	x			
19-3031	Clinical, Counseling, and School Psychologists	\$36.26	\$75,412	33.61	228	801MA+, OR 118 DR	Doctoral or professional degree	Internship/residency	x			

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
<b>Community and Social Services</b>												
21-1022	Healthcare Social Workers	\$24.57	\$51,098	35.45	144	3	Master's degree	None	x			
21-1091	Health Educators	\$25.06	\$52,114	26.72	40	10	Bachelor's degree	None	x			
<b>Education</b>												
25-1011	Business Teachers, Postsecondary	\$35.30	\$73,418	23.60	70	N/A	Doctoral or professional degree	None	x			
25-1032	Engineering Teachers, Postsecondary	\$46.18	\$96,064	28.49	49	N/A	Doctoral or professional degree	None	x			
25-1042	Biological Science Teachers, Postsecondary	\$29.88	\$62,146	31.30	48	N/A	Doctoral or professional degree	None	x			
25-1066	Psychology Teachers, Postsecondary	\$25.28	\$52,574	31.54	42	N/A	Doctoral or professional degree	None				
25-1071	Health Specialties Teachers, Postsecondary	\$50.86	\$105,779	35.70	295	N/A	Doctoral or professional degree	None	x			
25-1072	Nursing Instructors and Teachers, Postsecondary	\$27.67	\$57,555	36.17	80	N/A	Master's degree	None	x			
25-1081	Education Teachers, Postsecondary	\$23.20	\$48,247	23.86	59	N/A	Doctoral or professional degree	None				
25-1121	Art, Drama, and Music Teachers, Postsecondary	\$25.79	\$53,638	25.86	95	N/A	Master's degree	None				

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
25-2051	Special Education Teachers, Preschool	\$25.01	\$52,016	21.77	41	72	Bachelor's degree	Internship/residency				
25-9031	Instructional Coordinators	\$32.10	\$66,774	20.59	106	382	Master's degree	None	x			
<b>Media and Communication</b>												
27-2012	Producers and Directors	\$27.10	\$56,367	23.85	124	391	Bachelor's degree	None				
27-3042	Technical Writers	\$34.62	\$72,017	24.39	64	23	Bachelor's degree	Short-term on-the-job training				
27-3043	Writers and Authors	\$32.11	\$66,787	21.46	75	2,098	Bachelor's degree	Moderate-term on-the-job training				
27-3091	Interpreters and Translators	\$27.01	\$56,181	53.45	129	608	Bachelor's degree	Short-term on-the-job training				
<b>Health Diagnosing and Treating</b>												
29-1041	Optometrists	\$63.45	\$131,982	30.22	74	N/A	Doctoral or professional degree	None	x	x		
29-1051	Pharmacists	\$59.04	\$122,806	21.48	250	290	Doctoral or professional degree	None	x	x		
29-1067	Surgeons	\$108.83	\$226,366	24.48	54	*	Doctoral or professional degree	Internship/residency	x	x		

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
29-1069	Physicians and Surgeons, All Other	\$117.61	\$244,629	21.28	136	*	Doctoral or professional degree	Internship/residency	x	x		
29-1071	Physician Assistants	\$48.50	\$100,889	38.37	179	73	Master's degree	None	x	x		
29-1122	Occupational Therapists	\$39.80	\$82,781	36.54	155	50	Master's degree	None	x			
29-1123	Physical Therapists	\$36.06	\$75,003	44.42	358	135	Doctoral or professional degree	None	x	x		
29-1126	Respiratory Therapists	\$28.54	\$59,355	34.26	108	113	Associate's degree	None	x	x		
29-1127	Speech-Language Pathologists	\$39.82	\$82,817	30.40	191	186	Master's degree	None	x			
29-1131	Veterinarians	\$38.54	\$80,159	25.29	106	147	Doctoral or professional degree	None	x	x		
29-1141	Registered Nurses	\$33.05	\$68,747	35.72	2,912	2,558	Bachelor's degree	None	x	x		
29-1171	Nurse Practitioners	\$48.53	\$100,939	45.77	190	331	Master's degree	None	x	x		
<b>Health Technologists and Technicians</b>												
29-2011	Medical and Clinical Laboratory Technologists	\$31.61	\$65,758	31.79	150	46*	Bachelor's degree	None	x	x		
29-2032	Diagnostic Medical Sonographers	\$38.96	\$81,034	45.60	59	11	Associate's degree	None	x			
29-2034	Radiologic Technologists and Technicians	\$30.05	\$62,496	25.22	152	227	Associate's degree	None	x	x		

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticable by USDOL	Licensed Occupation	STEM
<b>Healthcare Support</b>												
31-2021	Physical Therapist Assistants	\$26.03	\$54,148	43.37	87	100	Associate's degree	None				
<b>Sales</b>												
41-9022	Real Estate Sales Agents	\$24.64	\$51,241	20.92	259	113*	High school diploma or equivalent	Moderate-term on-the-job training	x			
<b>Construction</b>												
47-1011	First-Line Supervisors of Construction Trades and Extraction Work	\$31.36	\$65,237	29.53	587	N/A	High school diploma or equivalent	None				
47-5012	Rotary Drill Operators, Oil and Gas	\$28.67	\$59,624	32.92	55	N/A	No formal educational credential	Moderate-term on-the-job training				
<b>Installation, Maintenance and Repair</b>												
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	\$26.20	\$54,492	38.29	289	229**	Postsecondary non-degree award	Long-term on-the-job training	x	x	x	
49-9041	Industrial Machinery Mechanics	\$27.10	\$56,360	28.76	287	45**	High school diploma or equivalent	Long-term on-the-job training	x	x	x	

SOC	Occupation Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized as Apprenticeship by USDOL	Licensed Occupation	STEM
49-9051	Electrical Power-Line Installers and Repairers	\$34.39	\$71,533	20.91	158	125**	High school diploma or equivalent	Long-term on-the-job training	x	x		
<b>Production</b>												
51-8021	Stationary Engineers and Boiler Operators	\$27.90	\$58,033	26.55	40	N/A**	High school diploma or equivalent	Long-term on-the-job training	x	x		
<b>Transportation and Material Moving</b>												
53-7073	Wellhead Pumpers	\$28.99	\$60,289	23.53	44	N/A	High school diploma or equivalent	Moderate-term on-the-job training	x			

N/A- Directly associated postsecondary program or completions could not be identified

\*- Completions are shared across multiple occupations and are likely insufficient to meet demand

\*\*- Incomplete data- does not include all apprenticeship or other industry certification program completions

Tier 2 Top Jobs List, Organized by Occupation Cluster

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Train	Existing Reg. Apprent in CO	Recog as Apprentic eable by USDOL	Licensed Occup	STEM
<b>Manage</b>												
11-9031	Education Administrators, Preschool and Childcare Center/Program	\$21.57	\$44,862	33.42	49	N/A	Bachelor's degree	None	x			
<b>Business</b>												
13-1121	Meeting, Convention, and Event Planners	\$19.83	\$41,236	23.64	138	N/A	Bachelor's degree	None				
<b>Life, Physical, Social Sciences</b>												
19-4021	Biological Technicians	\$21.29	\$44,274	21.07	144	N/A	Bachelor's degree	None	x			
19-4031	Chemical Technicians	\$20.47	\$42,576	21.85	54	N/A	Associate's degree	Mode rate-term on-the-job training	x	x	x	

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Train	Existing Reg. Apprent in CO	Recog as Apprentic eable by USDOL	Licensed Occup	STEM
<b>19-4091</b>	Environmental Science and Protection Technicians, Including Health	\$21.33	\$44,365	25.60	59	459	Associate's degree	None	x	x		
<b>Community and Social Services</b>												
<b>21-1011</b>	Substance Abuse and Behavioral Disorder Counselors	\$19.04	\$39,599	32.86	92	N/A	Bachelor's degree	None	x			
<b>21-1012</b>	Educational, Guidance, School, and Vocational Counselors	\$23.28	\$48,423	23.15	192	175	Master's degree	None	x	x		
<b>21-1014</b>	Mental Health Counselors	\$22.29	\$46,370	33.50	310	53	Master's degree	Internship/residency				
<b>21-1015</b>	Rehabilitation Counselors	\$17.21	\$35,789	27.81	88	9	Master's degree	None	x			

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Train	Existing Reg. Apprent in CO	Recog as Apprentic eable by USDOL	Licensed Occup	STEM
<b>21-1021</b>	Child, Family, and School Social Workers	\$21.54	\$44,813	22.83	316	725	Bachelor's degree	None	x			
<b>21-1023</b>	Mental Health and Substance Abuse Social Workers	\$19.66	\$40,887	32.74	104	N/A	Bachelor's degree	None	x			
<b>21-1093</b>	Social and Human Service Assistants	\$16.06	\$33,412	28.51	122	189	High school diploma or equivalent	Short-term on-the-job training	x			
<b>21-1099</b>	Community and Social Service Specialists, All Other	\$17.88	\$37,185	29.00	157	285	Master's degree	None				
<b>Legal</b>												
<b>23-2011</b>	Paralegals and Legal Assistants	\$23.73	\$49,363	22.62	266	253	Associate's degree	None	x			
<b>Education</b>												

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Train	Existing Reg. Apprent in CO	Recog as Apprentic eable by USDOL	Licensed Occup	STEM
25-1022	Mathematical Science Teachers, Postsecondary	\$27.11	\$56,387	32.29	53	N/A	Doctoral or professional degree	None	x			
25-1123	English Language and Literature Teachers, Postsecondary	\$24.28	\$50,501	25.47	58	N/A	Doctoral or professional degree	None				
25-1191	Graduate Teaching Assistants	\$17.56	\$36,532	20.71	89	N/A	Bachelor's degree	None				
25-1194	Vocational Education Teachers, Postsecondary	\$24.97	\$51,942	21.89	101	N/A	Bachelor's degree	None				

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recog as Appre by USDO L	Licen Occup	STEM
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<b>Busine</b>												
13-1121	Meeting, Convention, and Event Planners	\$19.83	\$41,236	23.64	138	N/A	Bachelor's degree	None				
<b>Life, Physical, Social Sciences</b>												
19-4021	Biological Technicians	\$21.29	\$44,274	21.07	144	N/A	Bachelor's degree	None	x			
19-4031	Chemical Technicians	\$20.47	\$42,576	21.85	54	N/A	Associate's degree	Moderate-term on-the-job training	x	x	x	

SOC	Occup Title	Media n Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recog as Appre by USDO L	Licen Occup	STEM
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<b>Community and Social Services</b>												
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<b>21-1014</b>	Mental Health Counselors	\$22.29	\$46,370	33.50	310	53	Master's degree	Internship/residency				

SOC	Occup Title	Media n Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recog as Appre by USDO L	Licen Occup	STEM
21-1015	Rehabilitation Counselors	\$17.21	\$35,789	27.81	88	9	Master's degree	None	x			
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21-1093	Social and Human Service Assistants	\$16.06	\$33,412	28.51	122	189	High school diploma or equivalent	Short-term on-the-job training	x			
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<b>Legal</b>												

SOC	Occup Title	Median Hourly	Median Annual	2016-2026 Growth Rate (%)	Annual Avg. Openings	Related College Awards (IPEDS, 2016)	Typical Entry Education Level	Add'l Training	Existing Registered Apprenticeship in CO	Recognized by USDOL	Licensed Occup	STEM
23-2011	Paralegals and Legal Assistants	\$23.73	\$49,363	22.62	266	253	Associate's degree	None	x			
<b>Education</b>												
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25-1123	English Language and Literature Teachers, Postsecondary	\$24.28	\$50,501	25.47	58	N/A	Doctoral or professional degree	None				
25-1191	Graduate Teaching Assistants	\$17.56	\$36,532	20.71	89	N/A	Bachelor's degree	None				
25-1194	Vocational Education Teachers, Postsecondary	\$24.97	\$51,942	21.89	101	N/A	Bachelor's degree	None				

## TIER 1

Occupations that are part of the Tier 1 list (high growth rates, high annual openings, and pay a living wage for a family of three) overwhelmingly require education or training beyond high school for entry into the field. When measured by job openings, 93 percent typically demand some level of postsecondary education or training, ranging from one-year-or-longer programs that combine OJT and coursework, to graduate-level degrees. Nine percent of job openings are for middle-skill jobs—a job that typically requires additional education or training beyond a high school diploma, but less than a bachelor’s degree—in fields like IT, health care, and the skilled trades. At the same time, a paradigm shift is underway, with employers increasingly recognizing the need to look for required competencies rather than simply defaulting to certain degree requirements. As WBL opportunities expand, more Top Jobs may be filled by individuals with these types of OJT experiences.

### Tier 1 Top Jobs - Projected Annual Openings by Typical Education Needed for Entry

Education	Number of Openings	Percentage
<b>Bachelor’s degree</b>	15,144	70%
<b>Doctoral/professional degree</b>	1,833	8%
<b>HS diploma &amp; mode rate to no OJT</b>	1,388	6%
<b>Master’s degree</b>	1,268	6%
<b>Associate degree</b>	589	3%
<b>Some college, no degree</b>	564	3%
<b>Long-term OJT</b>	485	2%
<b>Postsecondary certificate</b>	289	1%
<b>No formal educational credential</b>	55	0.3%

## TIER 2

For occupations that are on the Tier 2 list (high growth rates, high annual openings, and pay a living wage for an individual), less than half (45 percent) typically require formal postsecondary education/training for entry into employment. For jobs that call for education and/or training beyond high school, most are considered middle-skill jobs. Middle-skill jobs on this list are concentrated in the skilled trades and health care support positions. Here, occupations that expect a bachelor’s or graduate degree tend to be in education, counseling, or social services.

### Tier 2 Top Jobs - Projected Annual Openings by Typical Education Needed for Entry

Education	Number of openings	Percentage
<b>HS diploma &amp; mode rate to no OJT</b>	9,078	34%
<b>No formal educational credential</b>	5,550	21%
<b>Postsecondary certificate</b>	3,002	11%

Education	Number of openings	Percentage
<b>Apprenticeship</b>	2,688	10%
<b>Bachelor's degree</b>	1,719	6%
<b>Long-term OJT</b>	1,684	6%
<b>Associate degree</b>	1,217	5%
<b>Some college, no degree</b>	861	3%
<b>Master's degree</b>	823	3%
<b>Doctoral/professional degree</b>	111	0.4%

### Employers' Employment Needs

For the occupations identified in Colorado's "Top Jobs" list, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields. In fact, when using Brookings Institution's definition of STEM occupations, the 2017 Colorado Talent Pipeline Report found that 66 percent of Tier 1 job openings require high levels of STEM competencies while only 11% of Tier 2 job openings require STEM competencies, per the Brookings STEM definition. Compared to the share of STEM employment across the state's overall workforce - which is approximately 20 percent - this suggests that a number of STEM competencies are highly valuable, as this list highlights jobs with above average growth rates and typically pay a living wage for a family of three.

In addition to STEM skills, the Colorado Talent Pipeline Report also identified certain skills that make employers more likely to promote individuals within their organizations. By reviewing data available from LinkedIn that is listed below, the skills of Coloradans who were promoted from entry-level to a more senior level position were identified. The top fifteen skill clusters include for these promoted workers include:

- Economics
- Social Media Marketing
- People Skills
- Statistical Analysis and Data Mining
- Software Revision Control System
- Software Applications
- Multilingual
- Politics
- User Interface
- HR Recruiting
- Analytical and Problem Solving
- Software Development Skills (Other)
- Mobile Development
- Legal Skills (Other)
- History, Archaeology, and Anthropology<sup>[2]</sup>

In summarizing the analysis of these skill clusters, the Colorado Talent Pipeline Report noted:

Many of these skills are related to skills expected of high demand fields in the state (such as IT); this is exemplified by the vast number of technology-related skill clusters, such as software revision control system (e.g. competency using tools like Git or Subversion), software applications (e.g. expertise in Primavera or SharePoint), and user interface (e.g. expertise in WordPress or user experience design).

Yet, what is also interesting about this list is that it is not limited to technical skills - interpersonal skills, language skills and problem solving can also play a role in progressing one's careers.<sup>[3]</sup>

#### O\*NET Skills Scores by Key Industry Network

Our O\*NET skill scores are based on the staffing pattern for each Key Industry Network (KIN). By KIN, we then isolated the skilled occupations that had the highest concentration of workers, a total number that comprised at least half of the workers in the KIN. Based on the skills scores for these select occupations, we then established one score for each skill in each KIN. Below are the top ten ranked scores for each key industry; scores that exceed the average score for all occupations is denoted with an asterisk.

##### *Advanced Manufacturing*

1. Critical thinking 61.3
2. Reading comprehension 60.3
3. Active listening 59.9
4. Speaking 58.0
5. Monitoring\* 57.8
6. Complex problem solving\* 55.3
7. Judgment and decision making 54.9
8. Time management 52.3
9. Coordination 52.1
10. Writing 50.0

##### *Aerospace*

1. Critical thinking\* 68.3
2. Reading comprehension\* 67.3
3. Active listening\* 65.6
4. Speaking 63.0
5. Complex problem solving\* 62.7
6. Judgment and decision making\* 60.7
7. Monitoring\* 58.3
8. Writing\* 57.9
9. Active learning\* 54.9
10. Coordination\* 54.9

##### *Bioscience*

1. Reading comprehension\* 65.8
2. Critical thinking\* 65.3
3. Active listening 65.1

4. Speaking 62.0
5. Complex problem solving\* 59.1
6. Judgment and decision making\* 58.5
7. Monitoring 57.6
8. Writing\* 57.3
9. Active learning\* 54.1
10. Time management\* 53.5

*Creative Industries*

1. Active listening\* 67.5
2. Reading comprehension\* 65.5
3. Speaking\* 64.4
4. Critical thinking\* 64.0
5. Judgment and decision making\* 58.2
6. Writing\* 57.9
7. Complex problem solving\* 57.8
8. Monitoring 56.6
9. Time management\* 54.9
10. Coordination\* 54.9

*Defense & Homeland Security*

No available data

*Electronics*

1. Reading comprehension\* 68.4
2. Critical thinking\* 66.5
3. Active listening\* 66.1
4. Speaking\* 63.8
5. Complex problem solving\* 61.3
6. Judgment and decision making\* 60.1
7. Writing\* 58.8
8. Monitoring 57.0
9. Time management\* 54.7
10. Coordination\* 54.6

*Energy & Natural Resources*

1. Critical thinking 61.2

2. Active listening 59.3
3. Monitoring 57.6
4. Speaking 57.5
5. Reading comprehension 56.2
6. Judgment and decision making 55.7
7. Operation monitoring\* 54.9
8. Complex problem solving 54.2
9. Coordination 53.3
10. Time management 53.0

*Financial Services*

1. Active listening\* 72.6
2. Speaking\* 71.3
3. Reading comprehension\* 68.6
4. Critical thinking\* 67.6
5. Writing\* 63.6
6. Judgment and decision making\* 62.6
7. Complex problem solving\* 59.2
8. Social perceptiveness\* 59.0
9. Time management\* 56.9
10. Active learning\* 55.4

*Food & Agriculture*

1. Active listening 55.8
2. Critical thinking 55.6
3. Speaking 54.8
4. Operation monitoring\* 53.9
5. Monitoring 53.6
6. Coordination 52.9
7. Operation and control\* 51.4
8. Time management 50.1
9. Judgment and decision making 50.0

*Health & Wellness*

1. Active listening\* 74.0
2. Speaking\* 72.1

3. Critical thinking\* 68.3
4. Reading comprehension\* 68.2
5. Social perceptiveness\* 68.0
6. Service orientation\* 65.6
7. Monitoring\* 64.0
8. Judgment and decision making\* 61.6
9. Writing\* 61.4
10. Active learning\* 59.1

*Infrastructure Engineering*

1. Critical thinking\* 64.4
2. Active listening 62.7
3. Reading comprehension\* 62.0
4. Speaking 60.1
5. Judgment and decision making\* 57.1
6. Complex problem solving\* 57.1
7. Monitoring 56.6
8. Coordination\* 55.1
9. Time management\* 64.3
10. Active learning\* 52.7

*Technology & Information*

1. Critical thinking\* 67.6
2. Reading comprehension\* 66.7
3. Active listening 65.1
4. Speaking 61.7
5. Complex problem solving\* 61.6
6. Judgment and decision making\* 58.6
7. Writing\* 56.7
8. Monitoring 56.2
9. Systems analysis\* 55.5
10. Active learning\* 54.6

*Tourism & Outdoor Recreation*

1. Speaking\* 69.6
2. Active listening\* 67.9

3. Social perceptiveness\* 63.2
4. Service orientation\* 62.7
5. Coordination\* 60.5
6. Critical thinking 60.3
7. Monitoring\* 60.1
8. Reading comprehension 57.4
9. Judgment and decision making 56.7
10. Time management\* 55.6

*Transportation & Logistics*

1. Speaking 62.3
2. Active listening 62.1
3. Critical thinking 59.3
4. Reading comprehension 58.1
5. Monitoring 57.4
6. Coordination\* 54.7
7. Social perceptiveness 54.5
8. Time management\* 54.1
9. Judgment and decision making 53.5
10. Complex problem solving 52.6

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[1] The Colorado Talent Pipeline Report, 2015

[2] The Colorado Talent Pipeline Report, data sourced from LinkedIn, 2015

[3] Ibid

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[1] Living wage is defined for a family with two adults (one working) and one child. In Colorado, the living wage for a family of this size is \$21.18 per hour, according to [www.livingwage.mit.edu](http://www.livingwage.mit.edu). At the time of the analysis, above average growth included jobs at or above 24.4 percent growth and high projected annual openings included jobs with at least 40 annual average openings.

## 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'.

#### Workforce Analysis

To gain a better understanding of the workforce trends in the State of Colorado, state level data was compiled to have a holistic view of the workforce. The FY 2014-15 Colorado Skills for Jobs Report and the Talent Pipeline Study were created to guide Colorado towards its workforce goals. These two documents, in addition to labor market data from the Colorado Department of Labor and Employment (CDLE), were used to create the workforce analysis.

#### Employment and Unemployment

According to CDLE, the total civilian labor force (seasonally adjusted) for Colorado in December, 2017 was 3,050,118 of which 2,957,032 were employed, and 93,086 were unemployed, resulting in an unemployment rate of 3.1 percent, according to the Colorado LMI Gateway. Unemployment levels in Colorado, however, vary substantially based on individuals' educational attainment. In 2014, unemployment in Colorado hovered at 4.4 percent for people with some college or an associate's degree and at 3.1 percent for an adult with a bachelor's degree or higher—lower than the unemployment rate for high school graduates (4.7 percent) and for those with less than a high school education (8.9 percent). Average earnings continue to be higher for those with higher levels of education.<sup>(1)</sup>

Unemployment Rate by Level of Education		
Educational Attainment	Unemployment Rate	Median Earnings
Less than high school graduate	6.8 %	\$25,649
High School graduate	5.2 %	\$31,515
Some college or associate's degree	4.0 %	\$36,440
Bachelor's degree	2.5 %	\$51,136

## Unemployment Rate by Level of Education

Graduate or professional degree	2.5 %	\$65,657
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Source: Current Population Survey, 2015; U.S. Census Bureau, 2016 American Community Survey, 1-year Estimates

There are fluctuations in the unemployment rate by region of the state as well. A review of the unemployment rate for MSAs shows unemployment in December 2017 ranging from 3.2 percent (Boulder-Loungmont MSA and Fort Collins-Loveland MSA) to 5.6 percent in the Pueblo MSA.

### Colorado Unemployment by MSA

Area Name	Unemployment Rate
Pueblo MSA	4.8%
Grand Junction MSA	4.4%
Colorado Springs MSA	3.6%
Greeley MSA	2.9%
Denver - Aurora MSA	3.0%
Boulder-Longmont MSA	2.8%
Fort Collins-Loveland MSA	2.6%

Source: Colorado LMI Gateway, LAUS Unit, LAUS system output file

The 2015 Colorado Talent Pipeline Report explored the unemployment dynamics for special populations within the state's workforce. The number of individuals identified with specific barriers is shown in the table below.

### Populations with Barriers to Employment

Group	Number
<b>Low-Income Individuals (18-64)</b>	369,522
<b>American Indiana/Alaska Natives/Native Hawaiians</b>	40,925
<b>Individuals with Disabilities</b>	293,202
<b>Older Individuals(over 65)</b>	679,572
<b>Older Individuals, low-income</b>	630,786
<b>Youth in Foster Care</b>	5,553
<b>Farmworkers</b>	40,788

Populations with Barriers to Employment	
<b>Long-term unemployed</b>	22,700
<b>Single Parent Households</b>	309,558
<b>Single Mother Households</b>	210,499
<b>Single Father Households</b>	99,059
<b>TANF</b>	91,439

Unemployment rates and workforce participation rates for these populations vary from the overall state rates, in some cases significantly. The rates for veterans, low-income individuals, and individuals with disabilities is outlined in the table below. The table highlights that veterans have the lowest unemployment rate of groups with barriers at 4.8%, and a workforce participation rate of 76.4%. Individuals with disabilities participate in the workforce at a much lower rate, only 48.6% and unemployment is high at 13.2%. Low-income individuals also rate low in workforce participation at 54.5%, and high in unemployment at 18.8%.

Veterans	
Unemployment rate	4.8%
Workforce Participation Rate	76.4%
Disabled	
Unemployment rate	13.2%
Workforce Participation Rate	48.6%
Low-Income	
Unemployment rate	18.8%
Workforce Participation Rate	54.5%

**Youth Unemployment:** The youth unemployment rate (ages 16 to 19) remained quite elevated throughout and following the Great Recession; more recently it has seen improvement. Over the previous 12-month period (August 2014 to July 2015), the youth unemployment rate stood at 13.3 percent; whereas, the year preceding it stood at 20 percent. However, the rate is still very high for black youth, in particular, at 34.5 percent (Current Population Survey, 2015). In Colorado, 11.8 percent of youth ages 16 to 24 are not in school and not working; the national rate is 14.1 percent.<sup>[2]</sup>

**Veterans:** Unemployment rates for veterans are slightly elevated as compared to non-veterans (4.3 percent to 3.2 percent unemployment) although the gap has narrowed considerably, having been a 2.1 percent gap the year prior. Employment services for recently separated veterans play a critical role in the successful transition from military to civilian employment. The Colorado Department of Labor and Employment provides specialized services that are available only for eligible veterans, such as individualized job search assistance and case management for veterans with a service-connected disability or other barriers to employment, vocational and work-based training, as well as job fairs and hiring events specifically for veterans. Veteran-specific services are provided by Veteran Employment

Representatives (VER)—highly trained staff who are themselves veterans, and understand many of the challenges that veterans face.

One considerable veteran-specific issue is that many transitioning veterans have training and expertise in critical skill areas, but lack the civilian credentials necessary to obtain employment in their career field. The Colorado Department of Labor and Employment, Department of Regulatory Agency and Department of Higher Education are working together to identify military occupations that need civilian credentialing and licensing, compare military training with civilian requirements, and develop pathways to expedite the training and credentialing process. Initially, this collaboration will focus on healthcare occupations, specifically focusing on Certified Nursing Assistant (CNA), Licensed Practical Nurse (LPN), and Dental Hygienist.<sup>[4]</sup>

### **Individuals with Disabilities:**

Frequently the first, and most intractable barrier underemployed or unemployed Coloradans with disabilities face is an overemphasis on what is expected that he or she cannot, should not, or is not doing. The lack of balance between a focus on functional limitation rather than on the person's talent and ambitions is expensive and wasteful. The workforce development system in Colorado is committed to providing the high quality services necessary to prepare individuals with disabilities to compete for jobs and fully participate in Colorado's workforce. Colorado currently ranks 9<sup>th</sup> in the nation for employment of individuals with disabilities. There are just over 300,000 Coloradans with disabilities, representing 8.9% of the State's population. 41.6% of these individuals are employed compared to 79.1% of Coloradans who do not have a disability. When compared nationally, Coloradans with disabilities fare slightly better than the national average.<sup>[5]</sup> However, there is still significant work to be done to improve the employment prospects of individuals with disabilities in Colorado, including encouraging participation in the workforce by individuals with disabilities through increased understanding of the supports available to promote their success, and ensuring those who seek to work have opportunities to do so in competitive integrated employment.

The Division of Vocational Rehabilitation (DVR) leads the way by providing the full range of rehabilitation services, including one-on-one vocational guidance and counseling, necessary to understand and mitigate the ways a disability impedes the capacity to show and apply talent at work. In Fiscal Year 2016, DVR assisted 2,294 Coloradans with disabilities to secure, retain or regain employment. These workers earned an average of \$12.66 an hour working 29.14 hours a week on average. DVR further works with employers and community partners to increase opportunities for employment, career advancement and economic gain for eligible Coloradans with disabilities. In addition to the work of DVR, all Workforce Centers are compliant with Section 188 of the Workforce Innovation and Opportunity Act, ensuring physical and programmatic access to all services and benefits available throughout the workforce development system. Ensuring Physical and programmatic accessibility is also a component of the state's certification policy for one-stop centers, which will help to further ensure that all customers can access services in all parts of the state.

When individuals with disabilities can access services effectively and efficiently, they not only benefit from being productive members of the workforce, but the state benefits from a population that relies less heavily on social services; it is crucial to sustain a supply of capable workers that will continue to grow Colorado business while attracting others to the state.

**Long-term Unemployed:** The long-term unemployed, (individuals out of work for 26+ weeks), face a unique combination of social, emotional, and skill deficiencies caused by the duration of their unemployment. These deficiencies require intensive "wraparound" services to address these issues effectively, while rapidly moving individuals to paid work experience and reemployment. Currently, there are 27,400 individuals considered long-term unemployed; during the same period the year before there were 54,000 individuals who were considered long-term unemployed.

The share of long-term unemployed out of all unemployed persons also continues to decrease: currently, the long-term unemployed make up nearly one-quarter of all unemployed (Current Population Survey, 2015). Credit for this drop can be attributed to Colorado's improved economy, as well as to concentrated public and private initiatives.

For example, Governor Hickenlooper's Hire4Colorado Campaign challenged businesses to give the long-term unemployed an opportunity to prove themselves and also increased awareness of services available through workforce centers for long-term unemployed individuals. There have also been targeted efforts by a number of agencies and organizations to impact specific populations such as veterans, older citizens, youth and others with challenges to obtaining employment.<sup>[3]</sup>

## Labor Market Trends

The FY 2014-15 Colorado Skills for Jobs Report notes that by the year 2020, it is estimated that 64 percent of all jobs, nationally, will require post-secondary education. In Colorado, however, 74 percent of all jobs statewide will require some level of post-secondary education or training by the year 2020, well exceeding the national average. Relative to the rest of the nation, Colorado has a highly educated adult population. It is estimated that 68 percent of adults have some college experience or a postsecondary credential, while 46 percent have an associate's degree or higher.<sup>[6]</sup>

More jobs are expected to require higher levels of education in the coming years. To meet emerging employer demand, Colorado will need to increase postsecondary credential production by 2% per year or about 1,000 additional degrees/credentials annually, according to the FY 2014-15 Colorado Skills for Jobs Report, in order to meet the goal set by the Colorado Department of Higher Education of 66 percent post-secondary certificate or degree attainment level for Coloradans ages 25 to 34 by 2025.<sup>[1]</sup>

Additionally, comprehensive state level data show that several industries and occupations are on the incline while others will continue to decline over the next 10 years.

Health care and social assistance will add an additional 83,382 jobs to the economy. The subsectors that will experience the most growth are:

- General Medical and Surgical Hospitals (9,701 additional jobs)
- Offices of Physicians (6,315 additional jobs)
- Services for the Elderly and Persons with Disabilities (10,283 additional jobs)
- Home Health Care Services (8,641 additional jobs)

Professional, scientific and technical services will add an additional 66,059 jobs. The engineering services subsector will add an additional 8,731 jobs over the next ten years while the subsectors of Computer Systems Design Services, Custom Computer Programming Services, Offices of Lawyers and Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology) will add 11,196; 8,571; 2,731 and 2,302 jobs respectively.

Although these industries are not listed as a top employment sector within Colorado, their projected growth between 2015 and 2025 is worth noting. Mining, Quarrying, and Oil and Gas Extraction industry will grow over 55% by 2025 and the Management of Companies and Enterprises industry will increase by 49%.

Industries that are on the decline include crop and animal production, utilities and information. Each of these industries combined are projected to lose approximately 6,000 jobs over the next ten years.

## Education and Skill Levels of the Workforce

It is important to note that there are significant disparities in educational attainment by race ethnicity. Identifying these gaps is important in addressing overall workforce preparedness due to its impact on the development of the state economy. In Colorado, 19 percent of Hispanic adults have a college degree, whereas 53 percent of non-Hispanic white adults have a degree. By 2040, the non-white share of the working adult population (ages 25 to 64) is projected to be 43 percent. Due to these statistics, Colorado foresees needing additional support for those in underserved populations due to the impact of educational attainment on the long term sustainability of the workforce.<sup>[2]</sup>

According to the Colorado Skills for Jobs Report, one variable that complicates analysis of a state’s workforce supply are interstate migration patterns. On average, three-quarters of Colorado residents graduating from a public postsecondary institution are found in our workforce within the year following graduation. However, entry into the state’s workforce varies based on residency status, program major and degree level. Some graduates will continue their education and delay entry into the workforce, some will pursue opportunities out-of-state, and some will leave and then return to the state for employment years later. Typically, people with higher levels of education tend to have higher levels of geographic mobility, so while Colorado may lose a portion of educated Coloradans to out-of-state opportunities, the state still attracts a large share of highly educated people. While Colorado has consistently been able to attract qualified talent from outside of Colorado, the state must also anticipate an increase in interstate and global competition for these workers as older skilled workers continue to retire in large numbers.

### Skill Gaps

During the development of the Colorado Talent Pipeline Report, the Colorado Department of Education, Department of Higher Education, and the Colorado Workforce Development Council collaborated to identify the skills that will ensure Coloradans are prepared for work or education beyond high school. Through facilitated discussions with business and industry, education, higher education, non-profit organizations, government stakeholders, and students, core skills were identified for more than 100 established, industry-developed competencies that are necessary for success beyond high school. These core skills are included below<sup>(1)</sup> and will be a focus on the workforce and education programs driven by sector partnerships and career pathways in the state. Across industry, as measured by O\*NET scores, the most in-demand skills include:

- Critical thinking
- Active listening
- Reading comprehension
- Speaking
- Judgment and decision making
- Complex problem solving.

Colorado’s Graduation Guidelines are intended to assist students in gaining work-ready skills while in high school. At the secondary level, the goal is for all students to understand and articulate their individual skill-set, how they relate to potential careers and jobs, and graduate with these in-demand skills from high school. Colorado industry representatives are clear that students who graduate from high school and seek to work in Colorado need in-demand skills that meet business, industry, and higher education standards. Graduation guidelines are a roadmap to help students and their families plan for success after high school by demonstrating their knowledge, skills and abilities to enter the workforce, military or higher education without significant training or remediation. The expected K-12 Outcomes include Academic Competencies, Professional Competencies, Entrepreneurial Competencies, Personal Competencies, and Civic Competencies. As shown below, each of the most needed skills aligns with at least one of the expected K-12 Outcomes.

Competencies & Skills	Academic	Professional	Personal	Entrepreneurial	Civic
<b>Active Listening</b>	Yes	Yes	No	No	No
<b>Complex Problem Solving</b>	No	Yes	No	Yes	No
<b>Critical Thinking</b>	Yes	No	No	No	No

Competencies & Skills	Academic	Professional	Personal	Entrepreneurial	Civic
<b>Judgment and Decisions</b>	No	No	Yes	No	Yes
<b>Reading Comprehension</b>	Yes	No	No	No	No
<b>Speaking</b>	No	Yes	No	No	No

While the opportunity therefore exists for students to exit the K-12 system with necessary skills, employers communicate that they struggle finding individuals who have the necessary professional competencies to perform, even in low-skill jobs. Additionally, as stated above, eighty-eight percent of the job openings in the top jobs list are for occupations that typically require some level of formal postsecondary education or training for entry, whether it is an employer-sponsored formal training program, apprenticeship, certificate or degree. Colorado continually works with industries to identify the skills and competencies needed for critical occupations. This process is done with education at the table so that training providers can make informed decisions about program and curriculum shifts that may be needed to ensure in-demand skills are being taught to students.

Additionally, there are discrepancies in supply and demand at individual occupation levels, however there appears to be a shortage of completions for computer-related occupations, various skilled trades and science technicians in particular[1]. Data also shows that Colorado is not producing enough graduates trained to enter financial occupations, computer-related occupations or healthcare occupations.[2] STEM occupations are most likely to have supply-demand gaps. Eighty-six percent of bachelor’s level finance occupations and 87 percent of graduate level healthcare occupations are defined as STEM. All bachelor’s level computer-related and air transportation occupations are defined as STEM.[3]

Occupation groups that may not maintain current graduate-level educational attainment levels of workers include financial and IT workers. Many of these occupation areas— such as finance, engineering, architecture and skilled healthcare practitioners—are occupation clusters that tend to be more skewed to older age workers.[4]

The potential deficits in completions for the graduate/professional level group of healthcare practitioners is complicated by the fact that many of these jobs requires upwards of ten years of schooling, and the healthcare industry will continue to evolve in staffing structures as practices and technology change.[5]

[1] Colorado Job Skills Report

[2] IBID

[3] IBID

[4] IBID

[5] IBID

[1] Ibid

[1] FY 2014-15 Colorado Skills for Jobs Report

[2] Ibid

[1] Ibid

[2] Colorado Talent Pipeline Report, 2015

[3] Ibid

[4] Ibid

[5] Houtenville, Andrew J., Ph.D., Brucker, Debra L., Ph.D. & Lauer, Eric A. MPH, 2016. Annual Compendium of Disability Statistics: 2015. Durham, NH: University of New Hampshire, Institute on Disability

[6] FY 2014-15 Colorado Skills for Jobs Report

## 2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

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

### A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

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

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

Colorado's workforce development activities are coordinated through the following state agencies: the Colorado Department of Labor and Employment (CDLE), Colorado Department of Education (CDE), and Colorado Department of Human Services (CDHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

#### State Agency Program Responsibility

Agency	Core Program	Non-Core Program
CDLE	Adult (Title I) Dislocated Worker (Title I) Youth (Title I) Wagner-Peyser (Wagner-Peyser Act, as amended by Title III) Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)	Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act) Jobs for Veterans State Grants (Title 38, Chapter 41) Migrant and Seasonal Farmworker Program (Title I)
CDE	Adult Education and Family Literacy (WIOA Title II)	

CDHS	Senior Community Service Employment Program (Title V Older Americans Act) Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)
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The Colorado Workforce Development Council (CWDC) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. CWDC ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local, regional, and state levels. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Coloradans.

Colorado’s workforce system is driven from the bottom up through 10 local workforce areas including the Colorado Rural Workforce Consortium (CRWC), which is comprised of 10 sub-areas. Each workforce area and sub-area has a board strategically directing the workforce activities at the community level and providing local guidance for implementation of workforce programs. With local guidance, workforce activities are often customized to fit the needs of individual customers -both businesses and jobseekers alike. The partnerships and atmosphere of collaboration guided by the state agencies and CWDC funnel to the local areas to create a fully integrated workforce system of not only core and non-core program partners, but community stakeholders that facilitate a system design to provide impactful services and activities throughout the state.

#### Colorado Workforce Centers

The Colorado Workforce Centers are at the forefront of the workforce activities, and represent Colorado’s version of the American Jobs Center. There are 57 workforce centers spread across the state providing access to many Coloradans.[1] In addition to these locations, Colorado has partnered with several local stakeholders to establish 31 virtual workforce centers where customers can access staff members through technology. Another example of collaboration and an effort to provide additional access to as many customers as possible is an initiative led by the Colorado Rural Workforce Consortium. This initiative provides funding to establish 15 Library Partners where Coloradans can access basic career services including over-the-shoulder assistance with Connecting Colorado, the state job matching system. In all, Colorado has more than 100 physical locations where the unemployed, underemployed, and businesses can receive an array of workforce system information and services.

The Colorado Workforce Centers are overseen at the state level by the CDLE, and are managed locally by each of the local area and sub-area boards. Local boards are comprised of local businesses, labor, partner agencies, and other key stakeholders to create a diverse and functional group. The boards, in alignment with the States’ vision, provide front line strategic implementation for state-wide initiatives in addition to their locally-determined priorities. State initiatives include sector strategies, career pathway development, and standardized business services delivery. Local priorities include lay off aversion, specific career pathway development, youth programs, targeted sector partnerships, work-based learning, and others.

Local boards are tasked with procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). These boards carry out workforce activities by partnering locally through Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs. Colorado Workforce Centers are fully integrated with WIOA, Wagner-Peyser, Jobs for Veterans State Grant (JVSG), and Trade Adjustment Assistance (TAA); local partnerships and integration also exist in many areas with TANF, Supplemental Nutrition Assistance Program (SNAP), Adult Education and Family Literacy, Vocational Rehabilitation, and others.

With this foundation for service integration, Colorado Workforce Centers operate under the “no wrong door” philosophy, while local areas have developed their own customer flow strategies that are unique to their area. Typical customers entering the center are engaged by an intake process that is designed to identify the needs of the individual by gathering information and then utilizing the appropriate resources for those needs. In some cases,

the resources are initiated by a referral to a partner program. Customers are given solutions and next steps to their questions, barriers, and issues by connecting directly with the appropriate workforce system partner as part of this philosophy. Because Colorado Career Centers are fully integrated and operate in close partnership with other workforce agencies, co-enrollment in multiple programs is commonplace. Co-enrollment provides the customer with the ideal service plan while allowing the system to utilize its resources in an efficient manner.

### Collaboration of Activities

Communication is vital in order to coordinate and align workforce services statewide. This communication starts with the CWDC which has representation from the CDLE, CDHS, CDE, Colorado Department of Higher Education, and Colorado Department of Corrections, and which encompasses all of the core, non-core, and partner programs providing workforce activities in the state. Communication is further enhanced by the collaborative efforts of local area workforce directors, who hold a monthly director’s meeting where partnerships, special initiatives, and ongoing efforts are discussed with one another and state partners.

The CDLE recognized that local areas needed assistance in collaboration and information sharing and created an online Knowledge Management Portal, e-Colorado, which manages virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners, including businesses, workforce professionals, government, and others. This resource allows for all stakeholders within the workforce development system to readily access policies, best practices, and program information including eligibility criteria. The portal offers team rooms for front line staff to discuss services and coordinate workforce activities through online calendars. In addition to these features, the portal offers business tools that include Virtual Job Fairs and online fillable “smart” forms, and houses the Adobe Connect online meeting capability utilized by stakeholders, as well as Colorado’s Workforce Centers, to conduct webinars and other online meetings.

Connecting Colorado is the case management, data collection, and reporting system utilized by all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 60), plus discretionary grants in one common database. All reports generated from this system are “up to the minute,” thus allowing for better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally-requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state’s workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local workforce regions.

Through this planning and collaboration, Colorado Workforce Centers were able to provide a full range of workforce services to nearly 232,299 job seekers in PY16. In that same period, more than 2000 businesses received services from the standardized business service team while more than 4,300 job seekers were provided training services to increase the talent pipeline and meet the needs of the state’s businesses in targeted sectors with high-growth industries.

### Workforce System Services - Unemployed and Underemployed

Colorado Workforce Centers offer the full array of Career Services outlined in WIOA 134(c)(2) for unemployed and underemployed jobseekers.

#### Colorado Workforce Center Services

Basic Career Services	Determination of Eligibility Initial assessment Labor Exchange Information - Connecting Colorado Labor Market Information - Colorado LMI Gateway Unemployment Insurance Information FAFSA Assistance Referrals
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Individualized Career Services	Development of Individual Employment Plan Group Counseling Individual Counseling Comprehensive and specialized assessments Career Planning Internships Short-Term Pre-Vocational Services (soft skills such as communication, punctuality, and personal maintenance skills) Workforce Preparation Activities (i.e., MS office, keyboarding, and Internet) Financial Literacy
Follow-Up Career Services	12 months of follow-up

Career services available at the centers vary because of local area inflexion and needs of particular communities. Basic career services are available at over 100 locations throughout Colorado. Each center has computers, printers and copiers, printed resources, and staff to assist jobseekers.

Many of the services, including Connecting Colorado and Colorado LMI Gateway, can be accessed virtually though the internet via computer, smart phone, or tablet. Connecting Colorado is the state job matching system and is the virtual one-stop-shop where Coloradans can centralize all their career search activities. It allows jobseekers to self-enter his/her resume(s) and job search 24/7. Jobseekers can set up virtual recruiters and receive an e-mail notification once a job is entered that matches their unique specifications. Connecting Colorado also provides access to a tool box of job search assistance links that has been customized for each workforce area. Links include direct access to the area’s web page, career exploration, training resources, self-marketing tools, Unemployment Insurance information, and additional job banks. The built-in event calendar communicates upcoming hiring events, job fairs, and other workforce activities. Colorado LMI Gateway allows jobseekers to make informed data-driven career decisions. This labor market system provides a wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data. It allows jobseekers to set up a personal page for their career exploration data to be readily accessible.

Basic Career services also extend beyond the virtual world. After the initial assessment, customers—as appropriate—may be provided with direct linkages to additional workforce activities, including multiple education and training opportunities, across the workforce system though partner referrals. Many of these partners are housed within the workforce center, making customers unaware that they are participating in multiple programs due to the integrated service delivery.

### Individualized Career Services

Individualized career services within the Colorado Workforce Centers vary across the state, but all the offices offer a full line of activities to prepare jobseekers for the modern workforce. They address many of the soft skill and technical skill training Colorado employers require such as:

- Complex Problem Solving
- Writing
- Critical Thinking
- Judgment and Decision Making
- Deductive Reasoning
- Information Ordering
- Coordination
- Interacting With Computers, and
- Analyzing Data or Information

Local areas work with employers to identify these needs and systematically create programs to provide the education and training needed. These types of services begin with the development of an individual employment plan to address the unique requirements of each customer. Professional staff in the workforce system work with the customer to create and implement their plan. Staff provide the customer with local labor market information including in-demand occupations, wage data, and employer requirements. The plan may include activities such as:

- Workshops - Job Search, Application, Resume Writing, Interviewing, Finical Literacy, etc.;

- Short-Term Pre-vocational Services - Career Readiness that includes soft skill training;
- Workforce Preparation Activities - Microsoft Office Training, Basic Computer, Keyboarding, KeyTrain, etc.;
- Career Exploration Inventories - CareerScope, COPS, My Next Move, etc.; and
- Comprehensive Assessments - SkillCheck, Prove It!, WorkKeys, Test of Adult Basic Education, etc.

By utilizing these services and successfully completing the appropriate assessments, Coloradans are eligible to receive the Career Ready Certificate (CRC). The CRC is an assessment-based credential signed by the Governor that certifies a job seeker's skills. The certificate creates objective standards for employment readiness and demonstrates a job seeker's mastery of the work-applied skills employers are seeking. To earn a certificate, one must achieve appropriate levels for one or more of the vocational or soft skill assessment tests incorporated in the CRC by the State.

### Training Services

Career services are not always enough to enable job seekers to obtain self-sufficient employment. In some instances, formal training is required. Colorado Workforce Centers offer multiple trainings services such as:

- Occupational skills training
- On-the job training (OJT)
- Apprenticeships
- Incumbent worker training
- Skill upgrading and retaining
- Entrepreneurial training, and
- Adult education and family literacy activities

Training services are funded through WIOA programs, Pell Grants, partner programs, and state and local grants. Local areas are responsible for establishing and implementing local policies for eligibility, Individual Training Account (ITA) limits, and the identification of in-demand sectors or occupations. Through multiple initiatives and projects, Colorado has focused training and career development activities on sector strategies/partnerships and career pathway development.

**WORK Act** - The Skilled Worker Outreach, Recruitment, and Key Training Act (WORK Act) is a grant program administered by CDLE and an 11-member grant review committee that is made up of system partners and stakeholders. The grant enables recipients to reach a broader audience through recruitment and outreach activities, increase enrollment in and completion of their skilled worker training programs, and fill existing needs for skilled workers in the market. This allows for Colorado to address the middle skills gap by strengthening training programs and increasing participation. As of September 30, 2017 - 12,359 participants recruited, 3,136 new program enrollees, 2,314 program completers, and 1,064 program completers employed, in industries including Infrastructure Engineering, Advanced Manufacturing, and Tourism and Recreation.

**Colorado House Bill 15-1274** - The legislation directs the CWDC to coordinate multiple state agencies and industries in the design of career pathways in growing and emerging sectors. The IT industry career pathway was developed during fiscal year 2016, and the data captured from businesses throughout the state has been analyzed and released in the Tech Talent Forums Report as well as utilized to build career pathway maps housed on [careersincolorado.org](http://careersincolorado.org), which was developed as a result of this bill. In July 2017 the pathways for healthcare and construction were publically released on [careersincolorado.org](http://careersincolorado.org). Significant promotion and training efforts took place during the fall of 2017 to educate stakeholders on the web site and how to encourage their customers to use it as a career exploration and planning tool. Work has begun on the next two identified pathways, Cyber Security and Business Operations. Industry Forums on these pathways will take place in February and March 2018 and the pathways will be released online in July 2018. The forum reports for IT, Healthcare, and Construction can be found as appendices to the 2017 Annual Talent Pipeline Report.

**Colorado House Bill 15-1275** - This recent legislation has directed advisory boards made up of CDE, CDLE, community college systems, CWDC, and other stakeholders to create recommendations that assist local education providers in creating cooperative agreements to include apprenticeships and internship programs in the available concurrent enrollment programs. In addition, the legislation creates a tuition assistance program for eligible students enrolled in short-term certification programs that Pell Grants do not cover. This allows low-income individuals to enter career pathways through short-term certification programs, helping Colorado grow the middle class.

**Sector Partnership National Emergency Grant (NEG)** - The Sector Partnership NEG provides funding for the expansion or creation of new sector partnerships in multiple local areas. The partnership includes local community colleges or other educational institutions, county departments of human services, employers, and local area boards. The funding is also used for career services for dislocated worker training including OJT and other work and learn activities.

**Displaced Homemaker Grant** - The Displaced Homemaker Grant provides Keep Envisioning Your Success (KEYS) Scholarship, and is a partnership between CDLE and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of income and must re-enter the labor market. The program provides financial support to participants to earn their Certificate or Associate Degree with programs focused on in-demand careers in the areas of health care, computer science, human services, business, legal, and education. In addition, the program helps participants develop self-confidence, achieve academic success, and overcome barriers to employment.

The continued development of sector partnerships and career pathways allows Coloradans to understand the full potential of their participation in workforce activities. Non-traditional training such as work and learn programs including OJTs and apprenticeships offer a wide selection of training opportunities, at the same time enabling local areas to customize training to fit the needs of regional industry demands. This flexibility in training options provides the state with the opportunity to assist individuals in obtaining the technical skills demanded by employers as outlined above. At the state level, the Eligible Training Provider List (ETPL) has been updated pursuant to WIOA Sections 122 and 134. This list ensures that Coloradans are able to make informed decisions on training providers and programs based on accurate data including completion and placement rates, labor market information, and wage expectations.

#### Supportive Services

In order to assist job seekers in obtaining or retaining employment through career or training services, Colorado Workforce Centers offer a variety of supportive services. Local areas are responsible for establishing supportive service policy that outlines types, eligibility, limits, etc. Examples of supportive services include child care, transportation, needs-related payments, tools and equipment, uniforms, and other clothing. In addition to WIOA-funded supportive services, local areas have developed relationships with community partners that assist with utility payments, food, shelter, and other basic needs. Formal MOUs with workforce partners outlined below provide additional supportive services such as cash and food assistance to jobseekers.

#### Workforce System Activities: Business

The focal point of all workforce system activities is business and industry. Colorado has been a national leader in the development of sector partnerships and business services over the past several years. The workforce system created a statewide Business Service Team consisting of members across core partners. The team established eleven core services to present to employers. These activities are taking place statewide and include:

**Access to facilities** - use of Workforce Center facilities by a business for a variety of purposes such as meetings, trainings, orientations, interviews, etc.;

**Assessments** - Any test or assortment of tests used to measure the skills, interests and/or personality traits of a job seeker, potential employee, or current employee;

**Business education** - Seminars, round tables, workshops, focus groups, etc.;

**Business information** - Information given to a business pertaining to a variety of incentive programs or other information requested that provides a benefit to that business;

**Hiring events** - A customized event for a single employer that assists with recruiting, interviewing, and hiring of one or more positions;

**Job fairs** - Brick & Mortar is an event for multiple employers that assists with the recruiting, interviewing, and hiring of one or more positions; Virtual is an online “event” in which employers and job seekers each meet in a virtual environment, using chat rooms, teleconferencing, webcasts, training/workshop videos, webinars, employers online hiring sites, and/or email to exchange information about job openings and/or resources;

**Job postings** - Staff-entered or web-entered job orders approved by staff;

**Labor market information** - Information on state and local labor market conditions; industries, occupations, and characteristics of the workforce; area business identified skills needs; employer wage and benefit trends; short and long-term industry and occupational projections; worker supply and demand; and job vacancies survey results;

**Rapid Response** - A variety of services to businesses that are facing restructuring and downsizing including onsite workshops for employees in transition; job placement assistance; and information on unemployment benefits;

**Screening** - Any service that involves the initial evaluation of applications or resumes that assists the employer in the recruiting process; and

**Training and retraining** - Any service provided to a business that involves the training or retraining of current or future employees including OJTs, Work Experiences, Incumbent Worker Training, etc.

This collaboration among local areas is reinforced at the annual Business Service Summit where Business Services Representatives (BSR) from across the state work to ensure activities and strategies align system wide.

#### Workforce System Partners and Activities

##### Job Corps

Colorado has one Job Corps location in Collbran, Colorado. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 year olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. The Job Corps partnership with Colorado’s workforce system is statewide and comprehensive. Staff of the Collbran Job Corps Center and their outreach and recruitment contractor, CHP International, have a long history of participation in the state and local youth councils. Youth from the Collbran Job Corps Center also become members of local youth councils on a regular basis. Job Corps regularly participates in local youth job and career fairs. The strong relationship between the Colorado Workforce Centers and Job Corps is solidified by MOUs to provide Job Corps and their contracted vendor with access to Connecting Colorado. Collbran youth register with Connecting Colorado to search for jobs once they have completed their coursework and are transitioning back to the community. They benefit by posting a résumé, applying for a specific job, or completing a self-directed job search. A formalized process for referring Job Corps participants to local WIOA youth programs is in place with each workforce area and provides youth with access to more career services that they may need to meet their educational and employment goals.

##### YouthBuild

YouthBuild is an education, career-training, and leadership program for young adults without a high school diploma or equivalent. The program provides skill building and preparation for participants to obtain their diploma while simultaneously providing work and learn programming in a variety of in-demand occupations. Students are exposed to soft skill training throughout the program and build the foundational career skills needed to succeed in the modern workplace. Upon completion of the program, students are assisted with career or post-

secondary education placement and receive 12 months of follow-up services. With two active grantees in Colorado, YouthBuild program information and referrals are available through the workforce centers nearest these programs.

### Migrant and Seasonal Farm Workers Program

CDLE administers the Migrant and Seasonal Farm Workers Program (MSFW), ensures that program information is available at all workforce centers, and that eligible participants receive proper referrals. Colorado is designated as a significant MSFW state and six centers have been determined as significant MSFW Workforce Centers (Brighton, Greeley, Lamar, Monte Vista, Delta, and Rocky Ford). These centers administer a bilingual (English/Spanish) outreach program through workforce centers to ensure that equitable services are provided to all MSFW clientele, including:

- Job search assistance and placement registration assistance
- Assistance with Unemployment Insurance
- Testing
- Counseling
- Training opportunities
- Referral to supportive services
- Job development
- Referrals to other organizations that serve migrant and seasonal farm workers
- Complaint resolution, and
- Farm worker rights and labor law information

MSFW programs coordinate with Colorado Workforce Centers and many times customer are co-enrolled, which allows them to access the full array of workforce system programs.

### Employment First

Colorado operates its Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) and optional Workfare program under the title Employment First. The Colorado Department of Human Services administers the Employment First Program, which is run through local county human service departments in 45 counties statewide. Counties procure their own service providers, and may coordinate activities with local workforce centers. Several examples of integration already exist in Colorado between Employment First and workforce centers. Such local level collaboration provides customers an opportunity to apply for and receive SNAP assistance to help overcome barriers to employment, as well as allowing SNAP participants to access additional resources in their employment search.

The mission of Employment First is to increase employment for food assistance recipients through support, referrals, accountability, and community work. Participants may engage in a variety of employment-oriented activities through the Employment First program, including:

- English Language Acquisition
- Literacy
- Adult Basic Education
- Employability Education
- Working
- WIOA -Funded Programs
- Vocational Training
- Business
- Vocational Rehabilitation, and
- Post-Secondary Education

## Colorado Works

Colorado's Temporary Assistance for Needy Families (TANF) is known as Colorado Works and is administered at the state level by the Colorado Department of Human Services, and is locally administered by county departments of human/social services. In some local areas, agreements are in place to establish partnerships between human service agencies and the workforce centers. In other areas, the workforce center may fall underneath the broader umbrella of the county human service department. While human service offices exist in all of Colorado's 64 counties, workforce centers are not always accessible within every county. In these areas, partnerships take the form of regional collaboration or virtual services.

All applicants for Colorado Works are given an assessment within 30 days of application that focuses on identifying what services and assistance will best support the family in achieving economic stability. Often times these assessments lead to referral(s) to WIOA and other workforce partner services as a priority population. In many counties, workforce development activities associated with Colorado Works are administered through the workforce center via a local level agreement or contract for services. Participants may engage in a variety of employment-oriented activities through the Colorado Works program, including:

- English Language Acquisition
- Adult Education and Family Literacy
- Post-secondary and Vocational Education
- Work Experience/Internships
- Community Service
- WIOA - Funded Programs
- Job Readiness Training
- Employment

### Adult Education and Family Literacy

CDE's Office of Adult Education Initiatives (AEI) administers the federally-funded Adult Education and Family Literacy Act (AEFLA) grant program under Title II of WIOA, as well as the state-funded Adult Education and Literacy Act of 2014 grant program. AEI provides oversight for programs across the state, and services are provided locally by sub-grant recipients. As a combined plan core partner, and consistent with the focus of WIOA, adult education and family literacy services are essential to the workforce system. In many cases, meeting adult education and family literacy needs is the first step in a job seeker's career pathway. Adult education and family literacy services include adult basic and secondary education and english language acquisition focused on career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Colorado.

### Senior Community Service Employment Program

Senior Community Service Employment Program (SCSEP) is administered by the Division of Aging and Adult Services, Department of Human Services. SCSEP promotes useful, part-time employment opportunities in community service activities for persons with low incomes who are 55 years of age or older and have multiple barriers to employment. Priority is given to individuals who are: veterans, age 65 plus, live with a disability, have limited English proficiency and/or low literacy skills. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment.

SCSEP participants are placed in non-profit or government agencies called, "Host Agencies." Host agencies agree to provide employment training through community service activities, upgrading the participants' employability skills. Participants are provided minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining un-subsidized employment. Approximately 1,000 individuals throughout Colorado are served annually through SCSEP.

## Vocational Rehabilitation

Vocational Rehabilitation Programs fall under the authority of CDLE through the Division of Vocational Rehabilitation (DVR). DVR's positioning within CDLE, creates natural and meaningful partnerships with other WIOA services to better serve Coloradans with disabilities who have previously struggled to participate in the workplace, including those with disabilities for whom employment has remained completely out of reach, as well as other groups such as youth, recently discharged veterans, and the long-term unemployed. The DVR mission is to assist persons with disabilities to succeed at work and to live independently. DVR accomplishes this mission with a variety of employment and training activities including:

Evaluation and diagnostic services provided to determine eligibility and the services needed for the individual to become employed;

Vocational rehabilitation counseling and guidance provided directly by a vocational rehabilitation counselor during the individual's plan of services;

Physical and mental restoration services which may be provided to correct or substantially modify an individual's physical or mental condition;

Training services, when necessary to become employed, including vocational training, academic training, personal and vocational adjustment training, job coaching, on-the-job training, job-seeking skills training, and books, tools, and other training materials;

Specialized services for individuals who are blind, deaf, and deaf-blind, including interpreter services, note-taking services, and reader services;

Rehabilitation technology services, including assistive technology devices, assistive technology services, and rehabilitation engineering services to address barriers encountered by an individual in attaining or retaining employment;

Placement services provided to assist an individual with a disability to find adequate and suitable employment in his/her chosen career; and

Supportive services, such as maintenance, transportation, personal assistance services, and services to family members may also be provided if necessary for the individual to utilize the services identified above.

Post-employment services may be provided to previously rehabilitated individuals when needed to maintain or regain suitable employment.

Pre-employment transition services provided to students with disabilities, including: job exploration and counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.

Technical assistance, training, outreach and other supportive services provided to public and private employers of all sizes, including Federal and Federal contracting employers for the purpose of increasing employment opportunities for job seekers with disabilities.

## Trade Adjustment Assistance

Trade Adjustment Assistance is overseen by CDLE and is part of the integrated services team in the Colorado Workforce Centers. TAA provides enhanced reemployment benefits designed to help workers adversely affected by foreign trade obtain suitable employment. Benefits include occupational training, job search and relocation allowances, Reemployment Trade Adjustment Assistance (RTAA), reemployment case management services, Trade Readjustment Allowance (TRA), and extended unemployment insurance benefits. TAA customers are co-enrolled into Title I-B programs and are referred to other workforce system activities as needed.

## Jobs for Veterans State Grant

Jobs for Veterans State Grant (JVSG) programs are administered by CDLE, and are co-located and fully integrated within the Colorado Workforce Centers. JVSG funds two positions: Disabled Veterans Outreach Specialist (DVOP) and Local Veterans Employer Representative (LVER). Customers entering the career center are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG participants are co-enrolled in Title I-B programs. LVERs are subject matter experts and provide training and guidance on matters such as Priority of Service. DVOPs are charged with providing case management and careers services to young veterans aged 18-24, eligible spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter (VPL) 03-14 and 04-14, which include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those: 1) who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or, 2) were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36)).

DVOPs provide a range of services including career planning and counseling, comprehensive assessments, individual employment plan development, short-term pre-vocational services, and other career services within the Colorado Workforce Centers. LVERs operate on the local area business service team providing an array of business services such as planning and participating in job fairs, employer outreach, job development, and assisting in the education of workforce system partners on veterans programs.

JVSG grant staff also serve other populations of veterans in the State through MOUs. Those populations include:

National Guard and Reserve members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country;

Service-connected disabled veterans, who are targeted and identified through various Veterans Service Organizations (VSO), as well as outreach activities at Veteran Centers and Veterans Administration Medical centers;

Recently separated service member, who are targeted through Colorado's College Campus Outreach pilot program and through job fairs and hiring events;

Wounded and injured veterans, who are identified through the REALifelines program that staff coordinates, and through relationships established with the Wounded Warrior Program located at Fort Carson, Colorado;

Incarcerated veterans, who are identified and contacted through "in-reach" activities conducted within correctional facilities managed by the Colorado Department of Corrections. Veteran representatives will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders; and

Homeless Veterans - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP), providing one-on-one employment assistance and supportive services to homeless veterans to include,

but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job referrals.

### Unemployment Compensation Programs

Unemployment Insurance Division (UI) programs are operated by CDLE and work with both Workforce Development Program staff and Colorado Workforce Center staff. UI provides benefits to qualified dislocated workers to assist them with their financial needs during their work search. UI staff have partnered with system leaders to cross train workforce staff on the UI benefits systems, which allows for better distribution of information to jobseekers. In addition, UI operates the Reemployment Services and Eligibility Assessment (RESEA) and Links to Reemployment which focuses on engaging UI claimants within the first 5 weeks of their first UI Benefit payment by getting them physically into the workforce centers. This proactive strategy provides earlier workforce engagement and increased services to help expedite workforce reentry.

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[1] <https://www.colorado.gov/pacific/cdle/wfc>

## B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

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

### Strengths

Colorado's workforce system has many strengths. Colorado has transformed its workforce system into a business and industry driven model. The services and activities to unemployed, underemployed, and businesses outlined above are designed with the intent to meet local and statewide industry demands. Through initiatives including sector partnerships, career pathway development, data analysis, system collaboration, and work and learn programing, the workforce system has fully embraced the key principles of WIOA. Colorado has aligned business services through the statewide business services team and maintained a customer-centric approach for both jobseekers and businesses.

The vital element to this success is the understanding that workforce development is truly a multi-faceted approach harnessing workforce, education, economic development, and business. Examples of statewide and local collaboration among partners exist throughout Colorado. Alignment of resources and locally-specific co-location of services have allowed Colorado to have a flexible and proactive approach to workforce development by being able to create programs from the bottom up. Throughout Colorado there are numerous examples of "home grown" best practices that are shared through the e-Colorado online portal. Examples include:

Board member and workforce partner staff engagement program where they participate in a half day immersion program at the workforce center to receive a firsthand understanding of the customer flow and services available;

Onsite child care facilities and family friendly resources areas where customers can concentrate on skill building and career enhancement while their children and dependents are in a safe and secure environment;

Partnerships with K-12 education to assist schools with career exploration and providing information to the next generation of the workforce, enabling them to make educated and informed career decisions based on data and workforce demand; and

Collaboration with local media outlets such as radio and print media to market services and disseminate other workforce information.

Another key strength of Colorado's workforce development system is its alignment with the Colorado Office of Economic Development & International Trade (OEDIT). In 2011, the Colorado Blueprint was adopted as the state's economic development plan. The Blueprint featured 6 core objectives:

1. Build a Business-Friendly Environment
2. Retain, Grow, and Recruit Companies
3. Increase Access to Capital
4. Create and Market a Stronger Colorado Brand
5. Educate and Train the Workforce of the Future
6. Cultivate Innovation and Technology

Core objective five is led by the CWDC and tasks the CWDC to:

- Align the efforts of education, workforce training, and economic development across state agencies and stakeholders;
- Create a demand-driven workforce system matching Colorado's talent pool to upcoming needs of business;
- Prepare Colorado youth for full participation in the increasingly demanding and competitive economy; and
- Increase awareness of the availability of quality entrepreneurial training.

With this plan, CWDC and its partners have increased sector partnerships through their leadership. A Sector Steering Committee was established in 2011 and fostered the State's sector partnership philosophy. In 2013, the State held its first Sector Summit followed by another in 2014. The summit and committee's work supported 13 business-led sector partnerships statewide. A tool kit was created to assist local areas in the creation and retention of partnerships. Finally a step-by-step guide was released to outline how to create a data-driven and well-planned career pathway from inception through implementation.

#### Weaknesses

There is room for improvement in all things and the workforce system in Colorado is no different. Through stakeholder engagement, opportunities for enhancement were identified. These opportunities provide a platform for future initiatives and strategies. Opportunities include:

**Data Sharing - Connecting Colorado** allows access to some system partners but it does not function as the data management system across the board for all core, non-core, and system program partners. Additionally, not all labor market information, asset mapping, and other data is available statewide because of local area resources.

**Public Awareness -** The workforce system suffers from a lack of name recognition with both jobseekers and business. The lack of a unified language makes it difficult for the system to communicate its message to the public.

**Professional Development -** Workforce system staff need continuous professional development to be educated on current market conditions, as well as the latest initiatives and strategies. In addition, cross agency staff training would allow for increased knowledge of partner programs, creating a more holistic system.

**Consistency in Service Delivery -** There are opportunities to establish more consistency around elements of the service delivery strategies so customers can more easily navigate services within the system. Many examples of local best practices and successful strategic implementation exist, but there is a need to take these best practices and identify how, or if, they can be appropriately implemented in consistent ways throughout the state.

### C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

Colorado has implemented a workforce system designed to increase capacity to serve more customers. Led by the strategic vision set by Governor Hickenlooper and the Colorado Workforce Development Council, the functional design of the Colorado workforce system starts with housing five of the core programs in one state agency, allowing for optimal coordination in both strategic planning and operation execution. The recent addition of Vocational Rehabilitation under CDLE serves to further increase capacity and extend the alignment of the system

to a broader and more diverse population of jobseekers across the state. A streamlined customer experience through referrals from and to core, non-core, and program partners coordinates workforce activities and increases the capacity of each partner by allowing specialized services to function optimally and assist in the elimination of the duplication of services.

Furthermore, in an effort to reach more customers, partnerships were developed with libraries to increase capacity, especially in rural areas across the state. Beyond bricks-and-mortar, Colorado utilizes technology to increase access; examples include virtual job fairs, videoconferencing throughout the Colorado Workforce Centers, especially in rural areas, and resources available through Connecting Colorado.

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## B. STATE STRATEGIC VISION AND GOALS

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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

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Describe the State's strategic vision for its workforce development system.

Governor Hickenlooper has developed a three-year plan for Colorado known as Vision 2018 designed to ensure a healthy Colorado. A priority area for fulfilling this vision is developing world class education and training for a quality life and a strong workforce. The focus is on growing the middle class by helping people connect to careers. This overarching vision for the state is in alignment with the vision of the Colorado Workforce Development Council (CWDC), which is charged with aligning the efforts of economic development, education, workforce development, government and business stakeholders at the local, regional and state levels. The CWDC vision is that ***every Colorado business has access to a skilled workforce and every Coloradan has access to meaningful employment, resulting in statewide economic vitality.***

CWDC ensures the strategic vision for the workforce system remains relevant by convening partners, leveraging resources and working to remove communication and regulatory barriers in order to help businesses create jobs, retain jobs and access a highly competitive workforce. It is CWDC's mission ***to create and sustain a business-led Colorado talent system that appropriately integrates the work of economic development, education, training and workforce development to meet the needs of businesses, students, and job-seekers.***

### 2. GOALS

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

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

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\* Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible

migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

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

In order to fulfill Colorado's vision, the following goals have been developed based on the economic conditions of our state, future needs of industries, and the strengths of the system. Leadership of all of the programs in this combined plan crafted these goals based on input collected in focus groups and surveys from stakeholders throughout the state of Colorado. Achievement of these goals will not be possible without making significant strides in services to all customers, including youth and individuals with barriers to employment. Collectively, these goals create a focus on guiding all populations towards success in Colorado's economy.

**GOAL 1: ENGAGE BUSINESS AND INDUSTRY AS A FULCRUM TO INFORM AND ALIGN ALL ELEMENTS OF THE DEMAND-DRIVEN SYSTEM**

The Colorado workforce development system has built a strong foundation for itself in sector partnerships that have been launched, expanded, and sustained throughout the state. From this base, it is now time to increase business engagement within the system to an even greater level. Our first goal is to see sector partnerships taken to the next level with businesses buying-in - with their time, in-kind contributions, and financial resources - to inform relevant, demand-driven career pathways in Colorado. In designing or redesigning career pathways informed by our sector partnerships, we recognize that we need a better understanding of the value placed upon industry-recognized credentials by Colorado businesses. In understanding this, we will then be able to embed, stack, and ultimately promote these credentials in career pathways in a more resounding way. We also recognize that the career pathways informed by our sector partnerships must include work-based learning opportunities in order to remain relevant to business needs and will incorporate these strategies in career pathways and skill development programs.

**GOAL 2: ESTABLISH A CUSTOMER-CENTRIC AND HOLISTIC FOCUS TO INCREASE COORDINATION, EFFECTIVENESS, AND ACCESS THROUGH SHARED DATA, TOOLS, AND RESOURCES**

In order to derive significant value from our system, our business and jobseeker customers must be able to access an array of services and resources through a seamless experience. Our second goal is to establish a system that embraces a "no wrong door" philosophy at all levels. We have made progress on this front in business services; Colorado businesses can now experience the same eleven common services no matter where they are located in the state. We will apply the same LEAN process improvement approach we used to define the business services strategy to our jobseeker and youth services to understand where resources can be aligned, efficiencies can be gained, and opportunities to increase access can be seized.

We know, however, that further integration and alignment of services must be supplemented by increased coordination among data systems and tools. We will explore opportunities, for example, to streamline Connecting Colorado and increase partners' access to information.

**GOAL 3: ENGAGE PARTNER STAFF AT EVERY LEVEL FOR BETTER SYSTEM ALIGNMENT**

Throughout the process of developing goals and strategies for this plan, there was significant engagement and collaboration among state-level program leaders. It was also clear through focus groups throughout the state that there is strong collaboration and coordination among local decision makers. But, we need to engage more staff from all partner programs in system alignment efforts. From state-level leadership to front-line staff in the Colorado Workforce Centers, the third goal for Colorado's WIOA Combined State Plan focuses on including all levels of staff in efforts toward system alignment. This will include a heavy emphasis on professional development and cross-education on all programs, but will also include

providing more opportunities for staff within the system to provide input and insights gained through their first-hand experiences with customers.

#### **GOAL 4: CREATE AND DELIVER A UNIFIED MESSAGE FOR INTERNAL AND EXTERNAL COMMUNICATION**

As the Colorado workforce development system becomes more and more aligned, we have identified the need to increase the consistency in internal and external messaging about the value and benefits of the system. Goal 4 is focused on defining the Colorado workforce development system's "brand promise" for both internal stakeholders and external stakeholders. We will identify strategic messages targeted toward specific internal and external stakeholders and also explore ways to promote the return-on-investment of workforce programs.

#### **GOAL 5: DRIVE MEANINGFUL OUTCOMES THROUGH INNOVATION, ALIGNMENT OF METRICS, AND ACCOUNTABILITY**

In focus groups throughout the state and in planning sessions with state leaders, we identified that the innovation within the workforce development system is often stifled by limited resources and/or misaligned measurements of success. Colorado's final goal is to create a workforce development environment that embraces innovation and achieves meaningful outcomes for businesses and individuals. We will look to launch pilot programs to test new strategies while measuring the effectiveness of these strategies. We will also focus on looking beyond our WIOA common measures and identify additional indicators of system-wide success (see Governor's Vision 2018 described below).

**TARGETED POPULATIONS:** Additionally, Colorado will continue its efforts to serve individuals with barriers to employment. In August of 2014, Colorado worked with ETA Region IV to identify target populations and establish service goals. Colorado committed to increasing the total number of new participants served in each category year over year, beginning with the baseline period of April 1, 2013 - March 31, 2014.

A cross-functional work group comprised of state and local staff was convened to identify and implement strategies for achieving the above stated goal. Colorado has utilized, and will continue to utilize, the following strategies for identification, outreach, recruitment, and service delivery for individuals with barriers to employment:

- **Data Quality** - It is imperative that processes for the collection and reporting of relevant data are functioning effectively in order for Colorado to reliably demonstrate service to targeted groups. The aforementioned work group reviewed the functionality of Colorado's data management and reporting system to ensure its capacity to accurately gather and report this information.
- **Streamlining Intake** - The work group studied the various intake processes in Colorado's local workforce areas with an eye toward maximizing customer value and minimizing waste. The group recommended that unnecessary steps, forms, and functions be discontinued.
- **Partnerships** - Reaching and serving our state's most vulnerable populations requires strong, effective working relationships among the programs and agencies that make up Colorado's talent development system. State staff has worked, and will continue to work, to foster these partnerships in order to build referral systems and collaborative service delivery platforms that allow for quality wraparound services.

The following charts detail Colorado's progress in serving the agreed-upon population groups:

#### **Active Title I Adults**

	4/1/13 - 3/31/14	4/1/14 - 3/31/15	4/1/15 - 3/31/16	4/1/16 - 3/31/17	4/1/17 - 1/31/18
Not HS Graduates	49	80	145	205	150
Low Income	978	1294	1643	1807	1105
Offender	146	260	348	439	279
Single Parent	340	418	506	652	382
Veteran	195	216	260	175	129
Public Assistance (not TANF)	442	617	912	1110	657

### Active Title I Dislocated Workers

	4/1/13 - 3/31/14	4/1/14 - 3/31/15	4/1/15 - 3/31/16	4/1/16 - 3/31/17	4/1/17 - 1/31/18
UI Exhaustee	38	75	130	95	44
Veteran	131	124	247	192	77
Single parent	157	138	224	218	97
Displaced Homemaker	18	23	46	37	17

### Active Title I Youth

	4/1/13 - 3/31/14	4/1/14 - 3/31/15	4/1/15 - 3/31/16	4/1/16 - 3/31/17	4/1/17 - 1/31/18
Out-of-School Youth	813	850	1540	1409	1040
Dropout	403	428	760	785	592
Offender	201	182	331	280	195
Basic Skills Deficient	775	767	1208	1046	585
Pregnant or Parenting	231	225	435	414	293

### 3. PERFORMANCE GOALS

Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Performance measurements are negotiated annually with the US Departments of Labor and Education. Colorado has developed proposed targets for the applicable performance measurements for PY 18 and PY 19. These proposed targets are included in Appendix 1, and are subject to change in each program year based on the negotiation process with the federal departments.

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#### 4. ASSESSMENT

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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.

During the first program year of this state plan, assessment plans will be developed by the CWDC in partnership with all system programs. The assessment plans will include measureable goals, progress benchmarks, and specific indicators that will be used to monitor progress. Through ongoing WIOA Implementation Team meetings strategies will be assessed for their performance and the implications of that performance on the system overall in relationship to the overarching goals and specific program performance measurements.

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#### C. STATE STRATEGY

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

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

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#### SECTOR STRATEGIES

Colorado has been modeling sector partnerships for nearly ten years as a framework for economic and workforce development by investing in regional, public-private partnerships targeting key industries that are vital to our regional economies. We know that businesses within a single industry share common needs - recruiting and retaining talent, training and advancing workers, and increasing productivity and work quality, for example. A Sector Partnership is an industry-led effort that collectively defines common opportunities and challenges, and connects these businesses with workforce, education, and economic development partners to create solutions that improve the businesses' bottom line. As we look to the next four years, our focus is on continually enhancing and expanding the network of Sector Partnerships in Colorado to support key industries. Additionally, through funding, resources, and technical assistance, a focus is being placed on Sector Partnerships leading efforts to build Career Pathway Systems.

#### BUILDING INDUSTRY-DRIVEN CAREER PATHWAYS SYSTEMS IN COLORADO

The Colorado Model: In Colorado, industry-driven career pathways ensure that education, training, and workforce systems stay deeply attuned and responsive to the needs of the labor market, preparing students and workers with the skills and credentials they need for jobs and careers.

- What is a career pathway system? A career pathway system aligns public partners and engages them in a continuous conversation that is led by industry to ensure that jobseekers and students move seamlessly through and among support programs, educational institutions, training

opportunities, and work-based experiences to build skills and credentials that meet industry demand and prepare them for jobs and careers. In Colorado, a sector partnership is the vehicle for building industry-driven career pathway systems, providing a forum for productive and ongoing collaboration with industry and among workforce, education, training partners, and other community partners. In Colorado, the statewide career pathway system aligns career pathway programs and systems developed throughout high demand industries in each economic development region of the state.

- What's the difference between a career pathway system and a career pathway program? A career pathway program offers a clear sequence of stackable credits and credentials, combined with support services, that enables students and jobseekers to secure industry-relevant skills, certifications, and credentials and advance to higher levels of education and employment in high demand occupations.[1] A career pathway system is made up of multiple career pathway programs that span educational institutions, workforce and support service partners. These programs are all oriented around a shared understanding of the needs of industry. Often times, tools like career pathway maps are used to talk with students and job seekers about how they can progress through education and training experiences to obtain employment that meets his or her goals. Statewide career pathway maps focusing on the top industries in Colorado will be accessed on College in Colorado.
- What is a sector partnership and why do they matter for career pathway systems? In Colorado we've defined a sector partnership as an industry-specific regional partnership led by business in partnership with public partners in economic development, education, workforce development and community support partners. In Colorado, industry-led sector partnerships are the vehicle for aligning public partners with industries' needs in an effective, results-driven manner. They provide the "home" for career pathway systems-building, engaging industry leaders and public partners in a continuous dialogue to ensure that education and training systems respond to industry needs.

#### SUMMARY: STEP-BY-STEP GUIDE TO BUILDING REGIONAL CAREER PATHWAY SYSTEMS

**1. Build a regional, industry-led sector partnership** as the vehicle for productive engagement with industry leaders and the starting place for career pathways systems-building. Use the sector partnership—specifically, the education, talent or workforce committee—as the driver of career pathways systems-building efforts.

- **Goal:** Establish strong industry ownership over career pathway development. Beyond asking for one-time input into a program, engage industry as full partners in building and contributing to a talent development system that will prepare the workforce they need, now and in the future.
- **Outcome:** A core group of committed industry leaders willing to champion the development of a career pathway system for industry.
- **Role of business leaders:** Identify and champion talent development as an important priority for the growth and competitiveness of their sector.
- **Role of public partners:** Working as a regional team, partners from education, workforce, and economic development collaborate with industry to launch and support an industry-led partnership.

**2. Build out a career pathway support team of non-industry, partners** and prepare them with the right expectations. Non-industry public partners might include key decision makers in workforce development, secondary education, post-secondary education, human services, vocational rehabilitation, and other community partners. This includes what they will get from employers: real-time information on critical occupations and competencies as well as a willingness to partner in providing work-based learning and other training resources. It also includes a clear explanation of how they're expected to work together as workforce, education, and training systems to respond to industry demand.

- **Goal:** Build buy-in and support among workforce, education, training partners, and other community support partners preparing them to develop a coordinated response to industry’s talent needs.
- **Outcome:** A career pathway “support team” made up of workforce, education and training partners, human service, vocational rehabilitation, and other community support partners. This team will act as the joint decision-making body for responding to industry needs and determining how systems and programs should connect to one another at each level of a career pathway to collectively meet the needs of the targeted industry.
- **Role of business leaders:** None at this point.
- **Role of public partners:** Recruit workforce, education and training partners to participate on the career pathway support team, ensuring participation from key programs that prepare students and workers for in-demand careers in the targeted industry and provide them with the necessary supports to be successful in the career pathway.

**3. Identify critical occupations** based on labor market data and qualitative input from employers.

- **Goal:** Target a set of occupations that industry leaders agree are critical.
- **Outcome:** A list of occupations that industry agrees are critical; new support team members, drawing from education and training programs that relate to the targeted occupations.
- **Role of business leaders:** Convene to review labor market data and agree on a set of occupations that are critical to the industry.
- **Role of public partners:** Listen to industry-led conversations and consider opportunities to adapt programs to more closely align with industry needs as well as potential linkages across programs.

**4. Inventory relevant education, training, and workforce programs** that prepare students and workers for those occupations, mapping any existing linkages among those programs.

- **Goal:** Identify what programs already exist and start to identify gaps that need to be filled in order to best meet the demands of industry, students, and workers. Build out the career pathway support team with leaders from those programs.
- **Outcome:** An inventory of education and training programs that prepare students and job seekers for the critical occupations identified by industry. A support team including relevant workforce, education, training and support programs.
- **Role of business leaders:** Vet the program inventory to ensure key partners are included.
- **Role of public partners:** Inventory and document all education, training and workforce programs that have a role to play in preparing students and jobseekers for the targeted industry. Take stock of any existing linkages among programs (e.g. articulation agreements or dual enrollment) and begin to identify opportunities for stronger linkages among programs. Recruit new support team members, drawing from those programs.

**5. Understand critical competencies required to perform effectively on the job.** Industry-defined competencies are the specific knowledge, skills and abilities that industry leaders have collectively identified as being critical to performing a specific occupation or group of occupations effectively. Based on these competencies, develop occupational descriptions that both inform employers’ hiring practices as well as education and training partners in modifying curriculum and assessing students.

- **Goal:** Get the real story from employers about what is required to perform on the job, identifying both foundational and task-specific competencies.
- **Outcome:** Occupational descriptions for each targeted occupation, written to inform employer hiring practices as well as curriculum, program design, and program offerings.

- **Role of business leaders:** For each targeted occupation, hiring managers and high-performing employees convene to identify competencies. Business leaders also identify ways to contribute work-based learning experiences to pathways.
- **Role of community partners:** Partners listen in to sessions with hiring managers and high-performing employees to identify specific opportunities to strengthen existing programs and build stronger linkages across programs to align with industry needs.

## **6. Build career pathway programs that prepare students and jobseekers with critical, competencies.**

Based on an understanding of what competencies are required to perform effectively and advance in the industry, build career pathway programs that prepare students and jobseekers with those critical competencies. This includes building linkages among programs and institutions, integrating support services into programs, and augmenting classroom training with work-based experiences throughout the pathway.

- **Goal:** Develop seamless linkages among programs and institutions that support students and job seekers in building the competencies, credits, credentials they need to secure jobs and careers in the targeted industry.
- **Outcome:** Career pathway programs that target high-demand occupations or groups of occupations.
- **Role of business leaders:** Advise community support partners on career pathway program development. Contribute work-based learning opportunities.
- **Role of community partners:** Build stronger connections across programs and institutions to help students move seamlessly through pathways and ensure that competencies are developed that meet the needs of businesses. Advise students and job seekers on pathways that include training and supports needed to successful in critical occupations.

## **7. Share Career Pathway with Students and Jobseekers**

- **Goal:** Use career pathway system to equip students and jobseekers with the relevant critical skills for high demand jobs. Use assessments and career pathway maps to help students and job seekers identify industries of interest and map out a path that includes the relevant training and work experience to be successful in their chosen career.
- **Outcomes:** Training, support and guidance for students and job seekers that aligns with the needs of industry.
- **Role of business leaders:** Hire students and job seekers for critical occupations. Provide public partners feedback about incoming skills and preparation of new employees.
- **Role of public partners:** Implement career pathways and help students and job seekers effectively navigate career pathways, incorporating supports as needed. Collect and apply feedback from business, students, job seekers to refine programs and ensure they maintain alignment with needs of industry and are relevant and accessible for students.

**8. Create a system for continuous improvement.** Use the sector partnership as the place to continuously develop and update your career pathways system. This includes ongoing conversations with employers to identify and understand high-priority workforce needs as they evolve, and continued collaboration among public partners to develop and update a systems approach in response.

- **Goal:** Keep career pathways updated and relevant, ensuring education and training systems stay attuned and respond to the changing needs of the labor market.

- **Outcome:** Career Pathways Action Plan, with employer champions and support partners committed to specific actions that align education and training with industry needs and support students in building skills and earning credentials with labor market value.
- **Role of business leaders:** Provide on-going feedback to ensure career pathways programs are aligned with the current needs of industry. Continue to contribute to career pathway programs through work-based learning.
- **Role of public partners:** Update career pathway programs to maintain relevance and alignment with industry needs. Continue dialog with other public partners to continue building and refining career pathway programs to ensure that they are responsive to the needs of industry and relevant and accessible to students and jobseekers.

## APPENDIX: DEFINING TERMS

### **Career Pathway System**

A career pathway system engages education and training providers in a continuous conversation with one another and with industry to ensure that students move seamlessly through and among educational institutions and work-based experiences to build skills and credentials that meet industry demand and prepare them for jobs and careers.

### **Career Pathway Program**

A career pathway program is a set of stackable credits and credentials, combined with support services, that enables students to secure industry-relevant skills, certifications, and credentials and advance to higher levels of education and employment.

### **Career Pathway Map**

An online or paper map of how occupations connect to one another and what education and training is needed to prepare students or jobseekers for occupations.

### **Sector Partnership**

An industry-specific regional partnership led by industry in partnership with public partners.

### **Public Partners**

A regional group of non-industry partners engaged in a sector partnership who work together to develop a coordinated response to the needs of industry. Partners include decision makers in workforce development, secondary education, post-secondary education, human services, vocational rehabilitation, and other community partners.

### **Industry-defined competencies**

The specific knowledge, skills and abilities that industry leaders have collectively identified as being critical to performing a specific occupation or group of occupations effectively. These competencies are both foundational and task specific.

### **Work-based Learning**

A critical component of career pathway programs is work-based learning. Embedding work-based learning opportunities into the context of a guided program that comes with supportive services and yields stackable credentials creates the best outcomes for job seekers. This component is critical enough that it requires a specialized focus in this state plan.

Colorado's labor market is evolving faster than ever, demanding a labor force with a flexible and continuous approach to developing and upgrading skills. Addressing the evolving needs of businesses and ensuring Coloradans have pathways to the middle class requires:

- Ongoing learning and skill development opportunities for individuals
- Building and leveraging cross-sector public-private partnerships
- Support for the education and training system in the development of stackable credentials aligned with the demands of industry

We know that one of the most effective ways to prepare individuals for jobs is to give them real world experience. Work-based learning is a strategy that combines skill development with real world training opportunities. Apprenticeships and other work-based learning activities create opportunities for youth and adults to develop the skills needed to succeed.

Colorado has designed a Work-based Learning Continuum that illustrates the variety of work-based learning activities that can be pursued, as well as the dynamics of which activities are housed primarily within educational entities, which are located on a job site. As practitioners have begun utilizing this tool, it has brought clarity about the roles of different stakeholders and enhanced communication between the partners.

The number of initiatives focused on accelerating the creation of work-based learning opportunities continues to grow. To highlight a few of the key initiatives underway in Colorado:

- **CareerWise Colorado** is a high school apprenticeship program, which welcomed its inaugural cohort of students in the fall of 2017, with 121 students apprenticing across 42 businesses.
- **Registered Apprenticeships(RAs)** through the USDOL Registered Apprentice System, is working to expand the types of occupations and the number of opportunities in high-demand fields.
- In 2015, House Bill 15-1230 created the **Innovative Industries Internships** Workforce Development Program, now known as the Innovative Industries Internship Program, to incentivize employers in growing Colorado industries to increase paid internships and support a consistent and experienced talent pipeline.
- **Denver Opportunity Youth Initiative**, supported by the Denver Metro Chamber of Commerce, is aimed at providing education, career opportunities and support systems to opportunity youth by partnering with nonprofit, government, and business organizations to create a pipeline to meaningful work experiences and careers.

Finally, Colorado has created a definition of a *Thriving Work-Based Learning Community*. This concept is defined as a community that understands the problems plaguing their talent pipeline, recognizes the value in business-led work-based learning as a solution, and works collaboratively to effect systemic change. Work-based Learning Communities can exist in one of four phases: Exploring, Emerging, Demonstrating, and Thriving. The phase a specific community is in, is based on the activities that are in place across seven domains: Leadership, Needs Analysis, Asset Mapping, Stakeholders, Resources, Communications, and Evaluation. Financial resources are being devoted to local communities seeking to build the infrastructure necessary to make this work happen.

### Two-Generation Approaches

Career Pathway Programs are also more sustainable and effective for job seekers when a two-generation approach is taken and the entire family is served through programming and relevant resources. Colorado joined an NGA Policy Academy on two-generation strategies in 2017 and has created a state guide that supports the implementation of best practices. Workforce Development Boards are encouraged to consider

two-generation approaches within their programs to design partnerships with other agencies and service providers that can seamlessly meet the needs of the whole family.

### Early Childhood Education

A component of two-generation approaches often involves meeting the childcare needs of children ages 0 - 5. When a parent does not have a trusted, affordable provider of care for their children, they cannot engage effectively in work, education, or training programs. Yet, many communities do not have adequate childcare space available due in part to a lack of access to an effective, consistent childcare workforce in whom families can place their trust, and with whom young children can thrive. The lack of affordable childcare has become an economic issue in Colorado, as it is a contributing factor to the supply issue that companies are facing for talent.

Solutions are best designed by local communities that take into account the unique circumstances of an area. Workforce Development Boards are encouraged to partner with Early Childhood Councils and local programs to examine ways they can impact this issue in their community. *Colorado's Early Childhood Workforce 2020 Plan* specifically names local boards as potential partners in the efforts to recruit and retain a high quality workforce, and the plan contains strategies that can be pursued in the next three years.

### Employment First

Career Pathways will fall short of meeting the talent needs in Colorado if they are not available to all potential employees, including individuals with disabilities. Colorado has enhanced its focus on mobilizing the untapped talent of individuals with disabilities by enacting state legislation regarding the concept of Employment First. Employment First is based upon the premise that all people, including people with the most significant disabilities, are capable of full participation in employment and community life. It includes:

- The prioritization of employment as the first and preferred outcome for all working-age persons with disabilities, regardless of level of disability;
- A state-level systems change framework, resulting in increased, successful employment outcomes for people with disabilities;
- The alignment of employment-related policies, service delivery practices, and service funding structures between state agencies; and
- Promoting employment as defined by WorkForce Innovation and Opportunity Act language describing Competitive Integrated Employment (employment within businesses typically found in the community with regular compensation, the same opportunities for advancement and interaction with nondisabled coworkers to the same extent as other employees in comparable positions interact, i.e., a fully integrated workplace).

In 2017, the Employment First Advisory Partnership (EFAP) was convened, representing a multi-disciplinary state team with a focus on implementing the Employment First approach with fidelity through the alignment of policies, coordination of resources, and updating of service delivery models to facilitate increased integrated employment outcomes for people with disabilities, including people with the most significant disabilities. A strategic plan was released by the partnership that includes recommendations for actions that the state and local communities can take to make Employment First a reality throughout Colorado. As state and local plans and programs are developed, these concepts should be taken into consideration in order to design the best workforce system possible that works for all Coloradans.

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[1] The WIOA definition of a career pathway refers to a career pathway program: “a combination of rigorous and high-quality education, training, and other services.” WIOA also tasks Local Workforce Development Boards with facilitating the development of career pathway systems: “The vision for the Local

Workforce Development Board (Local Board) is to serve as a strategic leader and convener of local workforce development system stakeholders.” (Notice of Proposed Rulemaking §679.300). “The local board, with representatives of secondary and postsecondary education programs, shall lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment. (WIOA, Sec. 107(d)).”

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).

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Strategic Goals for 2016 - 2019

Goal 1: Engage business and industry as a fulcrum to inform and align all elements of the demand-driven system

**Strategy 1.1** - Expand regionally-focused sector partnerships that are championed by business and Industry to drive career pathways

**Strategy 1.1(a)** - Cultivate ownership from business and industry to leverage influence and resources; and

**Strategy 1.1(b)** - Design and disseminate multiple career pathways that enable Coloradans to have a clear roadmap for success.

*Rationale*

Since 2011, Colorado has been a national leader in creating and sustaining a state-wide sector strategy driven by regional sector partnerships. To date, however, there have not been *systemic* connections between career pathways offered by education and training providers and the sector partnerships in Colorado that are identifying skill needs and workforce trends. Over the next four years, we will encourage sector partnerships to focus on their role in informing career pathway development for youth, adults, and individuals facing barriers to education and employment by promoting a recently developed framework and offering tools, resources, and technical assistance. Furthermore, while industry continues to come to the table for this sector partnership work, we need them to “set the table” and truly drive the agenda of each partnership. This means more buy-in from business and industry - whether that is through commitments of time, in-kind contributions, or financial resources. This will be another priority as we expand sector partnerships throughout Colorado.

**Strategy 1.2** - Develop and implement a full spectrum of work-based learning opportunities to be deployed broadly across sectors.

*Rationale*

### *Rationale*

We hear more and more from businesses that they need talent with the necessary knowledge and skills as well as the ability to *apply* those skills. Work-based learning opportunities provide students and working learners exposure to the workplace, where they can not only utilize the knowledge and skills they are developing or have previously developed in the classroom but also develop employability skills. For these reasons, and because we also know that work-based learning opportunities facilitate connections between Colorado companies and Colorado talent, we believe a full spectrum of work-based learning opportunities ranging from short-term externships to structured on-the-job training to formal apprenticeships should be available. Over the next four years, we will develop a framework for different models of work-based learning and corresponding tools needed by employers and/or educators to implement these models widely throughout the state and across multiple sectors. Building on the launch of the Work-based Learning Continuum at the 2017 talentFOUND Sectors Summit: Accelerating Work-based Learning, Colorado will establish a community of practice to engage system stakeholders and practitioners, support the development of thriving work-based learning communities, and actively promote the development of apprenticeships for youth and adults in in-demand industries.

**Strategy 1.3** - Support collaboration between business and education to understand the value of stackable industry recognized credentials.

### *Rationale*

As professionals in the workforce system, we fully believe in the value of industry-recognized credentials and their importance within career pathways. However, our business and industry partners are not consistently familiar with the knowledge, skills, and abilities these credentials represent. Moving forward, we will leverage the state's sector partnerships to understand the currency industry-recognized credentials hold within the Colorado labor market and identify strategies to increase businesses' awareness of them so they become embedded within hiring practices.

Goal 2: Establish a customer-centric and holistic focus to increase coordination, effectiveness, and access through shared data, tools, and resources

**Strategy 2.1** - Adopt LEAN principles for the implementation of cross-partner strategies/services to increase efficiency, accessibility, and coordination of job-seeker services.

### *Rationale*

In identifying common business services, the statewide Business Services Team utilized LEAN principles to identify opportunities for improvement and efficiency. We will adopt this methodology as partner agencies and programs work toward greater system alignment with particular attention toward job-seeker services. As with business services, we will convene a working group with representatives from all partners included in this plan to first identify general areas of opportunity for more coordinated services/strategies and then apply LEAN principles to these topic areas. Of particular interest, in addition to key customers, will be identifying ways technology can be streamlined and/or leveraged to increase access to services and how it can improve individuals' experience in the system.

**Strategy 2.2** - Enhance the alignment of business services across all partner programs.

### *Rationale*

*Rationale*

One of the Colorado workforce development system's recent successes has been the intentional focus on streamlining the services available to businesses throughout the state. The identification and local implementation of eleven common business services signals strong collaboration among partners; but, more partners can be engaged. Currently, the statewide Business Services Team is incorporating the WIOA core partners and the services they represent. By expanding a consistent business services strategy to partners from other programs and agencies, the services offered to businesses will be more comprehensive.

**Strategy 2.3** - Develop and implement a technology solution or other methods for data coordination and information sharing across program partners.

*Rationale*

The current array of data systems that are used by partners do not lend themselves to the information sharing and transparency that are needed for true system alignment. While data sharing agreements exist as a starting point, we will explore ways to integrate data systems and/or share information more effectively to eliminate duplication of services, dual data entry, and customer frustrations. In doing so, however, we will be cognizant of the various program requirements, confidentiality, and previous investments made by partners and look for ways to build upon and/or link existing infrastructures rather than create new ones.

**Strategy 2.4** - Engage with community-based partners within the Talent Development Network to align the implementation of system activities and meet the supportive services needs of job seekers.

*Rationale*

The needs of job seekers often extend beyond the limited financial resources of programs within the public workforce system. Integration with outside partners is necessary to build the robust pathway programs that can meet the needs of the customers with significant barriers.

**Strategy 2.5** - Promote the adoption of 2-Generation models to combat poverty among all partners in the one-stop delivery system.

*Rationale*

Colorado has been a national pioneer in utilizing 2Gen strategies to address the impacts of intergenerational poverty. Well before the term "2Gen" was coined, innovative local and county leaders started embracing a holistic approach to working with children and their parents—providing access to a comprehensive set of services, including education, economic supports, social capital, and health care—to put entire families on the path to permanent economic security. Workforce development is a critical partner for 2Gen strategies to work and, through cross-sector collaborations, we can collectively achieve our overall 2Gen vision: "a state in which families, government, businesses and service providers are working together to achieve a holistic, strength-based approach to empowering families to strive for healthy, successful lives."

**Strategy 2.6** - Promote the adoption of competency-based hiring, education, and training to maximize opportunities for untapped talent to succeed in the labor force.

*Rationale*

### *Rationale*

Colorado is facing a skills gap that, if unaddressed, will diminish the ability of the economy to grow and limit the upward mobility of individuals throughout the state. Shifting our talent development network to embrace a competency-based approach to hiring, education, and training has been identified as a key strategy to address this gap and keep Colorado's economy and its citizens moving forward. A competency-based approach is necessary because skills are the best predictor of a successful hiring outcome and competency-based models expand access to education opportunities beyond high school. As a state, our system is pursuing four outcomes that, when achieved, will ensure that competency-based models are engrained throughout the talent development network.

Goal 3: Engage partner staff at every level for better system alignment

**Strategy 3.1** - Implement continuous professional development for staff from all partner programs to elevate internal expertise and professionalism and to equip them with the tools necessary to operate a comprehensive, holistic approach to talent development.

### *Rationale*

In order to have a customer-centric workforce system, staff within the workforce development system must 1) understand and buy-in to the "no wrong door" philosophy and 2) be equipped with the knowledge, information, and tools to guide customers through the system. This will require cross-education of staff on the different programs, resources, and processes that exist to support business and individual customers. We will ensure staff at all levels - from front-line staff to program managers to executive level leadership - are well-versed in the services the system offers and we will launch an intensive professional development effort aimed at elevating their professional skills and simultaneously promoting a collaborative, "no wrong door" philosophy.

**Strategy 3.2** - Create opportunities for staff at all levels to engage in continuous improvement efforts, leveraging their first-hand experience and unique perspectives to inform the processes.

### *Rationale*

As mentioned in Strategy 2.1 and 2.3, we will look for opportunities to expand the business services strategy to additional partners and apply LEAN principles to uncover opportunities for improvement and/or alignment within our services to individual customers. In doing so, we will actively engage staff at all levels within the system to gather input and ideas from those working first hand with customers. We will also establish a method for staff at all levels to participate in the ongoing continuous improvement efforts of Colorado's workforce development system. Whether they are identifying improvements that need to be made or offering solutions to common challenges, staff will have opportunities - either virtually or perhaps via in-person forums - to share their ideas and be a part of the solution.

**Strategy 3.3** - Streamline active workgroups across the system to maximize staff participation and contributions from local partners.

### *Rationale*

Colorado succeeds through a bottoms-up approach that values the input of all system stakeholders. That philosophy encourages ideas to be explored and solutions developed by workgroups that combine local staff members from multiple areas and state-level staff when reasonable. Staff-level workgroups were developed shortly after WIOA was passed, and the amount of activity has mushroomed through implementation. As federal financial resources are becoming more limited, it is critical to streamline workgroup activity to ensure the effectiveness of everyone involved.

Goal 4: Create and deliver a unified message for internal and external communication

**Strategy 4.1** - Establish a brand for the Colorado workforce development system that represents the vision and strategies of the WIOA combined partners.

*Rationale*

With this WIOA Combined State Plan, the Colorado workforce development system finds itself on the verge of transformation. The goals and strategies within this plan position the system to engage new partners, become more aligned through a “no wrong door” approach (Strategies 2.1, 2.2, and 2.3), test new ideas (Strategy 5.2), upskill its staff (Strategy 3.2), and truly understand its value (Strategy 4.3). Singularly, these changes would be significant. Together, they will result in a new workforce development system. The system’s brand needs to reflect these changes so customers, as well as internal and external stakeholders, recognize the value they are able to derive by engaging with Colorado’s workforce system.

**Strategy 4.2** - Define the key messages and brand promise for target audiences.

*Rationale*

As the Colorado workforce development system defines its brand, we will also define key messages for target audiences of the system. As the system transforms, there will be both internal audiences and external audiences that need to be aware of and bought-into the new philosophy and brand promise. These audiences are outlined below.  
Internal audiences: Workforce Development Board members State-level program administrators Local-level program administrators and sub-grantees Program-specific staff System-wide front-line staff Federal workforce partners  
External audiences: Businesses Adult job seekers Youth Individuals with barriers to employment Elected officials and policy makers Education and training providers Economic development organizations

**Strategy 4.25** - Fully adopt the TalentFOUND brand of the talent development network and utilize it for collaborative brand messaging across WIOA partners.

*Rationale*

Work on Strategies 4.1 and 4.2 has taken place and resulted in the launch of talentFOUND as the brand for the Colorado talent development network, including but not limited to the workforce development system. Collaborative messaging has been introduced, but all local and state WIOA partners have not yet fully embraced the concept. The next phase of implementation will include targeted support to utilize the talentFOUND brand across WIOA partners. Full adoption will result in a common understanding of the workforce system and an easily identifiable way for individuals and businesses to connect with that system.

**Strategy 4.3**- Explore ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.

*Rationale*

Workforce professionals see every day the value the system brings to our customers and our communities. We know that for every tax-payer dollar spent, there is significant return. But, we need to understand the actual return-on-investment of the workforce system if we are to promote its value to external stakeholders such as economic development partners, business and industry, elected officials, funders, and the like. We will look to learn from other states, communities, and government programs that have calculated their programs’ return on investment as a starting point. We will then explore methodologies that will capture Colorado’s unique system.

Goal 5: Drive meaningful outcomes through innovation, alignment of metrics, and accountability

**Strategy 5.1** - Adopt system-wide outcome metrics to portray an accurate depiction of the workforce system, which will be used for planning and implementation of system services.

*Rationale*

**While our core programs are held accountable to the common measures, each partner has nuanced definitions of success beyond these measures. We will seek to understand the ways each partner defines success for their program and largely for the workforce system by first mapping the metrics for each partner and identifying opportunities for alignment. With this foundation, we will work toward consensus on system-wide outcome measures to which each partner program can contribute. As described in this report, Governor Hickenlooper has established a Workforce and Education Scorecard in his Vision 2018 plan that can provide a starting point for system-wide outcome metrics.**

**Strategy 5.2** - Utilize partner relationships to implement meaningful pilot programs that foster an environment of innovation.

*Rationale*

**In order to improve and also keep pace with the changing economy, the Colorado workforce development system must encourage innovation and new ways of doing business. Untested ideas, however, can be risky when not managed responsibly. In order to mitigate risks, we will develop ways to engage our system partners and other external partners from economic development, higher education, and community-based organizations to conduct pilot projects to test innovative ideas and new strategies. These pilot projects will emphasize evaluation and outcome measurement to truly understand the impacts on our customers, communities, and the system itself. Those that prove successful will provide our system with models that can be scaled or replicated in other areas.**

**Strategy 5.3** - Publish a digital dashboard highlighting results and value of the system.

*Rationale*

**The PY16 WIOA Annual Report was the first collaborative report developed with all core programs under WIOA. It demonstrates the extensive progress that has been made against the goals in this state plan, but a 12 page narrative document is not conducive to all audiences. Creating and publishing a digital dashboard will allow better access to data on the activities outlined in this plan and allow for real-time information to be shared with the public.**

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### III. OPERATIONAL PLANNING ELEMENTS

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The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State’s strategy and the system-wide vision described in Section II.(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

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#### A. STATE STRATEGY IMPLEMENTATION

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The Unified or Combined State Plan must include—

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##### 1. STATE BOARD FUNCTIONS

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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 Colorado Workforce Development Council (CWDC) comprises business, workforce, and government representatives from throughout the state who represent key industries and programs instrumental in the successful implementation of the public workforce development system in Colorado. The CWDC is administratively housed within the Colorado Department of Labor and Employment and serves as a coalition of the state departments of Education, Higher Education, Economic Development and International Trade, Human Services, Corrections, Local Affairs, and others. All members are appointed by the governor to a three year term and per bylaws members can serve two terms.

The full council meets in person three times a year to discuss and approve strategy and policies, observe successful initiatives in action in various locations across Colorado, and generate solutions to issues facing the system. The CWDC has an active executive committee, which meets four times per year, as well as an Industry Committee, an Education & Training Committee, and an Advocacy Committee that meet throughout the year, each of which have sub-committees and task groups made up of local and state partners working together on specific strategies. A list of all board members can be found on the CWDC web site. ([www.colorado.gov/cwdc](http://www.colorado.gov/cwdc)).

The CWDC is supported by an executive director and a staff of 10 people that are involved in day-to-day implementation of key initiatives. On an ongoing basis, staff members develop and implement workplans that operationalize the required functions of the state board. Information is brought to the CWDC at regular meetings for action and to the Executive Committee as appropriate. Information is communicated to the public through quarterly newsletters and regular updates to the CWDC’s web site ([www.colorado.gov/cwdc](http://www.colorado.gov/cwdc)).

With the increased focus on work-based learning as a critical element in Career Pathways, the CWDC also partners with and supports the Governors Business Experiential Learning Commission (BEL). The executive director and chair of the CWDC both serve as BEL Commissioners, and the CWDC staff provides support to the commission, committees and work groups of the BEL.

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##### 2. IMPLEMENTATION OF STATE STRATEGY

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

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#### A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE’S STRATEGY

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

Colorado has a long history of coordinated implementation as a result of the Governor's 1996 Executive Order to integrate employment and training services in local One-Stop Delivery systems. All state policies that have followed have been designed to ensure that the local workforce areas and key partners are aligned with the strategic direction of USDOL, the Governor, and the Colorado Workforce Development Council. Colorado has excelled as one of three demonstration states for devolving Wagner-Peyser services to locally administered merit systems, fully embracing the key principles of the Workforce Innovation and Opportunity Act. This has allowed our statewide network of locally operated workforce centers to achieve total integration of Workforce Investment Act, Wagner-Peyser, veterans, and Trade Act employment and training programs, as well as launch state and local partnerships with TANF, SNAP, Adult Education and Family Literacy, Vocational Rehabilitation, and other required partners for the one-stop system.

With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs comes together monthly as an Implementation Team to provide guidance on the work and make commitments to specific actions necessary for moving forward. MOUs between agencies will be implemented as needed to support the alignment of efforts and activities.

Over the next four years, several tactics will be deployed to achieve the ambitious goals outlined in this plan. Businesses are engaged in the talent development system through sector partnerships and through our statewide business services team. To continue the excellent work that has been done over the past three years, one-stop partner programs will be included in the business services team and common procedure manuals will be developed to align the work of multiple agencies. The roles of partners and the resources they can provide are brought to the table to serve businesses through our overall sector strategy approach.

By providing intensive technical assistance to focus the workforce areas on the key industries that drive their local and regional economies and provide the spark for increasing economic vitality, Colorado has taken the next step in implementing its long-term sector strategy approach to system transformation. The local boards will convene local decision makers and respond to the recruitment and retention issues of these industries. Successful sector partnerships are aligned with career pathways strategies and the Colorado Community College System, and designed to address the skill upgrade needs of low-skilled adults. Sector strategies serve as the driver for all discretionary initiatives funded by the Colorado Workforce Development Council, as well as those that will be funded with Dislocated Worker 25% dollars.

Further, Colorado is one of five states participating with the Office of Career, Technical, and Adult Education's project to advance career and technical education (CTE) in state and local career pathways systems, which are designed to prepare students to transition into careers and college. The initiative builds on the U.S. Department of Labor's (DOL) Career Pathways Technical Assistance Initiative, and is designed to help states integrate CTE programs of study into broader career pathways system development efforts already underway. Colorado's state team worked with a coach to help them develop and implement their action plan and achieve their goals.

Focus will also be placed on the supply side of talent development to enhance the services provided to job seekers. A LEAN process will be implemented to examine how individuals are served across the system and how coordinated efforts will help reduce duplication and streamline the customer experience. Additionally, an effort will be launched to examine the intake processes and procedures of all programs and lay the groundwork for a common referral system and common intake system.

Through this strategic planning process the clear need for staff development for all system partners has been made apparent. Therefore, Colorado will develop training toolkits and implement cross-agency training to ensure that all of the resources of the system can be funneled appropriately to customers. The expertise of specific partners will be utilized, such as having adult education and family literacy programs provide training on assessment delivery to workforce center staff and using DVR's expertise to provide disability awareness and etiquette to core and combined partner staff.

Additionally, a commitment to innovation exists throughout Colorado and a framework will be developed for pilot projects that will allow for adequate, reliable, and safe experimentation to take place. Partner programs are also committed to scaling successful innovations and the necessary structures, guides, and training will be deployed to ensure that it is feasible to broaden successful programs.

While all of these initiatives will enhance the services that existing customers and those who are funneled to programs receive, the full vision of WIOA cannot be realized unless the system overall is understood as an asset and utilized as a resource by a much broader base of businesses and jobseekers. All of the agencies responsible for programming under this combined plan are committed to the branding initiatives that will take place and will appoint the right staff with communications expertise to collaboratively achieve this goal. The Advocacy Committee of the Colorado Workforce Development Council will provide the vehicle to launch these efforts and will support the implementation of awareness strategies throughout the state.

## B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

The CWDC serves as the convener of all partner agencies, both state and local, that compose the Talent Development System in Colorado. Regardless of a program's status in regards to this combined plan, all entities are invited to strategic conversations on implementation through the WIOA Implementation Team as well as through the regular CWDC meetings. Specific initiatives are in place to support sector partnerships and career pathways and the events and committees are open to all interested parties.

As the activities detailed above are implemented, all partners will be invited to the table and efforts will be coordinated with existing initiatives and meeting schedules to ensure that a fair opportunity has been created for the involvement of other agencies. As discussed above, all one-stop partner programs will be invited to participate in the job-seeker services LEAN process and on the statewide business services team to focus on coordination and duplication reduction.

In 2017, the CWDC began hosting quarterly Education & Training Learning Circles, which feature presentations on new and innovative programs and a question and answer designed to create more alignment across programs. These Learning Circles are open to all community partners, not just WIOA partner programs. The CWDC also works with partners, such as Skillful and CareerWise, to support the alignment of their work to promote skills-based hiring and youth apprenticeships, respectfully, with the public workforce system.

## C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section

II(a)(1)(B), and individuals in remote areas The activities described shall conform to the statutory requirements of each program.

Job seekers in Colorado are served by the statewide network of workforce centers as well as by the myriad government, education, and nonprofit organization locations of one-stop partner programs. All comprehensive workforce centers offer the full range of WIOA Title I-B, Wagner-Peyser, Veterans, and TAA services in a co-located model, and many local areas across the state have other partners co-located as well.

Regardless of location, customers of the public workforce system receive high-quality services designed to meet their specific needs. In a number of offices, the first question a customer hears is “What brings you in today?”, which creates a welcoming environment and sets up staff members to serve the highest need of the customer in the fastest amount of time. Within the parameters of each statutorily defined program, Colorado has implemented special initiatives to provide comprehensive, customized and coordinated services to targeted populations with barriers to employment.

### **UI Claimants, Long-Term Unemployed, Under-Employed, Dislocated Workers, Trade Displaced Workers, Displaced Homemakers**

- **Workforce Development Programs/UI Strategic Partnership** - The Colorado Department of Labor and Employment, Workforce Development Programs and the Unemployment Insurance Division have a long-standing partnership with co-location of staff members to coordinate reemployment initiatives for claimants and the long-term unemployed. The two programs work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. The largest joint endeavors include:

*o Development of a strategic plan for reemployment initiatives:* State and local stakeholder input was obtained on ways to improve communications and partnerships between the workforce and UI systems. The information was used to develop annual and long-term goals to promote reemployment and a more seamless customer experience. These goals included reducing and maintaining the average duration of UI benefits from 15.2 weeks to 12 weeks by June 30, 2017, through enhanced data sharing between the UI and workforce databases, and implementation of the revised UI profiling system (renamed Links to Reemployment) and Colorado’s first Reemployment Eligibility Assessment grant.

*o Design and Implementation of Reemployment Services and Eligibility Assessment (RESEA) and Links to Reemployment:* Links to Reemployment and RESEA focus on engaging Unemployment Insurance claimants within the first 5 weeks of their first UI Benefit payment, and provide earlier workforce engagement and increased services to help expedite their return to work. RESEA will be implemented in January 2016.

- **Hire for Colorado Long-Term Unemployed Initiative** - In January 2015, Governor John Hickenlooper announced Hire for Colorado, a \$3 million comprehensive reemployment program, to address the needs of the long-term unemployed while rapidly moving individuals back into the workforce. The new program utilizes many resources already offered through the state’s workforce centers, but also reaches out to the business community to make a pledge to hire the long-term unemployed. Hire for Colorado is being implemented through a tightly coordinated effort among CDLE, the Office of Economic Development and International Trade (OEDIT), employers, and local areas. Outreach to employers, employer pledges, and a regionalized marketing approach to job seekers comprise the major strategies of this program, which will serve a minimum of 300 long-term unemployed job seekers by December 31, 2016.
- **Sector Partnership National Emergency Grant** - Colorado was awarded a \$5 million Sector Partnership National Emergency Grant (SPNEG) in 2015 to temporarily expand capacity to serve dislocated workers and meet the increased demand for employment and training services with the goal of quickly reemploying laid off workers and enhancing their employability and earnings. This

grant will utilize sector strategies to advance and complement the more integrated and comprehensive dislocated worker services envisioned by WIOA. The specific activities targeted by this grant, which continues through PY 2017, include regional sector planning and strategies, enhanced career services to dislocated workers, and work-based training opportunities.

- **Displaced Homemaker Program** - In addition to services available through Wagner-Peyser and the WIOA Dislocated Worker formula programs, State funds are utilized to provide employment and training services to eligible displaced homemakers who, through divorce, separation, widowhood, or ineligibility for other public assistance, have lost their source of economic support. The “Keep Envisioning Your Success (KEYS)” Scholarship is a partnership between Workforce Development Programs (WDP) and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of income and must re-enter the labor market. Services include tuition scholarships, job training, career assessment, supportive services, personal and vocational counseling, and job development and placement. WDP has provided additional funding to enable CCD to increase KEYS Scholarships for summer students to help them achieve their educational goals faster and move towards successful employment, and this successful partnership will continue going forward.

**Low-Income Individuals**

- **WIOA Adult Priority of Service** - The state and all local workforce areas have adopted an adult priority of service policy that targets public assistance recipients, other low income individuals, and those who are basic skills deficient. This new WIOA requirement will ensure that the majority of Colorado’s WIOA Adult customers will come from these priority populations.
- **Colorado Works**—Within the parameters of Federal regulation and State policy and rules, county human service departments have considerable flexibility in operating their Colorado Works program, particularly around the programming for those considered “work-eligibles”. Many counties have found that robust partnerships with the one-stop center in their community is a natural fit that leverages the resources and employer-base available through the workforce development system for the benefit of Colorado Works participants.

Here is snapshot of the integration that was already in place prior to the passage of WIOA between workforce centers and Colorado Works programs:

Local Area	TANF Integration Exist Pre-WIOA	Method	TANF Integration Post-WIOA
<b>Adams County</b>	<b>Yes</b>	<b>Service Delivery Integration</b>	<b>Service Delivery Integration</b>
<b>Boulder County</b>	Yes	Service Delivery Integration	Service Delivery Integration
<b>Arapahoe/Douglas Counties</b>	Yes	Contracted	Contracted

Local Area	TANF Integration Exist Pre-WIOA	Method	TANF Integration Post-WIOA
<b>Colorado Rural Workforce Consortium</b>	Yes	Service Delivery Integration	Service Delivery Integration
<b>City and County of Denver</b>	Yes	Contracted	Contracted
<b>Larimer County</b>	Yes	Contracted	Contracted
<b>Mesa County</b>	Yes	Service Delivery Integration	Service Delivery Integration
<b>Pikes Peak Workforce Area</b>	No	Service Delivery Integration	
<b>Tri-County Workforce Area</b>	Yes	Service Delivery Integration	Service Delivery Integration
<b>Weld County</b>	Yes	Service Delivery Integration	Service Delivery Integration
<b>Notes:</b>	Service Delivery Integration means that departmental relationships exists between human services and workforce staff	Contracted means that the workforce center has a contract to run Colorado Works	

In several workforce development areas, the workforce system resides within the umbrella of the county human service department, and in some instances, full integration of these two systems is the norm for service delivery. This is the case in the Mesa county workforce development area, which shares boundaries with Mesa county, and is embedded into the county human service department in that area. One shared facility serves both WIOA customers as well as those seeking and receiving public assistance, and operations are fully integrated. In other areas, particularly in metropolitan communities, while workforce may sit outside the county human service governance structure, MOUs or contracts have been established for the provision of career services to Colorado Works participants within the workforce system. An example of this structure can be found in Larimer county, where human services and workforce are both county operated, but reside in different departments. The Larimer County Workforce Center has long operated the Colorado Works program through a MOU with the county human service department, to notable results in employment entry for Colorado Works' participants. In both instances, human service agencies benefit from strong relationships to the employer, economic development, and resource base of the workforce system.

However, dozens of counties in the state of Colorado do not have a physical one-stop location, and the ability to conveniently access services is a critical one, particularly for customers who may lack transportation resources. In these areas, connection with the workforce development system may take the form of participation on the local workforce board, or informal referrals and relationships. Colorado's large geographic area, as the 6<sup>th</sup> largest state in the country, poses challenges to rural communities. The Colorado Rural Workforce Consortium has established innovative approaches to help bridge these gaps through

technology, and rural human service counties will be learning more about these approaches in the coming year, building upon successful models for rural areas. One example of new partnership is in Park County, which is part of the Upper Arkansas sub-area within the Rural Consortium, where informal relationships have segued into participation on the local workforce development board, and a new contract for services for Colorado Works participants within the main county human service office. While there is not a physical workforce center within the county limits, partnership and innovation has found a way for the resources of workforce to meet the needs of low-income job seekers.

## **Youth**

**Governor's Summer Job Hunt (GSJH)** - The GSJH is a statewide program that assists Colorado's young adults, ages 14-21, with career exploration and interest-based job search. During Calendar Year 2017, the GSJH served more than 41,000 young adults, with a 61.2 percent entered employment rate.

Funding for the program is provided through Wagner-Peyser 10% discretionary funds, provided by CDLE/Workforce Development Programs, to the local workforce areas, primarily to cover staffing costs and costs for program outreach.

The GSJH will continue to utilize successful strategies such as:

- o **GSJH Website:** <https://www.colorado.gov/gsjh>
- o **GSJH Facebook page:** Utilized to promote local job fairs and workshops, state events, and partner events. <https://www.facebook.com/govsummerjobhunt>
- o **Think Big Youth Forum:** An annual statewide youth service provider conference that typically includes over 200 people from the state and local workforce system, education and higher education systems, the Division of Vocational Rehabilitation, local youth councils, and many other state and local organizations.
- o **Teen Jobline 9:** Colorado has a successful partnership with Denver NBC affiliate 9News TV station to host Teen Jobline 9 features staffed by representatives from the state and Denver metro area workforce centers to answer phone calls from parents, grandparents, guardians, and youth with questions about summer employment opportunities.
- o **Career Preparatory Experiences,** including resume preparation, mock interviewing, industry and career research, educational & training pathway development
- o **Industry tours** (Career Road Trips) targeted at growth industries, and hosted for youth, parents, and teachers.
- o **Entrepreneurial training and competitions**
- o **STEM focused career awareness events and forums**
- o **Sector partnership-based workshops,** followed up with industry specific job fairs
- o **Focused partnerships with Agenices and Organizations**
- o **Focus on Work-Based Learning,** including introduction to internships, pre-apprenticeship and registered apprenticeship
- o **Targeted outreach within** schools, partner organizations, community-based organizations, etc.

## **Individuals with Disabilities**

**Division of Vocational Rehabilitation (DVR)**— The focus of the DVR program is to provide individualized and customized services and supports to individuals with disabilities. DVR staff are subject matter experts who will commit to work with the staff of core and combined plan program partners to

support their efforts to provide effective services to individuals with disabilities. DVR will strive to coordinate individualized DVR plans for employment with the plans developed for individuals by other core and combined plan partners, and assure that the DVR plan is complementary to these other plans, whenever feasible.

Coordination between programs will be supported by working and, as appropriate, formal partnership agreements with state community partners to create referral processes and jointly deliver services to customers, including customers from unserved and underserved populations. At the local level, DVR will work with core and combined plan partners as well as other community resources, to reach out to unserved and underserved populations. Particularly, DVR will focus efforts on underserved youth (youth from the foster care, juvenile justice, and mental health systems), homeless individuals, and individuals with limited education. Finally, DVR will seek to coordinate and improve partnerships with Colorado's American Indian Vocational Rehabilitation Programs, the Ute Mountain Ute Tribe and the Southern Mountain Ute Tribe.

### **Adult Learners**

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will work collaboratively with partners within the Combined State Plan to ensure effective and efficient career pathways for Coloradans.

First, AEI will host regular Adult Workforce Partnerships Advisory Committee meetings with representation from core programs in Colorado's talent development system (as outlined in 22-10-106, C.R.S.). During these meetings, opportunities for collaborative planning and information sharing will occur. AEI will also host assessment trainings for adult education and family literacy providers and workforce and vocational rehabilitation partners to help ensure consistency of assessment efforts.

AEI will coordinate and promote activities that bring together adult education and family literacy providers with workforce, which may include equity trainings focused on support of nontraditional careers for individuals with barriers to employment, and implementation/utilization of integrated career pathways utilizing materials designed for Adult Career Pathways.

AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II to establish a baseline for partnership engagement, develop goals for growth and improvement of partnership, and progress monitor growth and improvement of partnership for high-quality, streamlined customer-centered service.

### **Veterans**

Colorado will continue its strong tradition of promoting the training, hiring and retention of veterans, plus ensuring veterans priority of service in all USDOL funded programs. This will be accomplished through close working relationships with workforce system partners to make sure that veterans are represented to potential employers and business owners as qualified and professional employees who bring a unique set of skills to the workplace. The state workforce system delivers the full array of labor and employment services to Colorado veterans at all 77 of its State and County-run full-service Workforce Centers and satellite offices around the state. Employment Specialists at the centers provide veterans with employment services such as job matching and referral to posted job openings, vocational and career guidance, labor market information, plus workshops on resume preparation and conducting effective job searches. Staff also refer eligible and qualified veterans to appropriate WIOA-funded training programs and discretionary initiatives, as well as registered apprenticeship programs throughout the state.

In addition to State and County workforce center employees, who provide career services to all veterans, CDLE currently employs 29 full-time Disabled Veteran Outreach Program (DVOP) Specialists and 9 full-time Local Veteran Employment Specialists (LVER) assigned to workforce areas around the state. These

positions are funded through a USDOL Veterans Employment and Training Service (VETS) grant and fulfill all responsibilities mandated by the grant programs, including the provision of case management services to Special Disabled Veterans, Disabled Veterans, economically or educationally disadvantaged veterans, and veterans with other barriers to employment, especially homelessness. ***The Jobs for Veterans State Grants Plan is included under Section VII.***

Veterans grant staff also serves other populations of veterans in the State through Memoranda of Understanding (MOUs). Those populations include:

- o **National Guard and Reserve** members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country.
- o **Service-connected disabled veterans**, who are targeted and identified through various Veterans Service Organizations (VSO) as well as outreach activities at Veteran Centers, Veterans Administration Medical Centers, and Community Based Outpatient Clinics (CBOCs.)
- o **Recently separated veterans**, who are targeted through the College Campus Outreach pilot program, and through job fairs and hiring events
- o **Wounded and injured veterans**, who are identified through the REALifelines program and through relationships established with the Wounded Warrior Program located at Fort Carson, Colorado.
- o **Incarcerated veterans**, who are identified and contacted through “in-reach” activities conducted within correctional facilities managed by the Colorado Department of Corrections. Veteran representatives will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders.
- o **Homeless Veterans** - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP) to provide one-on-one employment assistance and supportive services to homeless veterans including, but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job referrals. The supportive services provided include, but are not limited to, rent assistance, food, and transportation funding. CDLE’s HVRP Employment Representative is an active member of the Governor’s state homeless committee that seeks out innovative ways to solve the shortage of temporary housing and resolve issues with permanent housing placement.

### **Older Individuals**

- o **SCSEP**—Most of the SCSEP participants have been out of school for over 40 years and have limited work history or a history of unskilled labor. Those who have been out of the workforce for some time may not be aware of what is acceptable and unacceptable in the workplace; so workplace etiquette and customer service training is provided to give the participant the tools to ensure successful participation. Additionally, employer preferences have been trending toward computer/technology competencies as among the most-in-demand job skills. This preference is also observed consistently among SCSEP staff across project locations. Participants who have computer/technology skills, or are willing to develop these skills, are able to obtain unsubsidized employment faster and often with a higher wage. Many host agency supervisors commented that the participants need to have already obtained some basic computer skills prior to starting the Community Service Assignment (CSA) at the host agency. The host agency satisfaction surveys identify similar sentiments. Project staff have also found that participants with basic computer skills are more confident in their abilities and are more valuable to employers.

Through the additional training and supportive services provisions, the State of Colorado will be able to ensure a more widespread adoption of computer/technology training efforts. Training and supportive services will ensure barriers to employment have been mitigated to the greatest extent possible and develop participants who are more confident, computer literate, and have greater access to opportunities. Participants will be more marketable due to their newfound confidence in handling modern technologies. Greater confidence with technology will aid participants beyond employment as they become masters of simple yet oftentimes intimidating technologies that create barriers in their life, such as point-of-sale (POS) machines, ATMs, and tablet-based forms increasingly used in healthcare and medical facilities.

Colorado SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers (WFC), by utilizing WFC staff to assist in creating training and employment opportunities for participants of SCSEP. CDLE and the statewide network of workforce centers continue to work with and support the efforts of the Senior Community Service Employment Program (SCSEP) under the Colorado Department of Human Services: Aging and Adult Services, through participation on the Older Worker Task Force, which promotes connections between the SCSEP service providers, their participants and the workforce centers. In addition, workforce centers have older worker specialists, who provide workshops and employment services that are customized for this targeted group, and have developed MOUs with the Title V Older Worker service providers.

Colorado will continue to place SCSEP participants at WFC locations and collaborate with other WFC partners such as Veteran Services and the Division of Vocational Rehabilitation to maximize participant referrals and optimize participant training.

To assist SCSEP participants in the development of their on-line and computer literacy skills, the WFCs e-Colorado has a multitude of on-line options pertaining to career exploration, education and employment. Since SCSEP participants are required to enroll with a WFC, they will attend WFC classes that enhance/upgrade their skills. The WFCs play a pivotal role in training the participants and improving their opportunities for employment.

Moving forward with WIOA a system wide State training plan will be implemented to assure job seekers receive the best possible information regarding programs that may benefit them to achieve gainful employment. **The complete SCSEP plan is included under section VII** and further describes the initiatives for serving this population.

### **Migrant and Seasonal Farmworkers**

The Wagner-Peyser Agricultural Outreach Plan (**see the complete plan under Section VI**) sets policies, and objectives with regard to providing services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the statewide network of workforce centers to ensure that MSFWs receive the full range of employment, training, and educational services on a basis which is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs.

During the next five program years, the six significant workforce centers will continue to provide quality employment services and referrals to appropriate agencies as part of their assistance to the MSFW population. The contracts with each workforce area will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the local areas in their planning activities to help ensure that the needs of MSFWs are addressed, and that the workforce development system is in full compliance with the Judge Ritchie court order and federal rules and regulations.

### **Individuals with Limited English Proficiency**

Colorado is now on the tenth year of a special task force to address the needs of Limited English Proficient (LEP) clients. The group started out as the LEP taskforce and is now called “Colorado Workforce Speaks.” This effort was designed based on President Clinton’s Executive Order 13166 mandating that all agencies receiving federal funding must make their services available to limited English proficient clients. The task force has accomplished the following:

- Surveyed workforce center staff and identified the different languages that staff speaks on a statewide basis.
- Created an “I Speak” poster and provided them to all workforce centers throughout the state. The poster says “I Speak” in eleven different languages; for example, a Spanish speaker can point to the “Yo Hablo Español” section of the poster to request assistance from staff who speak their language.
- Established a format for local Language Assistance Plans that are updated annually as part of the WIOA and Wagner-Peyser annual local planning process.
- Stored all of the Colorado Workforce Speaks materials electronically in the e-Colorado.org Colorado Workforce Speaks team room. Topics include career planning, employment, education and training, emerging technologies, employer resources, workforce professional resources, high growth initiatives, legislation and policies, promising practices and supportive services.
- Colorado provides training for workforce center staff and outreach workers on how to access the team room information and apply it to the MSFW population.

### **Ex-Offenders**

Over the past several years, CDLE has designed, implemented and managed several highly successful ex-offender employment and training programs in collaboration with multiple state and local agencies. Among these were the “Stop the Revolving Door” and “Motherhood” initiatives, which provided employment and training services to 839 participants, and achieved a 71% entered employment rate as well as a 9% recidivism rate during the first year of post-program follow-up.

- **Workforce Development Programs/CDOC Strategic Partnership**-Workforce Development Programs has a long-standing partnership with the Colorado Department of Corrections (CDOC). Among the initiatives that are being developed and implemented as a result of this partnership are the following:

- **Road to Work Pilot Program** - The Road to Work Program provides rapid turn-around employment and training services to increase livable wage employment placement and retention opportunities for Parolees under the supervision of CDOC. Through a collaborative agreement between the Colorado Department of Labor and Employment (CDLE) and CDOC, the Road to Work Program creates an employment team comprised of the designated CDLE Road to Work Program

Coordinator, the Local Area Workforce Case Manager, the Community Parole Officer, the employer, and other identified partners to assist the Parolee in achieving successful re-entry into society.

- **Re-entry Employment and Training Navigators** - Through state legislation, CDOC has established four employment and training navigators that work with businesses to develop employment opportunities for parolees. Through the WDP/CDOC partnership, these staff have access to Connecting Colorado for tracking employer contacts and they will be integrated into the Business Services teams in the appropriate workforce centers to coordinate employer outreach.

- **Connecting Colorado for Incarcerated Offenders** - As a demonstration project, CDLE provided access to the statewide Connecting Colorado self-service job matching system inside one set of prisons during June 2012, allowing inmates to register for employment. In order to safeguard the workforce system’s employers, inmate registrations will not be activated until release; however, they will have the ability to

search for job possibilities and learn about the job requirements as part of their preparation for transition into the labor market. Upon release they can update and fully complete their registrations and have them activated by CDOC staff, who have been trained in Connecting Colorado administrative functions. Connecting Colorado will continue to be available statewide to all public and private prisons under the jurisdiction of CDOC.

The Veteran-specific curriculum to be created will be a complementary blend of programs developed by Veterans for Veterans, like the family reintegration curriculum developed by the U.S. Army for soldiers discharging from the military with the TAP (Transition Assistance Employment Program), and evidenced-based psycho-social programs developed by experts in the field. The 16-week specialized curriculum will also include a “Speaker’s Series” designed to increase releasing Veterans’ knowledge of essential life skills topics. Colorado’s current Incarcerated Veterans Transition Program will be integrated into this initiative and will also be involved in providing mentoring services to participants. The staff and instructors for this program will be Veterans themselves - Veterans teaching Veterans.

Since employment is paramount to success, incarcerated Veterans will have the opportunity to expand their skills through vocational programs designed for this special population. The collaborating agencies are also working with the local workforce system to leverage funds for specialized on-the-job trainings, work experiences and internships to better prepare Veterans for employment, as well as help them utilize and transition the skills they learned in the military. CDOC is considering creating a Veteran-specific parole officer position to support Veteran offenders upon release from prison. This position will provide a continuation of services, attitude and expectations for the Veteran offender.

### **Workforce Assessments for Jobseekers**

In 2016, the Workforce System Assessment Team re-designed the Colorado Employment Skills Certificate (CESC) and updated the form into a fillable document. Piloted several years ago by seven local workforce areas, the Workplace Readiness Credential is now a component of the CESC and is available to all workforce areas for use with job seekers. The Workforce Readiness Credential (WRC), is a soft skills online assessment tool developed by the Conover Company that measures attitude, communication, planning and organizing, critical thinking, interpersonal/social skills, teamwork, professionalism and media rules.

In the fall of 2017, the Workforce System Assessment Team undertook a survey asking local workforce areas what assessment tools they currently use. We received survey results from all 10 local workforce areas, including five of the ten rural consortium subareas. We are also gathering a list of assessments used by our WIOA partners, vocational rehabilitation and adult education (Colorado Department of Education). In addition to listing assessments, we asked specific questions relating to the use of assessments for career pathways, apprenticeships and soft skills. We hope that this information will better inform CDLE, local workforce colleagues, and our partners as to what assessments tools are used and what they are used for.

## **D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS**

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

### **Statewide Business Services Alignment Initiative**

In June 2011, business development services teams from workforce centers across the state began a dialogue that evolved into part of the workforce system’s strategic effort to address gaps in serving businesses across all workforce programs. The vision of the Statewide Business Services Alignment Initiative is “to provide seamless access to business development for all employers and produce positive

economic return for business/industry and our communities.” The areas of focus have expanded and are addressed by workgroups comprised of Business Development Representatives and charged with the mission of standardizing business practices. The key topic areas addressed by workgroups under this initiative include:

- Technology
- Developing partnerships under WIOA
- Marketing/outreach
- Communications
- Staff development, and
- Enhancing the talent pool available to employers.

These areas of focus are embedded in a plan of action, approved by the State’s local workforce directors, to create an integrated system that responds rapidly to Colorado business needs through easy to use technology and services that result in ready access to a skilled and competitive workforce.

This initiative is a key element in the implementation of the *Colorado Blueprint* to align services, and is supported by the Colorado Workforce Development Council, CDLE’s Workforce Development Programs and the local workforce areas. As part of the initiative, representatives from the business services teams and subject matter experts from CDLE created a comprehensive job order and business services policy to establish statewide standards regarding services to businesses. The Business Services Team and CDLE expanded this guidance to include the use of metrics to track the 11 primary services provided to Colorado’s employers. It is based on the current job order policy, which was expanded and enhanced to reflect national best practices. In addition, the Connecting Colorado database will see continued enhancements to the tracking and reporting of business services activities. After piloting the new uniform metric tool to track key services provided to businesses, it was fully implemented in PY14. Colorado will continue to use the business service metrics reports to track business services and show that the workforce system is able to meet the business community’s need for qualified workers.

A priority for PY15 is to develop partnerships that enhance service to Colorado businesses while reducing redundancy and silos. The statewide Business Services Team will expand to engage additional staff from the required one-stop partner programs. Efforts have already begun to integrate and align DVR’s internal Business Outreach Specialist Program with the statewide team as well as Job Navigators from the Department of Corrections Division of Adult Parole. Other partners will be engaged in the next two years and these partnerships will be leveraged to create one primary public point of contact for an employer while also connecting the business with a broad pipeline of workers across programs and agencies.

DVR has had a long history of providing services to employers and, in addition to collaboration with the Business Services Team, will adapt its strategies to maximize the benefits of a demand-driven system. Specifically, DVR will update the Disability Awareness Training Tool Kit and make these materials, including DVR staff subject matter expertise, available to core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce. DVR will use the resources and tools that are available through the local business services programs and through local sector partnerships to train local DVR staff. That training will encompass the adoption of common terminology among one-stop partners, how to use labor market information to educate individuals with disabilities about opportunities, and the language and culture of business and the private sector. Finally, pre-employment transition services will be provided to students with disabilities, including work experiences, to assure that youth and young adults are better-prepared for the services they will receive through other core and partner programs.

While five of the six core programs have experience working with businesses, serving employers is a new concept for adult education and family literacy. Therefore, AEI will provide guidance and support for

programs so that they can incorporate employer feedback to ensure effective and efficient programming. Further, AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II on utilization of new or existing business and industry advisory committees to ensure that necessary workplace readiness skills are integrated into curriculum so that adult education and family literacy clients are prepared to transition to post-secondary education and training to increase wage-earning capability.

Finally, SCSEP has always been a demand-driven program that supports on-going communication and continual feedback with employers and workers. The State collaborates with the WFCs, community college system and local employers to maximize unsubsidized employment opportunities for SCSEP participants. SCSEP job developers work with regional chambers of commerce, labor unions, community colleges and local employers to identify employment positions available and training needs, and these efforts will also be integrated into the Statewide Business Services Team.

Efficient services to businesses across all partners requires data integration, and system alignment efforts between the Colorado Benefits Management System (CBMS) and the State's labor exchange and workforce case management system, Connecting Colorado, have been under way for nearly 2 years. This improved system integration will enable users of both systems to serve customers more fluidly across workforce and human service programs, thus reducing duplicate effort and data entry, and will support business service staff in both systems through the ability to better understand and match participants to employer need. Human service staff who specialize in business development will be invited to participate in the business services alignment group through the workforce system.

Moving forward, the Business Services Team, inclusive of one-stop partner staff, will be the primary vehicle for alignment of efforts and coordinated services to employers. CDLE will continue to hold annual Business Services Summits to provide a forum for business services staff to discuss ways to improve statewide branding, service delivery and performance outcomes, and develop new innovations and strategies.

#### 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).

For several years the CWDC has convened a Policy and Legislation Committee consisting of legislative liaisons and policy experts from multiple state agencies, including the Department of Higher Education and the Department of Education. This body meets regularly throughout the year to discuss legislative solutions to issues facing our education and training system as well as to coordinate efforts in the implementation of new legislation. In addition to this committee, an agency data sharing group has been convened for the past two years that specifically looks at opportunities to leverage information contained within one agency for the benefit of multiple programs and customer bases. This data sharing group played a critical role in the development of the first and second *Talent Pipeline Report*, which highlights critical gaps in our talent development system and recommends solutions. Recommendations from the first report spurred several pieces of state legislation in 2015 that create new tactics for system alignment. Through state law, the CWDC will add an Education Liaison and a Training Liaison in 2016, who will work together to ensure that K-12, community colleges, CTE programs, community-based training providers, and four-year institutions are plugged into career pathways and understand how to use established pathways as a resource for students.

#### 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.

Through state law, the CWDC added an Education Liaison and a Workforce Liaison in 2016, who will work together to ensure that K-12, community colleges, CTE programs, community-based training providers, and four-year institutions are plugged into career pathways and understand how to use established pathways as a resource for students. The Workforce Liaison position is specifically established to work with all community-based training providers, including entities on the Eligible Training Provider List. Opportunities will be extended to these partners to engage in initiatives and activities to create alignment with the needs of industry as identified through sector partnerships.

#### 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).

Since taking office in 2011, Governor Hickenlooper has focused on improving the efficiency and effectiveness of state government. Strong collaboration and engagement across agencies is critical to achieving those goals, and there is a shared commitment within state agencies, the Governor's office, and the state legislature to ensure collaboration works to achieve the best outcomes for Coloradans.

Since 2013, multiple bills have passed the state legislature that focus on sector partnerships and career pathways and create new funding streams to support demand-driven workforce development activities.

**Colorado House Bill 13-1165, Development of a Manufacturing Career Pathway**, required that the State Board for Community Colleges and Occupational Education (SBCCOE) collaborate with the Department of Higher Education (DHE), the Colorado Department of Education (CDE), and the Colorado Department of Labor and Employment (CDLE), to design a career pathway for students seeking employment in the manufacturing sector.

**Senate Bill 14-205** required that the Colorado Workforce Development Council (CWDC) within the CDLE work with the DHE, the CDE, and the Office of Economic Development and International Trade (OEDIT) to create a talent pipeline infrastructure for use in creating career pathways for students.

**Colorado House Bill 15-1274, Creation of Career Pathways for Students for Critical Occupations in Growing Industries**, requires the CWDC, in collaboration and consultation with its partners (including state agencies, Superintendents of local school districts, local Workforce Centers, and industry partners), to design integrated career pathways for growth industries. The designed career pathways must focus on critical occupations in growth industries that do not currently have clearly articulated career pathways. The bill requires partnerships with industry (through regional sector partnerships) and trade associations to inform and drive the development of each pathway. Industry partners must also review each career pathway annually to ensure the pathway remains relevant to the industry and to provide input for ongoing adjustments to the pathway to meet workforce needs.

**Colorado House Bill 15-1230, Innovative Industries Workforce Development Program**, directs the Colorado Workforce Development Council (CWDC) to enter into agreement with one intermediary\* per innovative industry to work with the CWDC and its statewide partners on the following: Facilitate outreach to employers; Market the program; Inform the development of intern curriculum; Identify work experience opportunities for individuals; and work with the CWDC and the Colorado Department of Labor and Employment's Employment and Training Division (CDLE E&T Division) to determine what businesses should be pre-approved if more businesses apply than funding is available. \*"Intermediary" means an

association or industry group that represents an innovative-industry sector that has entered into agreement with the Colorado Workforce Development Council.

**Colorado HB 15-1170 Increasing Postsecondary and Workforce Readiness** creates the position of Postsecondary and Workforce Readiness Statewide Coordinator (position shall be named the Education Liaison) to work under the CWDC in the Colorado Department of Labor and Employment (CDLE). The Education Liaison will work with secondary school districts, area vocational schools, Community Colleges, the CDE, the Department of Higher Education (DHE), and the career and technical education division within the community college system to raise the level of PWR achieved by high school graduates.

Collectively, these bills fund new staff positions within CWDC, CDE, and the Community College System as well provide financial resources to the community that are in direct support of the vision laid out in WIOA to assure self-sufficient wages and career paths to all Coloradans.

#### 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.

Several initiatives are currently underway in Colorado that support the performance measure in WIOA for attaining postsecondary credentials. The initiatives work with employers, educational institutions, and training providers in unique ways to accomplish this goal.

Colorado's sector strategies include the implementation of skill panels that are designed to unpack what employers need when they often require a specific credential in a job posting. After the skills are uncovered, educational institutions can work with sector partnerships to adjust, customize, or design new industry-recognized credentials relevant for key industries in the state.

In order to raise awareness of the value and availability of training programs that lead to industry-recognized credentials, the WORK Act was passed in 2015. Starting in January 1, 2016, the program accepts applications for matching grants from public and private providers of qualified skilled worker training programs. Qualified grant recipients offer training for skills that are needed in the workplace, with a credential or other evidence of achievement awarded at the completion of training.

Applications received by the CDLE are transmitted to a 13-member grant review committee composed of representatives of certain government agencies, including CDLE, the Office of Economic Development and International Trade (OEDIT), the Department of Higher Ed (DHE), the Colorado Workforce Development Council (CWDC) in CDLE, as well as representatives from employers and industry. The bill sets forth guidelines for the review of applications by the committee, and the committee is directed to establish formal criteria and rank applications. The committee's recommendations and rankings are submitted to the executive directors of CDLE, DHE, and OEDIT. These directors then jointly determine grant recipients and amounts. Each grant recipient is required to submit an annual report to the committee, and the committee must, by May 1, 2017, and each May 1 until 2019, submit an annual report to the Governor and the General Assembly's business committees.

A growth opportunity has also been identified for concurrent enrollment programs, and Colorado **HB 15-1275, Measures to Support Concurrent Enrollment in Career and Technical Education Programs**, clarifies that a local education provider (secondary school) may include course work related to apprenticeships and internships in the programs that are available for concurrent enrollment with post-secondary Career and Technical Education programs. It also directs the Concurrent Enrollment Advisory Board to assist education providers with creating cooperative agreements with providers of internships and apprenticeships.

Finally, the Business and Experiential Learning Commission was launched in 2015 to assist in the development and scaling of work-based learning programs that directly tie high schools to a wide variety of employers. This group is exploring the feasibility of replicating the Swiss Apprenticeship Model in Colorado, and a team has traveled to Zurich to learn about the model. The first pilot is being launched in partnership with Denver Public Schools and it will engage students as early as ninth grade with career exploration activities, and by a student's senior year they will be spending multiple days per week on a job site.

### I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES.

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies and activities in the State.

The CWDC works closely with the Colorado Office of Economic Development and International Trade (OEDIT) as well as with the Economic Development Council of Colorado (EDCC). OEDIT has led the development of an original and an updated *Colorado Blueprint* that creates six statewide goals for economic development. One of the goals relates directly to workforce development and the CWDC serves as the owner of that goal. The executive director of OEDIT is a voting member of the CWDC and is a member of the executive committee as well to ensure the alignment of efforts and strategies. Additionally, the CWDC works with the Governor's Workforce and Education Cabinet work-group which includes the cabinet members from economic development, workforce development and higher education, and ensures alignment of shared goals across the agencies and the state. The EDCC is a professional organization dedicated to strengthening Colorado's economy, and the majority of its members are local economic developers. As a member of EDCC and its policy committee the CWDC is in tune with objectives and tactics being implemented and has a forum to bring workforce issues to this body on an ongoing basis.

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### B. STATE OPERATING SYSTEMS AND POLICIES

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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—

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##### 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.).

**Connecting Colorado Data/Reporting System:** This is the case management, data collection, and reporting system that Colorado developed for statewide use in all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 100), plus discretionary grants in one common database. All reports generated from this system are "up to the minute," thus allowing better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state's workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local workforce areas. This system will be updated to reflect all WIOA changes and requirements over the life of this four-year combined plan.

**Connecting Colorado Self-Service**- Connecting Colorado allows job seekers and employers to self-enter their work registration, resume, or job order data directly into the statewide database via the Internet, as well as search for jobs or qualified applicants. Colorado uses a skill based job matching system that focuses on experience, skills, and education level in addition to O\*Net job titles, as well as allowing the upload of applicant resumes. All job listings are automatically searched after entry based on the employer's requirements and in compliance with veterans priority of service. Job seekers can search for new jobs at any time or receive an e-mail notification once a job is entered that matches their specifications. Likewise employers may run applicant searches on demand or rely on the automated searches. Connecting Colorado also provides access to a Tool Box of job search assistance links that has been customized for each workforce region. Links include direct access to the local area's web page, career exploration, training resources, and self-marketing tools, Unemployment Insurance information, and additional job banks. Colorado has developed a mobile application that will allow customers to access these resources on smart phones and other portable devices.

**State Financial Reporting System** - This system was developed to track all Federal and state funds disseminated to the statewide system of local workforce areas, who are sub-recipients of the state. Such funds include the allocations for WIOA Title I-B, Wagner-Peyser, and TAA, JVSG, national, and state discretionary grants. It provides on-line access to state financial and program staff, as well as sub-recipient staff, to report expenditures and run real-time on-demand reports for budget monitoring purposes. Data from this system feeds the federal 9130 fiscal reporting formats that are required by USDOL. The software also embodies the payment system for the Trade Readjustment Assistance (TRA) program and generates reports covering TRA payment data. This system will be modified to incorporate all WIOA changes and requirements over the four-year life of this combined plan.

**Virtual Job Fair (VJF)**—Developed in-house by CDLE staff and Beta-tested September 2011 in Pueblo, CO, the VJF has been rolled out to all local workforce areas statewide, and staff have been trained on how to create and maintain their own local VJFs. To date more than 100,000 job seekers have participated in VJFs statewide.

- o The purpose is to reduce costs of job fairs and other services, and increase access to workforce services for job seekers and businesses statewide, especially in the rural areas of the state.
- o Local workforce areas, other service providers and businesses can partner to target a job fair to a particular business sector or population of job seekers.
- o This system has been used to provide resources and job information to National Guard troops before their return from Afghanistan.
- o Features include:

o Job listings, on-line workshops and career exploration resources

o On-line presentations by employers and access to their websites

o On-line real-time job interviews

o Run more than one job fair simultaneously

o Automatic upload of data to Connecting Colorado to track services and outcomes

o Site usage reports

### **CDLE Knowledge Management Portal - e-Colorado**

**Link:**<https://e-colorado.coworkforce.com>

The CDLE Knowledge Management Portal, e-Colorado, is designed to manage virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners including

business customers, workforce professionals, government, and others. The portal provides documents, team rooms, calendars, and more. e-Colorado provides improved services and tools which include the Virtual Job Fair and online fillable “smart” forms. In addition, it houses the Adobe Connect on-line meeting capability utilized by CDLE and Colorado’s workforce centers to conduct webinars.

e-Colorado was successfully migrated from Northern Illinois University to the Colorado Department of Labor & Employment servers on August 30, 2013. From September 2013 - November of 2015, the e-Colorado team has been working on re-designing e-Colorado. e-Colorado will be on a new content management system: Adobe Experience Manager (AEM) Sites, which will enhance the user experience and provide options for the addition of new features over the next four years. The re-design project will be completed in 2017.

### **LMI Gateway**

The Colorado LMI Gateway is a powerful labor market information system designed to meet the needs of workforce professionals, job seekers, and businesses, as well as economists, economic development organizations, and the media. Examples of LMI Gateway features include:

- A wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data
- Tools to chart and analyze labor market data
- Career exploration data
- A personal home page that allows a registered user to save items that fit their needs
- Recruitment Services: find qualified candidates and access a wide variety of information designed to help a business succeed
- Education and Training Resources: Find a suitable training or education program, as well as information on training providers and schools. This is also known as the Eligible Training Provider List for the Workforce Innovation and Opportunity Act programs.

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

All Colorado local workforce areas are required to use the state-developed common database (Connecting Colorado) to track all USDOL or CDLE funded programs provided through workforce centers including Wagner-Peyser, WIOA, TAA, and Veterans Employment and Training Services, as well as discretionary grants and locally funded programs. All labor exchange services delivered by the local areas are performed using this system, resulting in a true statewide labor exchange system. Data reporting to USDOL also derives directly from the statewide system, allowing real time reporting and tracking of results at the statewide, regional, local, and individual client level.

State policies and procedures related to data integrity and data validation are reflected in the structure of the Connecting Colorado system and are currently based on the standards set in TEGL 17-05: Common Measures Policy, but will be updated according to the final WIOA standards issued by USDOL. Colorado has also issued an updated, comprehensive set of data collection policies and processes that cover the entire participation cycle including enrollments, exits, participation services, and data entry standards. This document is titled Program Guidance Letter (PGL) MIS-2017-01: Guidance on Data Integrity and the Customer Participation Cycle for WIOA and TAA Programs and is available for review at: <https://www.colorado.gov/pacific/cdle/pgl>

This policy will be updated to reflect the reporting requirements of WIOA when final guidance is provided. In addition, Colorado has issued fully WIOA compliant procedures for eligibility and has updated Connecting Colorado accordingly. The WIOA Eligibility PGL 15-09-WIOA is also available at the link provided above.

\* For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

**2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, PROVIDE THE STATE'S GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM.**

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The CWDC and CDLE's Workforce Development Programs review, update, and create policy guidance on an ongoing basis as needed to support the strong implementation of activities throughout the state. Policies have been created to update local board membership and responsibilities, regional and local planning, one-stop certification, priority of service, and program eligibility. Specific guidance is being developed for all one-stop partners to clarify the requirements for access in the system so that one-stop operators and all partners have a mutual understanding of what is required. We expect to institute a training system that provides sufficient cross-training to all system staff so that the system can function effectively and meet the needs of customers across physical locations and entry points.

CDLE encourages local workforce areas to co-enroll participants into other programs that are appropriate for the individual participant's needs. Co-enrollment can offer the opportunity to access additional program services and funds to help address a participant's specific barriers to employment and/or education. When co-enrollments occur, case managers must include a case note of justification in the participant file explaining why the co-enrollment is appropriate. Participants must meet the eligibility requirements of each program and will become part of each program's performance outcomes. In addition to state policies, any local co-enrollment policies must also be followed. Going forward, CDLE will be working with the core and required One-Stop partners to update relevant policies and to develop a process for cross-agency policy development to address the new opportunities for integration as a result of WIOA. Details of the most current CDLE policies are listed below and the full text of each policy is available at <https://www.colorado.gov/cdle/pgl>.

The policies that support implementation of State Strategies are as follows;

- **WIOA-2015-01: Local Area Designation and Appeals Process:** To provide guidance and process for the designation and re-designation of Workforce Development Areas in Colorado, along with the process for appealing designation decisions.
- **WIOA-2015-02, Change 1: One-Stop Certification Criteria:** To provide guidance, process and deadlines for the certification of one-stop centers and the one-stop delivery system that is to be conducted by local workforce development boards, and to set criteria for the development of a local policy for one-stop certification.
- **WIOA-2015-03: PY15 Local Plan Guidelines:** The purpose is to provide information and guidelines for Local Workforce Development Boards (LWDBs) and Local Areas to develop their Workforce Innovation and Opportunity Act (WIOA) local transition plan for PY15. This year the plan will combine local action steps for implementing WIOA with the Colorado Workforce Development Council's continuous improvement plan submission. In addition, a new PY15 two-year Language Assistance Plan must be submitted at the same time.
- **WIOA-2015-04: Local Workforce Development Board Policies:** To provide comprehensive guidance and policy direction to Local Workforce Development Boards (LWDBs) and Local Workforce Areas on the requirements for establishment of WIOA compliant boards **by no later than October 1, 2015.**
- **WIOA-2015-05: WIOA Eligibility for Title I Programs:** To provide comprehensive guidelines for local workforce areas regarding the determination of eligibility for WIOA programs, and to provide information on the use of appropriate documentation or self-attestation to support eligibility determinations.

- **WIOA-2015-06: WIOA Eligibility Training Providers for Title I Programs:** This Policy Guidance Letter (PGL) provides new information, criteria, and procedures for Local Workforce Development Boards and local workforce areas to implement the Eligible Training Provider requirements in the transition from the Workforce Investment Act of 1998 to the Workforce Innovation and Opportunity Act of 2014.
- **WIOA-2015-07: Priority of Service for Title I Adult Programs** To provide policy guidance to Local Workforce Development Boards for the implementation of priority of service for WIOA Title I Adult program customers.
- **WIOA-2015-09: Individual Training Accounts for Title I Programs:** To provide guidance to Local Workforce Development Boards and Local Areas in the development of a local policy on Individual Training Accounts under WIOA guidelines
- **WIOA-2016-01: PY16-19 Regional and Local Plan Guidelines:** The purpose of this PGL is to provide information and guidelines for Local Workforce Development Boards (LWDBs), Regional Planning Areas and Local Areas to develop their Workforce Innovation and Opportunity Act (WIOA) four-year plans for Program Years 16 through 19. This year the plan narrative will incorporate regional and local area planning requirements, as well as the Colorado Workforce Development Council's continuous improvement plan, in a single submission. In addition, updated two-year Language Assistance Plans must be submitted with the Local Plan compliance requirements.
- **WIOA-2016-02: WIOA One-Stop Partner Requirements and Access to Services:** To provide guidance to Local Workforce Development Boards and Local Areas on: 1) The roles and responsibilities of required one-stop partners in the one-stop delivery system; 2) Establishing "comprehensive" workforce centers; 3) The requirements for access to the programs and activities provided by required One-Stop partners through the system; and 4) The elements that must be addressed in the memorandum of understanding with One-Stop partners.
- **WIOA-2016-03: State Infrastructure Funding Formula:** To provide comprehensive guidance and policy direction to Local Workforce Development Boards (local boards), Local Workforce Areas (local areas), and all WIOA required one-stop system partners on the establishment of a state back-up formula for infrastructure funding; and To establish a July 1, 2017, deadline for inclusion of infrastructure funding in local partner MOUs.
- **WIOA-2016-04: Local Workforce Development Board Certification:** To provide guidance to Local Workforce Development Boards and Local Areas on the process for certification of Local Workforce Development Boards (LWDBs) by the Colorado Workforce Development Council (CWDC).
- **WIOA-2016-05: WIOA Classroom Training and Work Based Learning - Interim Guidance:** To provide 1) interim guidance to Local Workforce Boards and Local Areas regarding the classroom based training and work based learning options available to participants of the WIOA Title I Adult, Dislocated Worker, and Youth programs; 2) To clarify the basic requirements and action steps necessary to implement each of the classroom based training and work based learning options; and 3) To identify which of these options will require the development of local policies once WIOA final regulations and comprehensive Policy Guidance Letters are issued.
- **MIS-2017-01: Guidance on Data Integrity and the Customer Participation Cycle for WIOA Title I and TAA Programs:** To provide uniform guidance for Local Areas that ensures compliance with the participation, enrollment, exit, and follow-up requirements of WIOA
- **WIOA-2017-01: Transfers of Funds Between the Adult and Dislocated Worker Programs:** Provide guidance regarding the transferring of funds between the Adult program and the Dislocated Worker program local formula allocations; and Outline the criteria and factors that would lead the Colorado Workforce Development Council, on behalf of the Governor, to approve or disapprove a request to transfer funds between the Adult and Dislocated Worker programs

- **WIOA-2017-02: Incumbent Worker Training:** To establish state policy regarding the use of local formula funds for Incumbent Worker Training (IWT) for WIOA Title I Adult and Dislocated Worker Programs
- **WIOA-2017-03: Program Evaluation:** To:
  - Provide initial guidance regarding the use of evaluations as a foundational practice within the workforce system
  - Explain the purpose and use of evaluation techniques
  - Encourage the identification and development of Promising Practices
- **WIOA-2017-04: Rapid Response Policy Guidance:** To provide information and guidelines for Rapid Response activities conducted by the State Rapid Response Team (SRRT) and the local areas. The intent of this PGL is to establish a basic standard of service across the State of Colorado. Local areas may improve or enhance this standard as indicated by local needs and resources.
- **WIOA-2017-05: Registered Apprenticeship:** To provide guidance to Local Workforce Development Boards and Local Areas on the new provisions for Registered Apprenticeship in WIOA
- **WIOA-2017-07: Local Negotiations on Infrastructure Funding:** To provide comprehensive guidance and policy direction to Local Workforce Development Boards (local boards), Local Workforce Areas (local areas), and all WIOA required one-stop system partners on the local negotiations process for infrastructure funding contributions.
- **WIOA-2017-08: Approval of Local Boards as One-Stop Operators:** To provide specific guidance and policy direction to Local Workforce Development Boards (LWDB) and local area directors on the approval process necessary for local boards to be the one-stop operator for the local area.
- **WIOA-2017-09: One-Stop Operator:** To provide information and technical assistance to local workforce development boards and local areas on the selection of a one-stop operator as required in the Workforce Innovation and Opportunity Act (WIOA) of 2014.
- **WIOA-2017-11: WIOA Title I Supportive Services:** To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of supportive services to Adult, Dislocated Worker, and Youth participants
- **WIOA-2017-12: WIOA Title I Youth Incentive Payments:** To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of incentive payments to WIOA Title I Youth participants
- **WIOA-2017-13: WIOA Title I Needs Related Payments:** To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of needs-related payments to WIOA Title I Adult, Dislocated Worker, and Youth participants

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### 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.

Colorado’s workforce programs are state administered and operated locally, allowing the needed customization to meet the unique needs of businesses and job seekers throughout Colorado. Therefore, each of the core programs and required one-stop partners function differently at both the state and local level. The Colorado Department of Labor and Employment (CDLE), Colorado Department of Education (CDE), and Colorado Department of Human Services (CDHS) each have administrative responsibility for one or more programs contained in this plan. Below is a list of each of the programs included in this Combined Plan and the state agency that has administrative responsibility for each program.

## State Agency Program Responsibility

Agency	Program
CDLE	- Adult (Title I) - Dislocated Worker (Title I) - Youth (Title I) - Wagner-Peyser (Wagner-Peyser Act, as amended by Title III) - Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV) Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act) - Jobs for Veterans State Grants (Title 38, Chapter 41) - Migrant and Seasonal Farmworker Program (Title I)
CDE	- Adult Education and Family Literacy (WIOA Title II)
CDHS	- Senior Community Service Employment Program (Title V Older Americans Act) Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)

### Narrative Organizational Charts of State Agencies

CDLE is led by the Executive Director, Sam Walker, and Deputy Executive Director Kristin Corash. There are eight divisions reporting to them including Employment and Training, Vocational Rehabilitation, Unemployment Insurance, and Labor Standards and Statistics. Additionally, as the Colorado Workforce Development Council is housed at CDLE for administrative purposes they also report to the Executive Director of CDLE.

William Dowling directs the Division of Employment and Training (E&T). The E&T Division includes the management information systems group and a large department named Workforce Development Programs led by Elise Lowe-Vaughn. Workforce Development Programs has administrative responsibility for Title I-B Programs, Wagner-Peyser, TAA, JVSG, and the Agricultural Outreach activities within the Wagner-Peyser program. Title I-B and Wagner-Peyser funds are distributed to the ten local workforce development areas in Colorado. JVSG is a state-run, federally funded program, and state employees are based at workforce centers throughout Colorado to deliver services.

Steve Anton directs the Division of Vocational Rehabilitation. Administrative staff are based in the CDLE main office in Denver and field staff are housed in locations throughout the state of Colorado.

Labor Standards and Statistics includes the Labor Market Information group and is headed by Alexandra Hall. Jeff Fitzgerald leads the Unemployment Insurance team.

Stephanie Veck directs the Workforce Development Council, and is supported by two assistant directors. Assistant Director Lee Wheeler-Berliner leads implementation of the state WIOA plan for the CWDC (including all partners of the system), and Assistant Director Wendy Brors leads work related to operations and industry engagement.

The Colorado Department of Education has administrative responsibility for Title II funds and conducts a competitive process to award grants to providers. The commissioner of education is Dr. Katy Anthes and she is hired by a publicly-elected state board of education. One of the divisions reporting to the commissioner is Innovation and Pathways, led by executive director Misti Ruthven. Underneath Ms. Ruthven is the Office of Adult Education Initiatives, led by Danielle Ongart. Ms. Ongart is the state AEFLA director and administers Title II programs and funds.

Colorado Works is administered through CDHS and is also county-run. Therefore the county department of human or social services is responsible for delivering services in each of Colorado's 64 counties. Many counties choose to contract portions of Colorado Works to the local workforce center or another provider. CDHS is led by executive director Reggie Bicha and has two departments that manage programs within this Combined Plan. The Office of Economic Security oversees the Colorado Works (TANF) Program and that

program is directly managed by the Employment and Benefits Director, Katie Griego. The Office of Community Access and Independence has an Aging and Adult Services unit that administers the SCSEP program.

## B. STATE BOARD

Provide a description of the State Board, including—

The Colorado Workforce Development Council serves as the State Board for Colorado and, through executive order, was updated to be fully compliant with the requirements of WIOA in 2015. A list of board members with affiliations can be viewed on the CWDC's web site, [www.colorado.gov/cwdc](http://www.colorado.gov/cwdc). All new board members are provided with an orientation on the background, purposes, and activities of the council. Staff are responsible for developing work plans to ensure that all required activities are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.

## I. MEMBERSHIP ROSTER

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

**Governor John Hickenlooper**

### **OFFICERS AND EXECUTIVE COMMITTEE**

**Kyle Sickman**, Chair, *Executive Committee Member* FirstBank

**Jay Hardy**, Past-Chair, *Executive Committee Member* Brinkman Partners

**Sam Walker**, *Executive Committee Member* Colorado Department of Labor & Employment

**Liddy Romero**, Secretary, *Executive Committee Member* WorkLife Partnership

**Katy Anthes**, *Executive Committee Member* Colorado Department of Education

**Stephanie Copeland**, *Executive Committee Member* Office of Economic Development & International Trade

**Josh Davies**, Education & Training Chair, *Executive Committee Member* Center for Work Ethic Development

**Ryan Keiffer**, Advocacy Chair, *Executive Committee Member* A-Train Marketing Communications

**Kim Hunter Reed, PhD**, *Executive Committee Member* Department of Higher Education  
**Kristie LaRose**, Treasurer, *Executive Committee Member* Lifeloc Technologies

### **BUSINESS MEMBERS**

**Evan Abbott**, Employers Council Evan Abbott, Employers Council

**Timothy A. Fry**, Mountain Racing Products

**Peggy Gair**, Royal Gorge Bridge & Park

**Carol Lewis**, Sonnenalp Hotel

**Lisanne McNew**, McNew & Associates, Inc.

**Bob Nogueira**, Comcast

**Rachel Patrick**, Small Business Department Center

**Heather Terenzio**, Tectonic Group

**Paul A. Harter**, Aqua-Hot Heating Systems, Inc

**Kevin Cory**, Noble Casing, Inc

**Frances Matthews**, IBM

**Michael Hess**, Blind Institute of Technology

**Bryan Dear**, The Payroll Department, Inc

**Ashley Valdez**, Xcel Energy

**Tara Hosick**, Climax Molybdenum Company

**WORKFORCE REPRESENTATIVES**

**Joe Anzures**Statewide Independent Living Council

**Joel Buchanan**Steelworkers Organization for Active Retirees

**Kelly Causey, PhD**

Colorado Children’s Campaign

**John Fleck**Colorado Sheet Metal Workers Apprenticeship

**Karla Grazier**Discover Goodwill of Southernand Western Colorado

**Sean McCarville**

Organized Labor

**STATE LEGISLATORS**

**Representative Dominique Jackson**, Colorado House of Representatives

**Senator Jack Tate**, Colorado State Senate

**GOVERNMENT REPRESENTATIVES**

**Reggie Bicha**Colorado Department of Human Services

**Commissioner Nancy Jackson**, Arapahoe County District 4, Local Elected Official

**Simon Tafoya**, Governor’s Office of Policy and Research

**EX-OFFICIO**

**Kristin Haveman Todd**, Daniels Fund

**Teina McConnell**, Pickens Technical College, representing Area Technical Colleges

**Kelly Ann Folks**, Arapahoe/Douglas Works!, representing Rocky Mountain Workforce Development Assn.

**Irv Halter**Colorado Department of Local Affairs

**Nancy McCallin**Colorado Community College System

**Rick Raemisch**Colorado Department of Corrections

**II. BOARD ACTIVITIES**

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

All new board members are provided with an orientation on the background, purposes, and activities of the council. Staff are responsible for developing work plans to ensure that all required activities are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.

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

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##### 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.

##### Adult, Dislocated Worker, Youth, and Wagner-Peyser

In accordance with Colorado's philosophy of local control, each local area designs and conducts its own evaluation. Additionally, the Colorado Department of Labor and Employment (CDLE) evaluates each local area's outcomes by utilizing the performance accountability measures described in 116(b) of WIOA by updating its Connecting Colorado on-line reporting system. CDLE provides tools to each local area that enable them to track their performance on these measures as the year progresses and to track the impact on performance of each of their participants.

In addition to local performance evaluation, CDLE uses a variety of assessment tools to evaluate and track program effectiveness and to promote a culture of continuous improvement, including:

Connecting Colorado Data/Reporting System - Connecting Colorado enables local workforce areas and their partners to track WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs, and discretionary grants in a single database. Reports generated from this system are "up to the minute," which allows better management of daily activities and performance. In addition to federally-mandated reports, CDLE has developed a variety of locally requested reports that allow staff to track caseloads, correct data entry errors, and analyze performance at the state, local and desk level. The reports measure levels of service and outcomes by program or targeted groups, provide the ability to measure the impact of outreach programs and specialized initiatives on performance, and can be easily adapted to add new reports and coding to accommodate new programs and initiatives. Core programs and required partners may access and use the system through data sharing agreements with the state or the local workforce areas.

In PY 14, Connecting Colorado added new modules to track and report on employer-focused activities. These modules link employer services with system-generated surveys to obtain information on customer satisfaction, effectiveness and service outcomes. The new reporting capability was recognized in a White House Paper, "Ready to Work: Job-Driven Training and American Opportunity," as a best practice.

Program Monitoring - CDLE's comprehensive monitoring guide, recognized as a model by the US Department of Labor (USDOL), is the result of an ongoing monitoring and technical assistance process that has built a strong working relationship between the state and local workforce areas. Quarterly, the State Monitoring team from CDLE meets with the local areas to review client service levels, program expenditure rates, and performance outcome results. Through these reviews, staff identifies areas that may require additional technical assistance and training to identify risk areas and rectify any deficiencies prior to the start of the annual state compliance monitoring. In PY16, CDLE will implement a new tiered risk assessment policy specifically for discretionary grants that will determine the criteria for compliance issues and draw on promising practices in grants management to prevent performance issues.

Return on Investment (ROI) - The CWDC, CDLE Labor Market Information and Workforce Development Programs sections, and the local workforce areas have used economic impact evaluations for several years

to determine the economic benefits and fiscal contribution of individuals who receive services through the workforce system, obtain employment, and are working six months later. Colorado will explore strategies to enhance the model to improve its effectiveness, expand it to include partner programs, and explore other ROI measurements such as the cost and benefits derived from reduced reliance on various forms of public assistance (e.g. Unemployment insurance, Colorado Works).

Continuous Improvement Management System (CIMS) - The CWDC has worked in partnership with the local boards and USDOL to develop a performance incentive system for workforce areas that meets the needs of the local area and ensures a high level of quality and continuous improvement across the state. The Continuous Improvement Management System (CIMS) is aligned with the Colorado Blueprint and CWDC strategic initiatives, and rewards local areas for pursuing:

- A dual customer approach that emphasizes a focus on business needs
- Strategies/partnerships to utilize industry sectors as the platform for increasing the number and level of training and educational opportunities, as well as for increasing the number of credentials achieved
- Partnership initiatives with economic development, chambers of commerce, and small business organizations
- Participation in the Key Industry Taskforce with the Governor's Office of Economic Development and International Trade
- Participation in the Statewide Business Services Alignment Initiative

CWDC and CDLE's Workforce Development Programs develop the local planning guidelines for workforce areas and review the local plans submitted each year. The alignment of all strategic planning efforts combined with implementation of continuous improvement efforts helps maintain an effective and efficient statewide workforce system that embodies innovation and excellent customer service.

Evidence Based Practice and Program Evaluation - CDLE is developing new policies and procedures to facilitate ongoing evaluation and research on current and new programs, including state initiatives, and to identify best practices that have the potential to become evidence based practice. This includes the development and use of logic models to establish benchmarks and outcome measures. CDLE will scale pilots that show promise to a statewide basis, or replicate the pilot through partner agencies who serve similar participants; similar evaluation methods will be used to determine whether the program warrants consideration as an Evidence Based Practice. Evaluation will also help identify and address areas such as gaps in services, program inefficiencies, duplication of effort, etc.

Data Coordination and Information Sharing - CWDC, CDLE and program partners will develop ways to share information across programs that take into account the federal and state rules that govern data collection and sharing and the release of information for each program. Colorado will then develop and implement the most effective and efficient solution for data coordination and information sharing, and use the resulting data to facilitate core program evaluations.

#### Adult Education and Family Literacy

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will develop and implement assessment consistent with the goals of the Colorado State Plan to emphasize quality, effectiveness, and improvement of programs at the provider level. The assessment of adult education and family literacy programs in Colorado will help to ensure that programs will continue to demonstrate their effectiveness.

Assessment of adult education and family literacy providers funded through Title II will include performance consistent with the negotiated performance measures for adult education and family literacy. Additionally, programming will be assessed based on effective utilization of evidence-based practices

associated with teaching and learning, as documented in local provider proposals or applications for grant funding, for career pathways and family literacy purposes. AEI will design a rubric to be used for programmatic assessment that will account for quality of instructional design and delivery, effectiveness of practices, and continuous improvement. In the competitive grant process, applicants will be required to submit plans for implementing evidence-based instructional design and continuous improvement, which will be used for consideration of funding under Title II.

Adult education and family literacy providers funded through Title II will be required to file comprehensive annual performance reports detailing both quantitative and qualitative results. Annual statistical reports from the information management system will track numbers of adult learners, demographic data such as sex and race/ethnicity, level of education, educational functioning level, and most importantly, progress at the local provider level.

The instructional performance measures will focus on continuous improvement of adult education and family literacy activities and are evaluated annually by core indicators including:

- Measurable Skill Gains - demonstrated improvements in literacy skill levels in reading, writing, and speaking the English language; numeracy, problem-solving; and English language acquisition.
- Credential Attainment - receipt of a high school equivalency diploma and/or placement in, retention in, or completion of postsecondary education and training, unsubsidized employment, or career advancement

AEI state leadership staff will conduct quarterly reviews to determine progress to date on program goals and objectives related to the Colorado State Plan and referenced in the proposals or application for grant funds. AEI will provide technical assistance both on a universal level and customized for individual programmatic needs, as deemed necessary based on quarterly reviews.

Further, AEI will continue to require adult and literacy providers funded through Title II to submit annual performance reports, addressing Colorado State Plan goals and content from the grant proposal or application. Based on the collection of programmatic reports, AEI will prepare a state report, which will assess programmatic performance and state leadership in meeting quality, effectiveness, and improvement initiatives to be submitted to the Department of Education Office of Career Technical and Adult Education.

### Vocational Rehabilitation

DVR reviews the program's performance each federal fiscal year based on the Standards and Indicators measures. Beginning in PY 2016 these criteria will be replaced with the performance measures outlined in WIOA section 116. The performance reports can be run on a statewide, regional, or local basis to provide a robust picture of performance throughout the state. To help inform the overall quality of the services being delivered, a quarterly client satisfaction survey is implemented and reviewed to guide work moving forward. Finally, a Comprehensive Statewide Needs Assessment is conducted every three years, which includes a survey of all staff members, to provide ongoing information and data points about service delivery.

## **B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS**

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

At a minimum, workforce delivery system partner program services, and the partner programs included in this Combined State Plan, will be assessed using performance measures they have in common, in addition

to other performance accountability measures required by each program's funding source(s) and grants. Performance will be reviewed at both the state and the local workforce area level.

### SCSEP

SCSEP has operational reporting requirements set by the US Department of Labor (DOL). The SPARQ (SCSEP Performance and Results Quarterly Progress Report) system is used for data collection and data reporting. The SPARQ system includes the Web Data Collection System (WDCS), which is an application that allows users to enter, store and manage SCSEP participant data.

The data is stored directly into the DOL SCSEP National Database via the Web. This Web-based system provides access to participants' information. The data entered into SPARQ is used to monitor enrollments, placements, follow-ups, data quality and other key data. SPARQ performs the calculation of the SCSEP performance measures and generates the Quarterly Progress Report (QPR) and Data Quality Report (DQR). The DOL analyzes data performance to determine if SCSEP is meeting annual performance goals each program year (July 1<sup>st</sup> through June 30<sup>th</sup>).

### Colorado Works

Through the Federal TANF program, the state is held accountable to the Federal Work Participation Rate (FWPR). This rate is calculated by the Federal Administration of Children and Families within US Health and Human Services, and states are expected to meet or exceed performance targets set on an annual basis. The performance rate is established through the analysis of CBMS data for countable participants, and their ability to meet the federally required hours of participation in countable activities. This information is reviewed and managed by county and state human service staff, and may also be a performance indicator for workforce development sub-contractors who have a formal agreement for service provision through the local human service department in their area.

Colorado has further promoted employment entry as a meaningful outcome for program participants, and implemented system changes to enable the tracking of employment nearly three years ago. A target rate for employment entry has been established in the Colorado Department of Human Services' 5-Year Strategic Plan, and is expected to be 35% or better for the current performance year. The rate is calculated through the attainment of certain outcomes identified in CBMS. This goal is tracked monthly through the Department's performance management system, known as C-Stat, and progress has been ahead of schedule toward the goal. County human service departments and their workforce development partners or sub-contractors are held accountable to this rate.

### TAA

With the passage of the Trade Adjustment Assistance Reauthorization Act of 2015, the TAA program will report performance under the WIOA measures used by core and partner programs. The TAA program currently reports all performance measures via the USDOL mandated quarterly Trade Act Participant Report (TAPR). As implemented by USDOL, the TAA program will utilize the new reporting PIRL report mechanism that is replacing TAPR to report data and evaluate the program.

In addition to the TAPR report, USDOL has implemented the TAA Data Integrity (TAA DI) report card that compares the financial and performance measures reported on the TAPR and the ETA 9130. If a state has any discrepancies between the two reports or any objectives that are not met, then the state must respond in writing on why the objective was not met and how it will be improved or fixed. The TAADI report card has provided areas of opportunity for improvement with the TAA program and will guide continued efforts in the future.

All case files at the local workforce center are monitored on an annual basis by CDLE's Workforce Development Programs Regional Services Team. The TAA program utilizes the monitoring reviews to

discover trends within the program and provide additional training to the regional case managers. In addition to annual monitoring, TAA files are verified by USDOL's annual Data Integrity review.

### Jobs for Veterans State Grant

The demonstration of Priority of Service is the responsibility of American Job Center (AJC) staff. It is also the responsibility of the state and county leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative (LVER), CDLE Monitors, State Veterans Program Coordinator and Assistant Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

CDLE and USDOL/VETS monitor and review the provision of services to veterans at the state and local levels at least annually, and provide the Executive Director, local directors, and the local workforce center manager with the findings, recommendations and/or corrective actions. LVERs will be brought together once a quarter for Priority of Service overview and training. An invitation to AJC staff in need of Priority of Service training will be extended but will not be paid out of JVSG funds. A Priority of Service Power Point will become an attachment and sent out to the each AJC region. This Power Point, in the absence of a LVER, can be used for training purposes of AJC new hires. As a condition of receiving any USDOL funds for programs, local areas will provide Priority of Service to veterans and covered persons. This annual agreement is a contract between the State of Colorado and the local areas. The contract must be signed by both the state and local areas as a condition to receive all US Department of Labor funds.

### MSFW

The MSFW programs, as required by US Department of Labor (DOL) regulations, work closely with partner agencies to provide information and referrals to our shared customer base. Each significant office hands out MSFW packets to migrants during outreach activities. These informational packets include resources for English as a Second Language (ESL), Migrant Education Program (MEP) and training opportunities available through the WIOA 167 provider. The agency Memorandas of Understanding (MOUs) have provided a way to track some of our referrals between agencies. MOUs have been in place with three of our close partners. The Connecting Colorado (CC) data base is used in part to collect data from referrals that have been made by Workforce agencies and outreach workers. The data entered in CC is used for monitoring purposes to ensure qualitative and quantitative proportionate referrals provided to the MSFW population

The overall program performance measures include: Entered Employment; Employment Retention; Average Earnings; Community Service referrals; and referrals to educational services and organizations. These performance measures are reviewed quarterly and targets are adjusted based on the economic conditions of Colorado. MOU referrals are also reviewed on a quarterly basis and discussed in meetings with our partners for reporting and evaluation purposes.

Additionally, CDLE will work with partner programs to develop additional forms of evaluation for joint initiatives, such as the CDLE-CDOC Road to Work pilot project targeting high-risk parolees. In addition to looking at the percentage of participants who obtain and maintain employment, and their average wage at placement, the pilot will also identify and evaluate which service strategies are the most effective at helping participants meet their goals at each stage of the process (e.g. assessment, training, credentialing, parole, etc.)

### C. PREVIOUS ASSESSMENT RESULTS

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

The Annual Report for Activities Funded through WIOA for Program Year 2016 can be found at this web link: [https://www.colorado.gov/pacific/sites/default/files/AppendixK\\_PY16\\_Annual\\_Report.pdf](https://www.colorado.gov/pacific/sites/default/files/AppendixK_PY16_Annual_Report.pdf). In this report it shares the progress that has been made towards achieving the goals in this state plan. It also reports on activities at the local workforce development areas that demonstrate the effectiveness of those programs.

Due to the lagtime in tracking the performance measures under section 116, reports are not officially available on the state's progress towards those measures. However, running reports utilizing all exiters in the date range for PY16 shows that Colorado is meeting or exceeded the negotiated targets for the performance measures.

Additionally, Colorado completed a one-stop certification process during PY16 and early PY17, and all local areas have been certified, which is in part based on the effectiveness of programming. Customer feedback was captured during that process that demonstrates the results and the strengths of Colorado's public workforce system.

### D. EVALUATION

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

The Colorado State Legislature is considering legislation to create a Results First Working Group to examine ways to build program evaluation capacity for state and local programs. If enacted, it will establish common definitions, policies, and guidelines for the evaluation of state-funded programs. CDLE/WDP will utilize these to the extent practicable in the implementation, delivery and evaluation of federal employment and training programs, and coordinate these activities with federal requirements, including evaluation activities conducted by the Secretary of Labor under WIOA. Colorado will use the results of state and federal evaluations to improve and enhance service delivery.

The use of evidence-based practices (EBT) will be problematic because there are a limited number of evidence-based practices in the field of workforce development, and the ones that currently exist may be difficult to implement with fidelity in Colorado. Colorado will therefore, utilize existing evidence-based practices only to the extent that they are feasible to implement, but will actively encourage the use and development of promising and theory-based practices that may eventually become evidence-based practices.

CDLE/WDP will:

- (1) Review existing program evaluation tools and processes
- (2) Work with its partner agencies to determine whether additional resources are required, and develop additional methods to evaluate existing data
- (3) Develop policies and guidance on how to identify and evaluate potential promising practices, and use evaluation as part of process improvement
- (4) Require the use of logic models and outcome measures as part of the development of new projects and proposals
- (5) Share information regarding promising practices identified through these activities with the appropriate state or federal entity for further evaluation to determine whether it might be an evidence-based practice
- (6) Work with the CWDC, local workforce development boards and state partner agencies to develop and use quasi-research methods to evaluate the effectiveness of core programs and new initiatives, to the extent practicable and within the constraints of existing resources.

CDLE/WDP will continue to utilize existing methods for program evaluation, such as annual compliance monitoring and data validation, routine tracking of state and local performance and expenditures, and look for ways to incorporate additional outcome measures. CDLE/WDP will work with its state partners to develop training in evaluation techniques for staff and foster a culture of informed inquiry. CDLE/WDP will also work with the local workforce areas to build capacity, and encourage the development and use of additional outcome measures and program evaluation as part of the selection and oversight processes for contracted workforce center operations.

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## 5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

### A. FOR TITLE I PROGRAMS

For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

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

Youth funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii). The formula is based on three components, with each component having a weight of 1/3. The components are the relative number of unemployed individuals in areas of substantial unemployment, the relative excess number of unemployed individuals in each state compared to the total excess number of unemployed individuals in all states, and the relative number of youth living in poverty. A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

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

Adult funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii). The formula is based on three components, with each component having a weight

of 1/3. The components are the relative number of unemployed individuals in areas of substantial unemployment, the relative excess number of unemployed individuals in each state compared to the total excess number of unemployed individuals in all states, and the relative number of adults living in poverty. A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

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

Dislocated worker funds are formula allocated to local areas based on a formula developed in partnership by the state agency, the CWDC, local elected officials, and local workforce areas. The determining factors and their weights are: 1) Share of insured unemployment (20%), Share of number served (20%); Share of percentage of expenditures (15%); Share of declining industry (10%); Share of farm/ranch in crisis (5%); Share of unemployment insurance claims open longer than 15 weeks (25%); and Share of federal fiscal year unemployment (5%). A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

#### B. FOR TITLE II:

##### I. MULTI-YEAR GRANTS OR CONTRACTS

Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

The Colorado Department of Education (CDE) is the State's eligible agency for adult education and family literacy programs. CDE is responsible for administering funds and providing program and performance oversight to sub-grantees.

Adult education and family literacy eligible providers approved under the Workforce Investment Act of 1998 (WIA) requirements will continue to receive funding through June 30, 2017, as long as they adhere to State and federal grant expectations, as measured through an annual continuation application, annual financial reports, annual performance reports, and desktop monitoring.

During grant year 2016-17, CDE will design and implement a new competition application process for all Title II funding. The WIOA competitive grant process for local adult education and family literacy providers will include a request for models associated with customer-centered services, including adult basic and secondary education and English language acquisition within career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty and build stronger local areas within Colorado. This process will include rating responses to the thirteen (13) considerations in Title II of WIOA.

Timeline: The following steps will be taken in conducting the Title II competition:

- November 2016: CDE publishes three-year federal AEFLA Request for Proposals (RFP) aligned with the priorities in the approved Combined State Plan.
- December 2016 - January 2017: CDE provides technical assistance to inquiries from potential eligible providers.

- January 2017: Eligible providers submit “Intent to Apply” notification to CDE.
- January - March 2017: CDE recruits candidates to review and score AEFLA grant applications.
- March 2017: Due date for AEFLA grant applications.
- March - April 2017: Reviewers review and score AEFLA grant applications.
- April 2017: CDE conducts review of budgets and other grant requirements and develops a rank-ordered slate based on applicant scores for each federally recognized local workforce development area.
- May 2017: CDE announces AEFLA grant applicants that will receive funding.
- July 1, 2017: AEFLA grant providers begin grant cycle, programming, and funding.

Funds will be available for a three-year grant cycle (July 1, 2017 - June 30, 2020) for the development, implementation, and/or delivery of adult education and family literacy programs that support strengthening of local areas. After successful development, implementation, and/or delivery of a program during year one of the three-year grant cycle, a provider may apply on an annual basis (for years two and three of the original three-year grant cycle) for continuation of financial support through Title II funding. All providers will be subject to the same funding cycles.

### *Proposal Process*

As a critical component of the Colorado talent development system, providers are encouraged to expand and improve the current system of delivering adult education and family literacy services and to encourage the establishment of adult education and family literacy programs that will:

- Build career pathways providing adults with basic and secondary education to enable them to earn a high school equivalency diploma, transition into postsecondary education or training, and/or gain or advance in employment in order to achieve self-sufficiency;
- Provide parents and guardians with sufficient skills to become full partners in the educational development of their children.

AEI will establish a work group of core partners and Combined State Plan partners to develop the Request for Proposal and indicators of successful performance in providing adult education and family literacy services as part of the Colorado talent development system. Demonstrated effectiveness will be included in the indicators of successful performance. Effectiveness will be based on improving the literacy of eligible individuals and the program’s proposed ability to meet the Colorado levels of performance. Further, the competitive grant process will include focus on plans for adult education and family literacy providers to include how they will ensure service to individuals with barriers to economic self-sufficiency.

AEI will seek the best possible combination of agencies, organizations, and institutions to implement the goals and objectives within the Colorado State Plan and allowed through the WIOA. Local programs may be approved for three-year funding, contingent on funding availability and CDE approval.

Proposals will be read and reviewed by a Review Team selected from the following areas:

- Core partners
- Combined State Plan partners
- Business and industry
- Civic organizations
- CDE representation
- Educational leadership
- School district personnel
- Non-profit agencies
- Local Workforce Development Boards (for alignment with local area plans)

The CDE Office of Competitive Grants will oversee the Request for Proposal and competition process. Title II Adult Education and Family Literacy funding will be used to award grants to providers offering adult education and literacy services in each of the ten federally recognized local workforce development areas. The funding allocated to each federally recognized local workforce development area will be based on the literacy needs within each area, using data from the American Community Survey. A formula method will be used to determine the amount of funding and will take into consideration the literacy rate in the federally recognized local workforce development area, existing capacity of the community to meet diverse needs of the learners, innovative practices, service delivery based on current and relevant research, demonstrated effectiveness in improving literacy of eligible individuals, and the core indicators of performance as outlined in Title II of WIOA. The formula will be designed to consider local provider levels of performance and service rates as compared to established benchmarks as a basis for increase or decrease in funds.

## II. ENSURE DIRECT AND EQUITABLE ACCESS

Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained reviewers and AEI staff.

In order to provide adult education and family literacy services, AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado. Written proposals are solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

The entire RFP and related documents will be posted on the CDE web site in a format that allows local providers to download and print them.

Efforts will be made to solicit proposals from each of the ten federally designated workforce development areas to ensure adult education and family literacy services for Coloradoans in each local area.

AEI will accept proposals from:

- Local educational agencies;
- Community-based organizations or faith-based organization;
- Volunteer literacy organizations;
- Institutions of higher education;
- Public or private nonprofit agencies;
- Libraries;
- Public housing authorities;
- Nonprofit institutions that are not described in any of the above that have the ability to provide adult education and family literacy activities to eligible individuals;
- Consortia or coalitions of the agencies, organizations, institutions, libraries, or authorities described above; and
- Partnerships between an employer and an entity described above.

### *Description of Steps to Ensure Direct and Equitable Access*

1. AEI will accept Requests for Proposals from all eligible providers.
2. In order to assure equitable access, all applicants will received identical Requests for Proposals, have the same amount of time to prepare and submit said proposals, and be evaluated using the same criteria and process.
3. Eligible providers will submit proposals directly to the CDE Office of Competitive Grants, and funded providers will receive payments directly from the CDE as approved.

Some eligible providers may choose to be subcontractors, in which case the subcontractor's proposal much be incorporated into the eligible provider's proposal. Subcontractors are subject to the same process described in detail above, as well as instituting and maintaining procedures to meet all accountability, intensity, duration, and continuous improvement factors for providing services to adult learners.

### 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.

Colorado has only one designated state unit for VR services that encompasses all populations and activities.

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## 6. PROGRAM DATA

### A. DATA ALIGNMENT AND INTEGRATION

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

#### I. DESCRIBE THE STATE'S PLANS TO MAKE THE MANAGEMENT INFORMATION SYSTEMS FOR THE CORE PROGRAMS INTEROPERABLE TO MAXIMIZE THE EFFICIENT EXCHANGE OF COMMON DATA ELEMENTS TO SUPPORT ASSESSMENT AND EVALUATION.

Colorado recognizes the opportunities that exist to streamline and enhance services and reporting procedures through data sharing. Activities are taking place at multiple points along the spectrum that runs from complete isolation in data systems to full integration across partners. To support these efforts, all partners are supportive of education and training on specific systems and are willing to advocate for policy changes as needed to establish data sharing agreements.

A project has begun to share data between the Connecting Colorado system and the Colorado Benefits Management System (CBMS) used to track the Colorado Works and SNAP programs. This will allow workforce center staff to track services given to work ready participants in these programs in Connecting Colorado. Those services will then automatically move to the Human Services systems for Federal reporting. This prevents any need for double data entry between these systems. Data sharing capabilities will continue to be expanded over the four-year life of this combined plan.

The Eligible Training Provider list has been moved to the Colorado Department of Higher Education (CDHE) and Colorado Unemployment Insurance Wage data is being shared with this Department. This will allow CDHE to calculate the performance metrics directly for schools using data they currently report

regularly to CDHE. In addition, this will allow CDHE to assist the Adult Education and Family Literacy program with WIOA-required reporting. This will also solve the issue of confidentiality under FERPA rules because CDHE will receive the student data from all the training providers and run the wage data matches on their system.

The Division of Vocational Rehabilitation moved from CDHS to CDLE on July 1<sup>st</sup>, 2016. This will facilitate linkages between their reporting systems and Connecting Colorado both for better service to customers and to more easily meet WIOA reporting requirements. Data sharing initiatives will begin after this move.

## **II. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN.**

The state has a comprehensive system of on-demand reports, utilizing data from its statewide Connecting Colorado database, that allows state and local staff to view outcome data at the state, regional, local, and case manager level for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. These reports provide mechanisms to measure levels of service and outcomes by program or targeted groups such as individuals with disabilities, veterans, etc., providing a better measure of the impact of outreach programs or specialized initiatives on performance. All reports are available to run anytime by any staff person, and all data, with the exception of wage data contained in the report, is up to the minute (wage data is updated quarterly). In addition, all performance reports have a breakout of how individual clients fit into each performance measure, whether positive, neutral or negative. This allows staff to better find errors and improves analysis by revealing the source of the data down to the individual level. Supplemental data that hasn't yet been obtained is tracked on a report that allows the case manager to obtain a list of clients that should be contacted during any given quarter.

Colorado provides ongoing technical assistance and training to its local workforce areas to ensure their understanding of performance measures and the impact of program strategies on performance outcomes. Monthly meetings are held between state and local staff to ensure good communication on performance and other related issues. These meetings also serve as the point of discussion on enhancements to Connecting Colorado that will further support performance accountability. The programs use the same set of services whenever possible so a service should only need to be entered once for a customer who is enrolled in multiple programs. This also helps in establishing integrated service plans for customers served by more than one program.

The WIOA required partners at the state and local levels have engaged in initial discussions regarding ways to streamline intake and service delivery and will incorporate their agreements in their regional and local plans, as well as their MOUs and cost-sharing agreements. Finalization of these plans and agreements will trigger a broad-based initiative to determine how data systems can be integrated or data can be shared across the various data systems of all the required partners that participate in the workforce system over the next four years.

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

The CWDC supports data sharing and alignment at the state level by convening a data sharing group across state agency partners and at the local level through the design of local and regional plans and the Continuous Improvement Management (CIMS) Process. The CWDC is supportive of education and training on specific systems and will advocate for policy changes as needed to establish data sharing agreements. Most recently, The Eligible Training Provider List has been transferred to CDHE to create better data reports and to more easily track performance of providers.

Moving forward, as highlighted in strategic goal 2, a LEAN process will be conducted for job seeker services across the entire system. A component of this process will include process mapping of the intake steps that each individual program utilizes. This intake mapping effort will serve as an exploratory step in the examination of the feasibility, value, and customer experience benefits in pursuing a common intake system.

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

Once the report requirements are finalized by USDOL, Colorado will contract with the Connecting Colorado system vendor to produce the PIRL and other required reports. System changes have already been completed to gather new required information and to calculate eligibility based on the proposed rules. These will be modified if needed to match the final regulations, but the changes were needed to allow WIOA-compliant enrollments. There are many other reports that will require changes based on the new WIOA performance and tracking requirements that are designed to provide information specifically for local boards.

Adult education and family literacy providers will request and collect data at client in-take and will input into the AEI information management system. Through state agency data agreements, a data match will be conducted for employment, median earnings, credential attainment, and measurable skill gain for individuals served through adult education and family literacy as part of the Colorado talent development system.

DVR will work closely and collaboratively with the electronic case management vendor to produce necessary reports. Resources will be committed to support upgrades and maintenance of data collection and reporting—including the addition of new data tables, data fields and reports—to collect data on and assess new WIOA data requirements and performance standards. DVR will participate with the agency's vendor as part of a multi-state test environment to determine the functionality of the data collection and reporting applications and will provide feedback to the vendor.

Colorado has a state longitudinal data system in development under our Department of Education. Once this database is in place we should be able to more easily share data required for reporting under WIOA, but all needed data is being shared currently under existing data sharing agreements and processes. Current processes will be able to meet the reporting requirements until the integrated data warehouse is complete.

*Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.*

#### B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

Colorado will use UI wage data to track job retention and wages across the core programs and Colorado Works through interagency agreements. For Colorado Works, the information is utilized to corroborate data collected through CBMS, and to inform any gaps between what is reported in the CBMS system and formal earnings records. Alignment projects between CBMS and Connecting Colorado are currently

underway, and it is expected that upon completion, local areas as well as the state will be able to better understand the outcomes associated with Colorado Works customers served through the workforce system through comparison to other program codes already available. Further strategies between UI reports and CBMS integration will be pursued to eliminate manual data entry and reduce errors on human service programs.

Case management follow-up services will be used to assess the progress of participants exiting to jobs and post-secondary education. These approaches will be enhanced through the local MOU service agreements that are being developed with the required one-stop partners. At the state level Colorado will also work with its state partners to share data and develop methods to evaluate outcomes for participants served through their respective programs. DVR, specifically, will explore opportunities to work with core, combined plan and other partners to collect and share data, including Annual Performance Report Indicator (APR) data required by the Individuals with Disabilities Education Act. DVR will also work closely with its electronic case management system vendor as the vendor develops and modifies their program in order to collect WIOA-mandated post-secondary and employment outcome data.

In addition, Colorado will incorporate evaluation strategies into all of its programs and initiatives, and develop additional outcome measures, such as wage progression, to help determine the effectiveness of strategies such as sectors and career pathways.

For Adult Education and Family Literacy programs, data about the progress of participants exiting the adult education and family literacy program into post-secondary education and training and employment will be analyzed annually as part of the program annual performance report process and the grant continuation application process. Data about advancement will be used by AEI in development of targeted technical assistance and promotion of best practices. Overall state assessment of participants' post-program success will be included in the statewide annual performance report submitted to the Department of Education Office of Career Technical and Adult Education.

### 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.)

All data needed to calculate and analyze performance for continuous improvement resides in Connecting Colorado. Wage records are uploaded quarterly to Connecting Colorado from the Unemployment Insurance data system, and currently Connecting Colorado maintains a file of wage data extending back to January 1996. This file is used in a variety of on-demand Connecting Colorado reports that track wage-based performance for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. Workforce areas and their partners with data sharing agreements have direct access to these reports (or can be provided these reports by the local workforce areas), which contain aggregated wage record information. Unemployment Insurance has formal data release agreements with the local workforce areas for their direct access to individual wage records available through the Colorado Unemployment Benefits System (CUBS).

### D. PRIVACY SAFEGUARDS

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

The State of Colorado takes its responsibility very seriously to protect the privacy of individuals and their personally-identifiable information (PII). Connecting Colorado utilizes masked individual identifiers for

online customer records and reports to ensure that the social security number (SSN) remains confidential. In addition, Connecting Colorado provides a multilevel system of access to data that is controlled by state and local administrators of the system. The level of access granted determines which screens and which data can be viewed by staff and whether individual staff has read only or data entry permissions. Industry standard encryptions ensure that data transfers between agencies are secure.

CDLE has moved the Eligible Training Provider list to the CDHE to ensure further security of PII. CDHE receives student information under FERPA (20 U.S.C. 1232g) as an educational entity, and CDHE also receives Colorado Unemployment Insurance Wage data on an annual basis. CDHE can match the student cohort data with the wage records provided to easily calculate performance for training programs in Colorado without compromising PII since all data calculations happen securely within CDHE. Performance is always aggregated and never presented at an individual level that might compromise the anonymity of students.

This process will allow the schools to drop expensive surveys they have been forced to perform for any program that had to be on the Eligible Training Provider list in order to gather results for the “All Students” section. In addition, it will make the performance results much more consistent, since the results will all be based on Colorado Unemployment Insurance Wage data.

DVR will maintain adherence to federal regulatory requirements around confidentiality and state requirements around personally identifiable information (PII) through staff training related to confidentiality of customer information. Additionally, DVR has and will continue to maintain processes and procedures that support the HIPAA level of confidentiality within its electronic case management system.

Within SCSEP, the privacy of participants, host agencies and employers is protected and stored in locked files that are not accessible to anyone other than authorized personnel. Data that is transmitted via the internet is sent encrypted, and only authorized personnel have access to the electronic files. Participants are given the option of providing their social security numbers for administrative purposes, and they are also asked to sign a consent form allowing release of information for the purpose of enhancing and marketing SCSEP.

The Colorado Department of Education (CDE) takes seriously its obligation to protect the privacy of Personally Identifiable Information (PII) collected, used, shared, and stored by CDE. CDE does not disclose student PII unless the disclosure is permitted under the Family Educational Rights and Privacy Act (FERPA) and covered by the appropriate agreements as required by Colorado’s Student Data Transparency and Security Act (SDTSA) [C.R.S. 22-16-101 et. seq.]. These agreements are required for any individual or entity that receives student PII from CDE. In addition, those individuals or entities receiving student PII from CDE are required to ensure that their subcontractors contractually agree to comply with the requirements of SDTSA.

CDE’s contractual agreements include specific information security and privacy requirements, including, but not limited to, incident response procedures and requirements, the encryption of student PII at rest and in transit, limitation on the uses of student PII to only what is specifically stated in the agreement, destruction of student PII upon the termination of the agreement, best practices around the use of technology, limited data access, and requirements to remove personally identifiable information from public reporting.

Violations of these agreements can result in the immediate termination of the agreement, a halt to all data sharing, and, under the requirements of FERPA, a prohibition from sharing student PII with the violating entity for a period of five years. In addition, all previously shared student PII will need to be immediately destroyed.

Colorado Works is guided by CCR 3.609.94: Protections to the Individual, which specifies that all information concerning an applicant or recipient is confidential and the exclusive property of the state and

county departments of human services. Unless disclosure is specifically permitted, no information will be released to other agencies or individuals.

By signing the application for assistance, clients agree to allow county departments to get and share information with any of the following agencies: Social Security Administration, Internal Revenue Service, United States Customs and Immigration Services, Colorado Department of Labor and Employment, financial institutions, child support agencies, employers, courts or other law enforcement agencies. Information may also be shared with county, state and federal auditors and individuals executing the Income and Eligibility Verification System (IEVS).

Permission to release information to advocate agencies that apply for, or act on behalf of, an individual is implied, as long as the county department is reasonably sure the confidential nature of the information will be preserved.

All other disclosure of information to agencies or individuals not listed above requires a formal, written release from the applicant/recipient.

County departments of human services are expected to provide privacy during client interviews and are instructed to set up facilities in a way that ensures information is not inadvertently revealed. County workers must also use discretion outside the office, by not mentioning department business or any other confidential information.

Storing of county records is located at 3.603, Case File Maintenance and outlines the responsibility for county departments to provide a location to store files in a safe place in order to prevent accidental disclosure of confidential information.

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## 7. PRIORITY OF SERVICE FOR VETERANS

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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.

Since the enactment of the Jobs for Veterans Act in 2002, Priority of Service has been established in the State of Colorado under policy guidance issued by the Colorado Department of Labor and Employment. Priority of Service, as required by 38 U.S.C § 4215 and 20 C.F.R. 1001 and 1010, is provided to ensure veterans and covered persons receive consideration for all opportunities, for which they qualify, funded in whole or part by the United States Department of Labor. After receipt of state policy, local AJC's are required to develop internal veterans' Priority of Service policies and procedures and implementing them after review and approval by the State Veterans Program Coordinator. Each year they are required to submit their local policy to the State Coordinator for review, particularly when changes have been made. The Priority of Service regulations require that local AJC's implement policies and procedures that:

- Identify veterans and eligible spouses at point of entry (physical locations, web sites, and other virtual service delivery resources);
- Advise veterans and eligible spouse of their entitlement to Priority of Service;
- Make veterans and eligible spouses aware of the full array of employment, training and placement services available; and
- Identify applicable eligibility requirements for programs and services.
- Veterans and covered person are identified and made aware of their entitlement for Priority of Service at the point of entry into Colorado's workforce system.

Services are made available and provided to eligible veterans transitioning service members, chapter 31 veterans, Native American veterans, and other groups targeted for special consideration like SBE veterans on a priority basis.

If “entry” is made via Colorado Department of Labor and Employment website under “Veteran Services”, Veterans are made aware of their entitlement to Priority of Service. This information advises the veteran or covered person of their entitlement to Priority of Service, and provides a web link that advises the covered persons of the full array of employment, training, and placement services available under Priority of Service. If a veteran or covered person is making “entry” via our Connecting Colorado statewide database they are made aware of their entitlement to Priority of Service through information on the registration page as well as at the end of the registration process. Additionally, veterans or covered persons who enter our workforce system via a local workforce center office are made aware of their entitlement to Priority of Service by signage posted in the local office. The signage advises veterans of their entitlement for Priority of Service and directs them to speak with workforce center staff regarding their eligibility for Priority of Service and the eligibility requirements for a particular program or service.

**Priority of Service in Programs:** AJCs that operate programs which deliver services to the public as a whole without targeting specific groups, veterans and eligible spouses will receive Priority of Service over all other program participants. The primary universal access services are the “core” services delivered through the AJC staff under the Wagner-Peyser and WIOA programs. Veterans and eligible spouses receive the first level of priority in universal access programs.

**1.** Some programs are required by law to provide a priority for a particular group of individuals or require the program to spend a certain portion of program funds on a particular group of persons. For programs with this type of statutory priority, AJC program operators will determine the status of each individual veteran or eligible spouse and apply Priority of Service as described below:

- Veterans and eligible spouses who meet the mandatory priorities and program eligibility must receive the highest level of priority for the program or service;
- Veterans and eligible spouses who do not meet the program-specific mandatory priority or spending requirement or limitation then receive the third level of priority for the program or service;
- Non-covered person who meet the program's mandatory priorities and program eligibility then receive the second level of priority for the program or service;
- Non-covered persons outside the program-specific mandatory priority or spending requirement or limitation then receive the fourth level of priority for the program or service.

**2.** Some qualified job training programs may include a focus on a particular group or make efforts to provide a certain level of service to a particular group without the authorizing law specifically mandating that the target group be served before other eligible individuals. For this type of discretionary focus, Priority of Service will be applied as described below:

- Veterans and eligible spouses who meet program eligibility and target population;
- Veterans who meet program eligibility but not target population;
- Non-covered persons who meet program eligibility and target population;
- Non-covered persons who meet program eligibility but not target population.

**3.** State policy requires that all AJC’s establish policy on recruitment, intake and enrollment of Veterans within programs offered, to ensure that veterans are notified, reviewed, and enrolled before non-veterans. In incidences where it has been noted that the veterans who have applied for but not completed the registration and/or enrollment requirements within a program, AJC staff is required to outreach to the veterans encouraging them to complete the process. Their outreach efforts must be documented before the

application and/or enrollment is closed. Documentation must show that various means were used to outreach to the veterans.

**Priority of Service in Employment Opportunities:** When job orders are entered into the state's automated database, Connecting Colorado, whether manually or virtually, they are placed in a 4 hour "vet hold" status. This allows only Veterans who have all required skills and who meet all required qualifications to be identified and contacted as suitable candidates before being released for review by non-veterans. The veterans are contacted about this job opportunity using our Integrated Voice Response (IVR) system which automatically e-mails all qualified veterans first and relays the information about the job opportunity and how to apply for the position. After each IVR email, a note is automatically entered into the applicant's record with information about the job posting. This noted information allows the JVSG supported staff and AJC staff to assist the Veterans if and when the Veterans call in regards to the job posting(s).

1. When the automated email generated by the IVR fails to reach the targeted Veteran due to a bad email address, a non-delivered notice is posted within the system. In the demonstration of providing Priority of Service, state policy requires that an attempt to contact the Veteran by phone and post card is required. These additional attempts to contact the veteran are the responsibility of the AJC staff - not JVSG staff.

2. When a job order is placed in Connecting Colorado system, a list of qualified veterans can be generated and viewed by the posting Employer, JVSG and/or, AJC staff. This generated list places all Veterans, beginning with Special disabled, disabled and then all other veterans, ahead of qualified non-veterans in accordance with 20 CFR Part 1001. When the automated applicant list is generated and AJC staff notices that the generated list contains little to no qualified veterans, they will conduct a manual search as a demonstration of Priority of Service. This manual applicant search acts as a safe guard to ensure that qualified veterans, even if there is one, is given priority within job search services.

The demonstration of Priority of Service is the responsibility of AJC staff. It is also the responsibility of the state and county leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative, CDLE Monitors, State Veterans Program Coordinator and Assistant Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

Regarding the referral process for veterans with significant barriers to employment to Disabled Veteran Outreach Program specialists, the local American Job Center (AJC) staff is responsible for providing an initial assessment at the physical workforce center point of entry. This triage is a two-part triage process that is conducted first for the purpose of determining whether or not a service member, veteran and/or spouse is eligible to receive DVOP services. Secondly, SBE eligible veterans and/or other eligible persons may be referred for DVOP services only after they have received an initial assessment to address and determine their level of need. This part of the assessment includes, but is not limited to, verifying the accuracy of information provided during Connecting Colorado registration, and determining the basic job readiness and the extent of AJC services needed by the individual.

Once a service member, veteran and/or eligible spouse has been deemed eligible for DVOP services, the AJC staff member then notifies the DVOP specialist either through email, phone or physically walking the individual over to the DVOP specialist. The triage checklist, or the locally approved version, must be uploaded to Connecting Colorado by the AJC staff and attached to the individual's CC record, to prevent veterans returning to the AJC or crossing regions from being subjected to a multiple triages. Although the two-part triage process identifies those eligible for DVOP services, the AJC is ultimately responsible for providing employment services to all registered individuals who are seeking assistance. The intent for assigning DVOP and RVER staff to the AJC is to supplement and not supplant the duties of the AJC staff when providing services to veteran customers. In addition, in offices where no DVOPs are stationed, the AJC staff is expected to provide the same level of needed intensive services while providing the service member, veteran and/or spouse the option of making an appointment to be seen by a DVOP specialist during a scheduled meeting.

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

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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.

Colorado has a rich history of going above and beyond the compliance requirements of Section 188 of the Workforce Investment Act (which are now incorporated in Section 188 of WIOA), and the American's with Disabilities Act of 1990. Over the life of the Workforce Investment Act, Colorado's one-stop system was governed by a comprehensive set of state policies regarding non-discrimination and accessibility that are in the process of being updated with the most current requirements. These policies include a robust system of monitoring to ensure that one-stop center programs practice non-discrimination and that centers accommodate the needs of those with disabilities. In addition, Colorado served as a lead state in the national Disability Navigator initiative between 2002 and 2009, providing technical assistance to other states and participating in the national evaluation process. During that time, the one-stop system partnered with Assistive Technology Partners, who worked with staff on the purchase of assistive technology and trained staff in its use.

Colorado expects to build upon its past successes by strengthening its partnership with the Division of Vocational Rehabilitation, which will become part of the Colorado Department of Labor and Employment as of July 1, 2016. As the leases for local DVR offices come up for renewal, there will be an effort to co-locate with one-stop centers. DVR staff is also preparing to provide ongoing training to their one-stop colleagues within the core programs and assist with the procurement and installation of more current assistive technology. Colorado's one-stop certification policy includes the following criteria related to accessibility:

*Physical and programmatic accessibility - ADA Guidelines:*

*· In compliance as shown by an inspection, audit, or review within last 3 years*

Colorado applied for and received a \$2.25 million Disability Employment Initiative grant from USDOL that is being implemented during 2018 and will provide increased access to one-stop career and training services. WIOA Title I funds will be leveraged with grant funds to ensure increased training and employment opportunities for the disabled population.

## 9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS.

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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.

Colorado is committed to ensuring that local areas take reasonable steps to provide “meaningful access” to their workforce programs and services by English Language Learners. The Colorado Workforce Speaks Taskforce was established in February 2005 in response to Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” and to make federally assisted workforce development programs and activities more accessible to individuals who are limited in their ability to use the English language.

Colorado Workforce Speaks! is a statewide task force working toward Colorado’s economic vitality by enhancing employment and career development opportunities for English language learners through collaboration with businesses, educational institutions, community/faith-based organizations, and Colorado’s Workforce Development System. Local workforce area representatives participate on this taskforce to provide input on the State’s directives and projects related to serving English language learners (ELLs).

Colorado has established policy on language assistance in State Policy Guidance Letter ADM-2010-01, which includes the state’s language assistance plan. Local areas are required to submit a Language Assistance Plan (LAP) or updated plan to the State biannually by June 1 of each year. The purpose of the Language Assistance Plan is to establish the need for language assistance services and to outline the process for responding to that need. The outcome of implementing a Language Assistance Plan is that language barriers have been removed enough to allow meaningful access to workforce programs by ELL customers.

#### IV. COORDINATION WITH STATE PLAN PROGRAMS

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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.

Efforts to coordinate the development of a combined state plan began in January 2015 with the creation of a WIOA Implementation Team. This team includes representatives from required one-stop partner programs and it has met on a monthly basis during 2015. The Implementation Team assisted in the design of the strategic planning process and helped to develop the input process that was undertaken across all partner programs. Focus groups and surveys were conducted throughout Colorado to identify the strengths and weaknesses and opportunities for the system. This data was synthesized by the Implementation Team to develop the strategies outlined in section II of this plan. Combined plan partners reviewed draft versions of the goals and strategies and worked together on the development of section III. Each program had the opportunity to review and comment on these sections of the plan prior to the publication for public comment.

## V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

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The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes
10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

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## VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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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.

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

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

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#### A. ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES GENERAL REQUIREMENTS

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##### 1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Colorado has identified three planning regions, a map of which can be found here: <https://www.colorado.gov/pacific/cwdc/workforce-partners>. They are as follows:

1. Central Planning Region - Adams, Arapahoe, Boulder, Clear Creek, Denver, Douglas, El Paso, Gilpin, Jefferson, Larimer, and Teller Counties
2. Rural Colorado Planning Region - Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties; Eagle, Garfield, Grand, Jackson, Lake, Moffat, Pitkin, Rio Blanco, Routt, and Summit Counties; Alamosa, Baca, Bent, Prowers, Chaffee, Conejos, Costilla, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Mineral, Otero, Park, Pueblo, Rio Grande and Saguache Counties; Archuleta, Delta, Dolores, Gunnison, Hinsdale, La Plata, Mesa, Montezuma, Montrose, Ouray, San Juan, and San Miguel Counties; Broomfield
3. Weld County Planning Region

Colorado's ten federally-recognized local workforce areas, a map of which can be seen here: <https://www.colorado.gov/pacific/cwdc/workforce-partners>, are as follows:

1. Adams County
2. Arapahoe and Douglas Counties
3. Boulder County
4. City and County of Denver
5. Larimer County
6. Mesa County
7. Pikes Peak Workforce Area- El Paso and Teller Counties
8. Tri-County Workforce Area- Jefferson, Gilpin and Clear Creek Counties
9. Weld County
10. Colorado Rural Workforce Consortium - consisting of 51 counties divided into 10 sub-areas:

- Broomfield Sub-Area
- Eastern Sub-Area - Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties
- Northwest Sub-Area - Grand, Jackson, Moffat, Rio Blanco, and Routt Counties
- Pueblo County Sub-Area
- Rural Resort Sub-Area - Eagle, Garfield, Lake, Pitkin, and Summit Counties
- South Central Sub-Area - Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties
- Southeast Sub-Area - Baca, Bent, Crowley, Huerfano, Kiowa, Las Animas, Otero, and Prowers Counties
- Southwest Sub-Area - Archuleta, Dolores, La Plata, Montezuma, and San Juan Counties
- Upper Arkansas Sub-Area - Chaffee, Custer, Fremont, and Park Counties
- Western Sub-Area - Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel Counties

**B. DESCRIBE THE PROCESS USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR “PERFORMED SUCCESSFULLY” AND “SUSTAINED FISCAL INTEGRITY” IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS.**

Process for Designating Local Areas:

The Colorado Workforce Development Council (CWDC) consulted extensively with local officials, local boards, partner agencies, and community organizations to assist with the identification of locally designed and supported areas consistent with the articulated needs of the communities. The CWDC determined the procedures for requesting initial and subsequent designation of local areas and the requirements each area must meet in state Policy Guidance Letter 15-04-WIOA. The local areas were required to detail in their request and operating plan how the requested local area would meet the criteria identified in the law for performed successfully and sustained fiscal integrity. The designation process began with the prior designated areas that operated under the Workforce Investment Act. All local officials reviewed the labor market areas and their ability to deliver WIOA services and then submitted their requests for designation as a local area to the Council and Governor. Meetings were held with county officials, one-stop operators and local boards for discussions. The nine original local areas requested initial designation, plus Mesa County requested separation from the Rural Consortium as an independent local area. All requests for initial designation were approved by the Governor.

Procedures for Determining Performed Successfully and Sustained Fiscal Integrity:

Each local area seeking designation is required to submit documentation for the following items to the CWDC for its review and recommendations to the Governor for final approval:

1. Evidence that the area, in the two program years for which data is available prior to the request, met or exceeded the adjusted levels of performance for primary indicators of performance or the Common Measures for Title I and Title III programs and was not subject to the sanctions process resulting from missing the same measure two years in a row, as applicable.
2. Evidence that during the two program years prior to the request, the U.S. Secretary of Labor, or the State in place of the Secretary, has not made a formal determination that the grant recipient or administrative entity for the local area has misspent funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration, as applicable.

Process for Designating Planning Regions:

The CWDC convened a workgroup of local workforce partners that was chaired by a local area director and the Director of the CWDC. This group reviewed existing regional maps that had been developed by various partner agencies for purposes of delivering program services. In addition, the workgroup examined worker commuting patterns, locations of key industries and the presence of existing partnerships that cut across geographic boundaries. The resulting map that was developed took these factors into consideration, as well as the existing local workforce areas and the regions identified by the Governor's Economic Blueprint initiative. Local Elected Officials reviewed the map and had the opportunity to request changes to best meet the needs of each local area.

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

The following is excerpted from Colorado's Policy Guidance Letter WIOA-2015-01, Change 1 (note that the naming conventions for Policy Guidance Letters changed in PY16, so the name is being updated here) regarding the designation of local areas:

**APPEALS PROCESS POLICY:**

An area or areas seeking to be designated or re-designated, as a Local Workforce Development Area, which has requested but has been denied its request for designation or re-designation as a Local Area, may appeal the decision to the Colorado Workforce Development Council.

1. An appeal must be in writing and filed with the Colorado Workforce Development Council within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the Colorado Workforce Development Council (CWDC) and to the Director of the CWDC by sending an email to [cwdc@state.co.us](mailto:cwdc@state.co.us).
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The State board will have 60 days to review the appeal and make a recommendation to the Governor. The review will take into account the information in the original request and supplemental information provided in the appeal to determine if the criteria set in this policy has been met.
4. The final decision rests with the Governor.
5. If the appeal is connected to a request for initial or subsequent designation under section V. A. or section V. B. of this policy, and if the appeal does not result in designation, the entity may request review by the Secretary of Labor to determine if procedural rights were granted or if the minimum criteria of WIOA Section 106(b)(2) or Section 106(b)(3) were met. This second level of appeal must be sent within 14 days to:

Assistant Secretary of Employment and Training

U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, DC 20210

A copy of the appeal must be simultaneously provided to the:

ETA Regional Administrator

U.S. Department of Labor

525 S. Griffin Street

Dallas, TX 75202

In addition, a copy must be sent to the CWDC at [cwdc@state.co.us](mailto:cwdc@state.co.us).

6. If the final decision of any appeal reverses the prior decision, it will become effective July 1st of the following year.

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

**APPEALS PROCESS POLICY:**

A local area, or a local area on behalf of a partner agency, may appeal the Governor's determination of the portion of funds to be provided for infrastructure costs, to the Colorado Workforce Development Council.

1. An appeal must be in writing and filed with the Colorado Workforce Development Council within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the Colorado Workforce Development Council (CWDC) and to the Director of the CWDC by sending an email to [cwdc@state.co.us](mailto:cwdc@state.co.us).
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The State board will have 60 days to review the appeal and make a recommendation to the Governor. The review will take into account information provided in the appeal on the basis that such determination is inconsistent with the requirements of state policy and/or WIOA Section 121(h).
4. The final decision rests with the Governor.
5. If the final decision of any appeal reverses the prior decision, it will become effective as of July 1st of the program year.

**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.**

Statewide Policies and Guidance: Colorado has established a public website that contains the Policy Guidance Letters for the workforce development system, which address both the programmatic and administrative requirements for utilization of state funds for workforce development activities. All policies can be accessed at: [www.colorado.gov/cdle/pgl](http://www.colorado.gov/cdle/pgl)

Currently Colorado is in the process of updating existing policies to become WIOA compliant and adding policies that provide guidance regarding new items such as work-based learning opportunities, infrastructure funding options, and other aspects of WIOA not previously required by the Workforce Investment Act. The policy development process involves the participation of key state and local partners

on cross-functional teams that provide critical input regarding content of the policies. A final draft of each policy is also distributed to state and local partners for comment prior to publication on the website. Policy modifications can be made as additional guidance is received from federal departments or specific needs are identified by one-stop system providers and partners.

**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**

Use of Governor's Set Aside Funding: Colorado expects to utilize 5% of the Title I set aside funds for the administrative purposes allowed under Sections 128 and 133 of WIOA, and the remaining portion of the set aside for both the required statewide activities, as well as the allowed statewide activities that support the strategic goals set forth in this four-year Combined Plan, as follows:

- Expand regionally-focused sector partnerships that are championed by business and industry to drive career pathways
- Develop and implement a full spectrum of work-based learning opportunities to be deployed broadly across sectors.
- Collaborate with business and industry to understand and promote the value of stackable industry recognized credentials.
- Enhance the alignment of business services across all partner programs.
- Adopt LEAN principles for the implementation of cross-partner strategies/services to increase efficiency, accessibility, and coordination of customers' services.
- Develop and implement a technology solution or other methods for data coordination and information sharing across program partners.
- Implement continuous professional development for staff from all partner programs to elevate internal expertise and professionalism and to equip them with the tools necessary to operate a comprehensive, holistic approach to talent development.
- Create opportunities for staff at all levels to engage in continuous improvement efforts, leveraging their first-hand experience and unique perspectives to inform the processes.
- Establish a brand for the Colorado workforce development system that represents the vision and strategies of the WIOA combined partners.
- Define the key messages and brand promise for target audiences.
- Explore ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.
- Create and adopt universal output and outcome metrics to depict accurate descriptions of the workforce system, which will be used for planning and implementation of system services.
- Utilize partner relationships to implement meaningful pilot programs that foster an environment of innovation.

Use of Rapid Response Funds: The State Rapid Response Team uses a variety of approaches and strategies to avert and respond to layoffs. These include the early identification of at-risk industries and companies through utilization of a variety of data including labor market analyses, layoff trends, and policy analysis including the impact of federal, state and local policies and regulations on businesses and industries. State unemployment insurance company layoff data is used to identify layoff trends and specific companies that are approaching WARN levels. These data are used to conduct outreach activities to businesses whose employees might benefit from Rapid Response services.

The State Rapid Response Team has formed collaborative partnerships to identify and design appropriate interventions. Partnerships include Colorado's local workforce areas and Workforce Development Boards,

the U.S. Department of Commerce's Trade Adjustment Assistance program for firms, Chambers of Commerce, Small Business Development Centers, State agencies such as the Office of Economic Development and International Trade, the Public Health Department, and Vocational Rehabilitation, community-based organizations and quasi-governmental organizations such as Connect for Health Colorado (Colorado's healthcare exchange). Rapid Response early interventions may include a variety of services tailored to the needs of the company and its employees and may include onsite or virtual workshops, onsite registrations, orientations and intakes for WIOA and TAA, and onsite "reverse" hiring events at which dislocated workers are connected with companies hiring for similar positions.

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

In the event of a natural or other disaster, the state initiates an emergency protocol, and the Rapid Response team mobilizes and convenes an emergency team. If the disaster has affected operations of the workforce agency itself, an established Continuity of Operations plan and communication protocol is initiated. The emergency team coordinates with FEMA, local entities, and partners to identify the impact of the disaster, the demographics, and the needs of those affected and the resources available to conduct outreach and deliver needed services to impacted individuals. Assistance includes access to UI or disaster unemployment assistance, support for mobile one-stop units, demographic information gathering for potential emergency grant applications and coordination with FEMA, Red Cross or other disaster response organizations. State and local area rapid response providers work closely with other state and local agencies and other critical partners through an established strategic planning process to ensure effective and immediate responses.

**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.**

Early Intervention is provided to worker groups through a coordinated and tightly integrated response team consisting of TAA and Rapid Response Coordinators from both the state and local levels, who are cross-trained in both programs. Cross training improves access to services and ensures that TAA filings are complete and accurate for investigations and determinations. Response coordination is reciprocal. When receiving a WARN letter from a company affected by foreign trade, the State Rapid Response team immediately notifies the TAA team and includes TAA personnel in the early planning stages with the company to identify the needs and the services required to meet those needs. Services delivered to the company include, but are not limited to, joint Rapid Response/TAA workshops at the customer location to provide information on TAA/TRA services and benefits, onsite workforce registrations and TAA/WIOA orientations, and one-on-one meetings with TAA Counselors and other professionals as needed. Workshops also include Unemployment Insurance Benefit information as well as information on other employment and training services and grants available to employees.

The State Rapid Response team also routinely monitors TAA petitions and certifications to determine if Rapid Response services have been previously delivered. If not, the Rapid Response team works closely with the TAA team as part of the planning process and collaborates to deliver services. As TAA petitions become certified, the TAA Coordinator immediately notifies the Rapid Response Coordinator. Outreach and

dissemination of TAA and Rapid Response information may occur via email, direct mail, press announcements and articles, websites including partner websites, radio and television public service announcements, flyers posted at the workforce centers as well as You Tube sites, Facebook, Twitter and other social media. Rapid Response and TAA teams also collaborate with partners to conduct workshops, present at conferences, trade shows, professional associations, Chambers, clubs and other outreach events.

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## B. ADULT AND DISLOCATED WORKER PROGRAM REQUIREMENTS

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### 1. WORK-BASED TRAINING MODELS

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

Work-based learning is a critical component of the education and training that Coloradans will need for the jobs of the future. Targeted efforts for the long-term unemployed are utilizing a variety of alternative training models to address the unique combination of social, emotional and skill deficiencies caused by the duration of their unemployment while rapidly moving individuals to paid work experience and reemployment. Governor Hickenlooper's Hire for Colorado program challenged businesses to give the long-term unemployed an opportunity to prove themselves and also increased awareness of services available through workforce centers for long-term unemployed individuals. In 2016, the program will be moving both long-term unemployed individuals and dislocated workers into work-based training opportunities.

The \$5 million Sector Partnership National Emergency Grant awarded in 2015 will include regional sector planning and strategies and work-based training opportunities for dislocated workers. A new "think tank" has been established as part of the grant implementation that will be looking at how to improve or enhance our work-based training opportunities to make them more user-friendly for businesses and job seekers.

A new work-based training program is being developed in 2016 and will provide veterans an opportunity to "learn and earn" through apprenticeships and on-the-job training.

Colorado's H-1B Technical Skills Training Grant, which ended in December 2015, utilized incumbent worker training as a key strategy and there was an overwhelming demand for this funding from Colorado's business community. Building on the successful partnerships developed through the grant, incumbent worker training may be utilized going forward to move up skilled workers and create lower-level vacancies that the workforce system can help to fill.

CDLE is implementing a piece of workforce legislation passed in the 2015 state legislative session that will provide work-based learning opportunities. HB15-1230, Innovative Industries Workforce Program, will provide support for creating a common collaborative structure for paid internships with businesses.

Colorado is also exploring the new opportunities presented by WIOA for transitional jobs. Hire Colorado was a successful subsidized employment program in 2009-10 that resulted in a 75% permanent employment rate for the 1,721 participants. Any new transitional jobs strategies going forward will build on this successful model and the lessons learned.

### 2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Colorado recognizes that Registered Apprenticeships (RAs) are an important component of potential training and employment services that the workforce system can provide to its business customers and job seekers. RAs are a key component within a spectrum of work-based learning activities that are used to

create opportunity for both industry and job seekers in Colorado. Local service providers will be expected to utilize RAs as a career pathway program for job seekers and as a job-driven strategy for employers and industries. Regional and local plans will address the inclusion of RAs in sector strategies and ensure that RAs are an integral part of the work based learning options that WIOA customers may access. The state will provide training, technical assistance and access to USDOL's RA resources to encourage and foster the use of existing programs, as well as the development of new RAs. Local workforce boards will be expected to develop local policies and procedures to implement RAs, which may include the use of pre-apprenticeships, Individual Training Accounts and On-the-Job Training awards to customers who wish to start an apprenticeship or complete an apprenticeship in progress.

Central to this strategy of creating industry-led opportunity is the work done under the ApprenticeshipUSA State Expansion Grant. The purpose of this grant is to strengthen RA efforts by expanding the industry sectors and range of occupations involved and increasing access to RAs for more diverse and underrepresented populations. This work is aimed at fundamentally changing the way Colorado's workforce and educational systems approach employment and training for youth and adults. RAs allow employers to design programs with specific skills, training and job-related instruction tailored to the company's needs and are considered the "gold standard" for apprenticeship training in the United States. Statewide, over a dozen new RA programs have been created and over 400 apprentices placed in new and existing apprenticeship programs through partnerships and opportunities fostered through this grant. Catalysts to RA expansion include CDLE's dedicated apprenticeship coordinator, technical support to industry associations, and a key partner in the creation of youth apprenticeships, CareerWise Colorado.

### 3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

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

Colorado has captured the full procedure for determining training provider eligibility in Policy Guidance Letter WIOA 2015-06 available at [www.colorado.gov/cdle/pgl](http://www.colorado.gov/cdle/pgl).

In summary, the PGL provides guidance on the following items:

- o The initial eligibility online application process, to include data regarding:
  - o A description of each program of training services to be offered;
  - o Information on cost of attendance, including costs of tuition and fees;
  - o Whether the training program leads to an industry-recognized certificate or credential, including recognized post-secondary credentials;
  - o Whether the provider has developed the training in partnership with one or more businesses (and the names of the businesses);
  - o Which in-demand industry sectors and occupations best fit with the training program;
  - o A description of the prerequisites or skills and knowledge required prior to the commencement of training; and
  - o Social security numbers for all students residing in Colorado, regardless of funding source.
- o The continued eligibility online application process, to include updates to the initial eligibility data and the following information:
  - o The total number of participants enrolled in the program;

- o The total number of participants completing the program;
- o The total number of participants exiting the program;
- o Information on recognized post-secondary credentials received by program participants;
- o Information on the program completion rate for such participants;
- o Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology;
- o Description of how the providers provide training services to individuals who are employed and/or individuals with barriers to employment;
- o Information reported to State agencies on Federal and State training programs other than programs within WIOA title I-B; and
- o Social security numbers for all participants in Colorado for the two previous years, regardless of funding source, which will be used to calculate the performance measures
  - o Process for WIA approved training providers to transition to WIOA approved training providers
  - o The roles of the three entities involved in the determination of training provider eligibility:
- o The Colorado Department of Labor and Employment establishes the eligibility criteria and approval process, as well as takes enforcement actions against providers that provide false information or violate the requirements of WIOA.
- o The Colorado Department of Higher Education hosts the ETPL website, reviews applications for minimum eligibility and/or performance requirements, and notifies local boards and CDLE regarding new requests for initial or subsequent eligibility once online applications are completed and reviewed. They also mark programs eligible for WIOA funding that have been approved by Local Boards and remove programs that don't meet required criteria or performance standards.
- o Local Workforce Development Boards may identify local eligibility criteria in addition to those set by the state, plus they will review initial and subsequent applications and either approve or disapprove programs according to state and local standards. The decision of each local board determines whether a program may be utilized in its respective local area. Local boards may also request the removal of a program for cause based on local and state standards.

Registered Apprenticeships: In partnership with USDOL's Denver Office of Registered Apprenticeship, all active apprenticeship programs have been and will continue to be invited to be listed on the state's ETPL, a process that will be ongoing as new apprenticeships are added. Registered apprenticeship programs will not be subject to the same application or performance reporting requirements as other training providers because they go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with USDOL. Any apprenticeship program may remain on the ETPL as long as it wishes if it remains registered by the USDOL Office of Registered Apprenticeship

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

Colorado has issued Policy Guidance Letter WIOA-2015-07: Priority of Service for Title I Adult Programs that provides detailed guidance to local areas regarding implementation of Adult priority of services. This

guidance includes definitions of the priority groups, identifies how veterans priority of service interfaces with adult priority of service, sets a minimum goal of adult enrollments meeting priority definitions, and requires local boards to create local policies that must include:

- o Local procedures for determining priority during the eligibility process and enrollment;
- o How the local area will define “low income” (it may be more stringent than the state definition in this PGL) and the relevant data used to establish the definition;
- o What criteria and procedures will be used to assess priority for basic skills deficient individuals;
- o Any local requirements, such as residency, that will be established in relation to the four priority groups;
- o Any local discretionary priorities that will be established in addition to the four targeted groups, the data to support the need for the local priority, and the documentation that will be required from an individual for the local priority; and
- o Local procedures for internal monitoring of the goal of Adult participants from the priority targeted groups.

The Colorado Department of Labor and Employment will add the Adult Priority of Service requirements to its annual compliance monitoring review of each local area within the state. PY15 will be a base building year with technical assistance provided by the state, and PY16 will serve as the first compliance year for meeting the goal.

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

Colorado has implemented Policy Guidance Letter WIOA-2017-01: Transfer of Funds Between Adult and Dislocated Worker Allocations, which updates the maximum amount that can be transferred and clarifies the approval process. This policy allows local areas to transfer up to 100% of funds, but different approval processes are required based on the total amount requesting to be transferred. Up to 50% may be transferred with Workforce Development Programs (WDP) staff approval; between 51 and 75% may be transferred with WDP and CWDC staff approval; and between 76 and 100% may be transferred only with the approval of the CWDC executive committee.

### C. YOUTH PROGRAM REQUIREMENTS

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

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

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

Colorado is a local control state that, to the extent practicable, devolves policy-making authority to local boards. In the case of local grant awards for youth workforce investment activities, local boards have been directed to adhere to the requirements within WIOA, develop additional local requirements as appropriate, and utilize their local procurement policies to create detailed statements of work for incorporation in competitive requests for proposals and the awards and contracts that result. Such RFPs, awards, and contracts are expected to set standards for achieving the WIOA Section 116 performance indicators, when organizations take on full sub-recipient responsibilities and require documentation of successful

achievement of outcomes. These service providers are to be required to demonstrate past success in delivery of services and commit to successful outcomes for any contracted services. In all cases, the local boards are responsible for ensuring that all sub-recipients and contractors are monitored for quality of services and achievement of performance standards.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Colorado has a long-established state youth council with membership that includes core and other required partners and that serves as an advocate for disconnected and other categories of high-risk youth served by the state's workforce system. Local workforce development boards are expected to establish youth committees that incorporate the same strategies and objectives. At both the state and local levels these councils and committees will set policy and oversee efforts on the part of local areas to expand and enhance services to out-of-school youth, including the selection of youth services providers that demonstrate the capacity to ensure successful outcomes for this population. In addition, CDLE's State Youth Coordinator conducts regular meetings with youth services operators across all local areas to provide guidance, technical assistance, and promising practices regarding outreach and services impacting out-of-school participants. This long-standing workgroup has been expanded to include the participation of core and required partners to assist the dialogue among the local partners regarding access to services and the leveraging of resources across youth programs.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT.\*

\* Sec. 102(b)(2)(D)(i)(I)

Local Boards and their youth committees in Colorado are expected to make all 14 youth program elements available within their one-stop centers through a competitive process established under local procurement policies that are as strict, or stricter, than federal procurement standards in the OMB Uniform Guidance. Local boards and their youth committees (as well as the state) will maintain a list of providers of these services that case managers can utilize to ensure that youth participants have ready access to the services needed to successfully achieve the objectives of their individual service strategies. In addition, local boards and their youth committees will require that the local area administrator review the effectiveness of program element providers and provide data necessary to determine whether providers will remain on the youth element provider list.

Colorado submitted a waiver request to waive the competitive procurement requirement for three of the fourteen youth program elements - work experiences, supportive services, and follow-up. Through a WIA waiver for these same elements, one-stop center staff has developed the expertise to deliver these services in-house and utilize the cost savings to provide additional services to the youth population. Note: The waiver became moot with the issuance of the WIOA final regulations, which do not require procurement of the youth program elements. Colorado is allowing local areas to determine whether procurement of these services should be pursued.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR "REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION

129(A)(1)(B)(III)(VIII) AND FOR “REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

Colorado is a local control state that, to the extent practicable, devolves policy making authority to local boards. The State policy for WIOA eligibility (PGL WIOA-2015-05) contains the following guidance for local boards to establish their definition of “requires additional assistance:”

*NEEDS ASSISTANCE - An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment. Because the State has not chosen to issue a policy that defines “additional assistance” as relates to WIOA Youth program eligibility, each local area has the responsibility for determining its own definition of this eligibility category. A local policy should be developed that specifies what conditions must be met for a youth to require additional assistance and what documentation is needed to demonstrate this eligibility category.*

The State policy also provides examples of appropriate documentation such as the WIOA application, the Individual Service Strategy, or case notes.

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE “NOT ATTENDING SCHOOL” OR “ATTENDING SCHOOL,” INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

The State policy for WIOA Eligibility (PGL WIOA-2015-05) contains the following definitions, which incorporate provisions of the state statute regarding compulsory school attendance, and guidance from the Colorado Department of Education:

**OUT-OF-SCHOOL YOUTH** - an individual is an out-of-school youth if they are:

**A. Not attending any school** (as defined under State law) - **must meet one of the following:**

**1. Colorado Department of Education Secondary Out-of-School Definition:** Out-of-school means youth up through age 21, who are entitled to a free public education in the State but are not currently enrolled in a K-12 institution. This could include students who have dropped out of school, youth who are working on a high school equivalency diploma outside of a K-12 institution, and youth who are “here-to-work” only.

**2. CDLE Post-Secondary Out-of-School Definition:** To be considered out-of-school, a youth must not be registered for or attending any credit-bearing post-secondary classes, whether remedial or regular. A youth may be considered “out-of-school” if registered for or attending ONLY non-credit-bearing post-secondary classes. This definition applies upon registration for specific post-secondary classes, even if classes have not started.

**3. Additional Out-of-School Categories:**

**a. Adult Basic Education and Family Literacy:** WIOA youth programs may consider a youth to be out-of-school youth for purposes of WIOA youth program eligibility if they are attending Adult Education and Family Literacy provided under title II of WIOA, YouthBuild, or Job Corps.

**b. SWAP:** Youth participating in the School to Work Alliance Program, **who are no longer enrolled in secondary school**, would be considered out-of-school. These individuals may have dropped out, aged out at 21, or obtained their diploma or certificate of completion.

**c. High School Equivalency Preparation Classes:** Youth enrolled in high school equivalency preparation classes outside of the K-12 system would be considered out-of-school.

**IN-SCHOOL YOUTH** - an individual is an in-school youth if they are:

**A. Attending school** (as defined by State law) - **must meet one of the following:**

1. **Colorado Department of Education Secondary In-School Definition:** Youth up through age 21, who are entitled to a free public education in the State and are currently enrolled in a K-12 institution, or meet one of the following exceptions to compulsory school attendance:
  - a. Home-schooled (consisting of at least 172 hours of class time per year, averaging 4 hours per day, with course transcripts developed)
  - b. Completing an online high school curriculum (consisting of at least 90 hours of class time per semester)
  - c. Attending a private secondary school
2. **CDLE Post-Secondary In-School Definition:** Under the WIOA youth program eligibility requirements the term “school” refers to both secondary and postsecondary school. Therefore, an individual attending a postsecondary school is considered an ISY.
3. **Attending an alternative education program:** (per WIOA definition that an individual attending an alternative education program is not considered to be a dropout and is in-school.)
4. **SWAP:** Youth participating in the School to Work Alliance Program, **who are still enrolled in secondary school**, up to age 21, would be considered in-school.
5. **Transition Programs:** Youth that are in transition programs (“receiving 18-21 services”) are considered in-school. They are still obtaining Free Appropriate Public Education, until the age of 21, or until their exit prior to age 21.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL’S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

The State policy for WIOA Eligibility (PGL WIOA-2015-05) contains the following definition for basic skills deficient:

**BASIC SKILLS DEFICIENT**) - is an individual—

A. Who is a youth, who has English reading, writing, or computing skills at or below the 8th grade level - no higher than 8.9 on a generally accepted standardized test; or

B. Who is a youth or adult, who is unable to compute or solve problems,

or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. This may also include lack of computer literacy.

**Note on Standardized Tests:** When using formal assessment tests to determine basic skills deficient, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. In addition, if a standardized test is used to assess basic skills, the test should include reading, writing, or computing skills. Lacking soft skills or specific skills needed for a particular job may not be used to assess otherwise high-functioning individuals as basic skills deficient. As a result, tests such as Prove-It are generally not appropriate for determining basic skills deficient or computer literacy as they are focused on occupational skills rather than basic skills.

**Acceptable Documentation for Basic Skills Deficient:**

- Standardized assessment test
- School records
- Case manager observation and case notes
- Adult Basic Education program referral or records
- Other \_\_\_\_\_

**D. SINGLE-AREA STATE REQUIREMENTS**

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

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)
2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)
3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

N/A

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.
5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.
6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.
7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.
8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

**E. WAIVER REQUESTS (OPTIONAL)**

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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:
  - F. SUPPORTING EMPLOYER ENGAGEMENT;
  - G. CONNECTING EDUCATION AND TRAINING STRATEGIES;
  - H. SUPPORTING WORK-BASED LEARNING;
  - I. IMPROVING JOB AND CAREER RESULTS, AND
  - J. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
  - K. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
  - L. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
  - M. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
  - N. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
  - O. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT
7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER;

Colorado will not be submitting waiver requests with this state plan modification. Waivers may be submitted at a future date.

#### TITLE I-B ASSURANCES

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The State Plan must include assurances that:

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

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

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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.**

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**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.**

Colorado is developing a comprehensive plan to address the professional development of Employment Service staff, as well as core program staff within the statewide system of one-stop centers. Major components of the plan will include:

- o Access to the National Association of Workforce Development Professionals (NAWDP) workforce professional certification courses
- o Annual Think Big Youth Forum, which provides workshops on services to youth customers for all workforce partners
- o Monthly Workforce Forum Training Webinars covering a wide range of topics related to WIOA implementation and partner program requirements
- o Spring 2016 Statewide Training Conference open to all WIOA partners and focusing on WIOA implementation and partner program requirements
- o Annual Business Services Summit for business services representatives across the statewide one-stop system.

Additional ongoing training strategies will be incorporated to address elements of the WIOA regulations once they are published and to assist with the implementation of each state policy that is issued to support the transition to a comprehensive one-stop system under WIOA requirements.

## 2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

CDLE's Workforce Development Programs (which administers the Title I and Title III WIOA core programs) and the Unemployment Insurance Division formalized their long-standing partnership in early 2012 with the co-location of Workforce Development representatives at the Unemployment Insurance offices to coordinate reemployment initiatives for claimants and the long-term unemployed. The two divisions work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. These initiatives have included the:

- o Cross-training of approximately 120 UI staff on the roles of the workforce centers. UI is brainstorming with staff at all levels, from front-line to upper management, ways to better integrate reemployment philosophies into UI's everyday conversations and workload involving customers. Once all ideas are heard and analyzed, UI will develop a plan to implement the approved concepts, which will include staff training and messaging to customers
- o Cross-training of approximately 70 workforce center staff on the Unemployment Insurance benefits system and UI eligibility issues. CDLE will schedule regularly held conference calls or presentations that will allow the workforce system to learn about relevant unemployment insurance programs and processes.

The Reemployment Services and Eligibility Assessment (RESEA) initiative required that UI staff participate in the development and training of the UI eligibility referral process for the workforce system. Training on RESEA was delivered, recorded and made available to the workforce system and other stakeholders. In addition, the workforce system received training on how and when to refer UI eligibility issues to the UI system. Lastly, CDLE developed a UI eligibility and work-search requirements video (in both Spanish and English). Participants of Links to Reemployment and RESEA watch the video during a reemployment and workforce services orientation. UI staff will investigate and adjudicate eligibility referrals made by the workforce system. Additional technical assistance and follow-up sessions will be made available, as appropriate.

- o Joint issuance of state policies to the workforce system regarding reemployment services such as Links to Reemployment (UI Profiling) and approved training status

o Joint development of online resources targeted to the reemployment of UI customers

This system of cross-training and joint communications will be expanded to include the Title II Adult Education and Family Literacy and Title IV Vocational Rehabilitation core partners. Initial steps have been taken to include these partners in all aspects of cross-training and awareness initiatives, including UI eligibility issues.

**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.**

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Workforce representatives throughout the statewide network of workforce centers are trained to provide general assistance and information to customers who have questions about filing a claim for unemployment compensation. This includes assistance other general unemployment insurance questions. Questions that require specific UI expertise are referred to UI for responses.

Colorado provides direct phone line access to a UI representative in 30 workforce center offices across the state (UI hot line). These phone lines bypass the main call center phone lines and expedite the resolution of any outstanding unemployment insurance questions. In addition, UI merit staff members are physically present in two of our high volume offices to address UI specific concerns. Additionally, UI has developed a Call Back form that allows claimant customers to receive a contact back from a UI representative based on the most convenient time and method. Workforce representatives complete this for and provide details about the claimant's question in order for the UI representative to be prepared to assist this customer in a timely and effective manner.

Colorado strives to continually improve upon existing processes and will expand upon what is already in place to include more workforce center offices throughout the state. As the need for additional access increases, enhanced technology, such as online chat, will be considered to meet the UI expertise access requirements of WIOA. The workforce system will continue to evaluate the triage process for referring claimant customers to UI expertise to ensure that questions specific to an individual's claim are referred to UI.

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

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In 2014, Colorado established a strategic plan for reemployment initiatives that outlines the state's direction for the year and future years, with the goal of reducing the average duration of weeks on unemployment compensation from 15.2 weeks to 12 weeks by June 2017. The plan contains components to analyze data, research state and national initiatives for integration, and enhance customer messaging, and it continually evolves due to fluctuating market conditions. In support of the plan:

- o The statewide network of workforce centers provides reemployment services to all customers, including UI claimants. Reemployment services include basic labor exchange, orientations to workforce services, the provision of labor market resources and information, workshops, one-on-one services, and referrals to jobs.
- o Additionally, Colorado administers Links to Reemployment, formerly known as Worker Profiling and Reemployment Services, to claimants who have recently received a first benefit payment. Colorado recently made technological enhancements to improve the efficiency of the program and will continue to evaluate the program effectiveness for additional process improvements.
- o Colorado is currently preparing for the administration of the Reemployment Services and Eligibility Assessment initiative for UI claimants. This is scheduled to begin in January 2016.
- o UI partnership initiatives are established for STC, TAA, TRA, ATAA, and RTAA. This includes recruitment efforts for special populations, such as Veterans and long-term unemployed customers.

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:

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1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

Wagner Peyser funds support the basic labor exchange services and all career services that are made available to all workforce center customers, including UI claimants. Relevant information about a claimant's status, and the completion of reemployment activities is securely shared between the two agencies' databases through a file transfer process.

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

Colorado law requires claimants to register for work with the State employment service. Connecting Colorado job seekers complete a full registration with Connecting Colorado and record current contact information, work experience and educational credentials, along with skill sets that are most relevant to the work that is sought. Job seekers are required to update the unemployment insurance status fields. These fields alert the Division of Unemployment Insurance of a claimant's compliance to register for work with Connecting Colorado. Active claimants who are registered in the Connecting Colorado database are required to receive job and event notifications, along with other communications from the Connecting Colorado database and the assigned local workforce area. Initially, all intrastate claimants, who are not job- or union-attached, are assigned five job contacts per week. Workforce Center representatives review the work registration status and determine the appropriate number of job contacts that must be made each week, based on the local labor market and the customer's specific skill sets. A claimant who does not register in Connecting Colorado within four weeks of filing a claim will stop receiving any eligible unemployment benefit payments until the eligibility issue is resolved.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

UI claimant customers must register or reactivate their registration with the state's online labor exchange system, called Connecting Colorado, unless they have been excused to register due to a job attachment or are participating in approved training. The administration of the work test generally occurs during the registration process or through mandated claimant orientations or appointments. Workforce center representatives have been trained on basic UI eligibility requirements and how to identify and refer "Able and Available" or A&A issues to UI merit staff. To strengthen the partnership between UI and the workforce system, training on identifying and referring A&A issues to UI will be readily available to the statewide network of workforce centers. Customers have access to job openings and job placement services both online and in-person. Workforce representatives are available to assist with in-person referrals and recommendations on work-search strategies.

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

During workforce center orientations, customers receive information regarding workforce services, programs and partner resources. This includes information about internal and external training and educational programs, including referrals to WIOA. Customers have access to resources and handouts. Online, customers may research information about different training programs within their community,

statewide, and nationally. Workforce center representatives provide individualized information and resources that assist the customer in making the most informed choice.

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--

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### 1. ASSESSMENT OF NEED

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The Agricultural Outreach Plan (Ag Plan) sets policies, and objectives in providing Wagner-Peyser (WP) services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the One-Stop Career Center system to ensure that MSFWs receive the full range of employment, training, and educational services on a basis that is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs. This Ag Plan presents the following information:

- **Assessment of need:** An assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State to include employment, training, and housing. A review of the resources available and their effectiveness is included.
- **Outreach activities:** A description of ways the State will ensure that MSFWs have equal access to employment opportunities. A description of the State's proposed outreach activities including strategies on how to contact farmworkers who are not being reached by the normal intake activities conducted by the employment service offices to include numerical goals and amount of full time staff.
- **Services provided to MSFWs through the One-Stop Delivery System:** A description of ways the State will ensure that MSFWs have equal access to employment opportunities. Coordinating outreach efforts with WIOA Title I section 167 grantees and other public and private community service agencies and MSFW groups. These outreach activities will include the explanation of services available at the one-stop centers, explanation of their basic rights and the marketing of the employment services complaint system.
- **Services provided to agricultural employers through the One-Stop Delivery System:** A description of how the State will promote and provide labor exchange services and identify agricultural employers expected to employ MSFWs.
- **Review and comment from key stakeholders**

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.

1. Top 5 agricultural activities in the state vary by regions.

Northern Colorado					
Crop	Onions	Corn	Cabbage	Lettuce	Carrots
<b>Labor Estimate</b>	1,000	300	400	350	150
<b>Months of highest activity</b>	Mar-Nov	July-Sept	Mar-Nov	Mar-Oct	Aug-Sept

Arkansas Valley			
Crop	Onions	Melons	Mixed Vegetables
<b>Labor Estimate</b>	630	400	300
<b>Months of highest activity</b>	Apr-Sept	Jun-Sept	May-Oct

San Luis Valley					
Crop	Potatoes	Lettuce	Spinach	Carrots	Cabbage
<b>Labor Estimate</b>	2,000	450	50	150	20
<b>Months of highest activity</b>	Sept-Oct	Jul-Sept	May-Oct	Aug-Sept	Aug-Sept

Western Colorado					
Crop	Onions	Corn (Sweet)	Lettuce	Beans	Fruit Trees
<b>Labor Estimate</b>	275	180	135	70	430
<b>Months of highest activity</b>	Jul-Sept	Jul-Sept	Jun-Sept	Aug-Nov	Jul-Oct

2) Employers in Colorado cite a need for affordable farmworker housing and the availability of more workers that are skilled, willing and able to do farm work.

3) Factors affecting agriculture in Colorado are water shortages and low unemployment rate. Because of this it is difficult to find local, migrant and seasonal workers that are willing to work in the harvesting and packaging of fruits and vegetables.

**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.

Colorado's MSFW population is difficult to track due to the mobility of workers from crop to crop and farm to farm. Current estimates of farmworkers during peak season are approximately 5,000 workers that consist of approximately 70% seasonal and 30% migrant. During the low season Colorado has approximately 3,500 farmworkers who are almost all seasonal. Year round farmworker numbers are not included in this estimate as it is difficult to guess the number as this population does not necessarily use the workforce system or apply for unemployment insurance. H2A workers are also not included in this estimate with 1,524 workers certified in FY14.

Colorado farm workers continue to have difficulty locating housing that is available and affordable. Migrant farm workers can't sign year-long leases or have difficulty passing credit checks, this makes housing difficult to acquire. In certain parts of Colorado where the oil boom is strong, oil workers have taken up temporary housing such as affordable long term motels.

Colorado's farm workers predominately speak Spanish with a very small population that speaks Karen. Most H2A workers come from Mexico, Chile, Peru, and South Africa. Those foreign workers that do not speak English mostly speak Spanish with a small group that speaks Creole.

## 2. OUTREACH ACTIVITIES

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

### A. Introduction

1. During PY16-PY19, the six significant workforce offices (Brighton, Delta, Greeley, La Junta, Lamar, and Monte Vista) will continue to provide quality employment services and referrals to appropriate agencies for assistance to the MSFW population.
2. Colorado is designated as a significant MSFW state, with a predominantly Spanish-speaking MSFW population. The Colorado Department of Labor and Employment (CDLE) will continue to administer its outreach program with bilingual (i.e. English/Spanish) staff.
3. CDLE entered into an on-going statewide Memorandum of Understanding (MOU) with Rocky Mountain Service Employment Redevelopment (RMSER) and Migrant Education for inter-agency referrals and data sharing. These MOUs help facilitate effective coordination of outreach and increase registration activities for all service providers.
4. The State's workforce development system is state-administered and locally-controlled. The contracts with each workforce area will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the workforce areas to help ensure that the needs of MSFWs are addressed, and that the workforce development system is in full compliance with the Judge Richey court order and federal rules and regulations.
5. Colorado's strategies to identify the number of MSFWs the State will reach through

outreach include the following:

- Each of the six significant offices will address outreach in their area plan. Planning requirements have been detailed in a Policy Guidance Letter that requires the following actions.

The One Stop Director or their designee shall submit an annual plan to the State Monitor Advocate. The plan shall set forth numerical goals of the projected number of MSFWs to be recruited, and shall include at a minimum, the following components: • Each significant office shall submit to the State Monitor Advocate their plan for outreach for the upcoming season. The plan must be signed by the Director, or their designee, and submitted to the State Monitor Advocate no later than April 30th of each year. • It must identify how MSFWs will be contacted, but more importantly, how those who qualify for services will be registered and recruited into the OneStop System. • A good faith estimate of the MSFWs located in the counties covered by the local office. • A goal for the actual number of MSFWs to be recruited for the upcoming fiscal year. The plan must accurately project recruitment numbers of eligible MSFWs and these recruitment numbers must be reflective of the number of MSFWs in the counties covered by the local office. • A synopsis of the goals that were met, or not met from the previous year's plan. If the goals were not met, the plan must address the reasons the numbers were not met, and identify new approaches to achieve the new goals. • It must include a monitoring portion, explaining how the local office will monitor the federally mandated equity indicators, and how the equity indicators will be met on a quarterly basis. The equity indicators include: a) MSFWs referred to jobs b) MSFWs provided some services c) MSFWs referred to supportive services d) MSFWs counseled e) MSFWs provided with job development f) MSFWs placed in jobs g) MSFWs placed in jobs 50 cents above minimum wage h) MSFWs placed in non-ag jobs over 150 days. • The State Monitor Advocate will be available to provide technical assistance for the plan development, and will negotiate the plan's goals with the Director or their designee. The State Monitor Advocate shall give final approval of the local office plan.

The local outreach plans allow the State Monitor Advocate to track the six significant offices and their unique issues.

- Colorado will increase the MSFWs' ability to access career services in the One-Stop centers through partnerships with other agencies that target the same population. Some of these agencies include: RMSER, Migrant Education, the local migrant health clinics, faith-based migrant community associations and Colorado Legal Services.
- The State Monitor Advocate will continue to regularly attend the migrant coalitions in La Junta, Monte Vista, Greeley, Denver, Pueblo, and Delta and explain how other agencies can partner with CDLE to help their clients access the full range of services offered by the six significant One-Stop centers. The outreach workers in each of these areas will continue to actively participate in local migrant coalition activities.

Outreach contacts shall be made by non-significant offices in conjunction with the Language Assistance Plan that can include the following:

- Placement of adds in local newspapers indicating that services are available free of charge in other languages
- Communicating with partner agencies so they can also get the word out to their customers
- Spanish language Flyers and Brochures
- Utilizing continued radio and television public service announcements to Spanish speaking populations
- Distribution of literature to agencies that provide assistance to Spanish speaking clients

- Utilize community groups such as the Migrant Coalition to help with making Spanish speaking individuals aware of the services available

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

In accordance with 20 CFR 653.107(i-p), MSFW outreach efforts will be conducted through personal contacts with MSFWs, employers and other agency staff; public meetings; and distributing pamphlets and other relevant printed materials. MSFW outreach workers will maintain records of their outreach efforts in a daily outreach activities log, and use the information to prepare and submit monthly reports to the State Monitor Advocate during periods of peak agricultural activity. MSFW outreach staff will make a concerted effort to provide agricultural employers with pertinent information regarding the procedures for the intra/interstate recruitment of temporary agricultural workers. All six significant offices will continue to recruit and hire Outreach Workers who are bilingual and have a migrant background or experience working with the migrant farmworker population when vacancies occur.

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.

Technical assistance is offered to all workforce centers for ES Complaint system, housing inspections, and MSFW application and services. All six significant offices are provided with formal twice annual training, the opportunity to attend the National Farmworker Conference, and one-on-one technical assistance tailored to each offices specific needs.

Training and technical assistance also includes collaboration with other agencies as in most cases we will have other MSFW service agencies provide presentations at our training sessions. Service provider agencies include WIOA 167 partners, Migrant Education, Migrant Head Start, Migrant Health, Farmworker Housing, Catholic Charities and other state, local, and faith based organizations. Agency presenters include US Wage & Hour, OSHA, Workers Compensation, Civil Rights, and Worker Protection Standards etc. These agencies provide information on farm worker rights and laws that are changing or currently in effect for farm worker protection.

#### 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.

Outreach workers receive formal twice annual training. During these training sessions topics will include awareness across core programs that will include the Unemployment Insurance program and the training on identification of UI eligibility issues for MSFWs. Other programs that will be included are Worker's Compensation benefits. Unemployment Insurance specialists in partnership with Workforce Development Programs have developed various materials such as a training video that is available to workforce customers to learn about work search and UI eligibility requirements and training for outreach staff on eligibility issues and instruction on how to refer potential eligibility issues for UI adjudication.

#### 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.

State merit staff outreach workers are provided with formal twice annual training that includes services to employers and jobseekers.

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

##### Outreach Activities

1. Colorado continues to employ six bi-lingual/bi-cultural outreach workers in Brighton, Greeley, Lamar, Delta, Monte Vista and La Junta. Colorado continues to employ outreach workers full time during the peak season as mandated by 20 CFR Part 653.107 (h) (3) (i).
2. The number of staff positions assigned to outreach activities is 6 FTE and will continue to be the same as in prior years with no reductions.
3. Colorado continues to share a cooperative agreement with Colorado's NFJP 167 provider (RMSER). All six significant offices conduct collaboration meetings with RMSER in order to meet the needs of our MSFW clients. Colorado has migrant coalitions in the following cities/towns: Denver, Greeley, Delta, La Junta, and Monte Vista. The State Monitor Advocate attends these migrant coalition meetings on a regular basis, and our outreach workers have identified ways to partner with members of the coalition in order to serve the needs of our MSFW population. Partners who attend coalition meetings on a regular basis are 167 NFJP provider RMSER, Board of Cooperative Educational Services (BOCES), migrant education representatives (MEP), migrant housing representatives, food bank representatives and various other representatives from the non-profit sector.
4. In the six significant offices, non-MSFW outreach staff has been cross-trained on how to take Employment Services (ES) related complaints. A policy guidance letter (**ADM-2009-01**) has been issued covering all ES complaint requirements and procedures. Each Workforce center prominently displays complaint posters and complaint fliers for customer's ease of information and also provides information about the complaint system during outreach contacts.
5. The following agencies also employ MSFW outreach workers in the state of Colorado:  
RMSER (167 NFJP provider), Migrant Education Board of Cooperative Educational Services (BOCES), RMSER Migrant Head Start and also migrant health providers. The state of Colorado's MSFW outreach workers routinely conducts co-outreach with this staff. Additionally, Plaza del Sol and Plaza Milagro in Greeley conduct a migrant information evening share MSFW services providers set up a tent and inform the MSFW agencies about their programs and requirements and also provide information to the migrants that are in attendance.  
Each of the six significant offices has customized handouts describing the services offered by the Workforce Centers. These handouts are shared with other migrant outreach workers in other organizations for them to give to their clients. The migrant coalitions in Greeley, Monte Vista, and La Junta routinely have a migrant appreciation picnic at the end of the season. At these picnics the members of the coalitions join forces to work with one another to meet the needs of the MSFW population. The Executive Director of CDLE routinely attends at least one of the picnics to personally thank the farm workers for their hard work in helping to feed America. The Delta area holds annual health fairs for the farmworker community.
6. Colorado will continue to work with the non-agricultural employers through Colorado Workforce Speaks (formerly: Limited English Proficiency (LEP) taskforce.) and provide a venue to help non-agricultural employers recruit and hire LEP clients, many of whom are MSFWs. CDLE will continue to provide resources for Colorado Workforce Speaks through its e-Colorado website: <https://e-colorado.coworkforce.com/>.
7. CDLE will continue to promote labor exchange services to the agricultural employers by participating in agricultural conferences. The State Monitor Advocate will maintain a very close working relationship with

the Colorado Department of Agriculture and identify developing agricultural trends as well as current employer needs. Planned activities include joint training sessions for outreach workers and Agricultural employees on issues such as the Worker Protection Standard, pesticide safety training, revised regulations, and the range of services available for agricultural employers and workers through the local workforce centers.

8. Colorado will continue to utilize annual growers' meetings to help identify agricultural employers expected to hire MSFWs, and to provide information to the growers regarding changes regarding to housing, pesticide protection and H2A regulations. The Agricultural recruitment system will continue as a resource to bring migrant workers to the state of Colorado. The State Monitor Advocate will continue to maintain close working relationships with the State Monitor Advocates from Texas and New Mexico (Colorado's labor supply states) to ensure equal opportunity for U.S. migrants for Colorado jobs.

### 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:

- XXXIX. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWs THROUGH THE ONE-STOP CENTERS;
- XL. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;

Information on career training and services will be provided to MSFWs at the time of intake or during outreach activities. All MSFWs will be apprised of all services available at the workforce centers, when appropriate, MSFWs will be referred to the WIOA representative or the 167 NFJP representative.

ii. How the State serves agricultural employers and how it intends to improve such services.

The Migrant and Seasonal Farm Worker Program is designed to enhance and expand services to meet the needs of the agricultural industry. Colorado will provide services to agricultural employers by effectively providing information about services available through the workforce development system and, at the same time, obtaining sufficient information about the employer's needs to provide appropriate services. Outreach workers will continue to conduct meetings with large growers and farm labor contractors to facilitate the exchange of information and maximize the effectiveness of the program. Staff will promote the use of the workforce centers to recruit workers by helping employers assess their labor needs and making appropriate referrals to their job openings.

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

1. MSFW outreach functions will be carried out by 6.0 FTE during PY16-PY20, with occasional backup from bilingual staff in significant offices with multiple bilingual staff. Workforce center staff will utilize approximately 360 staff days to provide MSFW outreach services to the farm worker community. Career services required under WIOA Title I will be provided to the MSFW clients by the six bilingual MSFW Outreach workers employed in the six significant offices. Colorado will utilize its statewide electronic

registration, Connecting Colorado, to capture data on Migrant and Seasonal Farm Workers, including an explanation of how they qualify as a MSFW. The system will also be used to provide job referrals and enroll MSFWs into WIOA services. The MSFW outreach workers and workforce staff will inform Migrants of training opportunities to improve their skills, and provide informational packets that include resources for English as a Second Language (ESL), Migrant Assistance Program (MAP) and training opportunities available through the WIOA 167 provider.

2. CDLE and RMSER, the WIOA 167 grantee, have had an MOU since 1995, and are currently updating it to comply with the new WIOA requirements. The MOU includes, but is not limited to, co-location and collaboration in communities where both agencies have a presence, and helps ensure that the needs of MSFWs that do not have access to the One Stop Centers are met. CDLE and Migrant Education have an interagency cooperative agreement that covers the six significant office areas to establish and demonstrate effective coordination of outreach and increase registration activities for all service providers; the agreement will be expanded to include all offices statewide.

These cooperative ventures between CDLE, RMSER, and Migrant Education have generally improved the operational knowledge of outreach staff, and reinforced principles and strategies. This successful partnership has provided the vehicle to better serve and to immediately expand the range of available services to the MSFW population.

3. Colorado markets the ES Complaint system by prominently displaying posters and brochures in the workforce offices and conducting informational presentations at migrant coalition meetings, agency collaboration meetings and during outreach contacts with MSFWs.

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

Services to agricultural employers will be provided by MSFW outreach workers and other workforce center staff through daily planned personal visits and promotional telephone contacts with the employer. Employers will be apprised of all services available through the workforce system to include the Agricultural Recruitment System (ARS), job orders with Connecting Colorado, file searches and other services as needed.

1. The Migrant and Seasonal Farm Worker Program is designed to enhance and expand services to meet the needs of the agricultural industry. Colorado will provide services to agricultural employers by effectively providing information about services available through the workforce development system and obtain sufficient information about the employer's needs to provide appropriate services. Outreach workers will continue to conduct meetings with large growers and farm labor contractors to facilitate the exchange of information and maximize the effectiveness of the program. Staff will promote the use of the workforce centers to recruit workers by helping employers assess their labor needs and making appropriate referrals to their job openings.

2. Services to agricultural employers will be provided by MSFW outreach workers and other workforce center staff through planned personal visits and promotional telephone contacts with the employer.

3. CDLE will continue to conduct pre-occupancy housing inspections to growers who provide housing to MSFWs, or to nonimmigrant aliens admitted to the United States under the H-2A Temporary Labor Certification program. Colorado continues to experience a shortage of agricultural workers and the number of H2A applications has remained constant for the last two years, although the Adverse Effect Wage Rate (AEWR) changes on a yearly basis.

4. Outreach workers will continue to develop and maintain productive relationships with agricultural employers, who are identified in several ways, including knowledge of the local labor market, incoming job orders, employer associations, and

word-of-mouth. Colorado will continue to utilize existing processes to link available MSFWs with employers, including ongoing collaborative efforts by workforce centers and local community-based organizations that provide services to MSFWs.

5. Each workforce region with an MSFW significant office will continue to actively promote all aspects of labor exchange services available to agricultural employers through a variety of venues such as attending in meetings for employer associations and farm labor contractors, and participating in MSFW sponsored meetings and conferences.

6. State and local workforce center staff will provide information on local labor market conditions and intrastate and interstate temporary agricultural worker recruitment requirements (including information on the Alien Labor Certification process). Information will also be provided on the Migrant and Seasonal Agricultural Worker Protection Act (MSPA) and how it affects agricultural employers and migratory workers.

#### 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).

(A) Collaboration. Describe any collaborative agreements the 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).

Colorado actively collaborates with RMSER (167 provider), Migrant Education Board of Cooperative Educational Services (BOCES), RMSER Migrant Head Start and also migrant health providers. The state of Colorado's MSFW outreach workers routinely conducts co-outreach with this staff. Additionally, Plaza del Sol and Plaza Milagro in Greeley routinely conduct a migrant information evening share MSFW services providers set up a tent and inform the MSFW agencies about their programs and requirements and also provide information to the migrants that are in attendance. Each of the six significant offices has customized handouts describing the services offered by the Workforce Centers. These handouts are shared with other migrant outreach workers in other organizations for them to give to their clients.

CDLE entered into a statewide Memorandum of Understanding (MOU) with Rocky Mountain Service Employment Redevelopment (RMSER) (167 grantee) and Migrant Education for inter-agency referrals and data sharing. These MOUs have established and demonstrated effective coordination of outreach and increased registration activities for all service providers. These MOUs are being evaluated on a yearly basis between all parties involved to change, adjust or change agreements as needed to better serve the MSFW population.

##### 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.

This plan will be shared with Chief Executive Officer of Rocky Mountain SER, Colorado's 167 provider, Colorado Department of Education Migrant Education Program and with the Colorado Department of Agriculture and an announcement made at the State Coalition meeting. In addition it will be published on CDLE's public website for a period of no less than 30 days to garner public comments prior to submission to USDOL. No comments were submitted on the plan.

### 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.

In assessing Colorado's Labor Exchange Agricultural Reporting System (LEARS) for PY11-PY14 Colorado has met all five Equity Ratio Indicators for all four years.

In assessing Colorado's LEARS for PY11-PY14 Colorado has met all 7 Minimum Service Level Indicators for PY14 and PY13.

Colorado missed two indicators for PY12 and PY11. The state missed Placed in a job and Placed in long-term non-ag job. Colorado saw a downturn in the economy during these two program years and therefore made it more difficult to meet these two indicators.

Colorado did however meet all the remaining indicators.

### 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.

As per PY 14, LEARS goals were met or exceeded in all areas that included the five Equity Ration Indicators and the seven Minimum Service Indicators. AOP outreach days were not met for PY14 due to a shortage in outreach workers. Colorado now has 6 FTE Outreach workers and we do not foresee any issues meeting our 360 outreach days for PY15 and beyond.

### E. STATE MONITOR ADVOCATE

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

The Colorado State Monitor Advocate has written, reviewed, commented on, and approved the four-year Agricultural Outreach Plan.

### WAGNER-PEYSER ASSURANCES

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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

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

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

### A. ALIGNING OF CONTENT STANDARDS

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

In June 2015, in an effort to better reflect the needs of adult learners in Colorado and to integrate services within the Colorado talent development system, the Colorado Department of Education reorganized the form and function of the team working with adult education and family literacy to form the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI). This reorganization began with revisioning adult education in Colorado with partners from workforce, labor and employment, policy advocates, higher education, community-based organizations, and the state's adult education professional organization. As a result of this effort, the following became the focus of the work of the revisioned AEI office in order to best meet the needs of Coloradans and effectively and efficiently contribute to the talent development system:

- Support a culture of change
- Engage in work groups across the state to move WIOA work forward
- Leverage funding by partnering
- Strengthen connections to livable wage, employability, postsecondary education and/or licensure
- Address barriers for transition through the system

Since the revisioning, adult education and family literacy providers and the AEI office have committed to learning more about the Colorado talent development system, to actively engaging in dialogue at local, regional, and statewide levels, and to building partnerships to best use public dollars and support the needs of Coloradans. Adult education and family literacy representatives have participated in focus groups to guide the work under the Workforce Innovation and Opportunity Act (WIOA), including identification of gaps and generation of solutions for service integration.

Additionally, adult education and family literacy representatives are engaged in work groups focused on partner alignment, service alignment, state legislative policy, and implementation. Further, adult education and family literacy representatives have been welcomed as members of local workforce development boards, which has initiated dialogue at the local level about the talent development system utilization and function.

In 2014, Colorado began a standards-based instruction initiative to promote the quality of adult education and family literacy outcomes to prepare learners for success in adult education, postsecondary education, employment, and the educational advancement of their children. The AEI office officially adopted the College and Career Readiness Standards (CCRS) as a framework to prepare Adult Education and Family Literacy Act (AEFLA)-funded programs for the new demands of high school equivalency exams. This adoption also signifies alignment with Colorado Academic Standards.

In support of this standards-based initiative Colorado joined the Standards-in-Action (SiA) national initiative in order to guide a statewide scale-up and sustainability plan of the CCRS. Statewide adoption of the CCRS promotes the explicit goal to equip students with the skills and knowledge needed for success in postsecondary education, employment, and beyond. Colorado has developed a sustainability plan to outline the professional development model, stakeholders, goals, strategies, tactics, and resources necessary to accomplish the goal of statewide implementation by July 1, 2017.

## B. LOCAL ACTIVITIES

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Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

### ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

The Colorado Department of Education (CDE) AEI office is the State's Eligible Agency for oversight of funding provided through the Adult Education and Family Literacy Act grant. AEI is responsible for administering funds to eligible providers and providing program management. AEI will provide technical assistance and guidance to programs originally funded under the Workforce Investment Act to prepare for continuation for 2016-2017. For 2017-2018, AEI will provide funding to eligible providers at the local level for the provision of adult education and family literacy services as a component of the Colorado talent development system through a competitive Request for Proposal (RFP) process. The competitive grant process for local adult education and family literacy providers will include a request for models associated with customer-centered services, including adult basic and secondary education and English language acquisition within career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Colorado.

CDE will use the considerations specified in section 231(e) of WIOA to fund eligible providers by incorporating each of the considerations into the narrative portion of the application. Each applicant will be

required to provide narrative detail to demonstrate how the applicant will meet each consideration. Finally, CDE will attach a point-based scoring rubric weighting each of the considerations.

Funds will be available for multi-year cycles for the development and implementation of adult education and family literacy programs that support strengthening of local areas. After successful development and implementation of a program, a provider may apply on an annual basis for continuation of financial support through Title II funding.

AEI will accept proposals from:

- Local educational agencies,
- Community-based organizations or faith-based organization,
- Volunteer literacy organizations,
- Institutions of higher education,
- Public or private nonprofit agencies,
- Libraries,
- Public housing authorities,
- Nonprofit institutions that are not described in any of the above that have the ability to provide adult education and family literacy activities to eligible individuals,
- Consortia or coalitions of the agencies, organizations, institutions, libraries, or authorities described above, and
- Partnerships between an employer and an entity described above.

Eligible individual means an individual (1) who has attained 16 years of age and who is not enrolled or required to be enrolled in secondary school under State law (CRS 22.33.104) and (2) who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner.

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained evaluators and AEI staff.

AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado. Written proposals will be solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

The entire RFP and related documents will be posted each year on the CDE web site in a format that allows local providers to download and print them. Efforts will be made to solicit proposals from each of the ten federally designated workforce development areas to ensure adult education and family literacy services for Coloradans in each local area.

As a critical component of the Colorado talent development system, providers will expand and improve the current system of delivering adult education and family literacy services through evidence-based practices and continuous improvement in order to:

- Build career pathways providing adults with basic and secondary education to enable them to earn a high school equivalency diploma, transition into postsecondary education or training, and/or gain or advance in employment in order to achieve self-sufficiency.
- Provide parents and guardians with sufficient skills to become full partners in the educational development of their children.

In accordance with legislation, eligible providers may receive adult education and family literacy funding for the delivery of any of the following adult education and family literacy activities:

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

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

Through further expansion and implementation of career pathways models across Colorado to serve adult learners, for competition programs will be expected to document collaborative efforts with talent development system partner programs in the local workforce development area, including but not limited to postsecondary training and education, vocational rehabilitation, and/or workforce. Concurrent enrollment of programs in the competition will ask eligible providers to first leverage partnerships for integration of workforce preparation activities and occupational components of integrated education and training in order to limit duplication of services.

To meet the needs of families in support and development of their children, concurrent enrollment of programs in the competition will ask eligible providers to describe research-based practices for integration of family literacy activities and English language acquisition activities. Additionally, eligible programs will be asked to document collaborative efforts with talent development system partner programs in the local workforce development area, including but not limited to human services and connections with K-12.

#### SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

#### C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will use the same competition process for section 225 (Programs for Corrections Education and Other Institutionalized Individuals) as will be used for section 231 for all eligible providers. The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained evaluators and AEI staff.

AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado. Written proposals will be solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

The entire RFP and related documents will be posted each year on the CDE web site in a format that allows local providers to download and print them. Efforts will be made to solicit proposals from each of the ten federally designated workforce development areas to ensure adult education and family literacy services for Coloradans in each local area.

CDE will use the considerations specified in section 231(e) of WIOA to fund eligible providers by incorporating each of the considerations into the narrative portion of the application. Each applicant will be required to provide narrative detail to demonstrate how the applicant will meet each consideration. Finally, CDE will attach a point-based scoring rubric weighting each of the considerations.

Further, CDE will use no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for activities under Section 225. Colorado adult education and family literacy sub-grant recipients use funds, as allowable, to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals. Further, eligible providers will be asked to document collaborative efforts with talent development system partner programs in the local workforce development area, including but not limited to postsecondary training and education, vocational rehabilitation, and/or workforce in order to establish career pathways for incarcerated and formerly incarcerated individuals. As part of the competition rating criteria, specific consideration will be given to programs serving individuals who are likely to leave the correctional institution within five years of participation in the program. Local activities include adult basic education, workplace adult education and literacy activities, family literacy activities, and/or English language acquisition.

## D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

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### 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 Colorado Department of Education Office of Adult Education Initiatives (AEI) will promote, support, and operate an Integrated English Literacy and Civics Program by offering a competitive RFP process designed specifically for Integrated English Literacy and Civics. This program will address the needs of Colorado's large and growing immigrant population and other English language learners. The competition for Section 243 funds will require applicants to describe how each plans to provide English language acquisition and civics education concurrently and contextually. Applicants will be required to submit a narrative description of literacy and English language acquisition integrated with civics education that includes instruction on the rights and responsibilities of citizenship and civic participation. The proposed activities will be reviewed to ensure that they meet statutory requirements and scored according to a point-based scoring rubric. Further, the competition will ask eligible providers to leverage partnerships for integration of workforce preparation activities and occupational components of integrated education and training in order to limit duplication of services and maximize Section 243 funds.

### 2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, AN INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM AND HOW THE FUNDS WILL BE USED FOR THE PROGRAM.

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained evaluators and AEI staff. AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado for Section 243 funds, alongside Section 231 and Section 225 funds. Written proposals will be solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

CDE will use the considerations specified in section 231(e) of WIOA to fund eligible providers by incorporating each of the considerations into the narrative portion of the application. Each applicant will be required to provide narrative detail to demonstrate how the applicant will meet each consideration. Finally, CDE will attach a point-based scoring rubric weighting each of the considerations.

AEI will award Integrated English Literacy and Civics grants to eligible providers that will prepare adults who are English language learners for unsubsidized employment within in-demand industries and occupations that lead to economic self-sufficiency and will integrate with the local workforce development system and its functions to carry out the activities of the program. English literacy, defined as instruction designed to help English language learners achieve competence in the English language, will be provided in the context of civics education, defined as an educational program that emphasizes contextualized instruction on the rights and responsibilities of citizenship, naturalization procedures, civic participation, and U.S. history and government to help students acquire the skills and knowledge to become active and informed parents, workers, and community members.

Through the competitive RFP process, eligible providers will be asked to describe models for career pathways for eligible individuals, including professionals with degrees and credentials in their native countries. AEI will continue to support sub-grant recipients and connections with training and employment through evidence-based practices.

## E. STATE LEADERSHIP

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### 1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA.

State Leadership will focus on the following priorities:

1. Providing purposeful leadership by serving as thought partners with stakeholders and refining and developing thoughtful, consistent policies and procedures for program performance;
2. Promoting growth and success focused on student outcomes by designing and conducting effective monitoring focused on continuous improvement and building capacity by gathering and sharing best practices;
3. Delivering high quality, responsive support to the field by continually gathering feedback for needs, offering meaningful technical assistance, and providing purposeful professional development; and
4. Supplying current, transparent, and useful information by providing accurate and timely communication with providers in the field.

Based on these strategic priorities, AEI will designate State Leadership funds to effectively and efficiently provide support and service to the field. In accordance with section 223 of WIOA, funds for State Leadership will continue to support local programs in their integration of services with core partners, development of career pathways, and ultimately, to benefit Coloradans. Colorado began this work through passage of the Adult Education and Literacy Act of 2014. This legislation began the work of aligning adult education and family literacy activities with the core programs of WIOA and one-stop partners. In alignment with WIOA, Colorado State Plan goals, and strategic priorities for the AEI office, State Leadership projects will include:

1. Alignment of adult education and family literacy activities with other core programs and community partners for consistency of service, building on the work piloted through the Colorado Adult Education and Literacy Act of 2014, through talent development system integration events, statewide work group participation, a LEAN process event, ongoing technical assistance efforts, and sharing best practices already in existence across local areas;
2. Establishment of high quality professional development programs to improve instructional and programmatic practices, that may include statewide self-assessment of professional development needs of educators; state, regional, and local level in-person professional development; regularly scheduled webinars dedicated to professional development; online communities of practice to support collaboration and local implementation of new practices; and regional specialist support to continually improve quality of adult education and family literacy services;
3. Delivery of consistent technical assistance to local programs through state leadership staff and subject-matter experts, which may include providing updated research on evidence-based practices in reading, writing, mathematics, English language acquisition programs, employability skills, digital literacy, distance education, career pathways, partnership development, and local workforce board representation;
4. Monitoring and evaluation of the quality of, and the improvement in, adult education and family literacy services focused on learner outcomes;

5. Supporting development of content and models for contextualized bridge programs, integrated education and training and career pathways to align with postsecondary education and training programs within the Colorado Community College System and workforce;
6. Development and implementation of distance education for both learners and educators to enhance digital literacy, increase learning opportunities and access to professional development training;
7. Continued implementation of College and Career Ready Standards across the state;
8. Other strategic priorities to further enhance collaboration with core partners and the role of adult education and family literacy in the Colorado talent development system.

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

AEI staff also conduct regular phone calls with program staff and annual meetings for program administrators to address challenges, gather information, provide feedback, and share best practices. Further, the AEI staff will conduct additional professional learning opportunities as needs arise from the field.

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### F. ASSESSING QUALITY

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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 Colorado Department of Education Office of Adult Education Initiatives (AEI) will assess the quality of sub-grant recipients through ongoing program monitoring and oversight. In order to empower adult education and family literacy providers to effectively serve individuals and communities, the AEI office will develop a matrix of quality indicators, based on evidence-based best practices. This tool will provide a framework to determine strengths as well as the level and type of support each sub-grant recipient needs from the AEI office. To assist in building stronger adult education and family literacy programs in Colorado, the AEI office will conduct ongoing programmatic and data reviews, plus quarterly and annual evaluations with sub-grant recipients. Quality will be evaluated through program visits, performance reports, and on-site program monitoring. Additionally, assessment will measure the effectiveness of the state and local providers in achievement of core indicators and levels of student improvement as negotiated with the U.S. Department of Education Office of Career, Technical, and Adult Education (OCTAE).

Programs must provide student progress measures obtained from all students who have attended at least 12 hours of instruction. Documented progress of student performance measures must include at a minimum:

- Literacy skill level improvements in reading, writing, and speaking the English language, problem solving, numeracy, and other literacy skills
- Placement in, retention in, or transition into postsecondary education, training, unsubsidized employment, or career advancement
- Attainment of a secondary school diploma or its equivalent.

All programs are required to maintain individual student records for all students who have attended 12 hours of instruction. Each record must contain the following:

1. Student identification and demographic information;
2. Attendance rates

3. Years of schooling and placement level at program entry
4. Specified pre- and post-testing student information
5. Entry
6. Other specified information necessary.

Additionally, all sub-grant recipients are responsible for maintaining the privacy of the data for learners of all ages who participate in their programs.

The AEI team will meet quarterly, at a minimum, to evaluate the overall viability of all sub-grant recipients - both from fiscal and programmatic perspectives. The AEI team will compare trends in data and determine necessary technical assistance and next steps. The AEI team will also develop assistance plans for programs struggling to meet goals and objectives, and those plans will be used for service and support to providers.

If a sub-grant recipient fails to meet performance goals or other programmatic requirements, the AEI office will take specific action to assist the program in improving the quality of the program. AEI will use the following two plans to take action to improve the quality of the adult education and family literacy activities.

1. Performance Improvement Plan (PIP) - A PIP will be required for programs which are identified as low-performing when compared to the State performance on federal or State benchmarks and/or for a variety of minor state policy and/or guidance violations. The PIP will include specific action steps related to performance. AEI will provide support and assistance to programs, which may include targeted professional development, one-on-one training in specific areas of challenge, and technical assistance visits by AEI staff to address particular issues.

2. Corrective Action Plan (CAP) - A CAP will be implemented with programs for significant and/or repeated state/federal policy and guidance violations. AEI will provide technical assistance throughout the corrective process, and by the end of a designated timeframe, programs should be able to correct the identified issues and end their respective CAP.

As a part of both plans, the AEI office will provide ongoing technical assistance, professional development, and other support until the required steps of the plans are completed. The type of technical assistance, professional development, and other support will be based upon the specific area(s) of deficiency or need for the individual program.

#### Quality Assessment Review Activities

Through the evaluation and monitoring process, AEI will, through its staff and/or representatives, pay close attention to the goals and objectives for achieving adult learner growth, transitions within the Colorado talent development system, advancement into post-secondary programs or training, and/or employment. The following activities are part of the AEI Quality Assessment Review process:

1. Ongoing Desktop Monitoring - Ongoing monitoring will include monthly data validations through the information management system conducted by the AEI team.
2. Quarterly Progress Review - Programs will submit quarterly reports whereby programs reflect on progress to date on performance measures and program goals, identify areas of strength and challenge, and note areas of needed technical assistance.
3. Annual Performance Review - Programs will submit an annual performance report on the effectiveness of adult education and family literacy activities of all sub-grant recipients based on the performance indicators, goals and objectives of individual programs.

4. Self-Evaluation - Programs will self-evaluate the effectiveness of adult education and family literacy activities at least once annually by using a uniform self-evaluation. The program must use data collected in the self-evaluation process to develop goals and objectives for improvement in achieving the goals set forth on learner outcomes, professional development plans as well as any other areas of weakness as may be found in the evaluation process. This must be developed and implemented in consultation with AEI.

5. On-Site Review - AEI will conduct on-site reviews of 25% of sub-grant recipients each year. Program order for On-Site Review will be based on levels of risk. Programs determined to be higher risk will receive on-site reviews first. Risk is determined based on an analysis of factors, including size of award amount, timeliness of data entry, “newness” of the program or key program staff, and expenditure amounts.

6. Peer Review - As requested by sub-grantees and/or required by AEI as part of program improvement, AEI will coordinate and conduct a peer review process focused on quality improvement.

#### Professional Development Quality Assessment

Participants will be surveyed after workshops, conference presentations, and webinars to evaluate and provide feedback on the activity or event. Further, CDE will provide opportunities for sub-grantee feedback throughout the year to identify opportunities for improvement. Feedback from the field will be utilized to inform creation of future training and modify existing training, if need be. CDE will encourage professional learning communities on a local level, as well as involvement in communities of practice. CDE will develop an annual professional development plan based on feedback shared from sub-grantees, data collected, and current research-based instructional practices.

Additionally, CDE will continue to require the Adult Basic Education Authorization for all instructors at sub-grantee sites.

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### CERTIFICATIONS

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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

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### CERTIFICATION REGARDING LOBBYING

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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 **Colorado Department of Education, Office of Adult Education Initiatives**

Full Name of Authorized Representative: **Danielle Ongart**

Title of Authorized Representative: **Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to OCTAE\_MAT@ed.gov

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### **ASSURANCES**

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals"

within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes

7. The eligible agency agrees that in expending funds made available under title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303 ). Yes

#### SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA )

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In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

The Office of Adult Education Initiatives (AEI) has taken multiple steps to ensure federally funded adult education programs are providing equitable access to, and participation in, Adult Education and Family Literacy Act (AEFLA) services in regards to students, teachers, and other program beneficiaries with special needs. AEI conducts monthly data monitoring and frequently reviews program data disaggregated by the barriers outlined in the statute against state and local demographic data to spot trends in service provision and technical assistance opportunities. AEI also monitors the plans for Section 427 compliance that programs submit with their applications.

A new role, Student Re-Engagement Coordinator, has been added to AEI to work with programs and school districts to re-engage opportunity youth ages 17-24 in the way that is most appropriate for their long-term goals, ensuring that age is not a barrier to participation in services.

To ensure that disability status is not a barrier to participation in adult education programs, AEI is a lead partner on the new Disability Employment Initiative grant Colorado was awarded in September 2017 by the U.S. Department of Labor (DOL). The state team will make more strategic use of a career pathways framework to improve training and employment outcomes for individuals with disabilities in Workforce Innovation and Opportunity Act (WIOA)-funded employment and training services. AEI also has an Accessibility Policy that outlines requirements for local programs around ensuring equitable access to services, staff training, testing accommodations, language on promotional materials, etc. Programs must write accessibility policies that are approved by AEI and execution of the policy is monitored by AEI staff during on-site visits. Professional learning opportunities are provided by AEI in collaboration with disability experts for local program Accessibility Coordinators.

To ensure that race, national origin, and/or color are not a barrier to participation, AEI collaborates with multiple offices and agencies to understand and try to meet the needs of various populations around the state. AEI is fortunate enough to have a longstanding relationship with CDE's Office of Migrant Education and Office of Culturally and Linguistically Diverse Education. As part of the Colorado Department of

Education’s ongoing tribal consultations, AEI is collaborating with the Colorado Commission of Indian Affairs to ensure tribal concerns and needs are reflected in adult education services.

AEI takes a multi-pronged approach to ensure compliance with Section 427.

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## PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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

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

### A. INPUT OF STATE REHABILITATION COUNCIL

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

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

The Colorado Division of Vocational Rehabilitation (DVR) has had a State Rehabilitation Council (SRC) for more than twenty-seven years. The SRC mission statement is:

“The Colorado State Rehabilitation Council provides individuals with disabilities a strong, substantive role in shaping the programs and services established to support their employment goals and aspirations and to provide clients of vocational rehabilitation services a mechanism to influence at the systemic and policy level the direction of vocational rehabilitation programming.”

The SRC meets every other month and has a yearly retreat. The SRC has three subcommittees: Membership; Quality Assurance; and Planning, Performance and State Plan (PPSP). Minutes are maintained of all SRC meetings, subcommittee meetings and retreats. Minutes summarize the advice and recommendations provided to DVR by the SRC. DVR continues to work closely with the SRC to share and discuss information on finances, personnel, services to clients, agency policies, state rules, federal standards and indicators, customer satisfaction, the wait list, and any other items that impact the extent, scope and effectiveness of rehabilitation services.

On May 8, 2015, Governor John Hickenlooper signed SB15-239, requiring that this transfer take place in two phases, and no later than July 1, 2016. The first phase transferred DVR staff and programs to CDLE and the second phase addressed program administration, alignment of services, and compliance with state and federal rules and regulations. SB15-239 directed CDLE and DVR to “engage, involve and seek the advice of DVR’s many interested stakeholders, including the State Rehabilitation Council, in developing detailed programmatic and budget recommendations and plans for a smooth and effective transfer of vocational rehabilitation programs and functions to CDLE”. To this end, the SRC worked closely with DVR and CDLE to establish a stakeholder committee. The committee developed the following goals:

- Engage stakeholders with an open, honest and transparent approach and commitment to building a strong foundation within DVR as it moves to CDLE;

- Create a strategy that includes as many advocates, service providers, staff and clients as possible;
- Provide multiple opportunities and methods for input; and
- Establish trusted relationships with stakeholders for an ongoing dialogue on potential improvements, modifications, corrections, etc. to DVR even after the July, 2016 transfer is completed.

The SRC was instrumental in the ongoing activities of the stakeholder committee. The stakeholder committee hosted ten in-person meetings across the state in the summer and fall of 2015, and used an online and fully accessible feedback form to capture feedback from individuals who were unable to attend the meetings. The stakeholder committee presented an initial report to the Colorado Joint Budget Committee on September 21, 2015 and completed their initial stakeholder outreach activities on October 21, 2015. The outcomes of the stakeholder outreach activities included six common themes suggesting areas for improvement within DVR. These themes were developed into three key areas that DVR and CDLE, together with the SRC and the stakeholder committee, addressed as the agencies moved toward the second phase of the merger. These three areas were: youth and transition services; blind services; and continuous stakeholder engagement. These areas, and the full results of the stakeholder outreach meetings, were a key component of Colorado DVR's comprehensive statewide needs assessment (CSNA), and were incorporated into DVR's goals, priorities and strategies within the vocational rehabilitation section of Colorado's Combined WIOA State Plan.

DVR participates with the SRC in the quarterly conduct of customer satisfaction, via electronic surveys, focus groups and public meetings. Surveys ask about satisfaction with DVR staff, rehabilitation services, available resources and employment outcomes. Results of customer satisfaction information, and guidance from the SRC, are used to drive more effective and efficient vocational rehabilitation services for customers. Quarterly customer satisfaction results are one data element of DVR's CSNA, and as such are used to develop the state plan.

DVR regularly seeks the advice of the SRC on pertinent issues, including the development and implementation of the state plan. To this end, DVR and the SRC jointly developed and conducted the 2015 DVR triennial comprehensive statewide needs assessment to determine the rehabilitation needs of individuals with disabilities in Colorado. The SRC and DVR established the goals of the CSNA and developed a plan for dissemination. Results were analyzed to determine findings which were then used to develop potential strategies. The SRC used the results of the CSNA to make recommendations to DVR that informed the state plan's goals, priorities and strategies. Additionally, the SRC and DVR will continue to conduct public hearings in person, by telephone and electronically to obtain comment on the DVR state plan and on potential policy changes that are a part of the state plan.

As a result of the 2015 CSNA and the SRC's related activities, the SRC makes the following recommendations to DVR for the upcoming state plan period:

**SRC Recommendation 1** The Colorado Division of Vocational Rehabilitation will increase numbers served. This will be done by encouraging and welcoming new applicants with disabilities that are in need of services in order to obtain employment. Offices will be open and friendly. New materials will be developed that focus on the successes of DVR and the website will reflect this. Unserved and underserved populations will be targeted and some of these include individuals with criminal histories, individuals with limited education, people with mental illness, homeless individuals, individuals with intellectual and multiple disabilities and others. Outreach to community partners to generate referrals and educate them will be crucial. Some of these partners will include workforce centers, employers, educators, parents, and others. As outreach is provided, technical assistance will be given to educate all communities about the Colorado Division of Vocational Rehabilitation.

**SRC Recommendation 2** All DVR staff will receive ongoing training in order to provide effective and high quality services to their consumers. An inter-disciplinary approach may be employed where counselors

and others with expertise work with staff to build skills. Training areas may include development of excellent customer service skills for office staff, counseling and guidance, specific disability trainings with resources available, work incentive training, assessment, cultural competence, or job development. Training may also include best practices for implementation of the key elements of WIOA, including customized employment, using “discovery” as part of the assessment process, or person-centered planning practices.

SRC Recommendation 3 Vendors working with Colorado DVR shall receive training so that they will have a clear understanding of the rehabilitation process and will be effective and qualified to work with counselors and their consumers for the consumers’ success. Training topics should include specifics on the rehabilitation process, increased cultural competence, clear understanding of disability issues, supported employment, use of interpreter and translation services, and more. Training may also include best practices for implementation of the key elements of WIOA, including customized employment, using “discovery” as part of the assessment process, or person-centered planning practices. Job coaches must be trained in order to provide effective services.

SRC Recommendation 4 Colorado DVR will create an active plan to provide innovative and effective transition services to youth with disabilities across the state of Colorado. This will include work with all stakeholders including the Colorado Department of Education, special education teachers, parents, workforce centers, and youth with disabilities. Stakeholders will have a clear understanding of DVR’s role, will understand the referral process and know when and how to make referrals. DVR should develop policies in order to collaborate with schools and workforce centers to provide pre-employment transition services to younger youth prior to their referral to vocational rehabilitation.

SRC Recommendation 5 Colorado Division of Vocational Rehabilitation shall decrease avoidable delays in services to DVR applicants and consumers. Examples of delays identified in the comprehensive statewide needs assessment include long waits for intake meetings, long waits for meetings with DVR counselors, long waits for assessment services, delays due to lack of assistive technology in rural communities, and delays due to lack of skilled vendors especially in the areas of job development and placement. Other areas identified include long waits for job maintenance services and lack of updated technology for rehab consumers and for DVR staff.

SRC Recommendation 6 Colorado DVR shall actively work closely with the executive and legislative branches of Colorado government to fully utilize Colorado’s share of Rehabilitation Services Administration matching funds. In order to create effective and far reaching success in the employment of people with disabilities in Colorado, the full allotment of funds must be available. Ongoing communication with the legislature will focus on the success that Colorado DVR is having in all areas of operation.

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

### **DVR Response to recommendation 1**

Colorado DVR agrees with this recommendation. The intent to increase the number of individuals served by DVR is incorporated, inclusive of strategies identified in this SRC recommendation, within the majority of the agency’s state goals and priorities as indicated in section (L).

### **DVR Response to recommendation 2**

Colorado DVR agrees with this recommendation. Increasing the skills of DVR staff is incorporated into section (L), where a DVR goal is to increase the skill set of DVR staff through professional development that results in a comprehensive, holistic approach to talent development. As DVR employees become employees of the Colorado Department of Labor and Employment (CDLE), all staff will participate in the development of individualized Employee Quality and Excellence Plans (EQEP). The EQEP contains specific coaching and

development activities to assist staff in polishing their existing skills and gaining new ones in order to provide effective and high quality services to DVR consumers. Additionally, DVR staff will participate with WIOA core program staff in the learning and cross-training of a core curriculum across WIOA partner programs.

### **DVR Response to recommendation 3**

Colorado DVR concurs with the SRC that vendors should exhibit high quality skills and provide excellent services to DVR consumers. DVR is unable to require mandatory training of DVR vendors. However, the agency has purchased and plans to implement tools to assess vendor performance: the Vendor Contribution Assessment (VCA) and the Vendor Quality Assurance module. The VCA analyzes vendors through the application of advanced analytics to vocational rehabilitation services and outcome data. The Vendor Quality Assurance module collects consumer and counselor feedback on vendor usage and outcomes. Data from these tools will empower and educate staff and consumers to use only effective vendors. Additionally, DVR can make available to vendors a variety of resources and education opportunities, including the rehabilitation process, disability awareness, cultural competence and others. Also, DVR commits to explore tiered rates for vendors who provide job coaching and customized employment, based on levels of training and credentials. Finally, DVR intends to make customized employment a topic of education for DVR staff and vendors so all are aware of and educated about this key emphasis within federal act and proposed regulation.

### **DVR Response to recommendation 4**

Colorado DVR agrees with this recommendation. The expansion of transition services to Colorado's youth with disabilities, including pre-employment transition services to Colorado's students with disabilities, is an agency goal and is incorporated into Section (L). Additionally, DVR will explore the utilization of services to groups of individuals, as identified in 34 CFR 361.49, as a mechanism for providing transition services to youth with disabilities and students with disabilities who may not have yet applied or been determined eligible for vocational rehabilitation services.

### **DVR Response to recommendation 5**

Colorado DVR agrees with this recommendation and incorporates within section (L) a strategy of process improvement to identify and address avoidable service delays in the delivery of rehabilitation services. DVR anticipates tackling this area as an activity of our merger with CDLE. Over the next several years, in partnership with CDLE and using the Colorado Lean process, DVR will strive for continuous improvement by applying Lean principles and tools to identify and eliminate avoidable service delays and improve the delivery of rehabilitation services. DVR intends for this effort to support the Colorado Combined State Plan goal of establishing a customer-centric and holistic focus to increase effectiveness.

### **DVR Response to recommendation 6**

DVR supports the carryover of this recommendation from the most recent state plan and agrees that legislative and state-level funding is essential to the continuity and growth of vocational rehabilitation services throughout Colorado. The agency anticipates greater opportunity and support for increased state-level funding as DVR merges with CDLE. DVR looks forward to the participation and support of the SRC in this endeavor and the opportunities to collaborate and advocate within the advancement of this recommendation.

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

N/A

## **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;

Colorado is not requesting a Waiver of Statewideness.

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

Colorado is not requesting a Waiver of Statewideness.

### 3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Colorado is not requesting a Waiver of Statewideness.

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

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

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

##### County Human Services Agencies

DVR cooperates with County Departments of Human/Social Services at both the state and the local levels to enable human services recipients with disabilities to reduce their dependency on public assistance through employment. Counselors and supervisors have increased efforts and activities with county social service agencies in working with recipients of services, who have disability related employment issues. In several counties, DVR staff participate on county human services advisory boards. Local DVR offices have working partnerships with county human services agencies. The partners have developed referral processes to and from county human service agencies and collaborate to obtain necessary services for DVR clients that DVR is unable to provide, including Medicaid, food stamps, Temporary Assistance to Needy Families (TANF), child care assistance and the Special Supplemental Nutrition Program for WOMEN, INFANTS, AND CHILDREN (WIC).

##### Healthcare Policy & Financing - Office of Community Living; Community Centered Boards

Community Centered Boards (CCB) serving persons with intellectual and developmental disabilities are important partners in DVR's effort to assure the availability of quality vocational rehabilitation services throughout the state.

Currently, DVR has one counselor whose office is co-located on site at the local CCB office. In the other areas of the state, DVR counselors and supervisors meet frequently with CCB staff to coordinate service delivery. These counselors focus on promoting successful community employment outcomes for individuals with developmental disabilities who have been determined eligible and are recipients of services through the CCB system. In addition, the Coordinator of Supported Employment for DVR meets regularly with the Home and Community-Based Services (HCBS-DD and HCBS-SLS) Supported Employment

Coordinator at the Office of Community Living (OLC) within the Department of Healthcare Policy & Financing to discuss issues impacting services.

The collaboration between DVR and the CCBs is especially evident in DVR's delivery of supported employment services. For DVR clients who meet CCB eligibility for service delivery, the CCB works cooperatively with DVR counselors to ensure the provision of extended ongoing support services and the success of the individual's supported employment outcome. DVR staff, working together with CCB staff, assist and facilitate each client's expression of choice in service delivery options, employment outcomes, and providers of services through networks of "approved service agencies". DVR staff attend board and committee meetings to facilitate an effective working relationship between our agencies.

On November 1, 2014 DVR implemented changes to the Fee Schedule to increase rates for job placement and job coaching services, including supported employment. These changes are intended to attract additional quality job placement vendors and increase individual employment outcomes.

DVR has a full-time Coordinator of Supported Employment Services. This person serves on the Colorado Developmental Disabilities Council representing DVR. In addition, DVR has lead DD counselors to help more effectively coordinate and provide quality services for individuals with developmental disabilities. These counselors serve as regional liaisons, providing training, guidance and support to all counselors in their areas to establish standards of practice with the local CCBs. In addition, their duties include functioning as the expert and serving as a liaison between the CCB and the local DVR offices as well as various community partners, vendors and independent contractors. These individuals also work as a team in conjunction with the Supported Employment Program Coordinator to identify emerging trends and issues, develop new and or unique services in the community and evaluate existing programs for persons with developmental disabilities.

The HCBS-DD and HCBS-SLS waivers' Supported Employment Coordinator for OCL and the Coordinator of Supported Employment for DVR periodically conduct meetings with the CCBs in Colorado. Attending these meetings are typically CCB Case Managers, vocational service providers, and DVR counselors and supervisors. DVR and OCL also provide regional training to bring together direct service provider staff from CCBs, DVR, and local service providers. The training supports smooth and seamless referrals to DVR, coordination of services, competitive integrated employment, and a variety of other subjects. DVR continues to partner with OCL to provide relevant training to staff and direct service providers.

The State of Colorado is a member of the State Employment Leadership Network (SELN). This membership is sponsored by OCL. The HCBS-DD, HCBS-SLS, and Coordinator of Supported Employment for OCL and the Supported Employment Coordinator for DVR meet monthly with SELN to discuss strategies to increase individual supported employment opportunities to people with Developmental and Intellectual Disabilities. Discussions will include opportunities for youth with disabilities to obtain education and employment outcomes.

### The Corrections System

DVR understands that many individuals who are involved with the Colorado corrections system are also individuals with disabilities. Colorado's correctional system is complex, with separate departments serving adults, youthful offenders, and youth. Additionally, there are regional and local jurisdictions as well as state and private correctional facilities and providers. DVR's recent CSNA indicated that individuals with criminal histories are a demographic of the disability population that DVR underserves. DVR is committed to increasing the number of applicants from this demographic. To this end, local DVR staff have developed, and will continue to develop, working partnerships with probation offices, parole offices, and diversion programs, as well as working directly with many of the youth and adult correctional institutions in the state. For individuals who meet DVR eligibility, staff work to coordinate timely referral processes and services that complement release plans that are mutually developed by the individual with the disability and the correctional program to which they are attached.

### Traumatic Brain Injury (TBI) Program Initiatives

Colorado is fortunate to have a Traumatic Brain Injury (TBI) Trust Fund. In 2002 Colorado passed legislation that allows for the collection of surcharges on certain traffic violations such as driving while ability impaired, driving under the influence and speeding. The surcharges collected from these convictions go into the Colorado TBI Trust Fund which is administered by MINDSOURCE Brain Injury Network (formerly the Colorado Brain Injury Program) housed within the Colorado Department of Human Services (and within DVR until June 30, 2016). The statute requires the following three program areas: services for children/youth and adults with brain injury (specifically case management); research regarding the care and treatment of brain injury; and education to increase the awareness and understanding of brain injury.

Through MINDSOURCE, case managers partner with DVR to help counselors understand how brain injury may be impacting the individual's ability to work and/or follow through with vocational planning. The program also works to provide education and consultation to DVR on a broader level. Finally, the program works across agencies and divisions to ensure policies and practices are inclusive of individuals with brain injury ultimately to ensure access to support for individuals with brain injury.

MINDSOURCE strives to not only provide supports to individuals with brain injury and their families but to also provide support to the "systems" that individuals with brain injury and their families interact with to obtain support. The program has a strong partnership with Division of Vocational Rehabilitation and other providers in the community.

### BOND (Benefit Offset National Demonstration) Project

DVR recently completed a seven year partnership with Abt Associates and Ability Connection Colorado (formerly known as CP of Colorado) implementing the Benefit Offset National Demonstration (BOND) project in Colorado and Wyoming. Funded by the Social Security Administration (SSA), BOND operated in ten different locations across the United States. Using a rigorous study design, the intent of the BOND project was to explore and evaluate the effectiveness of a variety of service levels and work incentives that, when offered to Social Security Disability Income (SSDI) beneficiaries, result in the beneficiaries obtaining and maintaining successful employment outcomes.

Within the BOND Project, DVR provided work incentive counseling, service coordination, and information and referral services to SSDI beneficiaries who have been randomly selected and enrolled in the Project. When these beneficiaries return to work, DVR assured that the beneficiary receives financial incentives not available to other SSDI beneficiaries. DVR's participation in the Project enabled DVR to be on the cutting edge of new approaches and strategies for service delivery that are intended to improve the effectiveness of services provided to SSDI beneficiaries supporting a return to work and a better quality of life for the beneficiaries.

### Colorado Work Incentive Coordinators

For the past several years, DVR has supported the ongoing and statewide availability of work incentives and benefits consultation. DVR, through an annual purchase order, assures that Ability Connection Colorado (ACC), the Work Incentives Planning and Assistance (WIPA) grant recipient, has adequate funding to provide personnel necessary to cover all parts of Colorado. DVR works with ACC program management to assure that DVR applicants and eligible individuals, as appropriate, receive work incentives consultation and that an effective and efficient statewide referral process is in place.

### ASPIRE

The Colorado Division of Vocational Rehabilitation entered into the six-state consortium, Achieving Success by Promoting Readiness for Education and Employment or ASPIRE, in September 2013 as one of six Promise Initiatives through the US Department of Education. Arizona, South Dakota, Montana, North Dakota, Colorado and Utah are partnering to recruit, 2,000 youth ages 14 to 16 who receive Supplemental

Security Income (SSI) to this experimental design. One half of the youth (1,000) will receive a variety of interventions to improve their educational and employment outcomes. These enhanced services are comprehensive case management, benefits planning, family financial education, paid employment during high school, youth self-determination training, and parent education and training. The other half will receive Usual Services, or those services currently available to youth.

ASPIRE Colorado completed the enrollment process of 400 youth and families in August of 2015. 201 youth and families are in the intensive ASPIRE services group and 199 are in the Usual Services group. ASPIRE Colorado is active in 17 counties; Adams, Alamosa, Arapahoe, Boulder, Delta, Denver, El Paso, Fremont, Garfield, Jefferson, Larimer, Logan, Mesa, Montrose, Morgan, Pueblo and Rio Blanco. ASPIRE Colorado has contracted with Peak Parent Center to provide Self-Determination and Parent training and Ability Connections Colorado is providing WIPA services to our ASPIRE youth and families. Financial training is provided by internal state partners.

Through Case Management services, ASPIRE Colorado is collaborating with existing local and state community partners to provide assistance to the ASPIRE youth and families with application and eligibility processes within the public and private sectors. The goal is to better serve families and youth with disabilities by increasing education attainment and employment opportunities in order to decrease the dependency on public benefit.

The ASPIRE youth employment interventions include career assessments, career exploration, and preparation. The expectation is that the interventions will lead to a paid employment experience for the youth by the end of the grant. ASPIRE Colorado will continue to provide services through March 2019.

#### Rocky Mountain ADA Center

DVR is a strong partner with Rocky Mountain ADA Center based out of Colorado Springs. This organization provides technical assistance and information to a six state region. Several DVR staff members have received advanced training on the ADA and the Amendments Act and are available for training upon request. The Rocky Mountain ADA Center is committed to on-going training and collaboration holding bi-monthly network calls, annual national training sponsorships, and regular educational opportunities.

#### Colorado Institutions of Higher Education

A significant number of DVR clients attend post-secondary education. In Colorado, there are more than 470 institutions of higher education. These include publically supported institutions, private accredited schools, area technical schools and private occupational schools.

Local DVR offices work closely with the many offices dedicated to support students with disabilities at each institution. This assists DVR clients in the completion of their areas of study and enables them to move more successfully into their chosen employment outcome.

At the state level, DVR has a representative who is a member of the Colorado/Wyoming Consortium of Support Programs for Students with Disabilities (the Consortium). The Consortium was created at least two decades ago through an establishment grant awarded by DVR. The Consortium's membership consists of individuals from post-secondary disability services offices, DVR and the Colorado Department of Education (CDE). The Consortium supports communication between the community colleges, universities, CDE and DVR in areas related to networking, accommodation, professional development, collaborative agreement development, national conference presentations, and other related topics. The Consortium creates guidance documents, such as Colorado's Best Practice Documentation Guidelines for Post-Secondary Institutions. The Consortium also participates in the development and renewal of memorandums of understanding between DVR and the six public post-secondary system boards in Colorado. These MOU agreements detail the collaborative provision of services to students with disabilities who are in an institution of higher education and who are also recipients of services through DVR.

### Collaboration with American Indian Vocational Rehabilitation Services

Colorado has two American Indian Vocational Rehabilitation Services (AIVRS) Program Grant Awardees. The Southern Ute Indian Tribe and the Ute Mountain Ute Indian Tribe are located in the southwestern part of Colorado, and the Ute Mountain Ute Reservation extends into New Mexico and Utah. DVR has a long history of partnership and collaboration with both AIVRS programs. However, with significant changes in the administrative and field services staff of all three programs over the last several years, collaborative activities have declined.

Colorado DVR and the two AIVRS programs are addressing this issue in a variety of ways. A southwestern Colorado DVR supervisor has been assigned to work as a liaison to interface with representatives of both tribes to strengthen the partnerships and develop formal cooperative agreements. DVR's liaison and representatives from both AIVRS programs have worked to develop and formalize the partnerships. Staff of all three programs provide cross-training between DVR and the AIVRS programs, and the Southern Ute program has invited local DVR program staff to participate in cultural awareness activities offered through their Cultural Center. Additionally, DVR is working with both AIVRS programs to attend one-another's staff meetings, develop a process for identifying and sharing data, and determine how referrals and information will be shared between the entities to assist in the eligibility determination and provision of vocational rehabilitation services to American Indians. Once determined, all collaborative processes and procedures will be developed into a separate cooperative agreement between DVR and each AIVRS program. The cooperative agreements will be used to guide the collaborative, effective and efficient provision of vocational rehabilitation services to American Indians who are individuals with disabilities, including mutual clients of the programs. The agreement will also be used to cross-train new staff within the DVR and AIVRS programs, and will be reviewed and updated regularly.

### Collaboration with the State Independent Living Council, the Centers for Independent Living, and the Older Individuals who are Blind Program

DVR administers two programs mandated by Title VII of the Act:

- The Colorado State Independent Living Services (SILS) program; and
- The Older Individuals who are Blind (OIB) program.

SILS programs are currently run out of Colorado's statewide network of ten Centers for Independent Living (CIL), which provide services to individuals with significant disabilities who face barriers to living self-directed lives in their communities. The OIB program is managed by DVR's Blind and Low Vision Services unit (BLVS) and funds are awarded through a competitive process every three years. Currently four of Colorado's CILs and two Community Rehabilitation Programs are awarded contracts on a three year cycle.

Under the SILS program, Centers provide independent living skills training, individual and systems advocacy, peer counseling, information and referral, transition services for people leaving nursing homes and for youth moving into adult responsibilities, assistance with social security applications, transportation, housing and many other services that support clients to set and achieve their goals of living independently in their community. This diverse and extensive list of service types allows Centers to provide the holistic support that many clients with significant disabilities may need.

DVR's local offices evidence close working partnerships and collaboration with all ten Centers. Together the partners share referrals, develop collaborative plans with clients, communicate to avoid duplicative service provision, and meet regularly to strengthen their relationships and cross-educate one another. In addition, in November of 2016, DVR established an Office of Independent Living Services (OILS). This unit further supports collaboration between DVR and the CILs by administering the funding and providing technical assistance and training to both CIL and DVR staff to strengthen the relationship. OILS also provides staff support to the State Independent Living Council.

The OIB program serves people who are 55 and older who are blind or have impairments to their vision. Clients tend to be people who are experiencing vision loss from age-related factors and who are concerned about losing independence, either in their home or in their community. The OIB program helps clients learn new skills and identify community resources that will support their participation in full, independent lives.

### Employment First Advisory Partnership (EFAP)

In 2016, Senate Bill 16-077 was passed creating an Employment First Advisory Partnership (EFAP), which identified partner agencies of the Colorado Departments of: Labor and Employment (CDLE), Health Care Policy and Financing (HCPF), Education (CDE), Human Services (CDHS), and Higher Education (CDHE), and tasked the State Rehabilitation Council with convening and leading the work of the partnership, which was to make recommendations to increase opportunities for competitive integrated employment for persons with disabilities. The EFAP's preliminary report and recommendations were presented to members of the General Assembly in January of 2018. These recommendations will drive change within each agency individually, but also facilitate collaboration to ensure a comprehensive approach to increasing the opportunities for competitive integrated employment for individuals with disabilities.

Recommendations of EFAP include:

- Produce data for all applicable EFAP agency partners that allow measurement of Colorado's progress toward compliance with federal law requiring people with disabilities receive state-funded services in integrated settings;
- Implement department-wide Employment First policies and practices;
- Implement a training plan for state-contracted service providers on evidence-based practice to expand employment outcomes, in conjunction with employer-lead initiatives and networks;
- Implement a communication plan with messaging describing available services that support the achievement of successful employment outcomes for people with disabilities, including those with the most significant disabilities, which targets employers, educators, people with disabilities and their families;
- Create an Office of Employment First to coordinate cross-departmental efforts to implement Employment First policies, regulations, and practices;
- Develop appropriate funding structures that will increase employment service and support capacity for people with disabilities within Colorado to successfully align service outcomes with the definition of Competitive Integrated Employment within the Workforce Innovation and Opportunity Act;
- Design and coordinate locally-based pilot projects to demonstrate the expansion of employment outcomes for people with disabilities through best-practice employment services and supports implementation; and
- Become a "model employer" for Colorado citizens with disabilities.

Each of the recommendations assigns primary responsibility to particular agencies within the partnership. Full implementation will require ongoing collaboration between all partners, as well as other key stakeholders, with the ultimate goal of improving competitive integrated employment for individuals with disabilities.

### Other Collaborative Partnerships

Colorado's western slope offices have a collaborative arrangement with the Marillac Clinic where clients can access medical, mental health, vision and dental care. Marillac Clinic is also a DVR provider for clients who do not meet the guidelines to receive these services as a comparable benefit. Northwestern Colorado DVR offices work closely with the Yampa Valley Medical Center and the Yampa Valley Autism Program to share referrals and collaboratively provide services. DVR has one rehabilitation counselor assigned solely to Craig Hospital in Denver. Jointly, DVR and Craig provide rehabilitation services, in-patient and out-

patient medical treatment, rehabilitation engineering, adaptive driving and community reintegration to individuals who have acquired a spinal cord injury or a brain injury.

Colorado DVR's eastern plains offices, Boulder offices, and Denver locations work with local homeless programs to obtain emergency shelter, transitional housing, and case management services that are available specifically for individuals with disabilities. DVR's Jefferson County office works closely with the Women's Bean Project, whose mission is to provide self-sufficiency to women through social enterprise.

The Denver metro DVR offices partner with Colorado Refugee Services to make and receive referrals of refugees with disabilities and to coordinate with Jewish Family Services and the African Community Center to collaboratively provide services leading to employment.

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

Assistive Technology Partners (AT Partners) through the University of Colorado Health Sciences Centers provides services statewide under the Assistive Technology Act of 1998. DVR's Assistive Technology Coordinator is a member of the AT Coalition, which seeks to increase awareness and accessibility of assistive technology to Colorado residents. DVR is working to develop and formalize an agreement with AT Partners. The formal agreement will strengthen the working relationship between DVR and AT Partners, and will define how the partners will work together, including a process for referral and the coordination of activities.

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

The Colorado AgrAbility Project promotes success in agriculture for people with disabilities or other physical challenges and their families. Colorado AgrAbility is part of a nationwide network of United States Department of Agriculture (USDA) programs begun through the 1990 Farm Bill. Colorado AgrAbility works in collaboration with Colorado State University and Goodwill Industries of Denver. The goal of the National AgrAbility Project is to inform, educate, and assist farmers, ranchers, farm workers, and their families with disabilities, so they can continue to have successful careers in agriculture. DVR counselors who serve clients within Colorado's rural communities work closely with the AgrAbility Project to assist individuals in maintaining successful agricultural employment. Jointly, DVR and AgrAbility staff assess agricultural work sites and tasks, determine and explore adaptive equipment and other services, provide services to clients, and train and follow up with individuals to assure their success. Additionally, DVR and AgrAbility jointly provide information, including workshops, to farmers, ranchers and family members with disabilities and other pertinent individuals who would benefit from this information.

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

While DVR does not currently have any formal cooperative agreements with noneducational agencies serving out-of-school youth, DVR takes an active role in state youth groups and committees to support ongoing collaboration between community agencies in the provision of services to out-of-school youth. Participation in these groups and committees promote better coordination of services and shared resources at both the state and local levels. Participation and involvement allows DVR to participate in the development of processes, procedures, guidelines and practices for more effective transitioning planning and services throughout Colorado's multiple areas and systems. DVR continues to explore opportunities for better partnership and develops formal agreements when appropriate.

## 5. STATE USE CONTRACTING PROGRAMS.

Colorado has a set aside program enabling non-profit agencies to become a self-certified vendor to bid on certain solicitations, such as janitorial services. To qualify, seventy-five percent of the non-profit's employees performing the work of the contract must be individuals with severe disabilities, and a minimum of twenty percent of those employees are individuals with developmental disabilities. The set aside program is managed by the State Purchasing Office and DVR is not directly involved. Some of the qualifying non-profit agencies may provide purchased services to DVR clients, however employment under these contracts would not be considered competitive integrated employment by DVR.

#### D. COORDINATION WITH EDUCATION OFFICIALS

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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.

Since 1985, the Division of Vocational Rehabilitation (DVR) has partnered with the Colorado Department of Education (CDE), and with local school districts and Boards of Cooperative Education (BOCES), in supporting a comprehensive transition planning and service delivery process for youth with disabilities. DVR has organized a Youth Services and Transition Unit within Administration. The Unit is responsible for assuring the provision of high quality vocational rehabilitation services to Colorado's youth with disabilities.

Colorado is exploring with education partners how to best provide students with pre-employment transition services and skills training when appropriate, in order to make a positive contribution to the IEP outcome. DVR is finalizing updates to our interagency agreement to include: the provision of services under the new direction identified within WIOA; the redefinition of the transition responsibilities of DVR and of education; assurance of access to services for youth; and ongoing support of effective and efficient working relationships between partners.

##### School to Work Alliance Program (SWAP)

DVR currently has 35 School to Work Alliance Program (SWAP) sites. These sites involve approximately 60% Colorado's school districts. SWAP serves over 2,500 youth annually, and is a collaborative initiative between DVR and local school districts, supported by CDE. The purpose of SWAP is to provide new patterns of service, increased community linkages, and successful employment outcomes for youth with disabilities who are applicants and eligible VR clients. The provision of pre-employment transition services to students with disabilities has also been incorporated into SWAP, further supporting a collaborative and coordinating transition for students.

At the local level, DVR counselors participate in resource fairs, back-to-school nights, and parent teacher conference nights. They present information about DVR at residential treatment centers, residential childcare facilities, and at teacher in-service events. DVR will continue these types of outreach, education, and consultation activities with our school partners for the purpose of providing consultation and technical assistance to support transition planning from school to post-school services. Counselors contribute to the classroom by identifying gaps relevant to pre-employment and transition services which they can assist education partners with. This contributes to an effective and consistent referral process for youth between agencies at the local level.

In collaboration with the State Rehabilitation Council (SRC), the Youth Services and Transition Unit is working to identify ways in which DVR can improve services to transitioning youth and ensure that all

stakeholders have a clear understanding of DVR's role, the referral process, and when and how to make referrals. DVR has developed policies and continues to refine practices to support collaboration with the districts/BOCES and workforce centers to provide pre-employment transition services to younger students prior to their referral to vocational rehabilitation. Between August and October of 2015, more than 200 DVR stakeholders including clients, vendors, staff and advocates attended a total of 10 in-person meetings across Colorado. These meetings were held by DVR and CDLE to solicit input about how DVR can better serve Colorado's individuals with disabilities, in preparation for the move of DVR into the Colorado Department of Labor and Employment. Several transition-related themes were identified during these public forums. As a result, DVR is committed to identifying a better way to align DVR resources to ensure delivery of transition services that are more focused, provide the best leverage of DVR and Colorado Department of Education (CDE) resources associated with the School to Work Alliance Program (SWAP) and are fully compliant with the 15% set-aside mandated in Workforce Innovation and Opportunity Act (WIOA). This work included restructuring the Youth Services and Transition Unit, which now reports to the DVR Director.

Colorado received the Employment First State Leadership Mentoring Program (EFSLMP), awarded by the United States Department of Labor and Employment's Office of Disability Employment Policy (ODEP). This grant provided mentoring, intensive technical assistance and training from a national pool of subject matter experts, and peer mentors to core states as they transformed existing policies, service delivery systems, and reimbursement structures to reflect an Employment First approach; facilitated virtual training and knowledge translation on effective practices; facilitated dialogue on shared experiences related to effectuating Employment First policies and practice; linked participating states with Federal initiatives focused on promoting state-level systems-change conducive to Employment First objectives; and evaluated the impacts of the investments in state Employment First systems change efforts over time to identify common challenges faced by State governments; and validated innovative strategies and effective practices that lead to the successful implementation of Employment First objectives.

As part of this process, a SWOT analysis of Colorado's current School to Work Alliance Program (SWAP) was completed with suggestions for service delivery to youth with disabilities served under this partnership. New policies were developed to incorporate WIOA transition requirements. Training is provided to both education and DVR staff on an ongoing basis. DVR and CDE continue to work in partnership with local education agencies to refine policies and practices by incorporating improvements indicated by the SWOT analysis. One such example is the creation of a state led Community of Practice comprised of representatives from stakeholders who hold a vested interest in transition age youth. This state level workgroup is currently reevaluating their objectives to ensure they are meeting the needs of local partnerships for greatest impact. DVR and CDE continue efforts to identify the most effective balance between pre-employment transition services and the more traditional transition and employment services within the SWAP contracts to meet the needs of students and youth with disabilities. The Youth Services and Transition Unit continues to monitor, the implementation of these changes and reports routinely to DVR's Senior Leadership Team and Education Directors on progress.

## 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;

DVR continues to monitor and implement the state-level agreement between DVR and CDE. This agreement promotes flexible and collaborative planning and service delivery among DVR, local education agencies, local school districts, and other state and community agencies for youth who are transitioning from school to work and/or post-school activities which lead to employment. The agreement promotes accessible,

timely and uniform vocational rehabilitation services for all Colorado students who have a disability and require vocational rehabilitation services. Additionally, the agreement encourages education agencies to develop, implement and promote pre-vocational services and career exploration for students with disabilities prior to their referral to DVR for services. Finally, the agreement assures that vocational rehabilitation services complement the transition services provided by education agencies and that the Individualized Plan for Employment (IPE) for students who are eligible for vocational rehabilitation services will be developed and approved before these students leave the school setting (or if Colorado DVR is operating under an order of selection, before each eligible student able to be served under the order leaves the school setting). The key tenets of the agreement have been developed into a desktop guide, updated annually and entitled the "CDE/DVR Cooperative Services Handbook for Youth in Transition". Thousands of these handbooks are distributed each year to youth, parents, educators, rehabilitation counselors, and community-based agency providers. Currently, DVR is partnering with CDE to update the interagency agreement and the accompanying handbook. The update will incorporate changes within WIOA and vocational rehabilitation regulation, upon their finalization. Once complete, the interagency agreement will guide local interagency operating procedures.

Through collaboration with education officials, DVR provides consultation and technical assistance to assist educators, as early as possible in the transition process, in the planning and provision of services that facilitate the movement of students with disabilities from school to post-school activities.

Time was spent this year mediating partnerships at the local level between DVR and districts/BOCES due to a high number of staff turnover, lost connections and frustration with the previous DVR wait list. Focused training in a number of areas of the state included cross training. Training will continue to be a priority as DVR and CDE work with local partnerships to identify promising practices that can be replicated statewide to promote pre-employment transition services and skills for students. Pre-employment transition services have expanded student access to work experience opportunities. Additionally, services to groups of students with disabilities will be considered as a mechanism for the delivery of pre-employment transition services.

DVR plays an integral role in annual institutes facilitated by CDE for local secondary education teams. The intent of DVR's involvement with the institutes is to elevate awareness and expand DVR's presence within education. The purpose of the institutes is to improve the quality of services in the area of secondary special education and transition at the local level through knowledge, capacity building, dissemination and outreach. The institutes, and the action plans which result from them, are supported and overseen by the National Technical Assistance Center on Transition (NTACT). Institute efforts focus on improving indicator outcomes that lead to effective transition practices for youth with disabilities both at the state and local levels. DVR commits content experts, presenters, DVR counselors, and technical assistance to local institute teams.

This year, CDE took the lead in assembling a new group of agencies and stakeholders who have an interest in serving transition age youth. DVR is an active partner in this endeavor. Colorado's Transition Community of Practice (CoP) was a result of a recent NSTACC gathering and recommendation. This group is formulating goals and objectives and is working to incorporate components of WIOA. The CoP has extended invitations to representatives from WIOA core partners.

#### **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 interagency agreement specifies how DVR and local education agencies will collaborate to implement each individualized education program, including facilitating the linkage of IEPs to other individualized service plans ensuring there are no gaps in services as the youth leave school. As DVR and CDE update the

interagency agreement, consideration will be given to practices and procedures that will facilitate joint planning and provision of services to students with disabilities.

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

The interagency agreement includes roles and responsibilities of each party, including which entity is financially responsible throughout the provision of transition services. This information is summarized in the “CDE/DVR Cooperative Services Handbook for Youth in Transition”, which is broadly distributed annually to each partner and families of students with disabilities.

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

DVR also collaborates with educators to reach out to and identify students with disabilities who might benefit from vocational rehabilitation services. Meeting these needs remains a challenge, particularly within the rural and mountainous areas of Colorado. Innovative opportunities are being tested that utilize technology to increase collaboration within large rural geographic areas. One education partnership recently acquired the HD electronic conferencing system Vidyo. This allows education and DVR partners to meet with students using the internet and to provide case management when inclement weather is a factor, or time is of the essence. Additionally, DVR’s computer lease offers the capacity to video chat. This is successfully and widely used with young adults and the agencies and families who support them. Additionally, the DVR Youth Services and Transition Unit is using technology, including a GoTo Meeting account, to provide technical assistance, support and training to education and DVR partners simultaneously on topics that support partners as they strive to meet the ever growing need of Colorado’s youth with disabilities who are preparing for career entry.

Many school districts in Colorado are now using iPads with staff and students. Staff are expected to be functional in the use of this technology for day to day operations, effective communications, and presentations. DVR staff are also learning and using this newer technology. One example of its successful use is within Colorado’s isolated mountainous areas and rural regions. It is often difficult for educators and vocational rehabilitation counselors to come together to meet with students and their families. The use of iPads provides flexibility for face to face meetings. Additionally, the iPad's compatibility with multiple technology systems, and its ability to create and share content, leverage data bases and promote social networking technology, increase collaboration and communication to support transitioning youth. DVR plans to continue to learn about and explore this new tool, with the intent to share apps with education and with DVR staff about supporting post-school outcomes, including career preparation, connecting activities, youth development and leadership.

As DVR moved to the Colorado Department of Labor and Employment (CDLE), DVR expanded its use of social media and other electronic means of communication that had not been readily available to staff previously, but that young adults commonly utilize. DVR believes that using this technology will improve client engagement and rapport with youth.

Colorado continues to explore with education partners how to best provide students with pre-employment transition services and skills training when appropriate, in order to make a positive contribution to the IEP outcome. DVR is finalizing updates to our interagency agreement to include: the provision of services under the new direction identified within WIOA; the redefinition of the transition responsibilities of DVR and of education; assurance of access to services for youth; and ongoing support of effective and efficient working relationships between partners.

Colorado strives to assure that system coordination for the benefit of all students is an ongoing process. This is accomplished at the local level through the organization of periodic meetings that enhance regular

contact and allow for annual and mid-year updates on potential referrals. DVR staff seek opportunities to educate young adults and families about DVR services and how to access these. Collaboratively with education partners, these activities take place during family nights, resource fairs, transition series, etc. Additionally, DVR and educators make DVR literature available in common areas of school such as libraries and career centers. These efforts align with the Colorado Exceptional Children's Education Act (CEEA) and the Individuals with Disabilities Education Act (IDEA).

Each year the Youth Services and Transition Unit and its CDE partners work to include DVR and education staff in activities to promote a seamless transition for youth exiting from education into education and employment. As the state-level partnership moves forward, the team is examining their practices and methods with a new focus on pre-employment transition services. Taking into consideration feedback from stakeholders from public hearings held between August and October 2015, data collected from the Comprehensive Statewide Needs Assessment and less formal inquiries, the team intends to improve existing partnerships and create new ones where they are absent at the local levels, for the purpose of increasing appropriate referrals to DVR and successful employment outcomes for transitioning youth that are competitive, integrated and relevant to Colorado's industry sectors.

Together with CDE, DVR takes an active role in state youth groups and committees to ongoing collaboration between community agencies in the provision of comprehensive transition services. Participation in groups such as the Advisory Committee on Homeless Youth, the State Youth Council, Colorado 9-25, the Mental Health Advisory Council/Under 26 Workgroup, MINDSOURCE, and the Colorado Ad Hoc Autism Group promote better coordination of services and shared resources at both the state and local levels. Participation and involvement allows DVR to participate in the development of processes, procedures, guidelines and practices for more effective transition planning and services throughout Colorado's multiple areas and systems.

#### E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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(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 Colorado Division of Vocational Rehabilitation (DVR) values the partnerships that have been developed with private non—profit organizations in Colorado. DVR has developed partnerships at the state and local levels.

##### Project SEARCH

Project SEARCH is a business-led program and internationally trademarked model that leads to year-round employment in an integrated setting for youth with a variety of developmental disabilities. The vision, direction, and leadership for Project SEARCH is provided by the Children's Hospital of Cincinnati, where the project began more than twenty years ago. The success of Project SEARCH is dependent upon the active involvement of multiple partners within a community, including business, secondary education, post-secondary education, vocational rehabilitation, community rehabilitation providers, ongoing support agencies, families, and social security. Over the past few years, Project SEARCH has operated in four Colorado communities: Boulder, Aurora, Fort Collins, and Jefferson County. Host business sites include Boulder Community Hospital in Boulder, Children's Hospital of Colorado in Aurora, Columbine Health Systems in Fort Collins, and University of Colorado Anschutz Medical Campus. DVR is an active partner within Colorado's Project SEARCH sites and has entered into partnerships with the above-identified agencies to support the success of the program. Through braided resources, DVR collaborates with the multiple Project SEARCH partners to assure the seamless and successful delivery of transition services leading to integrated employment at minimum wage or higher. DVR responsibilities within Project SEARCH vary from site to site, and include program development, employer education and technical assistance, participant referral and selection, assessment, job coaching, transportation training, work experience, job seeking skills training, and job placement assistance. Typically, local Project SEARCH partners enter into a

written working agreement to support the success of the program and the young job seekers involved in the program.

### PEAK Parent Center

DVR has a longstanding partnership with PEAK Parent Center. PEAK, founded in 1986, is a nonprofit that works to ensure that all people with disabilities are fully included in their neighborhood schools, communities, employment, and all walks of life. PEAK offers an array of free and low cost services to families of children with disabilities and advocates, including self-advocates, across the state. Additionally, PEAK collaborates with education, early childhood, rehabilitation and medical communities to create systems change and offers fee-for-service opportunities, workshops and customized training for school districts, community groups and agencies. DVR acts as a sponsor for PEAK's annual conference on inclusive education. DVR staff present at PEAK community and online workshops, and PEAK staff present at DVR workshops and training events. For example, historically, DVR, PEAK and the Colorado Department of Education typically collaborate to support the dissemination of transition best practices to educators, families, vocational rehabilitation counselors and community agency staff throughout the state. Within the past year, DVR's Director of Community Access presented a PEAK-sponsored workshop entitled "Finding Support and Resources for Meaningful Employment". DVR's "Achieving Success by Promoting Readiness for Education and Employment" or ASPIRE program contracts with PEAK to provide self-determination and parent training to youth and families involved with the ASPIRE demonstration project. Additionally, a key member of the PEAK leadership staff has maintained longstanding and active membership on the executive committee of the State Rehabilitation Council.

### Ability Connection Colorado

For 70 years, Ability Connection Colorado (ACCO) has been providing innovative and exceptional services, helping individuals and families thrive. Building on the legacy established in 1946 by nine mothers who were determined to help their children with disabilities lead productive lives, ACCO today serves 40,000 Coloradans a year by providing inclusive early childhood and charter school education for children of all abilities, pathways to employment for those with developmental and intellectual disabilities, and family support programs that include guardianship and conservatorship services. Additionally, ACCO operates the Colorado Work Incentive Planning and Assistance (WIPA) program and the Colorado Benefit Offset National Demonstration Project (BOND). The WIPA program receives funding from Social Security to provide Social Security Disability Income (SSSDI) and Supplemental Security Income (SSI) beneficiaries with no-cost access to work incentives planning and assistance. BOND is a project created to help SSDI beneficiaries return to work through the use of a benefit offset. ACCO is the only nonprofit approved to provide benefit counseling services through the Social Security Administration Program. DVR collaborates extensively with ACCO to implement both the WIPA and BOND programs. DVR partners with ACCO to contractually support the WIPA program's ongoing and statewide availability of workforce incentive and benefits counseling. DVR and ACCO recently partnered in the BOND project in Colorado and Wyoming, through which DVR provided work incentives counseling, service coordination, and information and referral services to SSDI beneficiaries who are randomly selected and enrolled into BOND

### The Salvation Army

The Salvation Army, an international movement, is an evangelical part of the universal Christian Church. The Salvation Army provides adult rehabilitation, housing, hunger relief, homelessness services, and veterans' services to individuals. In several local communities in Colorado, DVR partners closely with the local Salvation Army programs. Through these local collaborative endeavors, referrals of individuals with disabilities who are in need of vocational rehabilitation services are made to DVR and referrals from DVR to the Salvation Army are made to obtain emergency services and services DVR is unable to provide.

### Colorado Community Centered Boards

Colorado has twenty local community centered boards (CCB), which are responsible for the provision of case management services that assist individuals with developmental and intellectual disabilities in accessing necessary services and supports to meet their needs. Community centered boards are not-for-profit organizations. Collaboration between DVR and the CCBs is especially evident in DVR's delivery of supported employment services, discussed in depth elsewhere in this State Plan. Additionally, DVR and CCB partners collaborate to cross-train at the local level and develop referral systems and processes to coordinate individualized client plans for habilitation and vocational rehabilitation that complement one another and eliminate duplication of services.

### Community Mental Health Centers

Community Mental Health Center services include psychiatric services, individual and group therapy, peer services, support groups, medication management, intensive case management, educational opportunities and employment services including supported employment. Partnership between DVR and local Mental Health Centers is evidenced through the Mental Health Supported Employment Program, which operates under a formal interagency agreement between DVR and the Colorado Department of Human Service - Office of Behavioral Health (OBH) and involves local level supported employment agreements with twelve (12) Community Mental Health Centers. Services consist of job development, job seeking skills, job coaching, and on-going support. The purpose of this project is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. The project has resulted in increased integrated employment opportunities for individuals and is discussed in depth elsewhere in this State Plan.

### Private Non-Profit Vendors

Private non-profit vocational rehabilitation service providers have been and continue to be a longstanding resource used by DVR to obtain services for DVR clients. Examples of private non-profit vendors with which DVR partners:

- The Colorado Center for the Blind (CCB) The CCB is a world renowned training center located in Littleton, Colorado. The CCB provides innovative teaching techniques and philosophy that has far reaching effects on the lives of individuals with blindness. Services purchased by DVR include: independence training for adults, year round and summer employment, education, and independent living services for youth; college preparation; and senior services.
- Goodwill Industries of Denver and Discover Goodwill Southern and Western Colorado These programs work with both teens and adults to help them get the education and training they need to obtain and sustain meaningful employment and improve their lives. Services purchased by DVR include services offered within Goodwill areas of focus, including: youth career development at the secondary level; job skills training and placement for adults; work options for individuals with disabilities within Goodwill; retail employment; and recycling.
- Bayaud Enterprises Since 1969, Bayaud has changed the lives of thousands of individuals in the Denver community by providing employment training, assessment, coaching, placement, work incentives counseling and retention services. DVR purchases all of these services from Bayaud. Executive level Bayaud staff have long held active membership on the SRC.

Cooperative relationships between DVR and providers of vocational rehabilitation services, including not for profit providers, are formalized through a written Provider Agreement. The Provider Agreement process is designed to assure adherence to three procurement requirements:

1. That all qualified vendors have the opportunity to compete for business with DVR if they choose, and

2. That all vendors will be treated equitably and will be paid for their services in accordance with a standard method of rate setting procedures, and
3. That there will always be a written contract in place when annual expenditures to any vendor reach \$25,000, as required by State Law, while assuring continuity of service provision to clients.

This effort has resulted in a consistent structure for establishing working relationships with service providers throughout the state and at the same time helps assure equitable payment across providers for the same types of services at the least possible cost.

Our provider agreement system is market based, meaning that services are purchased based on competitive market rates instead of provider costs. The procedures require a vendor to complete the DVR Provider Agreement form that serves to register them as potential provider of specific services. Subsequent services purchased by DVR are limited to those identified on the agreement for which the vendor is registered.

Execution of the Provider Agreement obligates vendors to meet certain qualifications related to standards that have been developed by DVR for the provision of specific services. Vendors also agree to abide by the established payment procedures and rates for each service DVR might purchase. Registration as a DVR vendor does not obligate vendors to provide services to DVR clients nor does it obligate DVR to purchase services from any given vendor.

Initial approval of the Provider Agreement, once signed by the vendor, is done at the local DVR field office. Approval then goes to DVR's staff authorized to sign provider agreements under contract waiver H1115. This method encourages the DVR field office and the service provider to establish a strong understanding of each other's roles and responsibilities in the provision of services to clients. It also puts the responsibility on the DVR field office supervisor to review the agreement for consistency between services offered and appropriate compliance with standards and credentials prior to their approval. Specific services identified on the Individual Plan for Employment are authorized by DVR counselors.

DVR believes that these procedures help ensure that adequate contracting procedures are used and certify that:

- Purchases of services and goods maximize the efficient and effective use of public funds;
- Services and goods will only be purchased from qualified providers;
- All vendors who wish to provide services to DVR clients have the opportunity to do so and are subject to a consistent set of terms and conditions; and
- Most importantly, DVR's clients will have a wide range of options to choose from when selecting service providers.

#### F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

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(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division of Vocational Rehabilitation (DVR), Office of Workforce Development, the Developmental Disabilities Council (DDC), Mental Health Service Organizations, Office of Community Living (OCL), Office of Behavioral Health (OBH), the Behavioral Health Planning Council, and employers have an extensive history of collaborative and cooperative efforts to provide supported employment opportunities in Colorado for individuals with the most significant disabilities. The DVR Coordinator of Supported Employment serves on

the Developmental Disabilities Council and the Behavioral Health Planning Council. The Workforce Innovation Opportunity Act of 2014 (WIOA) further emphasizes the need for state agencies and other entities to develop innovative cooperative agreements as a strategy to leverage State/Federal dollars and encourage inter-agency cooperation. The Colorado Division of Vocational Rehabilitation believes that expansion of supported employment to all individuals needing supports to maintain competitive, integrated employment cannot be accomplished without such collaborative efforts. DVR is in the process of developing new inter-agency agreements with our partner agencies.

#### Office of Behavioral Health, Department of Human Services

The Office of Behavioral Health (OBH) and the Division of Vocational Rehabilitation (DVR) have maintained a formal interagency agreement to provide vocational services to individuals with the most significant mental health disabilities. This agreement represents a collaborative effort to increase access to quality vocational services and to ensure the availability of supported employment opportunities for individuals with the most significant disabilities due to mental illness.

The agreement stipulates collaborative planning and coordination of services by the local mental health centers, private agencies, and rehabilitation offices to eliminate duplication of services and maximize available resources. It also contains provisions for purchase of supported employment services. Such services are only purchased from vendors approved by both OBH and DVR, such as mental health centers and community-based programs. However, the rehabilitation counselor and client are responsible for determining the appropriate services and developing the supported employment Individualized Plan for Employment. Service providers must be registered with DVR to provide supported employment services under the DVR/OBH cooperative agreement. DVR and OBH have developed a new interagency agreement to comply with the provisions of WIOA and reflect the changes needed due to DVR's move to the Colorado Department of Labor and Employment (CDLE) as of July 1, 2016.

Improvements have been realized in interagency planning, training, information sharing, and resolving mutual programmatic and procedural concerns. There has been ongoing cooperation at the State level between DVR and OBH. OBH has included funding for ongoing supports as part of its contracts with mental health centers. OBH has hired a full time Individual Placement and Support (IPS) trainer to assist Mental Health Centers that have adopted this service provision model and DVR is partnering with OBH to implement IPS in all community mental health centers. This involves a Capacity Based Protocol Funding approach (braided funding with DVR, OBH & Medicaid) and training on the IPS model to Employment Teams, DVR Counselors, and other relevant partners. Community Mental Health Centers that implement IPS are involved in the Colorado IPS Learning Community and agree to follow the IPS Fidelity Scale. Annual Fidelity Reviews are conducted by the Colorado IPS Leadership Team, which includes staff from OBH, DVR, and other organizations.

In Colorado, collaboration among relevant state agencies, private nonprofit organizations and other community resources for the provision of extended ongoing support services takes many forms, ranging from informally established local cooperative working relationships between direct providers and clients of supported employment services to formally negotiated statewide agreements among state agencies. Informal working agreements are developed to coordinate activities such as transition from intensive supported employment services to extended services, the types of extended services to be provided, identifying qualified individuals to provide extended support, and referral to the Division of Vocational Rehabilitation (DVR) for post-employment services.

The primary entities involved in these types of collaborative efforts are local rehabilitation offices, local school districts, Workforce Centers, independent living centers, local community rehabilitation programs, mental health centers, developmental disabilities service providers, community centered boards and other available service providers, including advocates, family members and private vendors. Although supported employment depends on these informal collaborative efforts, more efforts are needed to enhance the

availability of extended support services following completion of intensive supported employment services authorized under WIOA.

DVR has 12 Mental Health Supported Employment programs around the state to provide services to participants eligible for supported employment. The contracts involve billing for services for individual eligible participants according to their service needs. Regular monitoring of these contracts occurs through a variety of mechanisms, including monthly progress reports and billing, quarterly Mental Health Consortium meetings, and a mid-year performance survey. For the eight Mental Health Supported Employment programs engaged in IPS, the IPS Fidelity Review also serves as an annual monitoring of the program.

For participants living in areas where there is not an available program, DVR will utilize vendors for the time limited services and the mental health centers have agreed to provide extended services.

## G. COORDINATION WITH EMPLOYERS

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(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

DVR has 10 Business Outreach Specialist (BOS) positions throughout Colorado. The BOS positions create and sustain important employer relationships with DVR's small, medium, large, Federal and Federal contracting employers. BOS staff work with DVR's pool of "ready" job seekers and partner with private job developers and job development programs to increase opportunities for individuals with disabilities. The manager of DVR's Work Supports and Employer Engagement (WSEE) unit sits of the CDLE Business Services Executive Committee to facilitate the coordination of BOS efforts with Workforce Center Business Services representatives.

BOS staff members determine beneficial memberships at the local level to include Chambers of Commerce, Society of Human Resource Management chapters, and economic development groups. BOS staff partner with local Workforce Center business services staff to work with local employers and conduct job fairs. Through the efforts of the BOS and other DVR staff, the Division is regularly called upon for Disability Awareness Training, job fairs, and other opportunities to exhibit and provide disability employment information.

Section 503 of the Rehabilitation Act brought many Federal Contractors to DVR for information and employment opportunities. BOS staff have received training on the 503 changes, have met with the Office of Federal Contractor Compliance Programs, and have responded to Federal contractor inquiries for information on compliance and Affirmative Action planning. BOS staff are conducting Disability Awareness Training for Federal Contractors and providing information on how these Federal Contractors can best meet the requirements of the 503 changes within their companies.

BOS staff have introduced the Talent Acquisition Portal (TAP) throughout all DVR offices in Colorado. All counselors are trained in accessing TAP and participant resumes are regularly being created via this valuable resource. Private job developers also have access to TAP to assist participants in creating resumes and accessing corporate jobs in TAP.

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

DVR maintains membership on the Colorado State Youth Council (SYC), which is a subcommittee of the Colorado Workforce Development Council. One goal of the SYC is to identify and support existing strategies,

practices and projects that demonstrate success, and to augment and introduce other successful practices throughout Colorado. Each year, local communities are invited to submit local promising practices to the SYC that effectively address the needs of youth who are transitioning into adulthood. Submissions are scored against the National Center on Workforce and Disability's (NCSD) evidence-based Design Guideposts for Success. These are: school preparation; youth development and leadership; career preparation; connecting activities; and family involvement and supports.

The SYC recognizes selected promising practices every other year at the Think Big Youth Forum. The Think Big Youth Forum is sponsored by the SYC, the Colorado Department of Labor, the Office of Workforce Development, the Colorado Department of Education and DVR. The Youth Forum brings together statewide youth practitioners from vocational rehabilitation, education and workforce development for two days of professional development. The promising practices recognized at the Forum are highlighted and recognized. The SYC continues to coordinate their efforts to work more closely with local youth councils using Colorado's Blue Print, a bottom-up economic development planning initiative. These benefit the youth we serve by moving them towards employment outcomes in the various industry sectors.

Results from DVR's recent comprehensive statewide needs assessment survey showed a greater need to expand work based learning activities for Colorado's youth with disabilities. School Districts in Colorado are not adequately equipped to serve students in this manner, although there is a shared opinion that young adults who have the opportunity to participate in a work experience have greater success after exiting the secondary education system. DVR has begun to address this need through by facilitating the development of work experiences at the local level through partnerships with employers, districts/BOCES, DVR and the work force centers. DVR will examine those areas that have demonstrated success in creating work experiences to determine if there are common themes that other areas of the state can learn and use or if practices can be replicated.

DVR continues to explore opportunities to further coordinate with employers to support the provision of transition services, including pre-employment transition services, for students and youth with disabilities.

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## H. INTERAGENCY COOPERATION

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Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### 1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Colorado Department of Health Care Policy and Financing (HCPF) administers the State Medicaid plan under title XIX of the Social Security Act. DVR continues to collaborate with HCPF related to provision of services for individuals eligible for home and community-based waiver programs. DVR has a formal interagency agreement with HCPF.

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

DVR and the Office of Community Living (OCL) continue to work in collaboration to effectively plan and coordinate the provision of supported employment services to individuals with the most significant developmental disabilities by the OCL community services agencies and DVR to avoid duplication of services, thereby maximizing available resources. As a result of this collaboration, much progress has been achieved in making community-based integrated employment available for persons with developmental disabilities.

Within this collaborative relationship, DVR is responsible for the provision of supported employment services including, but not limited to, job coaching. However, due to the expertise and proven history of

OCL in training individuals with the most significant developmental disabilities, the local OCL community service provider is typically used by the rehabilitation counselor to provide such training and other supported employment services.

The OCL community service provider must be registered with DVR to be able to provide supported employment services to DVR clients. Services are purchased in accordance with DVR's fee schedule and service providers must meet the standards and credentials as required for the provision of specified supported employment services. Systems have been designed to encourage local level development of supported employment strategies between all DVR field offices and OCL supported employment service providers.

Colorado has joined the State Employment Leadership Network (SELN). SELN brings together state Developmental Disability agencies for sharing, educating and providing guidance on practices and policies around employment to its members. DVR collaborates with the OCL on activities with SELN and as part of this, OCL has a staff person dedicated to spending at least fifty percent of his time focused on employment for persons with developmental disabilities. SELN is currently conducting webinars on topics identified at last summer's roundtable meetings. Colorado DVR has partnered with the Office of Community Living to hold regional roundtables to create discussions about issues faced by persons with developmental disabilities looking for competitive employment. Attendees included DVR staff, vendors, family members and Community Center Board provider staff. These roundtable meetings included presentations by DVR and OCL staff as well as breakout sessions in which groups reviewed and discussed relevant topics such as on-going support, individual supported employment, and line of sight supervision.

There are twenty Community Center Boards (CCBs) in the State of Colorado. Community Center Boards are organizations designated in statute as the single entry point into the long-term service and support system for persons with developmental disabilities. Each Community Center Board is responsible for intake, eligibility determination, service plan development, arrangement of services, delivery of services, case management, monitoring, and other functions.

DVR continues to have lead counselors who work specifically with individuals with developmental disabilities to help more effectively coordinate and provide quality services for these clients. These counselors serve as regional liaisons, providing training, guidance and support to all counselors in their region to establish standards of practice with the local CCB's. In addition, their duties include functioning as a subject matter expert and serving as a liaison between the CCB and the local DVR office as well as various community partners, vendors and independent contractors. These individuals will also work as a team in conjunction with the Supported Employment Program Coordinator to identify emerging trends and issues, develop new and or unique services in the community as necessary and evaluate existing programs for persons with developmental disabilities.

DVR has developed an interagency agreement with Health Care Policy and Financing, including the Office of Community Living.

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

The Mental Health Supported Employment Program operates under a formalized agreement between DVR and the Office of Behavioral Health (OBH) and involves local level supported employment agreements with twelve (12) Mental Health Centers, one (1) non-profit organization, and two (2) private vendors throughout the State. Services provided through the agreements consist of job development, job seeking skills, job coaching, and ongoing support. The purpose of this project is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program has resulted in increased integrated employment opportunities for these individuals.

A comprehensive program evaluation was completed on all mental health sites participating in the program in 2015, including site visits to the mental health centers as well as discussions with DVR counselors about how the program was working, what was working well and what improvements might help the program. Final reports indicated program strengths, common themes found across all programs, regional differences in service delivery and training needs.

Throughout the regions the DVR offices work with the community mental health centers serving the area. Counselors and supervisors provide orientation and training sessions for mental health center staff and their clients. Where the community mental health centers have established vocational and supported employment programs, DVR often partners with these centers to meet the needs of our mutual clients.

OBH joined the Dartmouth Collaborative in 2013. Dartmouth developed the Individual Placement and Support Model (IPS) and the Collaborative serves as a mechanism for training and support for those states and countries implementing this approach to job development for people with serious mental illness.

In moving forward with Mental Health Supported Employment, increased emphasis will be placed on serving Youth with Mental Health Disabilities in employment and education.

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

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

### 1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

#### A. QUALIFIED PERSONNEL NEEDS.

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

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

The Colorado Division of Vocational Rehabilitation (DVR) has a strong commitment to employing and retaining an adequate workforce of qualified vocational rehabilitation personnel, both professional and paraprofessional.

#### Collection and Analysis of Data

DVR currently has access to three existing data systems that identify the number of persons employed by DVR by personnel category. The primary one is maintained by the Department of Labor and Employment's (CDLE) Office of Human Resources. This is the database that maintains payroll information on employees including their dates of hire, official job classifications, and home addresses. An additional spreadsheet is maintained internally within DVR by the Human Resources Liaison. It contains information on offices and regions to which staff are assigned, functional job titles, and other information about the position. Finally DVR's electronic case management system, CO-AWARE, also contains staff information about positions to which employees are assigned. DVR uses a combination of these three data systems as well as supervisory records to continuously gather and analyze information about the qualifications of the 233 full time equivalencies (FTEs) assigned to DVR staff. When DVR transitioned from Colorado Department of Human Services to the CDLE on July 1, 2016, both Departments worked together to ensure a seamless transition of all relevant personnel data. DVR will continue to have access to needed personnel data through the CDLE Human Resources office.

Currently, 109 of the 233 positions are vocational rehabilitation counselors. The remaining 124 positions consist of 36.5 administrative assistants, 23 district and regional supervisors, 12.5 orientation/mobility & vision rehabilitation therapists, 10 business outreach specialists, 6 Business Enterprise Program professionals, 2 assistive technology specialists, 5 rehabilitation technicians, and approximately 26 central office managerial and infrastructure staff.

In addition to these positions, DVR also has the following federally or “other” funded program positions:

- ASPIRE Program: 2 central office professional staff and 8 case managers located in field offices.

Projections of the number of individuals to be served including those with significant disabilities are based on projected increases for the general population and incidence rates for disabilities, using Colorado census data and state demographics. These projections, in combination with DVR attrition and retirement rates, are used to predict personnel needs for the next five years.

The rate of attrition of DVR staff averages about 10-12%, or approximately 25-30 staff per year. It is projected that DVR will need to recruit approximately 30 new rehabilitation counselors during the next three years. In addition, DVR anticipates the need to continue to recruit high quality support staff; approximately 10 during the next three years given the average attrition rate for the agency.

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

DVR continues to work to develop a business plan that outlines necessary staffing levels. At the current point in time, DVR has the following vacancies: 8.5 rehabilitation counseling positions; 1 administrative assistant position, 3 business outreach specialist positions, and 1 central office professional staff position.

The ratio of the number of vocational rehabilitation counselors to the number of clients currently being served in applicant and active statuses is approximately 1 vocational rehabilitation counselor for every 80 clients. The ratio of vocational rehabilitation counselors to field support staff is approximately 3.5 to 1.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

The rate of attrition of DVR staff averages about 10-12%, or approximately 25-30 staff per year. It is projected that DVR will need to recruit approximately 50 new rehabilitation counselors during the next five years. In addition, DVR anticipates the need to continue to recruit high quality support staff; approximately 17 during the next five years given the average attrition rate for the agency.

## B. PERSONNEL DEVELOPMENT

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

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

The University of Northern Colorado (UNC), located in Greeley, offers a Master’s degree in Rehabilitation Counseling. Graduates of the rehabilitation counseling program meet the minimum qualifications for a Rehabilitation Counselor I position.

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

Faculty at UNC indicates that there are currently 24 individuals enrolled in their graduate level Rehabilitation Counseling program.

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

Faculty at UNC indicates three individuals graduated with Master's degrees in Rehabilitation Counseling in 2017; an additional 12-13 individuals are expected to graduate in 2018.

## 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.

DVR regularly partners with UNC to offer internship opportunities for students and a number of graduates have been hired by DVR in recent years. In addition, DVR has partnered with a number of Rehabilitation Counseling programs out of state that offer distance education, including Utah State University, University of Wisconsin-Stout and Hunter College when staff require additional training to meet minimum qualifications. When feasible, DVR also partners with universities from across the country to provide internship opportunities, particularly to students attending distance education programs or those considering relocating to Colorado. Additionally, there are a number of other institutions of higher education across the state that offer Master's level degrees in counseling and related areas. Individuals obtaining this level of degree, when combined with the appropriate acceptable work experience, meet the minimum qualifications as well.

DVR's plan for recruiting qualified personnel, including qualified individuals from minority backgrounds and individuals with disabilities, includes collaboration with all of the relevant educational programs mentioned above as well as several additional graduate schools with programs in vocational rehabilitation. DVR also recruits using various resources such as The Summit on Program Evaluation, Emerging Leaders, CSAVR, and other university websites to post staff openings.

Offices located near the state border have the added flexibility of being able to recruit qualified personnel who currently reside outside of Colorado. DVR also has the option to request a waiver to recruit out of state when unable to identify qualified personnel within Colorado. As needed, DVR works with the Department of Personnel Administration to secure a residency waiver allowing for this expanded recruitment.

DVR believes that the private sector is another good resource for recruiting experienced, competent staff. Through its relationships with various professional associations for counseling and other disciplines, DVR maintains a network for recruiting vocational rehabilitation counselors who have experience in the private sector. DVR ensures availability of accommodations necessary for qualified individuals with disabilities to successfully compete for and perform their job when hired.

As DVR continues to identify strategies for improving retention of qualified personnel, the agency is working with CDLE Human Resources and the Department of Personnel Administration to implement an expanded counselor series. This series will create additional advancement opportunities for counselors, which are currently quite limited. As the lack of a career pathway within DVR has been cited as a barrier to employee retention, it is believed the series will improve retention by allowing DVR to advance highly qualified personnel through the counselor series, rather than those staff advancing to positions in other organizations. Similarly, the changing nature of the role of vocational rehabilitation counselors has been

identified as a barrier to retention with many counselors leaving the agency due to the increased administrative burden of the position. DVR is actively engaged in a LEAN process to identify opportunities to adjust policies and procedures which create unnecessary burden and inefficiencies. The work accomplished through teams engaged in this process has already made significant progress and recommended changes that are expected to significantly reduce staff hours spent on unneeded administrative processes, which in turn is hoped to improve morale and retention. This work continues and additional improvements are expected.

### 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**

Colorado does not have state-approved or state-recognized certification, licensing, or registration requirements for any of the personnel classifications used by DVR, specifically rehabilitation counselors. In collaboration with Colorado's Department of Personnel and Administration, DVR works to ensure all counselors are fully qualified and possess an appropriate Master's level degree, experience working with individuals with disabilities, and whenever possible, are eligible to obtain the appropriate nationally recognized certification. DVR does not anticipate changes to current personnel standards as a result of the Workforce Innovation and Opportunity Act, as all professional staff positions include minimum qualifications that meet or exceed new legislative requirements. However, DVR will continue to monitor guidance published by RSA and will respond accordingly to ensure ongoing compliance.

When circumstances prohibit DVR from hiring a fully qualified rehabilitation counselor, DVR does maintain a rehabilitation counselor intern classification. If an individual is hired as a rehabilitation counselor intern, he or she is required to complete necessary coursework or accrue necessary employment experience to fully meet the minimum qualifications of a rehabilitation counselor within 5 years of the date of hire. In these situations, a training plan is developed with the individual identifying specific educational or experiential requirements that must be completed and the timeline for completion. DVR maintains partnerships with several universities offering financial assistance through RSA administered long-term training grants. DVR seeks to connect rehabilitation counselor interns with these funding sources to the extent possible when graduate coursework is required. This classification is used only infrequently when efforts to recruit fully qualified rehabilitation counselors have been unsuccessful. However, it is a useful tool, particularly in rural areas of the state and to ensure a diverse workforce.

**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.**

DVR has established minimum education and experience requirements for all positions providing rehabilitation services to ensure personnel have a 21<sup>st</sup> century understanding of the evolving labor force and the needs of individuals with disabilities.

### 4. STAFF DEVELOPMENT.

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

#### A. SYSTEM OF STAFF DEVELOPMENT

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

Colorado DVR recently developed a DVR Training Academy, enhancing the training provided to new counselors. The academy will provide all counselors with comprehensive training on DVR policies and procedures governing service delivery. Counselors also receive an overview of the legislation and regulation impacting the program. The academy is structured to include classroom instruction, modeling of needed skills, and observation and feedback for new counselors as they become more independent in performing job duties. All counselors receive extensive mentoring, coaching, and clinical supervision upon returning to their office, which is provided in collaboration between the new counselor's supervisor and a lead counselor in the work unit. Initial development of new counselors also includes review of all work to ensure thorough understanding and application of eligibility criteria, determination of severity of disability, completion of the comprehensive assessment, plan development and approval, provision of rehabilitation services, monitoring of employment, and appropriate closure decisions and practices. Each module of DVR Training Academy concludes with competency testing to ensure required knowledge and skills have been mastered, allowing for more intensive training and supervision if needed.

During this period of training and mentoring, new counselors are evaluated on their skills and receive training to enhance their ability to effectively seek and synthesize disability, vocational, and labor market information to effectively and appropriately move clients through the vocational rehabilitation process from the point of referral to case closure. Counselors receive guidance and training to assist them to appropriately utilize assessments, determine service needs, including the application of available rehabilitation technology, and partner with other workforce development agencies. Counselors regularly participate in case consultations and clinical supervision with their supervisors and mentor counselors to develop and refine skills needed to make sound clinical decisions and provide excellent vocational counseling and guidance. While this initial period of training focuses on new counselors, supervisors regularly evaluate performance of all counselors and counselors may re-enter this period of enhanced training, coaching, and supervision as needed throughout their tenure.

Additionally, as part of DVR's performance management process, all staff consider areas of needed development in collaboration with their supervisors. DVR began using CDLE's performance management process in April 2016, which requires agreement to a formal professional growth and development plan, enhancing DVR's current practices. In particular, supervisors will be asked to give special consideration to training needs of their staff related to the Workforce Innovation and Opportunity Act, Americans with Disabilities Act, the Individual's with Disabilities Education Act, the Assistive Technology Act and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentives Improvement Act of 1999, facilitating informed choice, and providing services to culturally diverse populations.

DVR continues to incorporate the principles of informed choice into all aspects of training curricula, including policy and procedural training. Such training efforts focus on helping clients develop skills necessary to analyze their strengths, resources, capacities, concerns, priorities, abilities, and interests, as well as a thorough understanding of the benefits and challenges inherent in various options available to them, allowing informed decisions to be made related to the development of their rehabilitation programs. DVR believes that these efforts help counselors become better facilitators and help clients develop the skills

needed to be more independent and self-directed, as they go through the rehabilitation process and enter the workforce.

The Organizational Planning and Development unit regularly gathers information from staff, clients, and stakeholders informally and formally to determine areas of training development. Information gathered during the Comprehensive Statewide Needs Assessment, stakeholder meetings, quality assurance file reviews, customer satisfaction surveys, and periodic internal training needs assessments help to determine areas of focus and shape training developed or purchased to ensure necessary staff development is available. DVR regularly provides access to a broad range of professional development opportunities for staff through relevant seminars, workshops, webinars, conferences, and distance education to enhance staff skills and knowledge. Training opportunities are regularly made available on topics including specific disabilities, ethics, case management, rehabilitation technology, assessment, job development and service delivery policies. Often this training incorporates the dissemination of knowledge gained through research in rehabilitation. DVR regularly reviews offerings and expands training to ensure staff needs are met. When training in rehabilitation technology is needed, DVR seeks to partner with the University of Colorado's Assistive Technology Partners (AT Partners), which is responsible for carrying out the Assistive Technology Act in Colorado. DVR will continue to explore ways to enhance and further promote this partnership to assure staff development needs in rehabilitation technology are fully met.

Additional training and development opportunities are available to support succession planning and leadership development. All DVR managers complete CDLE's Leadership Series to enhance their management skills and further prepare to lead the agency. All staff have access to a variety of courses available through the Department of Personnel and Administration's Statewide Training and Development Center, which offers a Supervisory Certificate Program, consisting of a series of leadership and management courses. These courses can also be taken independently, allowing staff to focus on specific areas of growth supporting their leadership abilities. Annually, DVR supports participation of a small number of staff in University of Washington's Center for Continuing Education in Rehabilitation's Emerging Leaders in Rehabilitation Series and the VR Supervisory Academy offered through University of Arkansas CURRENTS.

DVR is currently fully staffed within executive and upper management positions, despite some significant turnover in recent years. DVR anticipates increased stability in these positions moving forward, but always seeks to ensure staff are provided opportunities to grow their skills and develop the professional expertise necessary to be qualified for leadership roles. DVR has also experienced increased stability among district supervisors, with only periodic turnover. Supervisors are required to be qualified rehabilitation counselors with added years of experience and are often hired from among current rehabilitation counselors.

#### **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.

DVR regularly provides access to a broad range of professional development opportunities for staff through relevant seminars, workshops, webinars, conferences, and distance education to enhance staff skills and knowledge. Available training incorporates the dissemination of knowledge gained through research in rehabilitation. In particular, members of the leadership team, including those with responsibility for coordinating services to clients with particular disabilities (e.g. blindness, deafness, mental illness, and intellectual disabilities) have opportunities to attend conferences and receive training where research relevant to their areas of specialization is disseminated. These staff use this knowledge help to shape policies, practices, and training for other DVR staff.

### **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.

DVR believes strongly in being able to provide quality services to everyone who applies for vocational rehabilitation services. Consequently, DVR strives to meet the communication needs of all participants. At the present time, approximately 27% of DVR's field offices have one or more staff members who speak Spanish. Offices in the areas with a high Hispanic population have at least one staff member who is also Hispanic. DVR also has staff members who speak a variety of other languages such as German, Swahili, Polish, Greek, Yoruba and Afrikaans. In addition, all offices have access to translation resources. DVR also is able to access the State of Colorado Division of Refugee Services to capitalize on the knowledge, expertise and resources available to provide the best possible rehabilitation services to common clients. All communities with a significantly large population of individuals who are deaf are assigned at least one staff member who is proficient in American Sign Language (ASL). DVR ensures rehabilitation counselors predominately serving clients who are deaf are skilled in American Sign Language and knowledgeable of deaf culture. Evaluation of these skills is incorporated in the screening and hiring process for counselors working with this population. Similarly, orientation and mobility instructors and rehabilitation teachers must meet the same minimum qualifications of a rehabilitation counselor, along with specialized skills necessary to provide orientation and mobility services and vision rehabilitation. When no qualified candidates for the position of Rehabilitation Counselor for the Deaf possesses sign language skills, the individual hired in generally provided an opportunity to complete sign language training. There are approximately seven community-based organizations throughout Colorado that provide interpreting services as well as numerous private vendors. The Division of Vocational Rehabilitation provides personnel or obtains services to accommodate clients in need of appropriate modes of communication. Agency staff members who have an interest are encouraged to take sign language classes. Offices without staff members who can sign have local agreements with organizations and individuals to provide interpreting services. DVR also has the advantage of having several local colleges that provide interpreter preparation programs, such as Front Range Community College in Westminster, CO (which is in the northern part of Colorado), Pikes Peak Community College (which is in the southern part of Colorado), and The MARIE Center at the University of Northern Colorado. The combination of these programs is expected to sufficiently address future interpreter needs.

Every DVR office in the state has access to a telephone relay service available through Colorado's local telephone provider and those offices that serve a high number of individuals who are deaf are equipped with video relay equipment. The capacity to provide materials in Braille is available through equipment located in some of the offices throughout the state. Additional needs are addressed through private transcribers. This has been meeting the current level of need. Many clients, at this time, prefer materials electronically and this is accommodated routinely. Materials are also routinely made available in large print. In addition, all of the orientation and mobility specialists and vision rehabilitation therapists are being trained on the various uses of the iPhone and the applications that enhance accessibility. Due to the geographical nature of Colorado, there are a number of individuals who live in communities that don't have public transportation. This impacts their ability to access and to participate in vocational rehabilitation services.

To address this issue, DVR is working on a remote training program. This allows a participant to be trained remotely by staff based out of the Denver office, primarily in the use of assistive technology. Ongoing efforts continue in the employer relations area, where DVR is working with employers to make work sites and computer systems accessible for potential and current employees who are blind/visually impaired.

## 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.

As part of its implementation of transition services, including pre-employment transition services and Colorado's School-to-Work Alliance Program (SWAP), DVR has a formal cooperative agreement with the Colorado Department of Education (CDE). This agreement describes how each agency will provide cross-training and technical assistance to local DVR and education staff to enable them to work more effectively with students as they partner to ensure a seamless transition from school to post-school activities. DVR and CDE regularly partner to develop, sponsor and provide comprehensive training, and build effective partnerships at the local level.

## J. STATEWIDE ASSESSMENT

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(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;

Every three years, the Colorado Division of Vocational Rehabilitation (DVR) and the State Rehabilitation Council (SRC), jointly develop and conduct a comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities in Colorado. The triennial Comprehensive State Needs Assessment (CSNA) was developed and conducted in the summer and fall of 2015.

Colorado's CSNA was developed and implemented using the InfoUse guide submitted to Rehabilitation Services Administration on November 30, 2009 and titled "Developing a Model Comprehensive Statewide Needs Assessment With Corresponding Training Materials for State VR agency Staff and SRC Members: The VR Needs Assessment Guide". A CSNA team comprised of DVR executive leadership members and members of the SRC's Planning, Performance and State Plan (PPSP) committee collaborated to:

- develop the work plan and timeline for the CSNA;
- implement the CSNA;
- analyze the results of the CSNA
- develop and present findings to the entire DVR leadership and the SRC for consideration; and
- lead the development of recommendations, goals and strategies to inform the state plan.

Colorado's CSNA was designed to address the following seven informational goals:

14. The rehabilitation needs of individuals with disabilities, including individuals with the most significant disabilities and their need for supported employment services;
15. The rehabilitation needs of individuals with disabilities who are minorities;
16. The rehabilitation needs of individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program;
17. The needs of individuals with disabilities served through other components of the workforce development system;
18. The need to establish, develop or improve community rehabilitation programs within the state;
19. The need to expand and improve rehabilitation services for youth and students; and
20. The need to expand outreach, training and technical assistance to employers.

Data sources used to address the CSNA informational goals included:

- Demographic data including United States Census data, Colorado Workforce Investment Act (WIA) program participant data and Colorado Vocational Rehabilitation program participant data
- Information from ten in-person statewide meetings jointly held by DVR and the Colorado Department of Labor and Employment (CDLE) to discuss the transfer of DVR into CDLE and to engage, involve and seek the advice of DVR's stakeholders in developing recommendations and plans for a smooth and effective transfer of the vocational rehabilitation program to CDLE
- Key Informant interviews with multiple individuals
- Key Informant interviews with four statewide advisory groups; the Colorado Behavioral Health Council, the Colorado ASPIRE Advisory Group, the Colorado Transition Community of Practice and the Colorado Disability Support Benefits Support Program Board of Directors
- Results from the most recent quarterly DVR/SRC Client Satisfaction Surveys
- Results from the 2015 Colorado Developmental Disabilities Council five-year planning survey
- Results from the Statewide Independent Living Council's 2015 needs assessment
- The SRC and DVR current annual reports
- Feedback from more than 368 survey respondents. Surveys were sent to DVR staff, Colorado educators, families and youth, current and recent DVR customers. Surveys were also made available to the general public on the Colorado DVR website.
- Economic development publications including the Colorado Workforce Development Council's Talent Pipeline Report and the Colorado Economic Development Council/ Office of International Trade's Colorado Blueprint.

Enhanced, increased and improved services to DVR consumers was identified as an area of great need, specifically job development and placement services, counseling and guidance, situational and formal vocational assessment, job coaching, soft skills training, and technology training and equipment.

Outreach, technical assistance and education to employers were identified as areas of considerable need. Most commonly identified were the need, through education, to change employer attitudes about disability and the need to educate employers about the value of hiring individuals with disabilities. Also identified frequently was the need to educate employers about job accommodations and the need to reach out to employers in emerging industries and hot sectors.

The rehabilitation needs of individuals with disabilities living in rural areas garnered considerable rank. Improved access to DVR staff and services (including supported employment), improved transportation, greater numbers and array of vendors, and improved translation and interpretation services were areas of significant need.

DVR also explored how available and effective supported employment services are to individuals with the most significant disabilities. DVR has developed strong partnerships with the Office of Community Living and the Office of Behavioral Health, both of which play critical roles in ensuring supported employment services are accessible to those who require this level of assistance to achieve competitive integrated employment. During Federal Fiscal Years 2014 and 2015, DVR served 12,480 individuals with the most significant disabilities; 28% of these clients received supported employment services. DVR anticipates similar levels of need for supported employment services over the next 5 years. Since October 2013, DVR has required all successful rehabilitation closures to achieve competitive integrated employment and therefore, DVR does not expect significant changes to the need for supported employment services as a result of WIOA.

Primary concerns of stakeholders with regard to supported employment services related to the acceptance of employers and other community members in their willingness to hire individuals needing supported employment services, access to safe and reliable transportation, and an emphasis on quality supported

employment outcomes building the independence and self-sufficiency of individuals with the most significant disabilities.

#### B. WHO ARE MINORITIES;

Refugees were identified as an underserved population by DVR. Additional training to ensure culturally competent service delivery was also identified as an area of need.

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

CSNA findings were analyzed and weighted to indicate greatest areas of statewide need. The greatest area of need was within the area of unserved and underserved populations. Specifically identified as underserved were:

- individuals with criminal histories;
- youth (from foster care, juvenile justice, mental health systems and deaf/blind youth);
- individuals with limited education;
- homeless individuals;
- refugees; and
- individuals with a history of substance abuse.

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

The need for stronger collaboration between DVR and the workforce development system's programs and partners was identified through the CSNA, along with the need for increased disability awareness and knowledge, and greater accessibility within workforce centers and partner programs.

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

The CSNA showed a greater need to expand work based learning activities for Colorado's youth with disabilities. There is a shared opinion among DVR, educators, families, and youth that young adults who have the opportunity to participate in a work experience have greater success after exiting the secondary education system.

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

The CSNA results indicated the need for additional vendors and an increased array and range of services in order to meet the rehabilitation needs of all individuals with disabilities. Also expressed was the need for vendor disability awareness, cultural competence and communication skills, including foreign language translation and sign language.

#### 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 .

In terms of transition and pre-employment transition services (PETS), the CSNA indicated the need for greater collaboration between DVR and education partners, including increased understanding of educators and parents about what DVR does and the use of the referral process to DVR. Additionally, the CSNA indicated the need for increased coordination between DVR and the schools to provide PETS.

## K. ANNUAL ESTIMATES

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Describe:

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

There are currently 7439 individuals eligible for services. DVR anticipates between 11,800 and 15,334 individuals will be eligible for services during FFY19. This estimate is based on data from the previous five FFY through the first four months of FFY 2018.

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

#### A. THE VR PROGRAM;

DVR estimates between 7537 and 10,919 eligible clients will be served during FFY19 using Title I Vocational Rehabilitation Funds at a case services cost of \$13,245,575.00. These estimates are based on data from the previous five FFY through the first four months of FFY 2018.

#### B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

DVR estimates approximately 2450 eligible clients will receive supported employment services during FFY19. These estimates are based on data from the previous two FFY.

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

DVR estimates between 8927 and 10,457 individuals with the most significant disabilities will be eligible for services; between 2575 and 4030 individuals with significant disabilities will be eligible for services; and all other eligible individuals will total between 359 and 698 during FFY19. These estimates are based on data from the previous five FFY through the first four months of FFY 2018.

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

The Colorado Division of Vocational Rehabilitation (DVR) implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. Since March 1, 1993 DVR has restricted services through activation of the order of selection, four times.

Most recently, on March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. On April 22, 2013, based on continued increases in case service expenditures, DVR established wait lists for all three of DVR's priority categories.

During the next two years, DVR carefully monitored and managed staff resources, fiscal resources and the wait list, which consisted of 9,891 individuals during the period from March 1, 2013 through April 30, 2015. Through a series of eleven discrete releases of eligible individuals from the wait list and into active status, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Additionally, based on the number of individuals anticipated to be served annually and the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate a deficit or the need to establish a wait list. DVR anticipates providing the full range of vocational rehabilitation services to all eligible individuals who will be served during the planning period.

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

The table below contains the estimate of individuals who will be eligible for services by priority category and the cost of services under each under each priority category during FFY 2019. These estimates are based on data from the previous five FFY through the first four months of FFY 2018. The estimates do not include the contractual funds expended through DVR's School to Work Alliance Program (SWAP).

	Eligible Individuals	Cost of Services for Eligible Individuals
<b>Individuals with most significant disabilities</b>	8927 to 10,457	\$9,755,994
<b>Individuals with significant disabilities</b>	2575 to 4030	\$3,520,003
<b>All other eligible individuals</b>	359 to 698	\$491,640
<b>Totals</b>	11,861 to 15,185	\$13,767,637

The FFY cost of vocational rehabilitation services is projected to be approximately \$13,767,637 during FFY19. DVR anticipates the availability of funding that will allow all eligible individuals to be served without being placed on an Order of Selection wait list.

#### L. STATE GOALS AND PRIORITIES

The designated State unit must:

##### 1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The following goals were developed and approved through ongoing discussion between DVR leadership and the State Rehabilitation Council (SRC). The development of the state plan is a standing agenda item at SRC meetings. This is when DVR leadership and the SRC's Planning, Policy and State Plan Committee share the results of their state plan activities and solicit the involvement, discussion and approval of the entire SRC.

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

**Goal 1 - DVR will increase outreach and vocational rehabilitation services to communities and cultures throughout Colorado, with emphasis on underserved populations**

**Strategies:**

1. Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
2. Explore the expansion of technology and social media to provide better access and information to Coloradans.

**Goal 2 - DVR will expand transition services to Colorado's youth with disabilities, including pre-employment transition services, to Colorado's students with disabilities**

**Strategies:**

1. Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass pre-employment transition services requirements.
2. Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.
3. Explore the provision of transition services to groups of youth with disabilities who may have not yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services.

**Goal 3 - DVR will increase the skills of DVR staff and service providers to assure a 21<sup>st</sup> century understanding of the labor market and the provision of quality services that meet the needs of Coloradans with disabilities**

**Strategies:**

1. Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry. Put particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.
2. Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.
3. Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

**GOALS 4 - Build and strengthen stakeholder relationships to increase employment opportunities for individuals with disabilities**

**Strategies:**

1. Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.
2. Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.
3. Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

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

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

These goals are based on the 2015-2017 triennial Comprehensive State Needs Assessment (CSNA) results, comment from public hearings and the joint planning and development activities of the SRC and DVR leadership.

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

All performance accountability measures of section 116 of WIOA have been identified as baseline measures for VR programs. Currently available data is of limited value when compared against the performance measure. DVR began collecting and reporting on the performance accountability measures in July 2017, as required. This data will be used to evaluate progress toward goals and support the development of future

state goals and priorities. Sufficient data is not yet available to report on the DVR's performance, however as data become available, DVR's leadership team considers the information at monthly data meetings to compare progress, identify performance strengths, and explore areas for growth. DVR will continue this process.

**C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.**

All available information has been considered in the development of the identified state goals and priorities.

**M. ORDER OF SELECTION**

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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.**

In accordance with the Rehabilitation Act of 1973 as amended by the 2014 Workforce Innovation Opportunity Act, Colorado DVR has designated that individuals with disabilities will receive vocational rehabilitation services in the following order of priority, and shall be classified in the highest priority category for which the individual is determined qualified:

First, eligible individuals with the most significant disabilities;

Second, eligible individuals with significant disabilities; and

Third, all other eligible individuals.

**B. THE JUSTIFICATION FOR THE ORDER.**

DVR implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. This action resulted from increased costs for vocational rehabilitation services, increased demand for services and increased numbers of applicants with disabilities.

Since March 1, 1993, DVR has restricted services through activation of the order of selection, four times. Most recently, on March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. Following implementation, based on continued increases in case service expenditures, DVR determined the need to establish wait lists for all priority categories. As a result, on April 22, 2013, DVR established wait lists for all three of DVR's priority categories.

DVR implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. This action resulted from increased costs for vocational rehabilitation services, increased demand for services and increased numbers of applicants with disabilities.

Since March 1, 1993, DVR has restricted services through activation of the order of selection, four times. Most recently, on March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. Following implementation, based on continued increases in case service

expenditures, DVR determined the need to establish wait lists for all priority categories. As a result, on April 22, 2013, DVR established wait lists for all three of DVR's priority categories.

During the next two years, DVR carefully monitored and managed staff resources, fiscal resources and the wait list, which consisted of 9,891 individuals during the period from March 1, 2013 through April 30, 2015. During the period from March 1, 2013 through April 30, 2015 all individuals who were determined eligible for services and placed on the wait list were provided accurate information and referral services using appropriate modes of communication, to assist them in preparing for, securing, retaining, advancing in or regaining employment. Individuals receiving information and referral services were referred to programs within the statewide workforce development system.

Through a series of eleven discrete releases of eligible individuals from the wait list and into active status, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Additionally, based on the number of individuals anticipated to be served in Federal Fiscal Year (FFY) 2018 and based on the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate the need to establish a wait list under an active Order of Selection.

### C. THE SERVICE AND OUTCOME GOALS.

DVR anticipates sufficient resources to provide the full range of services to all eligible individuals.

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

DVR anticipates sufficient resources to provide the full range of services to all eligible individuals.

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

DVR, in accordance with federal requirements, has developed criteria that define the three priority categories to assure that individuals with the most significant disabilities are selected for services before all other individuals with disabilities. The priority categories are described below:

#### Most Significant Disability:

An individual is classified as having a most significant disability when he/she has a severe physical or mental impairment that seriously limits three (3) or more functional capacity areas (mobility, motor skills, interpersonal skills, communication, work tolerance, work skills, self-care and self-direction) in terms of an employment outcome; and, whose successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational rehabilitation services for at least five (5) months.

#### Significant Disability:

An individual is classified as having a significant disability when he/she has a severe physical or mental impairment that seriously limits one (1) or two (2) functional capacity areas and who otherwise meets the same criteria for a most significant disability. In other words, the individual's successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational services for at least five (5) months. An individual who is determined to be eligible for SSI/SSDI on the basis of his or her own disability is presumed to have at least a significant disability.

#### Individual with a Disability:

An individual is classified as having a disability when he/she meets DVR eligibility criteria but his or her disability does not meet the criteria for most significant or significant disability.

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.

DVR and the State Rehabilitation Council (SRC) will explore the options and impact related to serving eligible individuals (whether or not the individuals are receiving vocational rehabilitation services under the order of selection) who require specific services or equipment to maintain employment. DVR will use exploratory findings to determine if DVR will elect to serve eligible individuals who require specific services or equipment to maintain employment outside of the order of selection wait list. Based on this decision and if necessary, DVR will develop policy that reflects the decision.

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

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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.

Despite the loss of the appropriation of funds under Title VI, Part B, DVR continues to assure the provision of supported employment services to all who need them. Historically, DVR's Title VI-B funding has been insufficient to meet this need. For example, during FFY 2015, DVR's supported employment services award was \$400,457 and DVR expended \$1,434,212 for supported employment services. For FFY 2016 DVR's supported employment award was \$464,210 and DVR expected to spend \$1,505,922 for supported employment services. When VI-B funding is available, DVR's electronic case management system provides the utility to ensure that Title VI-B funding is the primary source of payment for supported employment services until that funding is exhausted, at which point funding continues to be provided through Title I. Title I funds are also used for supported employment services provided under cooperative agreements.

The Division's programmatic activities for supported employment services and programs are intended to increase the number of persons receiving supported employment services and to improve employment outcomes for these individuals. To successfully meet the supported employment needs of individuals with the most significant disabilities, DVR continues the collaborative efforts and working relationships between local DVR offices and mental health centers, and between local DVR offices and agencies serving clients with developmental disabilities. DVR counselors and vocational staff from the above agencies work together to identify individuals who would be appropriate referrals to DVR for supported employment services.

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

DVR has updated policies and procedures to allow for the provision of extended services for youth with the most significant disabilities for a period not to exceed 4 years. DVR worked with the developer of the program's electronic case management system to ensure the funds reserved pursuant to section 603(d) were appropriately expended and these expenditures accurately tracked. DVR maintains policies and procedures for the provision of these services and, should Title VI-B funds become available in the future, is able to accurately report how funds are reserved and expended to provide extended services to youth with the most significant disabilities.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Division believes that the most effective and efficient strategy to accomplish this is by expanding and strengthening its collaborative linkages with relevant state agencies and/or private not-for-profit agencies

for the provision of supported employment and extended support services. The activities to be conducted during FFY16 and beyond reflect a continuation and refinement of activities performed over the last several years.

DVR continues to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services including supported employment services along with all Colorado youth. DVR has worked to infuse best practices within these areas, so that the needs of youth with the most significant disabilities are considered and met. Colorado DVR and Colorado Department of Education state-level staff work and travel as a team throughout the state to respond to requests and to provide training, technical assistance and facilitation to local community agencies, such as schools and adult organizations, as these entities work to provide collaborative transition services to youth with the most significant disabilities.

The Office of Behavioral Health applied for and, with DVR's support, was accepted into the Johnson and Johnson-Dartmouth Community Mental Health Program. This program included \$380,000 to fund an Individual Placement and Support (IPS) Trainer for four years. Upon completing the program, OBH has continued funding an IPS trainer position and is committed to IPS being implemented in all 17 Community Mental Health Centers. Training in IPS has been expanded and provided to DVR counselors, supervisors, and leadership through an annual Colorado IPS Conference, Regional IPS Roundtable Training, and Mental Health Consortium meetings. DVR is a member of the Colorado State IPS Leadership team.

In 2016, Senate Bill 16-077 was passed creating an Employment First Advisory Partnership (EFAP), which identified partner agencies of Colorado Department of Labor and Employment (CDLE), Colorado Department of Health Care Policy and Financing (HCPF), Colorado Department of Education (CDE), Colorado Department of Human Services (CDHS), and Colorado Department of Higher Education (CDHE), and tasked the partnership with making recommendations to increase opportunities for competitive integrated employment for persons with disabilities. While the work of EFAP is not limited to youth with the most significant disabilities, if implemented, several recommendations ask partner agencies to identify strategies to increase resources for extended services and expand supported employment opportunities for this population. The EFAP's preliminary report and recommendations were presented to members of the General Assembly in January of 2018. These recommendations include actions such as implementing Department-wide Employment First practices and policies; implementing training for service providers on evidence-based practices to expand employment outcomes; and developing appropriate funding structures that will increase employment service and support capacity for people with disabilities within Colorado to align outcomes with the definition of competitive integrated employment within WIOA. DVR, and other partner agencies, are actively engaged in beginning the work to implement the recommendations made by EFAP.

## O. STATE'S STRATEGIES

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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.

These methods are supported by DVR's goal to increase the skills of DVR staff and service providers to assure a 21<sup>st</sup> century understanding of the labor market and the provision of quality services that meet the needs of Coloradans with disabilities. To achieve this, DVR will:

37. Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry. Put particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.
38. Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.
39. Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

## 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.

DVR has two dedicated staff positions (Assistive Technology Coordinator and Assistive Technology Specialist) within our Statewide PAT (Personal Adjustment Training) Unit to provide assistive technology services to clients. The Assistive Technology Specialist works with individuals with blindness or low vision within DVR's center-based program; however, referrals are accepted from clients with other disabilities as well. The Assistive Technology Coordinator works primarily to provide assistance, support, and services on a statewide level to DVR clients and teachers in the PAT Unit.

Outside of the center-based program, there are eight additional teachers who work with clients to provide assistive technology training. While the field teachers do not provide assistive technology on a full-time basis, they assess and provide training in this area as part of the individual's DVR program.

In addition to DVR's internal staff, DVR has numerous statewide vendors from whom we are able to purchase assistive technology related services including, but not limited to, assistive technology evaluations, ergonomic evaluations, assistive technology devices, etc.

DVR plans to develop and formalize an agreement with Assistive Technology Partners (AT Partners). AT Partners provides services statewide under the Assistive Technology Act of 1998. The formal agreement will strengthen the working relationship between DVR and AT Partners, and will define how the partners will work together, including a process for referral and the coordination of activities.

## 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.

DVR believes strongly in being able to provide quality services to everyone who applies for vocational rehabilitation services. Based upon DVR's recent Comprehensive State Needs Assessment, DVR is aware that specific demographics of the disability population appear to be underserved by DVR, specifically:

- Rural populations of Colorado;
- Individuals with criminal histories;
- Youth within the foster care, juvenile justice, and mental health systems;
- Individuals with limited education;
- Homeless individuals; and
- Refugees.

DVR intends to increase the number of applications for services from unserved and underserved populations, including minority populations. DVR has begun, and intends to increase, outreach to these

populations to educate individuals with disabilities about DVR and support their access to vocational rehabilitation services, when these are needed. Strategies include:

- As identified under DVR Goal 1, establishing partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
- DVR will develop working and, as appropriate, formal partnership agreements with state community partners to create referral processes and jointly deliver services to customers, including customers from unserved and underserved populations.
- As identified under Goal 1, exploring the expansion of technology and social media to provide better access and information to Coloradans.
- Outreaching and providing technical assistance to community partners to generate referrals and educate them about DVR and services DVR can provide.
- Making training on cultural competence available to DVR staff.
- Making resources on cultural competence available to DVR vendors.
- Expanding the provision of traditional transition services, and pre-employment transition services, to students and youth in all Colorado communities.
- Exploring opportunities to provide services to groups of individuals from unserved and underserved demographics of the disability population.
- Increasing collaboration with Colorado's two tribes, including the cross-training and the development of a formal interagency agreement between DVR and each tribe.

#### 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).

DVR has identified a goal to expand transition services to Colorado's youth with disabilities, including pre-employment transition services, to Colorado's students with disabilities. To achieve this DVR will:

55. Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.
56. Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.
57. Explore the provision of transition services to groups of youth with disabilities who may have not yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services.

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

DVR has an established fee schedule committee that works to effectively determine rates and standards for goods and services that vendors provide to address vendor related concerns and to improve the overall quality of vendors. DVR staff across the state continually work to recruit new qualified vendors to increase client choice of service providers. DVR's fee schedule committee, in collaboration with the Finance and Operations Unit, has implemented a code of ethics for vendors and is exploring the options of a vendor portal and electronic fund transfer payment for vendors. As mentioned, DVR intends to develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.

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

Vocational Rehabilitation is still within the baseline period established by the US Department of Education for all performance accountability measures. DVR continues to work with the vendor of its electronic case management system and other WIOA partners to ensure mechanisms for collecting and reporting performance accountability measures under section 116 of WIOA are in place timely. DVR has begun to monitor and evaluate the implementation of the six WIOA-required performance measures, and continues to consider findings from our long-standing Standards and Indicators to analyze available data of performance. DVR leadership routinely review available data to identify opportunities for improvement and consider strategies to ensure strong performance. As data associated with the common performance measures has become available, these data are considered to provide a more comprehensive picture of DVR's current performance.

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

DVR's recent CSNA indicated areas of need within the Colorado workforce development system related to the delivery of effective services to individuals with disabilities. Specifically, the CSNA indicated a need for greater collaboration between DVR and Colorado's workforce development partners. Additionally, CSNA results suggested a lack of accessibility within workforce centers and partner programs related to knowledge and awareness of disability, accessible communication, accessible programs and assistive technology. To address these issues DVR is actively implementing the following strategies:

- DVR participates in cross-training and sharing of curriculum among all core and combined plan partners. DVR places particular emphasis on collaboration, education and cross-training related to the delivery of effective transition and pre-transition services to students, youth and young adults.
- DVR will identify core and partner program providers at the state and local levels, including contracted adult basic education providers, and will assign DVR liaisons to these programs.
- DVR infuses disability awareness and etiquette into the cross-education of core and combined plan partners, including the sharing of best practices in serving individuals with disabilities.
- DVR assures the participation of DVR disability subject matter experts on the committees of local workforce boards.
- DVR, in collaboration with workforce partners, explores the feasibility of collocating DVR offices within Workforce Centers and does so when justified by economics and demographics in order to improve access to all workforce development services by individuals with disabilities.
- In keeping with the spirit and the letter of the law, DVR encourages and pursues the development of all MOUs, cooperative agreements and interagency agreements required and encouraged within WIOA.
- DVR ensures that DVR is represented and DVR staff are involved in state and local sector strategy efforts and activities.
- DVR is updating its Disability Awareness Training Toolkit and will continue to make these materials, including DVR staff subject matter expertise, available to core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce.
- DVR provides pre-employment transition services to younger students, including work experiences, to assure that youth and young adults are better-prepared for the services they will receive through other core and partner programs.
- DVR promotes STEM awareness, activities, and opportunities, particularly through pre-employment and transition services to youth.

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

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

**DVR Goal 1 Strategies:**

- Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
- Explore the expansion of technology and social media to provide better access and information to Coloradans.

**DVR Goal 2 Strategies:**

- Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.
- Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.
- Explore the provision of transition services to groups of youth with disabilities who may not have yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services

**DVR Goal 3 Strategies:**

- Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry. Put particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.
- Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.
- Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

**DVR Goal 4 Strategies:**

- Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.
- Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.
- Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

**Strategies Carried Over from Prior State Plan**

- DVR will improve case file documentation reflecting personalized and meaningful contact with clients, which will occur at least every other month.
- DVR supervisors will meet regularly with counselors and staff to model excellent guidance and counseling skills as well as motivational interviewing so that counselors and staff can in turn use these skills with clients.
- DVR will generate, monitor and use information to make sound fiscal decisions to ensure the ability to provide effective individualized services to clients.

- DVR will continue collaborative efforts and working relationships between local DVR offices and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.
- DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.

#### B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

The Division of Vocational Rehabilitation values and appreciates the collaborative efforts of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). Positive collaborative working relationships have resulted in valued input and contributions to help DVR develop goals and priorities as well as strategies to meet the needs of individuals with disabilities as identified in the comprehensive needs assessment. In addition, the SRC is actively involved on an ongoing basis any time that DVR revisits and updates its service delivery policies and procedures. DVR will continue to use Title I funds for innovation and expansion to provide staff support and to pay for the operating, travel, and per diem costs of members of the SRC and the SILC.

Additionally, DVR has begun to undertake a number of innovative practices to improve and expand vocational rehabilitation in Colorado. DVR had developed a Youth Transition Unit to enhance transition activities and ensure DVR is on the cutting edge of effective transition service to students and youth with disabilities. This unit will be further developed over the next 5 years and is tasked with identifying innovative strategies to provide Pre-Employment Transition Services to students with disabilities in addition to augmenting current activities to more fully meet the transition needs of youth with disabilities. A top priority of this unit will be to expand outreach to youth, ensuring students and youth receive timely transition services so they are poised for successful transition to post-secondary activities.

Similarly, DVR recently developed a Blind and Low Vision Services Unit. This unit is responsible for improving the availability and effectiveness of rehabilitation services to the blind and those with low vision. The creation of this unit will allow DVR to further develop counselors, vision rehabilitation therapists, and orientation and mobility specialists in order to most effectively meet the unique needs of individuals with visual impairments.

A new Office of Independent Living Services (OILS) has also been created within DVR. This unit has responsibility for overseeing and coordinating independent living by working in close partnership with each of the Independent Living Centers in Colorado. OILS provides an opportunity for DVR to enhance the high quality independent living services already available throughout the state by increasing the number of DVR staff dedicated to supporting the important work of the Independent Living Centers through the identification of innovative and promising practices that can be adapted to meet the needs of various communities in Colorado.

Over the past several years, DVR has developed a comprehensive approach to using data to drive the management of the VR program. DVR has increased its capacity to identify, gather, and analyze critical data to improve services and outcomes for clients, while ensuring the accountability and credibility of VR to all stakeholders. DVR intends to continue this approach of metrics driven leadership to further enhance performance management, quality assurance, and outcomes.

Currently, DVR is engaged in a LEAN initiative to identify areas of unnecessary administrative burden and streamline process with the goal of improving the experience of both staff and customers. The process improvement effort has required the engagement of staff at all levels within the organization to identify areas of redundancy, inefficiency, and nonessential tasks. Several workgroups have since taken on the tasks of thoroughly exploring each problem area and recommending the needed process improvements that will remove barriers to efficient and effective services, while ensuring compliance with all Federal and State

regulations and policies. This work has already resulting in significant reduction of staff time engaged in unnecessary administrative tasks and additional improvements are expected.

**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.**

DVR's strategies to achieve Goal 1 encompass activities to overcome identified barriers to equitable access to and participation in the VR program and Supported Employment Program.

**P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS**

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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 Colorado Division of Vocational Rehabilitation (DVR), in collaboration with the State Rehabilitation Council (SRC) is confident that DVR achieved or made progress toward all of the identified goals and priorities and innovation and expansion activities established within the FFY 2015 state plan.

**Goal 1 - DVR will increase outreach and vocational rehabilitation services to communities and cultures throughout Colorado, with emphasis on underserved populations**

**Strategy 1:** Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.

**Progress:** Over the most recent program year, DVR has improved existing partnerships with workforce centers and adult education to identify and connect with potential applicants. This has occurred through cross-education of staff across core programs and required partners, an increase in collocation, and DVR's involvement with the Job Seeker Services Alignment team, which seeks to improve the customer experience for participants across partners. Additionally, DVR has established collaborative partnerships with several Department of Corrections facilities, ensuring incarcerated individuals who are preparing to re-enter their communities are provided with information needed to make informed decisions about whether DVR may be able to assist with employment upon release. Similar efforts have been initiated with Juvenile Justice facilities and DVR will continue to pursue these partnerships to ensure detained and incarcerated juveniles with disabilities are connected to DVR when appropriate. Local offices have developed partnerships with agencies providing substance abuse counseling in order to increase outreach efforts to individuals experience substance abuse, another underserved population in Colorado. These partnerships have resulted in increased referrals to DVR of individuals served by these organizations. Individuals who are deaf-blind were also identified as an underserved populations through DVR's most recent CSNA. To address this, the Blind and Low Vision Services (BLVS) unit has developed a stakeholder committee that includes two members who are deaf-blind and also serve on the Commission on Deaf and Hard Hearing's deaf-blind task force. In 2017, BLVS hired an orientation and mobility specialist who has extensive experience working with individuals who are deaf-blind and is fluent in ASL. DVR is also supporting a Rehabilitation Counselor for the Blind to complete ASL classes, further developing the agency's ability to meet the service needs of individuals who are deaf-blind. Further, education provided to counselors related to deaf-blindness has lead to better identification of individuals for whom this is their primary disability, ensuring appropriate service provision. DVR has also begun to collaborate with the regional representative from the Helen Keller National Center for Deaf-Blind Youths & Adults.

**Strategy 2:** Explore the expansion of technology and social media to provide better access and information to Coloradans.

**Progress:** Upon moving to CDLE, DVR worked closely with the Department's Government, Policy, and Public Relations (GPPR) unit to update DVR's website, establish social media accounts, and develop updated marketing materials. With support from GPPR, DVR has been able to create marketing materials that are professional, accurate, and more appealing to potential clients and partners. In partnership with GPPR, DVR maintains social media accounts to ensure a virtual presence and create additional opportunities for potential clients to find DVR and learn about the services available. DVR continues to seek other opportunities to utilize technology in order to improve the experience of DVR clients and intends to begin a pilot of technology that will enable electronic signatures for many aspects of the VR process, facilitating an efficient experience for both DVR clients and staff.

**Goal 2 - DVR will expand transition services to Colorado's youth with disabilities, including pre-employment transition services (PETS), to Colorado's students with disabilities**

**Strategy 1:** Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.

**Progress:** DVR has worked closely with the Colorado Department of Education to ensure school districts/BOCES are well informed of pre-employment transition services. All education partners have received training in pre-employment transition services. Districts/BOCES with School-to-Work Alliance Programs have incorporated pre-employment transition services into these programs. Several education partners have worked with local DVR offices and the Youth and Transition Services unit to explore opportunities to improve referral processes for students with disabilities and strategies for providing pre-employment transition services. DVR and education continue to work together to refine these processes and ensure students in need of pre-employment transition services are identified and appropriately connected with DVR. Similar efforts have been completed with other workforce development programs to ensure all partners are knowledgeable of the services available to students with disabilities.

**Strategy 2:** Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.

**Progress:** DVR created a Youth and Transition Services Unit (YSTU) in 2016. Organizationally, this unit reports to the DVR Director and consists of a Manager, a Contracts Manager, the APSIRE program, and 4 regional Transition Lead Counselors. The focus of this unit is to expand access to innovative and high quality transition services throughout the state. This unit has provided training, supported policy development, provided outreach to community partners, enhanced relationships with education, and supported DVR's implementation of pre-employment transition services. While DVR continues to refine the structure of the unit to ensure it is as effective as possible, its priorities will remain the same moving forward.

**Strategy 3:** Explore the provision of transition services to groups of youth with disabilities who may have not yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services.

**Progress:** DVR has not yet fully explored the possibility of utilizing its authority to provide services to groups as a mechanism for providing transition services. DVR will engage in additional exploration of providing services to groups should the need arise.

**Goal 3 - DVR will Increase the skills of DVR staff and service providers to assure a 21<sup>st</sup> century understanding of the labor market and the provision of quality services that meet the needs of Coloradans with disabilities**

**Strategy 1:** Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry, putting particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.

**Progress:** Since the implementation of WIOA, DVR has been closely engaged with WIOA partner programs to ensure cross-education across partners and ensure a comprehensive approach to services for all participants. DVR is represented on the Job Seeker Services Alignment team, which seeks to create alignment of process, procedures, forms, and data collection to the extent possible across all programs, in addition to promoting cross-education across partners and co-enrollment of participants. Further, this team seeks to ensure ongoing opportunities for cross-education among partners to occur. These professional development opportunities occur at the state, regional, and local level to ensure consistent information and support local partnership. DVR's Business Outreach Specialists are members of CDLE's broader Business Services Team, and serve as a conduit to bring real-time Labor Market Information (LMI) back to their local teams. Further, DVR is receiving intensive technical assistance from the Job Development Vocational Rehabilitation Technical Assistance Center with the goal of infusing LMI into the comprehensive assessment process to establish employment goals that tie into available LMI, leading to higher wages and increased self-sufficiency of clients. Additional training will also equip supervisors to support, through clinical supervision and coaching, counselors in their efforts to incorporate labor market information more directly when counseling clients.

**Strategy 2:** Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.

**Progress:** DVR has an established vendor registration process, which involves review of provider qualifications to ensure individuals providing services have the knowledge, skills, and abilities necessary to provide high quality vocational rehabilitation services. DVR has a Vendor Relations Specialist who supports local teams in developing new vendors when needed. This staff also offers technical assistance to vendors when required to ensure appropriate quality and all procedures are followed. Vendors are made aware of available training that would support the development of skills relevant to the services they provide. As DVR implements the recommendations from the Employment First Advisory Partnership, it is anticipated that additional steps will be taken to further support the development of vendors providing purchased services.

**Strategy 3:** Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

**Progress:** DVR has undertaken a LEAN initiative to improve processes within the agency. This effort led to the development of a Process Improvement team which has focused on identifying duplication and inefficiency within DVR operations creating burden for DVR staff and delays for clients. A number of policy and procedural changes have been implemented as a result of this team's effort, which are expected to save staff time and assure the VR experience is positive, effective, and efficient for customers. These efforts are ongoing.

#### **Goal 4 - Build and strengthen stakeholder relationships to increase employment opportunities for individuals with disabilities**

**Strategy 1:** Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.

**Progress:** Both the manager of DVR's Work Supports and Employment Engagement unit and a Business Outreach Specialist represent DVR on Colorado's State Technical Assistance team supporting the development of sector partnerships. Additionally, several Business Outreach Specialists have been engaged in the development of sector partnerships at the local level.

**Strategy 2:** Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.

**Progress:** DVR's Business Outreach Specialists (BOS) have been included into CDLE's broader Business Services Team, and serve as a conduit to bring real-time LMI to their local teams through conversations with business and involvement with sector strategy initiatives. This team of BOS routinely provide disability awareness training to business partners throughout the state to improve awareness of disability employment within the business sector. DVR partnered with CDLE's GPPR unit to promote Disability Employment Month in October 2017, ensuring greater visibility across stakeholders than in previous years. This efforts included engaging stakeholders through social media, highlighting dual-customer successes through a series of video testimonials, and establishing a "Shining Stars of DVR" award to showcase several employers, clients, and service providers making strides in the employment of individuals with disabilities.

**Strategy 3:** Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

**Progress:** DVR has included services to employers within its service delivery policy, supporting these important services as being within the scope of service provision for DVR for both staff and stakeholders. DVR's Work Supports and Employment Engagement (WSEE) unit takes a lead in providing technical assistance and other services to the business community to support the employment of individuals with disabilities.

### **Goals Carried Over From Previous Plan**

- DVR will have thirty day contact with all clients to increase client engagement and enhance the client-counselor partnership.
  - Based on feedback received from clients, staff, and stakeholders a requirement for meaningful contact every thirty days was determined to be unnecessarily burdensome. It did not achieve its desired effect of improving client engagement. Re-evaluating this requirement, led to a policy change requiring meaningful contact at least once every two months. This policy change has allowed for greater flexibility within the counselor relationship and supports client engagement while accounting for the unique circumstances and preferences of each eligible individual.
- DVR will improve case file documentation reflecting personalized and meaningful contact with clients,
  - DVR has maintained policies and procedures referenced in the prior State Plan that have led to improved case file documentation. DVR continues to monitor the quality of case file documentation, providing coaching, training, and guidance to staff as necessary.
- DVR supervisors will meet regularly with counselors and staff to model excellent guidance and counseling skills as well as motivational interviewing so that counselors and staff can in turn use these skills with clients.
  - Additional training has been provided by Dr. Jared Schultz from Utah State University to support DVR supervisors in developing their clinical supervision skills. Dr. Schultz will continue to provide coaching to DVR supervisors as they support counselors to engage in effective counseling with those they serve.
- DVR will generate, monitor and use information to make sound fiscal decisions to ensure the ability to provide effective individualized services to clients.
  - DVR's leadership routinely utilizes a broad range of available data in order to make fiscal and programmatic decisions needed to ensure individualized client services. This team constantly monitors available information and adjusts strategies as needed to provide a seamless experience for clients.

- DVR will continue collaborative efforts and working relationships between local DVR offices and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.
  - DVR maintains collaborative partnerships with both mental health centers and agencies serving individuals with intellectual disabilities.
- DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.
  - DVR continues to work actively with education partners to assure youth have access to pre-employment transition, transition, and employment services, including supported employment.

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

DVR made significant progress toward achieving all identified goals and priorities. However, these successes were not without challenges and DVR continues to work toward ensuring progress made is maintained and expanded moving forward. DVR has continued to experience a high number of programmatic changes, in part due to WIOA implementation. Many of these changes were necessary to improve program performance and accountability. Common change management challenges continue and are addressed by DVR leadership as strategies are implemented.

As DVR planned for the full implementation of the Workforce Innovation and Opportunity Act, as well as a change in the designated State agency from the Colorado Department of Human Services to the Colorado Department of Labor and Employment, effective July 1, 2016, DVR also experienced a high number of priorities and projects which all needed to be carefully managed. While these factors complicated the achievement of goals and priorities, DVR made meaningful and significant progress in all areas and plans to maintain achievements made.

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

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

**SUPPORTED EMPLOYMENT GOAL - DVR will meet the needs of individuals with the most significant disabilities who need supported employment and will do so through collaboration with partner systems.**

**Strategy -** DVR will continue collaborative efforts and working relationships between local DVR office and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.

**Progress:** DVR and the Office of Behavioral Health maintain a formal agreement that stipulates collaborative planning and coordination of services by local mental health centers and DVR offices. This agreement successfully drives local interactions that support enhanced service delivery and decrease duplicative service delivery. Local DVR staff and vocational staff from all twenty community center boards have developed collaborative referral and service delivery processes to identify individuals who are appropriate referrals for supported employment services through DVR. DVR will continue this strategy and will expand upon collaborative partnerships and agreements between DVR and local providers who serve clients with mental health concerns and intellectual disabilities.

**Strategy** - DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.

**Strategy** - During FFY 2015, Colorado's team of DVR and Department of Education Transition Specialists continued their work to infuse transition best practices into local school districts through the provision of onsite training, technical assistance and facilitation regarding the provision of transition services to youth and students with disabilities, including those with the most significant disabilities. Additionally, in FFY 2015 Colorado developed a "Transition Community of Practice". DVR is a key player in this Community, along with state-level partners from the Office of Behavioral Health and the Office of Community Living. A goal of this group is to assure that all youth, including youth with most significant disabilities, receive excellent transition services that lead to desired post-school outcomes. DVR will continue this strategy.

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

DVR has strong collaboration with system partners to meet the supported employment needs of individuals with the most significant disabilities. DVR did experience turnover in staff following the retirement of two long-time staff who represented DVR when collaborating with system partners. Both positions were quickly filled with qualified personnel, highly skilled in interagency collaboration and the provision of supported employment services. DVR has been able to maintain effective collaboration with all partners during this transition.

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

DVR does not currently have data available to report on the performance accountability indicators under section 116 of WIOA. The new performance measures will require DVR to gather and report information in a manner which significantly differs from prior reporting on historic standards and indicators. These differences make it difficult to provide a meaningful report of past performance.

DVR continues to work with the vendor of its electronic case management system and other WIOA partners to ensure mechanisms for collecting and reporting performance accountability measures under section 116 of WIOA are in place timely. DVR has begun to monitor and evaluate the implementation of the six WIOA-required performance measures, and continues to consider findings from our long-standing Standards and Indicators to analyze available data of performance. DVR leadership routinely review available data to identify opportunities for improvement and consider strategies to ensure strong performance. As data associated with the common performance measures has become available, these data are considered to provide a more comprehensive picture of DVR's current performance.

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

Total expenditures of Title I funds for innovation and expansion activities for Program Year 2016 were as follows:

Support of the State Rehabilitation Council (SRC). The SRC had an operating budget of \$46,751. The budget was developed to be used for SRC meetings, SRC travel, meeting expenses including expenses for committee meetings and the SRC retreat, printing and materials, and contract expenses. During this time period, the SRC expended \$23,405.

Support of the State Independent Living Council (SILC): The SILC had an operating budget of \$48,000. The budget was developed to be used for professional services, SILC travel, meeting accommodations,

operating costs, conference calls, membership dues and fees, and the State Plan for Independent Living (SPIL) needs assessment. During this time period, the SILC expended \$59,506.

#### Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

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Include the following:

##### 1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Workforce Opportunity and Innovation Act of 2014 reinforces and expands the roles of both vocational rehabilitation counselors and clients with regard to supported employment services. Effective delivery of supported employment services for individuals with the most significant disabilities requires professionals to become even more creative in looking beyond the traditional array of practices and services. Therefore, the skill and experience of vocational rehabilitation counselors is key to the development of successful supported employment programs. The Colorado Division of Vocational Rehabilitation's training efforts continue to focus on helping counselors and other involved professionals understand the importance of supported employment. Training assists staff to develop skills necessary to the provision of excellent supported employment services. Training addresses client evaluation, realistic goal setting, the development of precise plans of services, objective progress reporting, and meaningful recordkeeping. DVR's Supported Employment Coordinator leads this training and has provided training on supported employment to individual DVR offices as well as to provider agencies, Community Centered Board (CCB) staff and parent groups.

Direct utilization of Title I (Vocational Rehabilitation Services) and Title VI-B (Supported Employment Services) case service funds facilitate the counselor's ability to provide supported employment services for individuals with the most significant disabilities. The resources available through the Title VI-B program were used only to provide supplemental evaluations and supported employment services, as identified in the Individualized Plan for Employment (IPE), to assist eligible individuals with the most significant disabilities to obtain and secure competitive integrated employment.

Supported employment services are provided to enable individuals with the most significant disabilities to obtain employment, to learn job skills, and to maximize their hour and wage employment opportunities in the competitive labor force. The Division of Vocational Rehabilitation will continue to provide a wide range of supported employment services to individuals with the most significant disabilities for whom competitive employment has not traditionally occurred or has been interrupted or intermittent and who need supported employment services and extended ongoing support services to attain and maintain integrated competitive employment.

Any other vocational rehabilitation service may be provided when necessary to prepare and support the individual in supported employment. Such services include, but are not limited to, physical and mental restoration services; vocational adjustment and other vocational and academic training; occupational licenses, tools and equipment; specialized services for the blind and/or deaf; and, support services, such as maintenance, transportation, services to family members, and personal assistance services.

DVR's required documentation for supported employment for an eligible individual with the most significant disability will include the individual's weekly work goal, job stabilization criteria, the supported employment services to be provided, the type and frequency of monitoring contacts which will be provided during the provision of supported employment services, and a description of extended services needed. With the passage of WIOA, extended services can now be provided by DVR for up to four years for youth with disabilities, and DVR's policy and documentation requirements has been revised accordingly.

The Division of Vocational Rehabilitation believes that the need for supported employment cannot be met by vocational rehabilitation agencies alone, but requires the collaborative efforts of all providers of services to individuals with the most significant disabilities. In accordance with this belief, DVR continues to analyze and address the systems barriers in Colorado which have historically hindered local delivery of supported employment services. For example, when DVR has an active wait list, there is a process in place to allow applicants with developmental disabilities to access waiver services more swiftly. DVR has developed an "Affidavit of Application" letter to be used for individuals with a developmental disability who are currently working with a Community Centered Board (CCB) and have Medicaid Waiver Supported Employment Services available to them. The intent of this letter is to notify the CCB case manager that an application for the client has been taken, and that the client will be placed on DVR's Order of Selection wait list once his/her priority classification is determined. Completion of this form will allow the CCB to access Medicaid Waiver Supported Employment Services for the individual after the DVR intake is complete. In addition, DVR has trained staff about SSA work incentives and other options for extended support provision such as self-pay and Impairment Related Work Expense (IRWE) plans, so that clients who unable to receive funding under the Medicaid Waiver, may move forward toward pursuing their employment goals.

DVR, the Office of Community Living (OCL), and the Office of Behavioral Health (OBH) have created an environment, through collaborative policy development and innovative funding initiatives, which encourages local provider agencies to enhance existing supported employment services. These efforts continue through an intra-agency agreement between DVR and OBH to expand and develop methods to provide effective supported employment services to mutual clients. DVR is also working on developing a new interagency agreement with the OCL to address each agency's responsibilities and assure the collaborative and streamlined provision of supported employment to mutual clients.

The Division of Vocational Rehabilitation's strong commitment to facilitate coordination and development of community-based supported employment services for individuals with the most significant disabilities is reflected in the prioritization of supported employment initiatives. As a result, increasing numbers of community rehabilitation programs throughout Colorado have developed supported employment services to supplement those provided by the Division of Vocational Rehabilitation. One such initiative involved the collection and study of data by a team of DVR staff, state agency partners, and community rehabilitation providers. As a result, changes were made to the DVR Fee Schedule. Payments made by DVR for supported employment services increased. The increased fee schedule rate supports an increase in the number of supported employment providers throughout the state.

DVR has a strong commitment to serve Colorado's youth population. DVR's supported employment Coordinator serves on the ASPIRE Oversight Committee, to support and educate ASPIRE staff and partners in the coordination of supported employment services to youth. ASPIRE is working with DVR counselors in the Denver DVR office to pilot services to supported employment youth and students. Public school personnel often refer students with most significant disabilities to DVR prior to their completion of the school transition program. DVR's has counselors with supported employment expertise throughout Colorado. These counselors begin plan development and services so the youth can move to employment as they are completing their education. DVR is also coordinating services with the Mental Health Center of Denver in their newly formed Emerson St. Program for Teens and Young Adults. With the focus on youth within WIOA's proposed regulation, this strong foundation will serve DVR well as it begins a new program year, and focuses 50% of its Title VI B funds on youth with disabilities annually on an ongoing basis

## 2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Supported employment services are provided up to 24 months from when employment begins unless the team has determined that more time is necessary for the client to achieve job stabilization before the client transitions to extended services. In these cases, the Individualized Plan for Employment (IPE) can be

amended to provide a longer period of services to fully attain the weekly work goal and/or stabilize employment.

During the provision of supported employment services, assessing job stabilization and transition to extended services is the final phase of the vocational rehabilitation counselor's involvement in the provision of supported employment services. Job stabilization, which occurs when the individual can and is reasonably expected to continue to perform all job duties acceptably, should be attained prior to transition to extended services. The timing and flexibility of the transition process is critical to ensure that the individual's placement is not jeopardized once the job coach fades from the job site. Training and technical assistance will continue to be provided to counselors and other service providers on how to identify the appropriate time to fade job coaching services and when extended support services, including natural supports, should begin. DVR and the Office of Behavioral Health have developed written guidelines for mental health centers, which provide supported employment services to eligible individuals with serious mental illnesses, to clarify their role in the provision and funding of extended services.

With the passage of WIOA, extended services can now be provided by DVR for up to four years for youth with disabilities, and DVR's policy and documentation requirements have been revised accordingly.

### CERTIFICATIONS

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

Name of designated State agency **Colorado Department of Labor and Employment**

Full Name of Authorized Representative: **Steve Anton**

Title of Authorized Representative: **Director**

#### **States must provide written and signed certifications that:**

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

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

## FOOTNOTES

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### Certification 1 Footnotes

\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

### Certification 2 Footnotes

\* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

### Certification 3 Footnotes

\* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

## ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

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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

Full Name of Authorized Representative:

Title of Authorized Representative:

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT\_OCTAE@ed.gov

#### CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the

entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

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

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

### STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

Applicant's Organization

Full Name of Authorized Representative:

Title of Authorized Representative:

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

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

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:

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.

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

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

- J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.
- K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES, STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A)(15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.
- L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO EXPAND AND IMPROVE THE PROVISION OF VR SERVICES TO INDIVIDUALS WITH DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.
- M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

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

- A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.
- B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .
- C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above

- D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.
- E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.
- F. COMPLY WITH REQUIREMENTS REGARDING THE PROVISIONS OF INFORMED CHOICE FOR ALL APPLICANTS AND ELIGIBLE INDIVIDUALS IN ACCORDANCE WITH SECTION 102(D) OF THE REHABILITATION ACT.
- G. PROVIDE VOCATIONAL REHABILITATION SERVICES TO AMERICAN INDIANS WHO ARE INDIVIDUALS WITH DISABILITIES RESIDING IN THE STATE, IN ACCORDANCE WITH SECTION 101(A)(13) OF THE REHABILITATION ACT.
- H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14) OF THE REHABILITATION ACT.

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

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

- XC. HAS DEVELOPED AND WILL IMPLEMENT,
  - . STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND
  - A. 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

XCI. 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:

- XCII. 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
- XCIII. 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

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States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.\* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on [www.regulations.gov](http://www.regulations.gov) for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting Docket ID number ETA-2015-0006.

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

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### TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

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States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

A. CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT).

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**Colorado’s TANF program is known as Colorado Works and is designed to assist families in becoming stable and self-sufficient, reducing the need for the social safety net due to positive outcomes, particularly employment. Colorado values engaging low-income families in services and strategies that result in meaningful, self-supporting employment as the best strategy for promoting long-term well-being for those in poverty. In addition to the core function of the safety net, Colorado Works promotes job preparation, successful transition to and progression in work, and develops strategies and policies that ensure**

participants are engaged in an individualized and outcome-oriented plan that promotes well-being and economic security.

The Colorado Works program, in its design, also promotes capacity building and preventative measures to strengthen families, provide for positive youth development and healthy relationships. The Colorado Works program operates in all counties in Colorado and is administered locally by county departments of human/social services, per State statute. Each county enters into a performance memorandum of understanding with CDHS and has written county policies describing its program. CDHS is responsible for ensuring that all counties comply with the terms of their county policies, as well as with all federal and State statutes and regulations. County departments of human/social services have flexibility in determining the most effective approach for accomplishing the four federal purposes of TANF within their local area and within the parameters established by the State and federal government, including the authority to contract all or part of the program operation to private and/or public providers. Counties develop their program policies to deliver the most appropriate services to eligible participants in their communities. All local program policies must meet federal and State statutory and regulatory requirements.

In addition to the services and investments made by counties through implementation at the local level, CDHS is committed to supporting programs throughout the State that serve low-income families and that are designed to meet one of the four purposes of TANF. CDHS also administers the Personal Responsibility and Education Program (PREP) grant, which provides comprehensive and medically accurate sexual health education to teens.

#### **Eligibility Criteria, Benefit Levels and Services**

Colorado Works statutes state that no individual is entitled to benefits or services under the Colorado Works program. Colorado Works provides fair and equitable treatment to all applicants and participants and does not discriminate based on age, disability, race, color or national origin, or any other basis prohibited by law.

**Basic cash assistance.** Colorado Revised Statutes set uniform statewide basic eligibility and minimum benefit levels for basic cash assistance based on Aid to Families with Dependent Children (AFDC) rules that were in effect on July 16, 1996, with the following exceptions:

- (1) Families do not have to include half siblings in the same assistance unit if at least one of the half siblings is receiving child support;**
- (2) Sixty seven percent of a participant's income is disregarded for ongoing benefit calculation;**

**(3) All wages earned in subsidized employment from eligibility determination and grant calculation pursuant to C.R.S. 26-2-706.9 (9) (d) and C.R.S. 26-2-709 (1) (II);**

**(4) Two parents are treated the same as single parent families however; cash assistance is paid using State-only funds; and,**

**(5) A family's resources are exempt.**

**ELIGIBILITY CRITERIA FOR CASH ASSISTANCE ALSO INCLUDE THE FOLLOWING:**

**(1) Colorado does not impose a family cap;**

**(2) Colorado does require the participant to work with child support services, to ensure child(ren) receive financial supports. Colorado does require the assignment of child support rights as a condition of eligibility for Colorado Works;**

**(3) Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other states;**

**(4) Expectant parents that can prove pregnancy are eligible; and,**

**(5) All work eligible individuals must sign and participate in an individualized plan for employment.**

**The following persons shall be ineligible for all Colorado Works benefits or services:**

**(1) Fugitive or fleeing felons, parole violators, or probation violators;**

**(2) Specified caretakers who fail to report, without good cause within normal program reporting requirements, a child(ren) who is expected to be out of the home for longer than forty-five (45) calendar days, will be ineligible for assistance for ninety (90) calendar days from the date that it is determined he or she should have reported the expected absence;**

**(3) Persons convicted of a drug-related felony on or after July 1, 1997, unless the county department has determined that the person has taken action toward rehabilitation, such as, but not limited to, participation in a drug treatment program;**

**(4) Assistance units with an adult participating in a strike; and,**

**(5) Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.**

**In addition to the basic cash assistance grant, county departments of human/social services may provide other assistance in the form of additional benefits, services, and incentives to participants above the basic benefit level, as outlined in their county policy.**

**Dependent child(ren) must live with a specified caretaker; except for child(ren) receiving family preservation services or child(ren) receiving services as outlined in Colorado's approved Title IV-A State Plan in effect as of September 30, 1995. A specified caretaker is a person who exercises responsibility for the child and may or may not be related to that child.**

**To receive benefits, an assistance unit may consist of the dependent child, siblings of the dependent child, and specified caretaker (such as parents or grandparents, etc.). A dependent child is a child under age 18 or between 18 and 19 who is expected to graduate from high school prior to his/her 19<sup>th</sup> birthday.**

**Every household receiving TANF assistance is raising a child. There are three primary family types receiving Colorado Works assistance:**

- Single parent households with at least one child (including pregnant women without other children)**
- Child(ren) living with a caretaker where the child(ren) and the caretaker are also receiving benefits**
- Child(ren) living with a caretaker whereby benefits are to support the child(ren), but not the adult(s) in the household (referred to as Child-only participants)**

**Persons living in the household who are financially responsible for members of the assistance unit, but who are not required to be in the unit, will have their income, minus the employment disregard, deemed available to the family unit. The income disregard at initial application is \$90; once eligibility has been established, 67% of income will be disregarded during the certification period (up to six months). The generous disregard after eligibility has been determined is intended to support a transition to employment for families receiving assistance, allowing access to not only basic cash, but also case management and supportive services that are critical during early attachment to work.**

**SERVICES ARE PROVIDED TO CHILD(REN) IN OUT OF HOME PLACEMENTS OR IN JUVENILE JUSTICE FACILITIES IN ACCORDANCE WITH THE PROVISIONS OF THE APPROVED EMERGENCY ASSISTANCE STATE PLAN IN EFFECT ON SEPTEMBER 30, 1995. NON-MONETARY SERVICES MAY ALSO BE PROVIDED TO A NON-CUSTODIAL PARENT ACCORDING TO PROGRAM RULES, AS OUTLINED IN COUNTY POLICY.**

**SPECIFIED CARETAKERS ARE REQUIRED TO NOTIFY THE AGENCY WITHIN NORMAL PROGRAM REPORTING REQUIREMENTS IF A CHILD HAS LEFT THE HOME AND IS EXPECTED TO BE GONE**

FOR MORE THAN 45 CALENDAR DAYS. SPECIFIED CARETAKERS WHO FAIL TO MEET THIS REQUIREMENT WILL BE INELIGIBLE FOR ASSISTANCE FOR NINETY CALENDAR DAYS.

GOOD CAUSE EXCEPTIONS FOR TEMPORARY ABSENCE INCLUDE:

(1) CHILD(REN) RECEIVING MEDICAL CARE OR EDUCATION THAT REQUIRES HIM OR HER TO LIVE AWAY FROM THE HOME; OR,

(2) CHILD(REN) VISITING A NONCUSTODIAL PARENT, AS SPECIFIED IN A PARENTING PLAN ENTERED BY THE COURT OR BY BOTH PARTIES NOT TO EXCEED SIX (6) MONTHS UNLESS OTHERWISE SPECIFIED AND MUST BE SIGNED BY BOTH PARTIES; OR,

(3) CHILD(REN) RESIDING IN VOLUNTARY FOSTER CARE PLACEMENT FOR A PERIOD NOT EXPECTED TO EXCEED THREE (3) MONTHS. SHOULD THE FOSTER CARE PLAN CHANGE WITHIN THREE MONTHS AND THE PLACEMENT BECOME COURT-ORDERED, THE CHILD IS NO LONGER CONSIDERED TO BE LIVING IN THE HOME AS OF THE TIME THE FOSTER CARE PLAN IS CHANGED.

**Applications and redeterminations of eligibility.** Applications for Colorado Works benefits must be processed within 45 calendar days. For persons receiving ongoing basic cash assistance, a redetermination of eligibility must be completed every six months. Redeterminations for Colorado Works benefits must be completed by the last day of the month if submitted prior to the 15<sup>th</sup> of the redetermination month and must be completed by the 10<sup>th</sup> of the month following the redetermination month if received after the 16<sup>th</sup> of the redetermination month.

**Method and frequency of basic cash assistance.** Assistance units are certified as eligible and receive benefits through a six-month certification period, notwithstanding changes to household composition or income that would render the unit ineligible entirely. The Certification Period aligns with the State's Food Assistance simplified reporting rules; families are required to report changes as they occur, including changes to household composition, income (source or amount, earned or unearned), or residence.

Changes that do not render the unit ineligible will not negatively affect benefits during the certification period. Changes that would increase the assistance amount will be applied and acted upon as they are reported, irrespective of the certification period. All other reported changes take effect at the beginning of the next Certification Period.

**Time limits.** Adult members of the assistance unit are limited to 60-months of TANF assistance during their lifetime. Up to 20% of the caseload may receive an extension of federal TANF assistance beyond the 60-month lifetime limit if their cases meet hardship or domestic violence criteria. No extensions will be formally granted until the adult has received TANF benefits for 60-months. All extensions will be granted by the county department of human/social services based on hardship or domestic violence reasons defined in Colorado Works rules and

county policies. Domestic violence extensions and hardship extensions may be granted when domestic violence or hardship problems prevent the adult(s) from participating in work activities or securing employment. Hardship reasons for extensions beyond the 60-month time limitation include the following:

- (1) Disability of the caretaker, his/her spouse, the dependent child(ren), or immediate relative for which the caretaker is the primary caregiver;
- (2) involvement in the judicial system because a member of the assistance unit has an existing case;
- (3) family instability, including the proven inability to maintain stable employment or inability of the caretaker to care for child(ren) in his or her own home or in the home of a relative;
- (4) inadequate or unavailable child care, housing, transportation, or employment opportunities;
- (5) families experiencing current or past domestic violence issues; and,
- (6) other hardship reasons specified in the county's policies.

**Minor parents.** A minor parent is a parent who is under age 18. All unmarried minor parents are considered child(ren) for purposes of time limits and budgeting. Unmarried minor parents must live with a parent or adult relative or guardian, or in a setting deemed appropriate by the county, with exceptions for good cause. Minor parents who have not completed high school or its equivalent must attend high school, work on a GED, or be in an alternative education training program approved by the State in order to be eligible for assistance unless receiving benefits paid with segregated State/local funds. Colorado does not require non-custodial, non-supporting minor parents to fulfill community work obligations or attend appropriate parenting classes after school.

**Tribal Eligibility.** Members of Indian tribes who live in Colorado and are not eligible for assistance under a Tribal Family Assistance plan approved under Section 412 of the Social Security Act could be eligible for Colorado Works. Any month of receipt by an adult while living in Indian Country or a Native Alaskan Village where at least 50 percent of the adults are not employed shall not count towards the 60 cumulative months of assistance. Indian Country is defined in Section 1151 of Title 18, Part 1, Chapter 53, United States Code, as of January 6, 1999.

**Sanctions.** Sanctions are imposed on Colorado Works recipients who do not participate in or otherwise violate the terms and conditions agreed upon in the individualized plan. Sanctions apply to the full family. Before sanctions take effect, the county office must attempt conciliation with the participant. Good

cause may be granted, and benefits will not be sanctioned. If conciliation is not successful, the sanction process will ensue, as follows:

(1) The first sanction shall be twenty-five percent (25%) of an assistance unit's cash assistance for a period of one month. The first sanction shall remain in effect until cured and served. Sanctions not cured by the end of the sanction period shall progress to the second sanction.

(2) The second sanction shall be fifty percent (50%) of the cash assistance for one month, and shall remain in effect until cured and served. Second sanctions not cured within the sanction period shall progress to the third sanction.

(3) The third sanction shall result in the termination of cash assistance to the assistance unit for a period of three months.

(4) A full case closure for a period of one month can occur for complete refusal to participate in or comply with the entire individualized plan.

The sanction period is determined by the State Board of Human Services. Once a participant reaches the third sanction, all subsequent sanctions are at the third level.

**Disqualifications.** Persons who are required members of the assistance unit, but are disqualified or excluded from receiving Colorado Works basic cash assistance or diversion due to program prohibitions or violations, shall be removed from the assistance unit.

(1) Individuals who commit fraud will be removed from the grant for a 12-month period for the first offense, 24-months for the second offense, and permanently for the third offense.

(2) Individuals who misrepresent information in order to receive assistance in two states at the same time will be ineligible for a period of ten years.

(3) Individuals who are fugitive or fleeing felons, parole violators, or probation violators.

(4) Individuals who have been convicted of a drug-related felony on or after July 1, 1997, unless the county has determined that the person has taken action toward rehabilitation.

(5) Individuals who have failed to apply for a Social Security Number.

(6) Individuals who are non-citizens and do not meet the definition of a qualified legal noncitizen.

**Overpayments and recoveries.** All overpayments are promptly established as account receivables unless:

- (1) The household members are without fault in the creation of the overpayment,**
- (2) The change in income or other circumstances were reported timely, and**
- (3) The recovery would deprive the household of income required for ordinary and necessary living expenses or would be against equity and good conscience. The definition of against equity and good conscience must be consistently defined in county policy. The fact that the recipient is receiving public assistance shall not be the only factor in making a determination that the person would be deprived of income required for ordinary and necessary living expenses or that equity and good conscience exist.**

**A county will not pursue collection of overpaid benefits from individuals who were dependent child(ren) in the overpaid Colorado Works case.**

**A. For individuals actively receiving assistance, the Monthly Recovery Reduction Amount is as follows:**

- (1) If the error is a result of an agency error compute five percent (5%) of the authorized payment amount or, if the error is result of a client error, compute ten percent (10%) of the authorized payment amount. If the resulting percentage amount is less than ten dollars (\$10), the deduction from the authorized payment amount shall be ten dollars (\$10).**
- (2) Deduct the percentage amount, or ten dollars (\$10) when the percentage amount is less than ten dollars (\$10), from the authorized payment to arrive at the payment amount. This amount shall be rounded to the next lower whole dollar amount, if not already a whole dollar amount. This rounded amount is the final payment amount.**
- (3) When recovery deductions reduce the payment amount to less than ten dollars (\$10), such lesser amount shall be paid except when that amount is less than one dollar (\$1.00) in which case no payment is made and that month shall not count towards the recipient's federal TANF time limit. The client shall continue to receive services as applicable.**
- (4) When the authorized payment amount is less than ten dollars (\$10), no deduction shall be made from such "no payment" case.**
- (5) When recovery deductions reduce the payment amount to less than one dollar (\$1.00) and as a result no payment is made, such case shall not be considered to be an active Colorado Works case.**
- (6) When recovery is due to a fraudulent action on the part of the recipient and interest may be added thereto in accordance on the part of the recipient, the interest amount shall not be included in the payroll deduction unless the**

recipient agrees to such inclusion. If the recipients does not so agree, the interest amount shall be collected.

(7) The amount of recovery deduction shall be recorded in the recipient's case file and collected via the statewide benefit management system.

(8) Previously established claims will be deducted from cash assistance under the Colorado Works program in accordance with the AFDC Recoupment policy.

(9) Claims shall not be collected against supportive services and/or other assistance payments unless such claim is due to fraud and/or IPV claims.

**B. For overpayments to non-active cases, the county shall establish a monthly repayment plan with the family which shall be no more than ten percent (10%) but no less than five percent (5%), of the family's gross income or an amount defined by the recipient in excess of ten percent (10%), or the amount can be paid in full unless hardship is established.**

**Non-recurrent, short-term benefits.** Colorado offers non-recurrent, short-term benefits and services to its Colorado Works participants in two forms - state diversion and county diversion.

(1) A "state diversion" is a needs-based, cash or cash-equivalent payment made to a participant who is eligible for basic cash assistance;

(2) A "county diversion" is a needs-based, cash or cash-equivalent payment made to a participant who is eligible for assistance pursuant to the maximum eligibility criteria for non-recurrent, short-term benefits established in the State plan, in the county-defined expanded eligibility based on federal poverty and other standardized guidelines, and in county policies.

(A) Eligibility for Colorado Works county optional benefits and service requires:

(1) A family consisting of child(ren) living with a specified caretaker or parent(s) with unborn child(ren); and,

(2) The family's gross income is within the county limit, up to \$75,000 per year.

Notwithstanding the above eligibility requirements, all Colorado residents are eligible to receive services intended to reduce out-of-wedlock pregnancies and/or encourage the formation and maintenance of two-parent families if paid exclusively with federal TANF funds. The federally funded Personal Responsibility Education Program intends to decrease teen pregnancies through the implementation of evidence-based comprehensive sexual health education curriculum. The grant requires additional programming to focus on three federally outlined Adult Preparation Subjects: healthy life skills, healthy relationships, and adult/child communication.

**Additional Colorado Works Benefits and Services.** Other benefits and services include, but are not limited to, the following:

- (1) Colorado allows county departments to use Colorado Works funds to provide vouchers for State approved job placement agencies.**
- (2) Colorado provides family planning services not available through Medicaid.**
- (3) Colorado provides employment incentives to participants or employers as determined necessary by county policy.**
- (4) Colorado screens for domestic violence as a part of the assessment process but will only exempt domestic violence victims from time limits and other requirements for work participation when indicated by the assessment, not as a standard practice. Colorado refers domestic violence victims for needed services. Colorado is meeting the requirements for the federally approved domestic violence waiver.**
- (5) Colorado meets the needs of the refugee population through the Colorado Refugee Assistance Program (CRSP) utilizing Colorado Works funding.**
- (6) Colorado promotes responsible fatherhood through evidence-based responsible parenting and relationship education programs.**
- (7) Colorado offers subsidized employment programs for both custodial and non-custodial parents that are TANF eligible. The Colorado Works Subsidized Employment and Training Program (CW STEP) is one example. The program assists Colorado Works recipients to attain living-wage, permanent jobs through employment opportunities with subsidized wages, including apprenticeships, on-the-job training, transitional jobs, and paid internships.**
- (8) Colorado disregards all wages earned in subsidized employment from eligibility determination and grant calculation pursuant to C.R.S. 26-2-706.9 (9) (d) and C.R.S. 26-2-709 (1) (II).**

**Non-citizens.** Non-citizens, who entered qualified non-citizen status on or after August 22, 1996 and have been in the country for five or more years, are eligible for TANF funds in accordance with Section 402 (b) of the Act. Colorado pays TANF assistance to excepted qualified non-citizens as required by Title IV of PRWORA. Victims of severe forms of trafficking are eligible for federally funded TANF benefits to the same extent as refugees. Counties may assist 1) unexpected qualified aliens who arrived on or after August 22, 1996 and have been in this country less than five years and 2) aliens lawfully present who would be eligible for TANF but for Title IV of PRWORA with segregated State/local funds.

**Refugees.** Refugees are qualified aliens exempt from the five-year bar. Refugees eligible for assistance through Colorado Works submit an application through their county of residence. The State provides its Refugee-TANF (Colorado Works) population assistance and services by utilizing county departments and the Colorado Refugee Services Program. County departments are charged with the responsibility of Colorado Works eligibility determination, and CRSP with case management and service provision responsibilities, which may include workforce development. The model implemented by the State helps ensure all services for refugees are culturally and linguistically appropriate.

Through the assessment process, CRSP determines the most appropriate way to serve refugee families. Consistent with all families accessing Colorado Works benefits, the assessment is used to determine if either a monthly grant or a non-recurrent short term benefit is most appropriate based upon family circumstances.

**Family preservation.** The Family Preservation Program replaced the IV-A Emergency Assistance Program that was administered by the child welfare. This program utilizes segregated federal TANF funds to provide services to families where the child(ren) are at risk of out-of-home placement. These services are designed to ensure that child(ren) can be cared for in their own homes or in the homes of caretaker relatives, and include case planning, case management, counseling, family support programs, intensive family therapy, day treatment, home-based services, non-medical drug and alcohol treatment, and crisis intervention services. Eligibility for Family Preservation is as follows:

- (1) The family income must be under \$75,000 yearly; and,**
- (2) The child must meet out-of-home placement criteria; and,**
- (3) The child lived with a specified relative within the last six months.**

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

**Assessment and Individualized Employment Plans.** All applicants for Colorado Works are assessed no later than 30 days after the application date. The initial assessment focuses on identifying what services and assistance will support the family in achieving economic stability, and are particularly centered on obtaining meaningful employment. All assessments, both initial and ongoing, are individualized and include formal and informal evaluations to determine strengths and challenges to obtaining economic stability, such as recent work history and skills, education level, needs of the assistance unit, and other relevant factors. Counties may utilize specialized assessment tools, such as those for substance abuse or vocational interest, depending upon the circumstances of the family, in order to fully develop a suitable and individualized plan. All plans identify a goal for lasting economic security, and are intended to support not only the process components of work participation and verification, but the attainment of a long-term

outcome or goal. Strategies and accommodations to address challenges are included in the individualized plan developed from the assessment, and roles are clearly delineated. A contract between the work eligible individual(s) in the family and the county agency focuses on each party's responsibilities, and clearly states the terms and conditions of benefit receipt. The specific actions, activities, goals, and supports needed are outlined in the individualized plan. Whether assistance is one-time (diversion) or recurrent (basic cash assistance), a plan is developed and agreed to by both the participant and the county human service department.

Colorado places a strong emphasis on employment as the most likely path to economic stability for families in need of assistance, and as such, works closely with existing agencies at the State and county levels to ensure service integration and innovative practices. This includes partnerships with the State's Division of Vocational Rehabilitation, Workforce Investment Board, Department of Labor and Employment, Department of Higher Education and Community Colleges, and local workforce and education partners.

**Work Eligible Individuals.** Work eligible individuals are identified through logic in the Colorado Benefits Management System (CBMS), which is the State's eligibility and work program tracking system for Colorado Works participants, as well as other public assistance. Colorado does not employ separate state programs under TANF and has executed sanctions since PRWORA was signed into law in 1996. Non-recipient parents are not considered work eligible individuals in Colorado for reasons outlined in the TANF Final Rule, such as non-citizen status and minor parents who are not a head of household. Colorado does not include SSI/SSDI recipients in the work participation rate calculations. CBMS identifies cases where a parent is caring for a disabled family member and should not be categorized as a work eligible individual. County departments are trained and formally advised of the need to document medical verifications in the case file for this purpose. Medical verification will be updated at each redetermination of Colorado Works eligibility, or before, if warranted. A family member for the purpose of this coding is considered to be any person living in the household who is dependent on the work eligible individual(s) for care and receiving financial support.

**C. ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT)**

**Work participation.** All work eligible individuals engage in an individualized plan, and as such, participate in a State or county defined work activity. Exception is made for those with a domestic violence waiver or for single parents with a child under age six for whom childcare is unavailable. Single parents with a child under age one are not exempt, unless specified by county policy.

Failure to engage in the individualized plan components and activities without good cause will result in sanction, as described in the sections of this plan on "sanctions" and "disqualifications". Colorado considers childcare unavailable if childcare is inaccessible, unaffordable, or unsuitable as defined in each county policy. All participants are notified in writing of the criteria for this exemption, how to apply for the exemption, and the effect of this exemption on time limits.

**Work activities, good cause for failure to participate and definition of ready to work.** Colorado utilizes the federally defined work activities as the building blocks of an individualized plan that is outcome-based. Federally defined work activities are considered a means to an end, but not the end itself. As such, Colorado has implemented a statewide Employment Entry performance measure for the Colorado Works program, and provides guidance to counties on how to best utilize work activities to support and promote an employment goal. Per the State's Work Verification Plan (WVP), all federally recognized work activities are used in Colorado, save the provision of childcare for another recipient in community services. Colorado adheres to the federal requirements around work participation and verification, and has consistently met the state's work participation rate since 1996. Please see the WVP for a detailed list of activities, hours, and verification requirements.

Good cause for not engaging in work activities is determined at the county level, in accordance with federal and State guidelines. County departments utilize assessments, interviewing skills, and case management to support families in the goal of self-sufficiency, and determine together with the participant what activities best support their individualized plan. Case management is ongoing, allowing for the adaptation of the individualized plan over time and as circumstances change; Colorado employs a model of the Colorado Works program that is strengths-based and customer-centered. Counties are encouraged to engage program participants in a manner that stabilizes and supports the family, reserving sanctioning as a final resort after conciliation is unsuccessful.

Job ready is defined locally and outlined in county policies; Colorado has found that being ready to work is fluid and looks different family-to-family, and is committed to working with customers where they are at. Counties are encouraged to think about mid- to long-range planning for economic stability, implementing strategies that protect against recidivism because those who are exiting are truly more economically stable and no longer need the support of the program. In this vein, work ready is considered not only the ability to get work tomorrow, but also the ability to maintain and succeed in employment over the long-term.

**Provisions of the Patient Protection and Affordable Care Act (PPACA):**

Other Specialized Training: Colorado assists individuals to train for, seek and maintain employment to provide direct care in a long-term care facility and in other occupations related to elder care determined appropriate by the State for which Colorado identifies an unmet need for service personnel.

**D. TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)**

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**Confidentiality.** All applicant or recipient information is confidential and available only for the purposes of the effective administration of the program and will be made available to federal or State agencies as appropriate. All employees are trained to maintain the confidentiality of information and are notified that failure to do so will result in dismissal. All parties acting on behalf of the county department must be employees or contractual agents. County departments of human/social services contracting for program administration or services are required to include confidentiality requirements in their contracts. County departments of human/social services administering the program are required to include procedures to ensure confidentiality in their policies.

**E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)**

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Colorado has established goals and taken action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and established numerical goals for reducing the illegitimacy ratio. Colorado works with county departments of human/social services and educational and health agencies to reduce the out of wedlock birth rate, with a special emphasis on teenage pregnancies. Specifically, all Colorado residents are eligible to receive services intended to reduce out-of-wedlock pregnancies and/or encourage the formation and maintenance of two-parent families if paid exclusively with federal TANF funds. The federally funded Personal Responsibility Education Program (PREP) intends to decrease teen pregnancies through the implementation of evidence-based comprehensive sexual health education curriculum. The grant requires additional programming to focus on three federally outlined Adult Preparation Subjects: healthy life skills, healthy relationships, and adult/child communication.

**F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES**

EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

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Local law enforcement personnel, representatives of counseling services in the counties, and the education system provide training regarding statutory rape education to males and females alike. Efforts are made to get law enforcement personnel and judicial personnel to impose stricter enforcement of the statutory rape laws.

G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

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(1) *Colorado has policies and procedures to prevent access to assistance through electronic benefit transfer transactions in an automated teller machine or point-of-sale device located in casinos, liquor stores, and retail establishments which provide adult-oriented entertainment.*

(A) *Legislation.* Colorado State Legislature passed a law addressing the Prohibited Uses of Public Assistance Benefit Cards. This law addressed the use of Colorado Works benefits provided to a recipient on a Colorado Quest EBT card account (Section 26-2-104 (2) (a)). The enacted Statute outlines that: Recipients cannot access their EBT cash benefits from an ATM located at licensed gaming establishments; in-state simulcast facilities; commercial bingo facilities; stores that sell firearms; or retail establishments licensed to sell malt, vinous, or spirituous liquors.

(B) *Rule.* Colorado State Regulations have been revised to reflect prohibited locations, and includes increasing penalties when misuse occurs. County departments are required to discuss this information with the recipient during the eligibility interview and when the EBT card is issued.

(C) *Education.*

Participants. Information about establishments where EBT transactions are prohibited is provided to recipients at the eligibility interview and when the recipient requests to receive cash benefits on an EBT card. This information is also posted in County Department Human/Social Service offices. Recipients are also given an informational brochure. This brochure informs recipients:

- Which types of transactions involve no fees or charges;
- Which types of transactions involve fees and/or surcharges; and
- Where they can access or withdraw their cash benefits (POS terminals at retail locations statewide and ATM machines).

The State requires participants to sign a disclaimer upon issuance of the EBT Card indicating they are aware of and understand the usage restrictions.

County Staff. Caseworkers and county administrators have and will continue to receive information about the law through monthly newsletters and meetings. New and existing caseworkers will be consistently trained in providing accurate information to EBT card recipients. Compliance will be monitored during the County Management Evaluations conducted by the State department.

(D) *Monitoring.* Monitoring will consist of running quarterly EBT usage reports to track businesses including marijuana shops allowing this activity. Businesses allowing this activity will be notified that they

are out of compliance with Public Law 112-96, Section 4004 and of the specific steps to take to come into compliance.

Individuals' transactions are also be examined at least quarterly. Individuals who use prohibited ATMs are contacted by the State department and provided information about the appropriate use of EBT cards. Repeated inappropriate usage will result in disabling the card and requiring personal interaction with the county department for additional assessment, education and/or explore access issues.

(E) *Automated Prevention.* Colorado's EBT vendor implemented a new automated prevention strategy July 1, 2014. It flags transactions at prohibited businesses based on goods or services it provides using a "merchant category code." When a client attempts an EBT transaction at a point of sale (POS) device or ATM located in one of these businesses, the transaction will be denied.

***Fraud.*** Colorado reviews information from our benefit payment system, interfaces with other systems, and fraud investigations to limit the amount of fraud and abuse in the program. Questionable cases will be reviewed through a county investigation to certify the accuracy of the information, and determine if the applicant and/or participant committed an Intentional Program Violation (IPV) or fraud. IPV's are processed by the county and are resolved by obtaining a "Waiver of Intentional Program Violation" through an administrative disqualification hearing or through referral for civil or criminal action in a State or federal court. An IPV is committed when an individual makes a false or misleading statement or fails to disclose any action intending to mislead or conceal any eligibility factor on any application or other written communication. Fraud is subject to criminal action and must be proven beyond a reasonable doubt.

Colorado continues to review and implement standards and procedures to enforce program regulations and combat program fraud and abuse. All counties are required to create and comply with their county fraud prevention policy, which includes standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

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Colorado has three options for recipients to receive their cash assistance: Colorado EBT/Quest card, direct deposit into a bank account, and enrolling in the KeyBank branded debit card. Fidelity Information Services (FIS) is the vendor that processes all EBT transactions for Colorado. The EBT/Quest card is the traditional method for recipients to receive their cash assistance. There is not a fee for making cash purchases, including getting cash back through a Point of Sale (POS) device. FIS charges a 32-cent (\$.32) fee for withdrawing money at an ATM; any additional ATM surcharges may apply. The KeyBank debit card requires the recipient to complete an enrollment form to request this option. The KeyBank card provides the recipient more options for accessing cash; including online bill pay, while offering better opportunities for managing their money. The recipient can obtain their cash anywhere MasterCard is accepted. KeyBank does not charge a fee for withdrawing or accessing money at a; KeyBank branch, KeyBank ATM, AllPoint ATM, or POS terminal including cash back and online purchases. There is a \$1.50 ATM processing fee for using a Non-KeyBank or Non-AllPoint ATM; additional ATM surcharges may apply.

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

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Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other States.

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

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Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

K. SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

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ELIGIBILITY CRITERIA

Colorado Revised Statutes set uniform statewide basic eligibility and minimum benefit levels for basic cash assistance based on Aid to Families with Dependent Child(ren) (AFDC) rules that were in effect on July 16, 1996, with the following exceptions:

- (1) Families do not have to include half siblings in the same assistance unit if at least one of the half siblings is receiving child support;
- (2) Two-thirds of a participant's income gets disregarded for ongoing benefit calculation
- (3) Two parents are treated the same as single parent families;
- (4) A family's resources are exempt

Eligibility criteria for cash assistance also include the following:

- (1) Colorado does not impose a family cap;
- (2) Colorado does require the participant to work with child support services, to ensure child(ren) receive financial supports
- (3) Expectant parents that can prove pregnancy are eligible; and
- (4) All work eligible individuals must sign and participate in an individualized plan for employment.

The following persons shall be ineligible for all Colorado Works benefits or services:

- (1) Fugitive or fleeing felons, parole violators, or probation violators;
- (2) Specified caretakers who fail to report, without good cause within normal program reporting requirements, a child(ren) who is expected to be out of the home for longer than forty-five (45) calendar days will be ineligible for assistance for ninety (90) calendar days from the date that it is determined he or she should have reported the expected absence;
- (3) Persons convicted of a drug-related felony on or after July 1, 1997, unless the county department has determined that the person has taken action toward rehabilitation, such as, but not limited to, participation in a drug treatment program;
- (4) Persons participating in a strike;

(5) Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

In addition to the basic cash assistance grant, county departments of human/social services may provide other assistance in the form of additional benefits, services, and incentives to participants above the basic benefit level, as outlined in their county policy.

Dependent child(ren) must live with a specified caretaker; except for child(ren) receiving family preservation services or child(ren) receiving services as outlined in Colorado's approved Title IV-A State Plan in effect as of September 30, 1995. A specified caretaker is a person who exercises responsibility for the child and may or may not be related to that child.

To receive benefits, an assistance unit may consist of the dependent child, siblings of the dependent child, and specified caretaker (such as parents or grandparents etc.). A dependent child is a child under age 18 or between 18 and 19 who is expected to graduate from high school prior to his/her 19th birthday.

Every household receiving TANF assistance is raising a child. There are three primary family types receiving Colorado Works assistance:

- Two parent households or single parent households with at least one child
- Child(ren) living with a relative or caretaker where the child(ren) and the relative or caretaker are also receiving benefits
- Child-only participants are child(ren) living with a relative or caretaker whereby benefits are to support the child(ren), but not the adult(s) in the household

Persons living in the household who are financially responsible for members of the assistance unit, but who are not required to be in the unit, will have their income, minus the employment disregard, deemed available to the family unit. The income disregard at initial application is \$90; once eligibility has been established, 67% of income will be disregarded during the certification period (up to six months). The generous disregard after eligibility has been determined is intended to support a transition to employment for families receiving assistance, allowing access to not only basic cash, but also case management and supportive services that are critical during early attachment to work.

Services are provided to child(ren) in out of home placement or in juvenile justice facilities in accordance with the provisions of the approved Emergency Assistance State Plan in effect on September 30, 1995. Non-monetary services may also be provided to a non-custodial parent according to program rules, as outlined in county policy.

**Appeals. All programs and services under the Colorado Works program are implemented in a fair and equitable manner. This includes ensuring the correct use of any adverse actions towards applicants and participants of Colorado Works whose basic cash assistance benefits have been denied, reduced or discontinued. An applicant and/or participant may appeal such decisions through the appeals process established by CDHS.**

**All disputes and complaints begin at the county level. Participants are informed of their appeal rights at application and when any adverse action is taken on his/her case. Individuals who believe that an agency decision regarding the receipt of benefits or services is incorrect may appeal the adverse action. An applicant or recipient who disagrees with a proposed action has the right to a**

**local level dispute resolution conference, which must be requested prior to the effective date of the proposed action. If the individual does not wish to utilize the local/county conference to resolve the dispute, they may request a State level fair hearing before an Administrative Law Judge. If the individual is dissatisfied with the outcome of the local dispute resolution conference, a State level fair hearing before an Administrative Law Judge can take place if a request is received no later than 90 calendar days after the date the notice of proposed action was mailed by the county department/agency.**

**Judicial review of the final agency decision in the appropriate State district court, after exhausting the administrative appeals rights, may be granted. If the appellant is receiving financial assistance, medical assistance, social services, or basic cash assistance under the Colorado Works Program at any time a conference or hearing is requested, all benefits will continue, pending the outcome of the State level fair hearing and final agency decision, if the request for local conference and or State level fair hearing is made prior to the effective date of the proposed action being appealed or the 10 day period for appealing a county dispute resolution decision to the State department. Continued benefits will be authorized unless the recipient states in writing that the continued benefits are being waived.**

**A Colorado Works participant receiving basic cash assistance will have benefits continued if an appeal is filed timely and in accordance with the rules and regulations established by CDHS. If a recipient requests a local dispute resolution conference or State level fair hearing within the noticing period, financial assistance under the Colorado Works program will continue during the dispute resolution process or State level appeal period until the final agency decision is entered or the recipient voluntarily abandons the appeal or discontinues benefits.**

**Any county employee complaints are heard by the Colorado Department of Labor and Employment.**

**L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—**

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**1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR**

**2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.**

Colorado intends to assist individuals to train for, seek and maintain employment to provide direct care in a long-term care facility and in other occupations related to elder care determined appropriate by the State of Colorado for which Colorado identifies an unmet need for service personnel.

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

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**The Colorado General Assembly annually appropriates TANF funds for State administration, evaluation, computer system maintenance, funding for specific program needs, with the largest portion going towards a county block grant. The total block grant includes local and federal funds for counties to operate the Colorado Works program. The county block grant is then allocated to individual counties through the statutorily authorized Works Allocation Committee (WAC). The committee applies a formula based on economic and demographic factors to derive individual county allocations.**

**Counties have primary programmatic flexibility for implementation of the TANF program, and as such are allowed by State statute and program rule to make fiscal and policy decisions based on the amount of funds available to them each year through the county block grant. CDHS monitors and reports expenditures through the Colorado Financial Management System (CFMS). State auditors (both internal to CDHS as well as external) may audit county operations. Colorado segregates State/local maintenance of efforts (MOE) funds from federal TANF funds to increase program flexibility, and ensures that fiscal constraints related to each funding source are applied accurately.**

**Maintenance of effort. Colorado continues its maintenance of effort based on FFY 1994 expenditures at the level of at least 80 percent unless federal work participation rates are met, in which case Colorado will reduce its MOE expenditures to 75 percent. In order to meet its annual MOE obligation, Colorado may count any qualifying expenditures that are allowed under federal statute and regulation. Qualifying MOE expenditures are any non-federal and otherwise unclaimed expenditure made on behalf of TANF-eligible families with household gross income up to \$75,000 per year. The primary sources of qualifying expenditures include:**

**(1) Colorado Works. This includes expenditures made at the county level on benefits and services as well as program administration costs directly related to the provision of these benefits and services.**

**(2) Emergency Assistance to Families with Child(ren).** This includes case planning services, case management services, counseling, family support programs, intensive family therapy, day treatment, home-based services, non-medical drug and alcohol treatment, or crisis intervention services.

**(3) Child Welfare Services.** This includes expenditures made at the county level on services for TANF eligible families to protect child(ren) from harm or to assist families in caring for their child(ren).

**(4) Colorado Child Care Assistance Program (CCCAP).** This program serves families consisting of caretaker relatives caring for child(ren) up to 225 percent of the federal poverty level through assistance with payments for child care services. Families receiving services are employed, in training, or looking for a job.

**(5) Low-income Energy Assistance Program (LEAP).** LEAP provides benefits and services to TANF-eligible households for help with winter heating costs. Colorado is aware that it may not count toward their TANF MOE requirement any expenditure used to receive Federal LIHEAP Leveraging Incentive Funds.

**(6) Refundable Tax Credits.** The Colorado Earned Income Tax Credit and the Child Care Tax Credit.

**(7) Education Expenditures from the Colorado Preschool Program.** This program provides funding to Colorado schools in an effort to establish quality early childhood education programs, strengthen families, and support them as participants in their child's education. School districts conduct an individualized educational program for the child with family involvement.

**(8) Nurse Home Visitor Program.** This program consists of nurse home visitors who work with women and their families in their homes during pregnancy, and through the first two years of the child's life. The program provides regular visits with new or at-risk mothers to improve parenting skills and child wellbeing and to link mothers to needed social services. This is accomplished through regular home visiting sessions through the child's second birthday.

**(9) Pro-family healthy marriage and responsible fatherhood activities** enumerated in part IV-A of the Act. Colorado is aware that the pro-family MOE spending provision pertains only to the allowable non-assistance healthy marriage and responsible fatherhood activities enumerated in sections 403(a)(2)(A)(iii) and section 403(a)(2)(C)(ii) of the Act, and listed in TANF-ACF-PI-2008-10, e.g., not public education activities.

**(10) Non-profit and private spending.** Colorado receives spending information from non-profits, foundations, and other charitable organizations on TANF

**eligible families. The services provided fall mainly into the categories of family stability, short term housing assistance, educational and youth development activities, job readiness and transportation.**

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#### TANF CERTIFICATIONS

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States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act) Yes

Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under The Unified or Combined State Plan under title XIX. (section 402(a)(3) of the Social Security Act) Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have had at least 45 days to submit comments on the plan and the design of such services Yes

Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act) Yes

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act) Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— refer such individuals to counseling and supportive services; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence Yes

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## TRADE ADJUSTMENT ASSISTANCE (TAA)

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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

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## JOBS FOR VETERANS' STATE GRANTS

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The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

### A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

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#### **The JVSG 5 Year State Plan states:**

Colorado will assign JVSG supported staff to AJCs located within the State Workforce Agencies (SWA) in order to most effectively advance and assure both Priority of Service with regard to all employment and training services, as well as, the prompt referral to appropriately needed supportive services for veteran customers. That is not to say that it is JVSG staff's responsibility to provide Priority of Service, but to provide technical assistance for AJC staff as needed. Of the supported staff, the majority will be placed in the local areas that have the greatest Veteran population. DVOP specialists assigned to their regional AJCs will be allowed to visit the offices of our outreach partners located outside of the AJCs after an approved schedule has been arranged and approved by their Regional Director. The JVSG supported staff may be assigned to locations outside of the AJC such as, but not limited to, the Department of Veteran Affairs (DVA) Vocational Rehabilitation & Employment in Denver and, the Soldier and Family Assistance Office on Fort Carson, and college campuses.

One LVER position will be assigned to the CDLE Headquarters to serve as the State Veterans Coordinator (SVC). With a veteran friendly state as large as Colorado, supporting 6 very active military bases, with 60 American Job Centers and satellite offices and a JVSG program that employees over 35 support staff members, among other duties this position will oversee developing, implementing and monitoring a department Statewide Veterans Employment Program. In partnership with our county and state operated AJCs and other Veteran focused partners, the Coordinator (SVC) will develop this program to improve upon Priority of Service procedures by addressing the strategies by which the workforce system delivers employment services.

Within the AJCs, DVOP specialists will be collocated and aligned within the WIOA divisions. The reasoning behind this decision is to promote; (i) program co-enrollments, (ii) similarities in WIA and JVSG case management practices and (iii) promote the appearance of a seamless application process to Veterans who

apply for training in one or both programs (iii) and most importantly to ensure the demonstration of Priority of Service and Refocusing.

In an effort to continue to meet the employment and training needs of veterans, CDLE recognizes that changes in delivery strategies when targeting Veterans need to respond to the forecasted increase in veterans transitioning out of the military and into the civilian labor force. Outreach to locate veterans with SBEs is a required duty of the DVOP specialist as outlined in VPL 03-14. As such, DVOP specialists conducting outreach will begin assisting eligible veterans first within their assigned AJC and then at the outreach locations they visit or are assigned to. At the outreach locations, Veterans identified as not meeting one of the SBE categories will be provided a point of contact for assistance at the nearest AJC by other AJC staff. The DVOP specialists will conduct outreach activities within various organizations that provide services to Veterans allowing us to identify from within the Veteran population they serve, those who are eligible for DVOP services. The sole purpose of these outreach activities are to identify eligible SBE veterans and other eligible persons who, without the receipt of intensive services, would not be able to obtain employment on their own. State MIS Database and partner organizations that have been identified and approved as effective outreach sources include, but are not limited to:

- Connecting Colorado (State MIS Database)
- AJC Partners (particularly WIA and Wagner Peyser)
- Military Installations...excluding the Transition Assistance Program (TAP)
- Colleges, Universities and Technical Schools
- Homeless Veterans Reintegration Programs (HVRP) and Homeless Shelters
- Vocational Rehabilitation and Employment Programs (VR&E)
- Department of Veteran Affairs Medical Centers and Vet Centers
- Veteran Service Offices (VSO)

**B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE;  
SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS  
OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH  
CURRENT GUIDANCE;**

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**The JVSG 5 Year State Plan states:**

Under this grant Colorado will staff 29 fulltime permanent DVOP specialists and 9 LVER in FY 2016. This staffing arrangement allows intensive services and business engagement to be available in the areas of the state where the largest concentrations of veterans are seeking employment.

The primary duties of DVOPs are to provide intensive service to veterans with significant barriers to employment and any other veteran category identified by the Assistant Secretary. Case management continues to be an appropriate service delivery strategy or framework in which intensive services will be delivered.

The intensive services and the purpose for which they are used by the DVOP specialists are:

- Comprehensive Assessment (CA): Comprehensive and specialized assessments of the skill levels and services which may include diagnostic testing and use of other assessment tools and in depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
- Counseling (CS): A client centered service that may involve personal, financial, life management, case management, career guidance and counseling. This service also includes referrals to other assistance, as well as, arranging for additional support services not previously acquired.
- Individual Employment Plan (IE): A formal written document outlining a course of action that will lead to the individual entering employment; to include short and/or long term goals to remove barriers to getting and keeping employment.

- Pre-Vocational Services (PV): Short-term pre-vocational services such as GED, ESL, remediation and workplace literacy.

The primary duties of LVERs are:

- Conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups;
- Facilitating employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems. Facilitate is defined as capacity building within all programs.
- Working with other service providers in order to promote veterans as highly skilled and experienced members of the workforce;
- Advocating for veterans employment and training opportunities with businesses, industry, and community-based organizations is also a primary duty;
- Conducting outreach that includes, but is not limited to, planning and participating in job fairs, promoting employment and training opportunities for veterans with business organizations, unions, and apprenticeship programs;
- Promoting credentialing and training opportunities for veterans with training providers and licensing agencies;
- Establishing and maintaining regular contact with employers to include federal contractors ;
- Active involvement with the AJC employer or business services/relations team;
- Coordinating the Regional Manager's Report on Services to Veterans using the format found in VPL 07-05. Reasonable attempts are made to include best practices and success stories, special projects, and other LVER and DVOP activities.

#### C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR ONE-STOP DELIVERY SYSTEM PARTNER NETWORK;

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**The JVSG 5 Year State Plan states:**

As a mandatory partner under WIOA, DVOP specialists and LVERs will be fully integrated with the WIA, Wagner-Peyser, and Business Service Representatives. The JVSG staff is under the direct supervision of the state; however, local workforce directors ensure the functions of grant staff are integrated into the One-Stop environment. The State Veterans Program Coordinator provides general oversight and monitoring of Colorado's Veterans Employment and Training Programs and alerts state administrators to any program issues.

The purpose of the integration is to deliver the appropriate services as seamless as possible. Integration also allows other than the JVSG staff to deliver services to veterans on a priority basis. The integration of the JVSG staff support the co-enrollment of eligible veterans into funded programs in order to leverage available training funds to provide skills development for the veterans who meet the program criteria with the purpose of preparing the veteran for in-demand careers. During and after training the one stop delivery system partner network, LVER and DVOP will work together to find and place the veteran in viable employment.

The DVOP specialists will be placed within close proximity of the WIOA case managers in order to promote cross training in the way of case management and program processes and alignment with other service providers of intensive services. The LVERs are placed in close proximity of the Business Service Division in order to promote cohort job driven efforts in the outreach to employers, the planning of employment events and the sharing of labor market information. LVERs are the subject matter experts who will ensure

that training is facilitated in regards to Priority of Service, preparing veterans for a civilian career and program policies. LVERs will also make themselves available to assist those who may have a question in regards to connecting to other veteran resources located outside of the State's employment service delivery system or one-stop delivery system partner network.

**D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;**

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**The JVSG 5 Year State Plan states**

The program provides an award and recognition system authorized by Colorado Veterans Employment and Training Program in accordance with 38 U.S.C. Chapter 41 and 42 and by direction of Veterans Program Letter (VPL) 02-07. The program is designed to recognize contributions to the objectives of VPL 02-07 through excellence in performance and service to veterans. The program will be funded by 1% of the JVSG grant.

Eligible recipients of Incentive Awards are as follows: Disabled Veterans' Outreach Program Specialists (DVOPs), Local Veterans Employment Representatives (LVERs) staff, employment service offices operating under WIOA and WIOA partner programs, and any employee of an office that provides services to veterans through employment service delivery programs, including employees who indirectly contribute to improving services to veterans such (i.e. business services, MIS, admin, support staff, etc.). Recipients of Performance Incentive Awards can be individuals, a team, or an office that meets the eligibility criteria. Ineligible recipients include volunteers, VA work studies and federal employees.

These awards recognize eligible recipients for excellence in the provision of services or for making demonstrable improvements in the provision of services to veterans through the American Job Center System. The selection criteria for award recipients will be based on performance or activities that impact the services offered to veterans during the program year for which the award is given using both objective and subjective information. Examples of such information may include but is not limited to; attitude, motivation, program improvement, positive feedback and other competency indicators of performance and outreach in the areas of entered employment rates, Priority of Service in referrals of triage processes, or best practices.

The Colorado Department of Labor and Employment administers the funds for the Incentive Awards Program. Recipients will be recognized with Distinguished or Spot Awards that may be monetary or non-monetary. Spot Awards will be valued at or less than \$250 per award. Distinguished Awards will be valued at or greater than \$100 and no more than \$3000 per award and may be presented to individuals, groups or offices. Non-monetary awards will consist of awards, such as but not limited to, tickets to sports and entertainment events, gift cards, conference fees, ceremonies, luncheons, travel, and others awards as allowable in VPL 02-07. The type, amount, manner of distribution and specifics for Spot or Distinguished Awards will be determined by an incentive awards committee. The committee members will be determined by CDLE leadership and may consist of any combination of representation from the Colorado Veterans Employment Program, CDLE, American Job Center System, and/or WIOA partner programs.

All awards will be based on performance or activities that occurred during the program year for which the award is given. The intent is to present the awards before or during the last quarter of the fiscal year. In accordance with VPL 02-07, incentive award funds will be obligated by September 30 each FY and expended by the following December 31. A report of the obligated funds will be provided with the fourth quarter report and a report of the expended funds will be provided with the first quarter of the following fiscal year.

**E. THE POPULATIONS OF VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR**

SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS;  
VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

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**The JVSG 5 Year State Plan states:**

The primary role of the DVOP specialists is to provide intensive services to Veterans who, after being properly triaged and assessed by either Wagner Peyser or WIA staff, are identified as “eligible veterans and eligible persons.” In order to best serve eligible Veterans effectively and efficiently and to better target their services, the DVOP specialists will deliver these services utilizing a case management approach and will limit their services to eligible veterans and eligible persons who meet the definition of an individual with a Significant Barrier to Employment (SBE), specifically defined in VPL 03-14 including Change 1 and 2, 04-14, and 08-14. Veterans categorized as having a SBE are:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those:
  - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
  - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36)).
- Veterans between the ages of 18-24 years old;
- \*Transitioning Service Members who participated in TAP and are in need of intensive services;
- \*Wounded warriors assigned to a wounded warrior transition unit or the care-giver of a wounded warrior.

\*Per VPL 01-14, services to these additional populations is contingent upon an authorized extension past FY14 (December 31, 2014).

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF  
SERVICE TO COVERED PERSONS;

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**The JVSG 5 Year State Plan states:**

**Priority of Service:** Since the enactment of the Jobs for Veterans Act in 2002, Priority of Service has been established in the State of Colorado under policy guidance issued by the Colorado Department of Labor and Employment. Priority of Service, as required by 38 U.S.C § 4215 and 20 C.F.R. 1001 and 1010, is provided to ensure veterans and covered persons receive consideration for all opportunities, for which they qualify, funded in whole or part by the United States Department of Labor. After receipt of state policy, local AJC’s are required to develop internal veterans’ Priority of Service policies and procedures and implementing them after review and approval by the State Veterans Program Coordinator. Each year they are required to submit their local policy to the State Coordinator for review, particularly when changes have been made. The Priority of Service regulations require that local AJC’s implement policies and procedures that:

- Identify veterans and eligible spouses at point of entry (physical locations, web sites, and other virtual service delivery resources);
- Advise veterans and eligible spouse of their entitlement to Priority of Service;
- Make veterans and eligible spouses aware of the full array of employment, training and placement services available; and
- Identify applicable eligibility requirements for programs and services.
- Veterans and covered person are identified and made aware of their entitlement for Priority of Service at the point of entry into Colorado's workforce system.

Services are made available and provided to eligible veterans transitioning service members, chapter 31 veterans, Native American veterans, and other groups targeted for special consideration like SBE veterans on a priority basis.

If "entry" is made via Colorado Department of Labor and Employment website under "Veteran Services", Veterans are made aware of their entitlement to Priority of Service. This information advises the veteran or covered person of their entitlement to Priority of Service, and provides a web link that advises the covered persons of the full array of employment, training, and placement services available under Priority of Service. If a veteran or covered person is making "entry" via our Connecting Colorado statewide database they are made aware of their entitlement to Priority of Service through information on the registration page as well as at the end of the registration process. Additionally, veterans or covered persons who enter our workforce system via a local workforce center office are made aware of their entitlement to Priority of Service by signage posted in the local office. The signage advises veterans of their entitlement for Priority of Service and directs them to speak with workforce center staff regarding their eligibility for Priority of Service and the eligibility requirements for a particular program or service.

**Priority of Service in Programs:** AJCs that operate programs which deliver services to the public as a whole without targeting specific groups, veterans and eligible spouses will receive Priority of Service over all other program participants. The primary universal access services are the "core" services delivered through the AJC staff under the Wagner-Peyser and WIA programs. Veterans and eligible spouses receive the first level of priority in universal access programs.

**1.** Some programs are required by law to provide a priority for a particular group of individuals or require the program to spend a certain portion of program funds on a particular group of persons. For programs with this type of statutory priority, AJC program operators will determine the status of each individual veteran or eligible spouse and apply Priority of Service as described below:

- Veterans and eligible spouses who meet the mandatory priorities and program eligibility must receive the highest level of priority for the program or service;
- Non-covered persons who meet the program's mandatory priorities and program eligibility then receive the second level of priority for the program or service;
- Veterans and eligible spouses who do not meet the program-specific mandatory priority or spending requirement or limitation then receive the third level of priority for the program or service;
- Non-covered persons outside the program-specific mandatory priority or spending requirement or limitation then receive the fourth level of priority for the program or service.

**2.** Some qualified job training programs may include a focus on a particular group or make efforts to provide a certain level of service to a particular group without the authorizing law specifically mandating that the target group be served before other eligible individuals. For this type of discretionary focus, Priority of Service will be applied as described below:

- Veterans and eligible spouses who meet program eligibility and target population;

- Veterans who meet program eligibility but not target population;
- Non-covered persons who meet program eligibility and target population;
- Non-covered persons who meet program eligibility but not target population.

3. State policy requires that all AJC's establish policy on recruitment, intake and enrollment of Veterans within programs offered, to ensure that veterans are notified, reviewed, and enrolled before non-veterans. In incidences where it has been noted that the veterans who have applied for but not completed the registration and/or enrollment requirements within a program, AJC staff is required to outreach to the veterans encouraging them to complete the process. Their outreach efforts must be documented before the application and/or enrollment is closed. Documentation must show that various means were used to outreach to the veterans.

**Priority of Service in Employment Opportunities:** When job orders are entered into the state's automated database, Connecting Colorado, whether manually or virtually, they are placed in a 4 hour "vet hold" status. This allows only Veterans who have all required skills and who meet all required qualifications to be identified and contacted as suitable candidates before being released for review by non-veterans. The veterans are contacted about this job opportunity using our Integrated Voice Response (IVR) system which automatically e-mails all qualified veterans first and relays the information about the job opportunity and how to apply for the position. After each IVR email, a note is automatically entered into the applicant's record with information about the job posting. This noted information allows the JVSG supported staff and AJC staff to assist the Veterans if and when the Veterans call in regards to the job posting(s).

1. When the automated email generated by the IVR fails to reach the targeted Veteran due to a bad email address, a non-delivered notice is posted within the system. In the demonstration of providing Priority of Service, state policy requires that an attempt to contact the Veteran by phone and post card is required. These additional attempts to contact the veteran are the responsibility of the AJC staff - not JVSG staff.

2. When a job order is placed in Connecting Colorado system, a list of qualified veterans can be generated and viewed by the posting Employer, JVSG and/or, AJC staff. This generated list places all Veterans, beginning with Special disabled, disabled and then all other veterans, ahead of qualified non-veterans in accordance with 20 CFR Part 1001. When the automated applicant list is generated and AJC staff notices that the generated list contains little to no qualified veterans, they will conduct a manual search as a demonstration of Priority of Service. This manual applicant search acts as a safe guard to ensure that qualified veterans, even if there is one, is given priority within job search services.

The demonstration of Priority of Service is the responsibility of AJC staff. It is also the responsibility of the state and county leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative, CDLE Monitors, State Veterans Program Coordinator and Assistant Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND ONE-STOP DELIVERY SYSTEM PARTNER STAFF:

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1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

Colorado Department of Labor and Employment (CDLE) Jobs for Veterans State Grant (JVSG) supported staff is assigned to the local area workforce centers in order to most effectively assure receipt of all employment and training services and the prompt referral to appropriately needed job and job training individualized career services for veteran customers and their eligible spouses. The placement of the JVSG supported staff is determined by CDLE based on veteran population in accordance with the JVSG State plan.

Within the local workforce centers the Disabled Veteran Outreach Program specialists are co-located and aligned with the WIOA divisions. The reasoning behind this decision is to promote; (i) program co-enrollments, (ii) cross training between the WIOA and DVOP case managers and case management practices and (iii) promote the appearance of a seamless application process to Veterans who apply for training in one or both programs. For training enrollment, the DVOP specialists follow the workforce center's enrollment protocol and works very closely with the WIOA case managers during the co-enrollment process. The tools in which we measure the services provided include but not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- CDLE Regional Director meetings

2. EMPLOYMENT PLACEMENT SERVICES, AND

Local Veteran Employment Representatives (LVER) work with employers to expand opportunities and build capacity for all veterans utilizing the workforce system. In addition, LVER's work closely with Disabled Veteran Outreach Program (DVOP) specialists, WIOA case managers and Wagner Peyser staff to ensure that veterans deemed job ready are connected to employment opportunities through their own personal network of businesses and of those located within the states labor exchange Connecting Colorado, LVER's are co-located and aligned with the workforce center Business Service Division Team. By doing so this provides the LVER the opportunity to work with the Business Service Representatives and to participate in the planning and implementation of any employer focused initiative in which all veterans and eligible spouses may benefit from. The LVER and DVOP specialists meet at a minimum of once a month to review and discuss the SBE veterans in their case load, The tools in which we measure the services provided include but not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

- CDLE Regional Directors meeting

### 3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

The JVSG and workforce center staff participate in state and local area training sessions and initiatives centered around sectors and career pathways. JVSG and workforce center staff utilizes local labor market information as a tool when eligible veterans and persons are making job-driven training decisions. Before, Through the complete training process, the DVOP specialists, WIOA and Wagner Peyser staff will work in conjunction with the LVER and business service team to assist eligible veterans and persons to identify employment opportunities through the state labor exchange Connecting Colorado. The tools in which we measure the services provided include but not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- CDLE Regional Directors meeting

### H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

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#### **The JVSG 5 Year State Plan states:**

The steps below indicate how the state will expeditiously fill vacancies or keep grant-funded positions filled despite State budget problems, hiring freezes, and or potential furloughs. The announcement of DVOP or LVER openings is published online at the State Classified job website. When the announcement is published, all qualified applicants may apply. Email lists developed by DVOPs and LVERs are used to broadcast the announcements to veterans.

**1.** When a LVER vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated with a DD214 and letter from the Department of Veterans' Affairs to qualify for the position. These requirements apply to all applicants whether internal or external. If no qualified veteran can be found, then a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran cannot work more than six months in a LVER position after which time the LVER vacancy will be re-announced to recruit qualified veterans.

**2.** When a DVOP vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated by a DD214 and letter from the Department of Veterans' Affairs regarding the existence of a service connected disability. These requirements are for all applicants from internal or external sources. If no qualified disabled veteran can be found, then a veteran without a disability can fill the position. If neither a qualified disabled veteran nor qualified veteran can be found, a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran cannot work more than six months in a DVOP position after which time the DVOP vacancy will be re-announced to recruit qualified veterans.

Both DVOP and LVER are required to attend the National Veteran Training Institute (NVTI) for to receive specialized training unique to their roles and responsibilities. This training must be accomplished within 18 months from their hire dates. The State Veterans Coordinator Assistance maintain the below table so that the state can track the hire dates along with the mandatory training dates for all DVOp specialists and LVER staff.

JVSG funded staff	Position	Date Assigned Current Position	Mandatory training completion date	LES/FVE	CM/IS	PPE/EO	Complete Y/N
<b>Alred, Dave</b>	DVOP	6/1/10	12/1/11	10/17/00	12/4/01	5/19/15	YES
<b>Amthor, Tim</b>	LVER	6/1/11	11/30/12	9/30/03	3/3/15	4/10/12	YES
<b>Bangert, Martin</b>	DVOP	10/4/14	4/4/16	9/1/15	3/3/15	N/A	YES
<b>Broker, Matthew</b>	LVER	1/11/16	7/12/17	9/1/15	3/3/15	<b>NO</b>	
<b>Bryce, Monica</b>	DVOP	10/1/12	4/2/14	2/8/05	5/17/05	3/6/12	YES
<b>Chavez, Ben</b>	DVOP	9/1/04	3/3/06	11/16/04	1/25/05	N/A	YES
<b>Columna, Vince</b>	DVOP	7/13/98	1/12/00	10/5/99	7/20/98	N/A	YES
<b>Duplikhin, Alexey</b>	DVOP	6/10/13	12/10/14	6/6/14	12/6/13	N/A	YES
<b>Fisk, Carol</b>	DVOP	6/5/07	12/4/08	8/14/07	1/29/08	4/7/15	YES
<b>Ford, Antonio</b>	DVOP	3/16/09	9/15/10	10/20/09	1/26/10	2/2/10	YES
<b>Ford, Kathy</b>	LVER	6/1/11	11/30/12	2/1/05	8/23/05	10/26/07	YES
<b>Foster, Micah</b>	DVOP	8/24/15	2/22/17	3/8/16	5/3/16	N/A	YES
<b>Garcia, Alfredo</b>	DVOP	5/18/15	11/16/16	9/1/15	10/27/15	N/A	YES
Garner, Leniel	DVOP	3/1/16	8/31/17	N/A	<b>NO</b>		
<b>Hall, Bethany</b>	LVER	4/1/13	10/1/14	3/27/07	4/7/15	11/18/08	YES
<b>Hendricks, Bert</b>	LVER	6/1/11	11/30/12	5/16/06	4/7/15	9/19/06	YES
<b>Kroese, Kent</b>	DVOP	12/31/09	7/2/11	1/30/07	7/24/07	N/A	YES
<b>Lindell, Sharon</b>	DVOP	10/1/12	4/2/14	3/20/07	4/16/13	N/A	YES
<b>Marquart, Tim</b>	DVOP	2/1/12	8/2/13	6/12/12	11/27/12	N/A	YES
<b>Medina, Anthony</b>	DVOP	10/1/12	4/2/14	10/4/05	3/21/06	N/A	YES
<b>Norway, Sarah</b>	DVOP	8/3/15	2/1/17	9/1/15	1/12/16	N/A	YES
<b>Parks, Dawanta</b>	DVOP	5/1/12	10/31/13	10/30/12	11/27/12	N/A	YES
<b>Perry, Christopher</b>	DVOP	8/3/15	2/1/17	9/1/15	1/12/16	N/A	YES
<b>Rivas, Toby</b>	DVOP	10/4/14	4/4/16	3/17/15	3/3/15	N/A	YES
<b>Savage, Daniel</b>	DVOP	5/18/15	11/16/16	9/1/15	1/12/16	N/A	YES

JVSG funded staff	Position	Date Assigned Current Position	Mandatory training completion date	LES/FVE	CM/IS	PPE/EO	Complete Y/N
<b>Schneider, Colin State Coordinator</b>	LVER	3/1/13	8/31/14	6/12/12	3/3/15	4/9/13	YES
Simmons, Mark	DVOP	3/1/16	8/31/17	N/A	<b>NO</b>		
<b>Spindler, William</b>	DVOP	7/1/10	12/31/11	3/6/12	3/22/11	N/A	YES
<b>Thompson, Shelly</b>	LVER	6/18/12	12/18/13	9/18/12	3/17/15	8/21/12	YES
<b>Tillman, Johnathan Asst. Coord</b>	LVER	1/5/15	7/6/16	1/8/15	3/17/15	5/19/15	YES
<b>Westbrook, Joseph</b>	DVOP	8/3/15	2/1/17	3/19/13	1/29/13	N/A	YES

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

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.)

As members of the Baby Boom generation continue to retire and leave the workforce there will be fewer people able to fill the current job openings in Colorado. This will create opportunities for older workers in the workforce. Specifically, businesses are recognizing the value of older workers and the cost savings that can be attributed to employing people with many years of work experience.

Colorado's diverse economic base and recent employment turnaround indicate positive prospects for a variety of industry sectors that require the expertise and experience that older workers can provide. Throughout the country, demand for education and healthcare services workers will continue to grow. Teachers and healthcare workers of all levels are needed to meet this demand. Specifically, Colorado's scenic attractions, numerous gaming facilities, and Denver's status as a destination location will increase employment in the tourism, hospitality, and transportation industries. Additionally, professional, scientific, and technical services employment will continue to increase in both the short and long term. Opportunities for computer software engineers, accountants and auditors, and executive and administrative support positions for these occupations are increasing as well. Highly skilled construction workers such as carpenters, electricians, plumbers, and construction managers are needed to meet the continuing demand for building activity, particularly as a result of recent wildfires and floods in the state.

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))

Community service assignments for SCSEP participants are carefully selected to train them for unsubsidized employment in areas where local employers have identified unmet needs. With regional economic trends as a broad roadmap, knowledge of the needs of community employer partners is critical to the proven success of our employer-based philosophy. By matching employer needs to the tested and validated skills of SCSEP participants, efforts focus on both employers and participants in areas that meet the needs of both.

Computer training, which is a key means for increasing the job preparedness of participants, will continue to be provided to participants at local project sites as part of community service assignments in Colorado's Host Agencies. Training takes place at Workforce Centers (WFCs), local community colleges, and through community agencies.

According to the Colorado Department of Labor and Employment, until Colorado's citizens are educated to a level that maximizes their potential, gaps will exist across every skill set through the next several years. Reading comprehension ranks highest at most education levels as a skill facing critical shortages. In fact, there is a significant skill gap for many skills associated with communication across all education levels. Other skills that show up high on the list of those facing possible shortage for every education level include: critical thinking, troubleshooting, and judgment and decision making abilities. Skill gaps are identified using the Skills Based Employment Projections System, a tool provided by the Projections Managing Partners. Ongoing, each SCSEP participant must participate in services at the local Workforce Center in the county where the participant works to attend classes that enhance/upgrade their skills.

The WFCs use individualized assessments and tests to ensure participant training is customized to the participants' skills and abilities. Within the WFCs there are defined categories that have a career ladder and list of similar jobs, job levels, and next steps.

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))

**CO Statewide Occupations with the Highest Projected Openings 2010-2020**

**SOC Title Training and Education Required**

41-2031 Retail Salespersons Short-term on-the-job training

35-3031 Waiters and Waitresses Short-term on-the-job training

41-2011 Cashiers Short-term on-the-job training

29-1111 Registered Nurses Associate degree

35-3021 Combined Food Prep & Serving Short-term on-the-job training

43-4051 Customer Service Representatives Moderate-term on-the-job training

13-1199 Business Operations Specialists Bachelor's degree

11-1021 General and Operations Managers Bachelor's or higher degree, plus work experience

13-2011 Accountants and Auditors Bachelor's degree

25-2021 Elementary School Teachers Bachelor's degree

## **CO Vocational Training Occupations with the Highest Projected Number of Openings 2010-2020**

### **SOC Title**

31-1012 Nursing Aides, Orderlies, and Attendants

29-2061 Licensed Practical and Licensed Vocational Nurses

49-3023 Automotive Service Technicians and Mechanics

41-3021 Insurance Sales Agents

39-9031 Fitness Trainers and Aerobics Instructors

25-2011 Preschool Teachers, Except Special Education

39-5012 Hairdressers, Hairstylists, and Cosmetologists

41-9022 Real Estate Sales Agents

25-4031 Library Technicians

49-9021 Heating, Air Conditioning, and Refrigeration Mechanics and Installers

## **CO Other Occupations with the Highest Projected Number of Openings 2010-2020**

### **SOC Title**

41-2031 Retail Salespersons

35-3031 Waiters and Waitresses

41-2011 Cashiers

35-3021 Combined Food Preparation and Serving Workers, Including Fast Food

43-4051 Customer Service Representatives

43-5081 Stock Clerks and Order Fillers

43-6014 Secretaries, Except Legal, Medical, and Executive

37-2011 Janitors and Cleaners, Except Maids and Housekeeping Cleaners

41-4012 Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products

43-6011 Executive Secretaries and Administrative Assistants

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### **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 GRANTEEES 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))**

Colorado's SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers, by utilizing WFC staff to assist

in creating opportunities for participants of SCSEP. In addition to providing more opportunities to place participants, Colorado has a cadre of community recruiters who regularly send applicants to SCSEP host agency sites, leveraging the efforts of SCSEP project directors. This gives SCSEP project directors unique recruitment opportunities in their local communities. Project directors are called upon to speak to local business leaders as part of the larger public/private partnership. Project directors will assist the local WFC to implement the "Protocol for Older Workers." Colorado will continue to send SCSEP participants to staff the WFC locations and collaborate with other WFC partners such as Veteran Services, Wagner-Peyser, and Vocational Rehabilitation to maximize participant referrals.

To enhance services to SCSEP participants, Colorado has added the Career Edge System™ to the e-Colorado portal. The Career Edge System™ is an audio and written comprehensive career exploration program available online to career, adult education, and employment centers. This program is at a simplified reading level, includes a completed varied-voice audio component, and is available in English and Spanish. The voices are varied to maintain the interest of nonreaders. The program ties in all components a person needs to make an informed and intelligent career selection. In three steps, a person who has limited English proficiency (LEP) can find appropriate occupations, consider accessible education and training options, search for jobs by location, learn to read career-oriented information, and work systematically toward employment goals. This system benefits both the LEP customer and the SCSEP staff in accessing services.

The participants of SCSEP come to the program with highly developed soft skills, such as loyalty, strong work ethic, dependability, and honesty. However, many participants may need additional training on current technical and operational skills.

The SCSEP Administrator works closely with all SCSEP providers in the State to identify and coordinate training opportunities. The WFCs play a pivotal role in training the participants. In the rural areas there is a great cooperative effort with all of the agencies and often there is free training in the region through the libraries and non-profit sector.

#### **B. ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))**

SCSEP participants have access to a wide array of programs and services. SCSEP programs are encouraged to establish strong linkages with the county department(s) of human services within their region. The program engages these departments as workforce partners to assist low-income individuals, including recipients of public assistance. However, the degree and nature of the relationship will ultimately be determined by the local elected officials and department directors in each county. Regions are encouraged to use the Work Opportunity Tax Credit (WOTC) program as hiring incentives to encourage employers to hire disadvantaged job seekers. Additionally, SCSEP participants 60 and older have the opportunity to participate in the services available through their local Area Agency on Aging (AAA) such as administrative assistants, food service, and environmental services. Colorado's SCSEP participants are placed in community service agencies that include schools, health care, housing, workforce services, recreation, environmental quality, public works, and social services agencies. Likewise, essential and necessary community services are provided to the participants of SCSEP. The following is a list of services that are available to Colorado SCSEP participants:

1. Education/ESL/Tutoring/Libraries
2. Health Care/Hospitals
3. Recreation/Parks/Agriculture
4. Social Services/Welfare/Local Government
5. Economic Development/Counseling/Tax Service

6. Recreation/Senior Center Operations

7. Housing

8. Nutrition Programs

9. Transportation

10. Homemaker Services

11. Caregiver Services

12. Material Aide

13. Legal Assistance

14. Other Counseling Services

Many of the SCSEP participants placed in community programs provide services for the elderly. There is a significant need among agencies that provide various services to the elderly for trained workers. Increased placement and training expenditures per individual in these types of agencies would benefit senior service providers (e.g. adult day care, nutrition programs, and independent living centers), SCSEP participants, and SCSEP contractors. Ongoing training and the development of targeted services for older workers must continue in order to give SCSEP participants a competitive edge.

The SCSEP Administrator incorporates language in Requests for Proposals (RFP) to ensure services are provided to older adults in poverty. A sample of language commonly used in contracts is "in the delivery of services under this contract (provider) agrees to give preference and priority to older adults who meet the following criteria: are of a minority status or have a language barrier; are of low income; are homebound; live in a particularly remote area; and live alone or are frail due to health condition or disability." The State ensures that preference will be given to providing services that meet the target criteria through these efforts. Participants of SCSEP that qualify for the services provided through the Older Americans Act will be directed to agencies that provide those services.

**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))**

Commitment to full access of services for persons with disabilities is mirrored at the State level. The Colorado Department of Labor and Employment (CDLE) and Colorado SCSEP have a long-standing interagency agreement with the Division of Vocational Rehabilitation (DVR) and work closely with DVR on projects such as planning, job development and placement, training, WOTC, and job fairs targeting persons with disabilities. CDLE is a member of the Interagency Consortium and Stakeholders Policy Forum created as a result of Project WIN (Workforce Incentive Network), a multi-year systems change project to identify and develop strategies to remove barriers to employment for persons with disabilities. Several WFCs are involved in Project WIN's "consumer navigator" project.

Colorado abides by, and follows, the Charitable Choice philosophy. The provision in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) enacted in 1996, and its later revisions, allows the opportunity to contract and work directly with faith-based and community-based organizations. Additionally, it allows these organizations to work with workforce clients who are in need of services.

Over the past four years, Colorado has actively participated in the identification, recruitment, education, and training of faith-based and community-based organizations in order to build better partnerships with

WFCs. Thus far, Colorado has been successful using Charitable Choice to partner with faith-based and community-based organizations in helping to serve Colorado's workforce clients.

Colorado State sub-grantees maximize WFCs' ability to serve SCSEP clients, as well as expand and enhance services by utilizing websites that provide comprehensive tools for FBOs/CBOs. The WFCs have assembled a list of service providers in Colorado in the form of an on-line catalogue. The catalogue has the capacity to search for 50 specific services by region and provider, and currently contains over 800 providers.

#### D. ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

A demand-driven SCSEP is made up of the public and private sector policies and programs that help people acquire the knowledge and skills needed to earn a living. This model includes policies and programs that help employers get and maintain a skilled workforce. Unlike separate programs operating in an uncoordinated and static manner, Colorado's SCSEP demand-driven workforce is flexible and able to adapt quickly to changing economic conditions. The demand-driven model is characterized by ongoing communication and continual feedback among employers, workers, educators, and governmental agencies.

Labor Market Information's LMI Gateway is an online resource intended to meet informational needs of both the employer and employee community. The (<http://www.colmigateway.com/>) contains an extensive amount of readily accessible labor market data as well as provides job search capabilities for SCSEP participants. The following is a list of additional key components that support SCSEP:

1. Strategies and incentives that support sustained public and private sector investment in skills development.
2. Strategic linkages among employers, union, educators, governmental, non-governmental organizations, and individual citizens in the labor market to promote system responsiveness to economic needs, and results-based accountability.
3. Labor market information, job placement, employment retention and work support services that increase access to employment and meet the needs of workers and employers, the system's dual customers.
4. Target marketing to new businesses and high-growth industries using direct mail and follow-up telephone calls to introduce customers to available program and services; maintain active membership and participation in local business organizations such as local Chambers of Commerce, economic development groups, and human resource manager groups; conduct business forums at the local level to market local employment and training services and brief attendees on labor market information; and conduct job fairs and on-site recruitment to assist small business high-growth industries, and targeted populations.

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

A major goal of SCSEP is to ensure opportunities for placement for the maximum number of eligible individuals. Therefore, each project sponsor uses every reasonable means to place SCSEP enrollees into unsubsidized employment. The goal established by the U.S. Department of Labor is to place 33 percent of all authorized positions into unsubsidized employment during the program year.

Some SCSEP projects have higher goals. Unsubsidized employment is officially defined as:

"Employment in the public or private sector where the former SCSEP participant is not a participant in a federally funded employment and training program. Placements in programs operated by VISTA (now Americorps) shall not be counted as unsubsidized unless they are in non-volunteer positions."

Each project sponsor is encouraged to contact private and public employers directly in an effort to identify and develop suitable unsubsidized employment opportunities for enrollees. Sponsors should also encourage host agencies to employ enrollees. All enrollees must understand their obligation to demonstrate initiative in seeking unsubsidized employment whenever possible. As part of the effort to find unsubsidized placement, enrollees should be strongly encouraged to register as a job seeker with the appropriate local Workforce Center, as well as public sector employers.

Every reasonable means are employed by the sponsor staff to assist enrollees with job search activities including the following strategies:

1. Seek assistance at One-Stop Centers;
2. Seek assistance from local, state and federal employment agencies;
3. Seek assistance from other local agencies;
4. Prevail upon host agencies to accept qualified enrollees into their regular work force;
5. Maintain a liaison with other SCSEP sponsors and state agencies to identify job openings or training opportunities;
6. Identify and seek the assistance of for-profit and non-profit organizations concerned with employment and services for seniors; and
7. Consistently remind enrollees of their responsibility to seek and accept unsubsidized employment.

Some techniques that SCSEP project staff have found useful for increasing unsubsidized employment are:

1. Using motivational techniques with enrollees;
2. Using public relations effectively;
3. Organizing and operating a job club;
4. Training and using a job developer;
5. Training enrollees in job search techniques;
6. Providing training to increase enrollee's skills.
7. Rotating enrollees;
8. Keeping job search records; and
9. Asking host agencies to hire enrollees and move enrollees to another site if they are not considered for job opening.

**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)**

Prior to enrolling in SCSEP, potential SCSEP participants must enroll with a WFC in the county they reside. Participants will attend WFC classes that enhance/upgrade their skills. Each enrollee looks for a minimum of six jobs a month, and goes on job interviews when a job developer has a possible job opening for the participant's particular skill set. The participant must work with the job developer to set an interview. The classes and job search will continue until a job is secured.

**F. EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.**

There are six economic development offices in rural Colorado, specifically under the department of agriculture, in Alamosa; Cortez; Craig; Delta; Las Animas; and Wray. The State SCSEP managers will contact the offices within their respective regions to develop a plan that will maximize the employment and training opportunities for participants in rural Colorado. There may be an opportunity for the offices to become host agencies. As a host agency the office may have an opportunity to increase program visibility in rural Colorado through the assistance of SCSEP participants.

**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.)**

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

State leadership makes efforts to create new ways of engaging business through collaborative public/private partnerships that utilize technology to resolve critical labor market shortages and deficiencies. State workforce and labor market professionals must work with business to identify the additional skill sets needed in the future and to identify the foundational skills needed to acquire those skills. Additionally, there is a critical need for industry, workforce, and economic development organizations to work together to strengthen the ability and responsiveness of higher education to develop training that meets real time needs of high growth/high demand industries. Finally, there is a need to continue the development of a comprehensive demand-driven system that will provide all Coloradans the opportunity to engage in productive work.

Training a project job developer can increase SCSEP project's unsubsidized placement rates. Some activities for job developers are:

1. Accessing local labor market information - Using Workforce Centers, regional community colleges, the chamber of commerce, labor unions, etc.;
2. Setting up job banks - Obtaining listings from Workforce Centers, Connecting Colorado (the state's on-line job bank), and local newspapers;
3. Participating in job clubs; Assisting job club leader in job search activities;
4. Developing systems to inform enrollees of job openings - Putting notices in with pay checks, call enrollees at host agencies, request enrollees to come into the project office for face-to-face discussions; and
5. Contacting local employers.

SCSEP staff make use of the Labor Market Information (LMI), which is an important feature of the One-Stop Career Center System. Through America's Labor Market Information System (ALMIS), job seekers will have access to a database containing information about over ten million employers throughout the country.

**3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))**

In Colorado there was no significant change in service to minorities in program year 2014. Colorado SCSEP will continue to initiate strategies that encourage minority populations to participate. The sub-grantees recruit minority individuals to the program through a variety of methods and resources. Posters, brochures, and flyers are placed in strategic locations throughout communities specifically to encourage people to consider SCSEP when seeking employment. The program materials and interpreting services are available in Spanish and English. The sub-grantees promote SCSEP where people congregate, such as Social Service agencies, government offices, libraries, senior centers, low-income housing projects, faith based

organizations, service/cultural organizations, grocery stores, and medical facilities. Social Service agencies and medical clinics in the counties have referred people who are in need, specifically minority populations and people with disabilities. Advertisements are placed in the local newspapers to market the program, provide eligibility requirements, identify benefits, and promote the emphasis on recruiting minority populations and persons with disabilities.

The State SCSEP program partners with several workforce centers that serve minority populations. The Older Workers Specialist at the workforce center provides information and assistance to the enrollees of the workforce center, focusing on the programs that serve the elderly populations, minorities, and people with disabilities. The Otero County workforce center has been very successful in recruiting minority participants for SCSEP.

A barrier to recruiting minorities may be program partners' lack of understanding of cultural differences. An example of this is the Hispanic population and the strong family bonds or hierarchy. The female elder of the home may stay home to care for the grandchildren, while the children's parents go to work. There may be a need for more income; however, the senior may not be accustomed to working outside of the home when children need care.

In addition, occasionally there are barriers to communication when interpreters are not readily available or if there are dialects that the SCSEP managers are not familiar with. To address these barriers the sub-grantees must be familiar with the different cultures. The State hosts a quarterly meeting of the Older Workers Task Force. This task force is very diverse and is comprised of the State sub-grantees, national grantees, SCSEP participants, private industry representatives, Colorado Department of Labor and Employment staff, and representatives of people with disabilities. The group addresses specific challenges encountered during the program year. The task force, through educational forums addresses barriers to communication, if there are cultural misunderstandings or cultural differences; an educational forum addresses the uniqueness of the culture with specific strategies to communicate successfully.

The US Department of Labor identifies that participants who are most in need are those with multiple barriers to employment: people that are over age 65; limited English proficiency; homeless or at risk of being homeless; have a disability; reside in rural areas; are Veterans or eligible spouses of Veterans; have low employment prospects; have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act; have the greatest economic need; are minority individuals; and have the greatest social need. The locations of the people that meet the above criteria are located throughout the state. However, many may be found to have just been released from prison; they may live in central metropolitan areas in shelters, on the street or in subsidized housing; and there are participants that are isolated in rural communities; and those that are in segregated areas of the city with minority populations.

**4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)**

The State SCSEP office has identified the need for additional community service training needs in rural Colorado and for individuals throughout the State that have a felony background. Over the next four years, the State will focus on community service opportunities within the targeted in-demand industries, such as healthcare, IT, manufacturing and construction. The State will partner with community colleges, businesses, and local government to develop a plan of action that will meet the community service training needs of the participants as well as the needs of the business community, thus creating a win-win approach for everyone.

The community service agencies that may meet the needs of the participants include nonprofit thrift stores, correctional industries, Habitat for Humanity, government offices, colleges, hospitals, home health agencies and nonprofit clinics. The goal of the State SCSEP office is to increase the number of host agencies listed above by 10% over the next four years and increase the placement of those hard to serve participants by 10%.

**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 GRANTEEES 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 following collaborative steps comprise the state's long term strategy to improve SCSEP's goals and objectives over the next four years.

**Local Workforce Centers**

1. Increase the number of people served with multiple barriers by 2% a year over the next four years, specifically those participants that are hardest to serve;
  - a. Utilize Colorado work readiness training programs such Key Train, Work Keys and computer literacy courses;
2. Increase the number of Workforce Center host agencies by 2% a year over the next four years;
  - a. Participants will utilize workforce counselors, such as DVR, Veterans, and Older Workers counselors;
  - b. Greater opportunities to receive outside funding due to the number of clients served.
  - c. Participants will have the opportunity to receive community service training at the workforce center thus will have greater access to services and employment opportunities as they become available.

**Community Colleges**

1. Increase the number of SCSEP students enrolled over the next four years at 1% a year;
  - a. Increase partnerships with colleges developing programs designed to meet participants' needs and the in-demand employment opportunities.

**Community Service Organizations and State Programs will increase at approximately 1% - 2% a year for the next four years.**

1. Additional educational services through partnerships with educational institutions and community service assignments;
2. Paid employment training through internships and SCSEP;
3. On the job experience leading to unsubsidized jobs;
4. Increase opportunities for partnerships for grant related funding;
5. Increase access to community and faith based resources; and
6. Increase capacity to clients and participants for needed supportive services; and
7. Participants will receive chemical dependency counseling, food assistance, transportation funding, clothing, housing assistance and healthcare.

**Business/Community**

1. Increase educated labor pool of SCSEP participants by 1% a year over the next four years;
2. Increase pool of community service workers;
3. Opportunity to complete green energy projects, creating a green community; and
4. Expansion of economic opportunities through doubling the number of On The Job Experience participants over the next four years.

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))

1. In grant years 2018 and 2019 DOL has indicated that these years will be used to establish a baseline for the new performance measure. During this time frame the grantee will continue to encourage the sub-grantee to provide participants with the training they will need for unsubsidized employee. This training will may include skills training, job seeking and interviewing skills, and the skills needed to obtain and keep meaningful unsubsidized work. Once the base line has been established, then the grantee with the help of the sub-grantee can look at what will need to change, if anything in order for us to meet the goals that have been established by DOL.
2. The sub-grantee will continue to base community service job training assignments on the participant's assessments and the Individual Employment Plan (IEP). Using these tools will help the sub-grantee place the participant in a community assignment the not only interests them, but is appropriate for the participant's level of skill, previous training, and any physical or mental obstacles that the participant may have. Being in the right assignment will help the participant learn the skills or hone the skills they have to find unsubsidized work that is both meaningful work and work the participate will enjoy.
3. The sub-grantee will continue to monitor and work with the participant after they have found unsubsidized employment to ensure that the participant has the tools and encouragement they need to be successful in their new job. This follow up may include more skills training or coaching. This training will be done through local resources that are at no cost or very little cost to the participant or the SCSEP program. The primary purpose is to enhance the participant's ability to succeed at their new job.
4. The grantee and sub-grantee do have some concerns in meeting the unsubsidized goals being set for the state of Colorado. While the unemployment rate is low in Colorado at 2.9% for April, the minimum wage is above the federal minimum wage at \$10.20 for 2018 and the economy is strong in Colorado this has and is creating some unique challenges for the SCSEP program. With the higher minimum wage and lower or flat funding we are not able to serve as many people as we have in the past, in PY 2017 our modified positions was 62. The other major issue and pry more importantly with the good economy in Colorado is the cost of living has increase to a point where it is very difficult for our participants to live without some form of subsidized support from the state or county. Besides food assistance many of our participants receive housing and medical assistance and without this help they would not be able to maintain their current way of life. What we are encountering with unsubsidized work is our participants are turning down the work because if they take the job they will be above the income guidelines to receive some or all of the subsidizes they have been receiving. The pay, while good at \$10.20 or above still is not enough to support the participant after the program so while they are very grateful for the training, they simply cannot afford to take an unsubsidized job.
5. Colorado and our sub-grantee will continue to work with participants, the work force centers, and various employers to help our participants find meaningful unsubsidized employment that they are not only qualified for, but that they enjoy doing.

6. As we have done in the past the grantee and sub-grantee will continue to monitor all the performance goals so that we are meeting or exceeding the new performance goals that have been set for us.

### C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

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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))

The 2010 Census found that approximately 85% of Colorado's population lives in urban areas and 15% in rural areas. 13.7% of Coloradans 65 and older live in rural areas, and 7.9% of Coloradans 85 and older live in rural areas.

The 2000 Census altered its previous definition of "urban" to include "urban areas" and "urban clusters," which changed the classification for many communities in Colorado.

#### **Specific Population Groups**

Priority will be given to special populations in accordance with the Older Americans Act and USDOL rules and regulations. Priority will be given (based on Section 508 of the 2006 OAA Amendments) to individuals who:

1. are age 65 years or older;
2. have a disability;
3. have limited English proficiency or low literacy skills;
4. reside in rural areas;
5. are veterans or the spouse of a veteran;
6. have low employment prospects;
7. have failed to find employment after utilizing services provided under Title I of WIOA;
8. are homeless or at risk of being homeless;
9. have the greatest economic need;
10. are minority individuals; and
11. have the greatest social need.

According to the Colorado State Demographer, the *number* of older adults below the federal poverty level will greatly increase. The human and fiscal impacts are vast. As older adults age, their economic resources dwindle. The 2010 Census found approximately 43,000 persons 65 years and older in Colorado below the federally designated poverty level. If the same percentage (8.1%) of older adults 65 years and older are below the federal poverty level in 2020, Colorado will have more than 72,000 older adults below the federal poverty level. In 2030 more than 100,000 older adults 65 years and older may be below the federal poverty level and in 2040 close to 116,000 may be below the federal poverty level.

The 2000 Census found approximately 71,000 older adults 65 years and older in Colorado below 150% of the federally designated poverty level. In 2010, Colorado has approximately 92,000 older adults below 150% of federal poverty level. In 2020 about 150,000 older adults 65 years and older may be below<sup>(1)</sup> 150% of the federal poverty level. In 2030 to 2040 there will be over 200,000 people 65 and older that may be below federal poverty level.

[1] U.S. Bureau of the Census, 2000 Census, Summary File 3.

Poverty is substantially more prevalent among Hispanic, Black, and American Indian older adults than for all older adults in Colorado. Poverty is only slightly more prevalent among Asian older adults than all older adults combined. Low-income minority older adults are at a higher risk of being unable to obtain housing and healthcare due to affordability, accessibility, and availability within their communities.

Colorado will experience remarkable demographic changes through the year 2017. The portion of the total population over the age of 55 will increase to 25 percent from 20.6 percent in 2007. Conversely, the portion of the population in their "prime working years" (generally considered to be between 25 and 54 years of age) will shrink to 40.3 percent from 43.6 percent today. Should the population grow at the same pace it did between 2000 and 2005, Hispanics will account for 25.2 percent of the population while non-Hispanic Whites will comprise about 67 percent of the population. Females will remain almost exactly half of the total population. Colorado SCSEP will continue to use various outreach methods to broaden local awareness in its service areas and encourage unemployed low-income people age 55 and over to apply for SCSEP.

[1] U.S. Bureau of the Census, 2000 Census, Summary File 3.

**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.**

**The distribution chart below shows the number of slots allocated to the State of Colorado. AARP, National Indian Council on Aging (NICOA), and SER National are the two national grantees. SER National is the State sub-recipient and has 82 slots allocated for the State operations. The State's authorized positions have decreased from the prior year.**

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
County				
<b>Adams County, CO</b>	10	21	0	<b>31</b>
<b>Alamosa County, CO</b>	3	0	0	<b>3</b>
<b>Arapahoe County, CO</b>	5	34	0	<b>39</b>
<b>Archuleta County, CO</b>	0	0	2	<b>2</b>
<b>Baca County, CO</b>	2	0	0	<b>2</b>
<b>Bent County, CO</b>	2	0	0	<b>2</b>
<b>Boulder County, CO</b>	17	0	0	<b>17</b>
<b>Broomfield County, CO</b>	3	0	0	<b>3</b>
<b>Chaffee County, CO</b>	0	0	2	<b>2</b>
<b>Cheyenne County, CO</b>	0	0	0	<b>0</b>
<b>Clear Creek County, CO</b>	0	0	0	<b>0</b>
<b>Conejos County, CO</b>	0	0	2	<b>2</b>

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
<b>Costilla County, CO</b>	0	0	0	<b>0</b>
<b>Crowley County, CO</b>	1	0	0	<b>1</b>
<b>Custer County, CO</b>	1	0	0	<b>1</b>
<b>Delta County, CO</b>	0	0	6	<b>6</b>
<b>Denver County, CO</b>	17	49	0	<b>66</b>
<b>Dolores County, CO</b>	0	0	0	<b>0</b>
<b>Douglas County, CO</b>	8	0	0	<b>8</b>
<b>Eagle County, CO</b>	0	0	2	<b>2</b>
<b>Elbert County, CO</b>	1	0	0	<b>1</b>
<b>El Paso County, CO</b>	0	41	0	<b>41</b>
<b>Fremont County, CO</b>	0	0	5	<b>5</b>
<b>Garfield County, CO</b>	0	0	5	<b>5</b>
<b>Gilpin County, CO</b>	0	0	0	<b>0</b>
<b>Grand County, CO</b>	0	0	0	<b>0</b>
<b>Gunnison County, CO</b>	0	0	1	<b>1</b>
<b>Hinsdale County, CO</b>	0	0	0	<b>0</b>
<b>Huerfano County, CO</b>	2	0	0	<b>2</b>
<b>Jackson County, CO</b>	0	0	0	<b>0</b>
<b>Jefferson County, CO</b>	0	0	34	<b>34</b>
<b>Kiowa County, CO</b>	0	0	0	<b>0</b>
<b>Kit Carson County, CO</b>	0	0	1	<b>1</b>
<b>Lake County, CO</b>	0	0	1	<b>1</b>
<b>La Plata County, CO</b>	0	0	5	<b>5</b>
<b>Larimer County, CO</b>	0	0	20	<b>20</b>
<b>Las Animas County, CO</b>	3	0	0	<b>3</b>
<b>Lincoln County, CO</b>	0	0	1	<b>1</b>
<b>Logan County, CO</b>	0	0	3	<b>3</b>
<b>Mesa County, CO</b>	0	0	16	<b>16</b>
<b>Mineral County, CO</b>	0	0	0	<b>0</b>
<b>Moffat County, CO</b>	0	0	1	<b>1</b>
<b>Montezuma County, CO</b>	0	0	4	<b>4</b>

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
<b>Montrose County, CO</b>	0	0	5	<b>5</b>
<b>Morgan County, CO</b>	0	0	3	<b>3</b>
<b>Otero County, CO</b>	3	0	0	<b>3</b>
<b>Ouray County, CO</b>	0	0	1	<b>1</b>
<b>Park County, CO</b>	0	0	2	<b>2</b>
<b>Phillips County, CO</b>	0	0	1	<b>1</b>
<b>Pitkin County, CO</b>	0	0	2	<b>2</b>
<b>Prowers County, CO</b>	2	0	0	<b>2</b>
<b>Pueblo County, CO</b>	0	0	23	<b>23</b>
<b>Rio Blanco County, CO</b>	0	0	1	<b>1</b>
<b>Rio Grande County, CO</b>	0	0	2	<b>2</b>
<b>Routt County, CO</b>	0	0	2	<b>2</b>
<b>Saguache County, CO</b>	0	0	2	<b>2</b>
<b>San Juan County, CO</b>	0	0	0	<b>0</b>
<b>San Miguel County, CO</b>	0	0	1	<b>1</b>
<b>Sedgwick County, CO</b>	0	0	0	<b>0</b>
<b>Summit County, CO</b>	2	0	0	<b>2</b>
<b>Teller County, CO</b>	0	0	2	<b>2</b>
<b>Washington County, CO</b>	0	0	1	<b>1</b>
<b>Weld County, CO</b>	0	0	17	<b>17</b>
<b>Ute Mt. Ute Tribe</b>	0	0	0	<b>0</b>
<b>Yuma County, CO</b>	0	0	1	<b>1</b>
<b>TOTALS:</b>	<b>82</b>	<b>145</b>	<b>177</b>	<b>404</b>

### 3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

The State is sent an Equitable Distribution report by US DOL allocating participant slot placement within the counties the State is required to serve. Currently Colorado is under-serving 65% of the counties and over-serving 25% with an average of over/under service of 36.7%. The rural counties tend to be under-served and the largest urban county, Denver is over-served. The urban areas are continuing to increase in population while the rural areas are decreasing in population thus contributing to the imbalance of participation. The State will continue to recruit participants in the rural areas. SCSEP recruitment forums will take place in low income senior housing areas, senior centers, libraries and churches throughout the State. In the Urban areas the State will partner with businesses and educational institutions to assist in the placement of individuals that are not able to enroll in SCSEP due to the cap on enrollment in over-enrolled

areas of the State. The State will continue to work towards creating a more equitable balance of participation between the rural and urban areas of the State.

Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled. The individuals that apply for enrollment in counties that are over enrolled will be referred to the American Job Centers, businesses that provide on the job training, and educational institutions that provide training for careers that are in-demand.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at service organizations. The site managers will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP. Partnerships with local community colleges will continue to evolve, providing participants with the training necessary to meet the needs of a changing workforce.

#### 4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

##### A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

The State is sent an Equitable Distribution report by US DOL allocating participant slot placement within the counties the State is required to serve. Currently Colorado is under-serving 65% of the counties and over-serving 25% with an average of over/under service of 36.7%. The rural counties tend to be under-served and the largest urban county, Denver is over-served. The urban areas are continuing to increase in population while the rural areas are decreasing in population thus contributing to the imbalance of participation.

Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low-income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

##### B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at service organizations. The site managers will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP.

The State will continue to recruit participants in the rural areas. SCSEP recruitment forums will take place in low income senior housing areas, senior centers, libraries and churches throughout the State. In the

Urban areas the State will partner with businesses and educational institutions to assist in the placement of individuals that are not able to enroll in SCSEP due to the cap on enrollment in over-enrolled areas of the State. The State will continue to work towards creating a more equitable balance of participation between the rural and urban areas of the State.

**C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)**

**A. Recruitment and Selection of Participants**

The Contractor will ensure the following:

1. The recruitment of sufficient numbers of eligible individuals to maintain the established number of authorized;
2. To provide job training assignments for eligible participants with the greatest economic need, greatest social need, poor employment history or prospects, and over the age fifty-five.

**B. Enrollment Priorities Include:**

1. Veterans and qualified spouses at least aged sixty;
2. Other eligible individuals at least sixty years old;
3. Veterans and qualified spouses aged fifty-five to fifty-nine; and
4. Other eligible individual aged fifty-five.

Other Special Considerations are:

1. Incomes below the poverty level;
2. Poor employment prospects;
3. Greatest social or economic need;
4. Minorities;
5. Limited English Speaking; and
6. Native Americans.

**C. SCSEP ELIGIBILITY SHALL BE DETERMINED USING THE FOLLOWING CRITERIA**

(A) Age - not less than 55 years of age; no upper age-limit may be applied

(B) Income - family income may not exceed 125% of the Federal Poverty Level

(C) Residence - at the time of initial enrollment, participants must reside in the state in which the project is authorized (homeless people may qualify).

**5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))**

Geographic Area Name	Eligible Population	Ratio of County to Total
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Geographic Area Name	Eligible Population	Ratio of County to Total
<b>Rio Blanco County, Colorado</b>	342	0.24%
<b>Adams County, Colorado</b>	11011	7.62%
<b>Alamosa County, Colorado</b>	907	0.63%
<b>Arapahoe County, Colorado</b>	13763	9.52%
<b>Archuleta County, Colorado</b>	524	0.36%
<b>Baca County, Colorado</b>	287	0.20%
<b>Bent County, Colorado</b>	250	0.17%
<b>Boulder County, Colorado</b>	6232	4.31%
<b>Broomfield County, Colorado</b>	1044	0.72%
<b>Chaffee County, Colorado</b>	729	0.50%
<b>Cheyenne County, Colorado</b>	71	0.05%
<b>Clear Creek County, Colorado</b>	215	0.15%
<b>Conejos County, Colorado</b>	695	0.48%
<b>Costilla County, Colorado</b>	386	0.27%
<b>Crowley County, Colorado</b>	314	0.22%
<b>Custer County, Colorado</b>	447	0.31%
<b>Delta County, Colorado</b>	2155	1.49%
<b>Denver County, Colorado</b>	23910	16.54%
<b>Dolores County, Colorado</b>	146	0.10%
<b>Douglas County, Colorado</b>	3104	2.15%
<b>Eagle County, Colorado</b>	785	0.54%
<b>Elbert County, Colorado</b>	417	0.29%
<b>El Paso County, Colorado</b>	14825	10.25%
<b>Fremont County, Colorado</b>	1882	1.30%
<b>Garfield County, Colorado</b>	1522	1.05%
<b>Gilpin County, Colorado</b>	196	0.14%
<b>Grand County, Colorado</b>	457	0.32%
<b>Gunnison County, Colorado</b>	446	0.31%
<b>Hinsdale County, Colorado</b>	51	0.04%
<b>Huerfano County, Colorado</b>	583	0.40%

Geographic Area Name	Eligible Population	Ratio of County to Total
<b>Jackson County, Colorado</b>	83	0.06%
<b>Jefferson County, Colorado</b>	12150	8.40%
<b>Kiowa County, Colorado</b>	64	0.04%
<b>Kit Carson County, Colorado</b>	317	0.22%
<b>Lake County, Colorado</b>	182	0.13%
<b>La Plata County, Colorado</b>	1721	1.19%
<b>Larimer County, Colorado</b>	7252	5.02%
<b>Las Animas County, Colorado</b>	917	0.63%
<b>Lincoln County, Colorado</b>	267	0.18%
<b>Logan County, Colorado</b>	1038	0.72%
<b>Mesa County, Colorado</b>	5761	3.98%
<b>Mineral County, Colorado</b>	30	0.02%
<b>Moffat County, Colorado</b>	411	0.28%
<b>Montezuma County, Colorado</b>	1394	0.96%
<b>Montrose County, Colorado</b>	1966	1.36%
<b>Morgan County, Colorado</b>	1035	0.72%
<b>Otero County, Colorado</b>	1098	0.76%
<b>Ouray County, Colorado</b>	271	0.19%
<b>Park County, Colorado</b>	662	0.46%
<b>Phillips County, Colorado</b>	213	0.15%
<b>Pitkin County, Colorado</b>	656	0.45%
<b>Prowers County, Colorado</b>	711	0.49%
<b>Pueblo County, Colorado</b>	8057	5.57%
<b>Rio Grande County, Colorado</b>	659	0.46%
<b>Routt County, Colorado</b>	812	0.56%
<b>Saguache County, Colorado</b>	499	0.35%
<b>San Juan County, Colorado</b>	23	0.02%
<b>San Miguel County, Colorado</b>	222	0.15%
<b>Sedgwick County, Colorado</b>	148	0.10%
<b>Summit County, Colorado</b>	662	0.46%
<b>Teller County, Colorado</b>	793	0.55%

Geographic Area Name	Eligible Population	Ratio of County to Total
<b>Washington County, Colorado</b>	197	0.14%
<b>Weld County, Colorado</b>	6298	4.36%
<b>Yuma County, Colorado</b>	325	0.22%
<b>TOTAL POPULATION</b>	144590	1

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

Provide the relative distribution of eligible individuals who:

**A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE**

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for the first quarter of Program Year 2015 (July - September 2015) and indicates that 38% of the participants reside in rural areas within the State and 62% reside in urban areas of the State.

Location	Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
<b>Individuals residing in rural areas</b>	42	44	53	38	53	38

**B. HAVE THE GREATEST ECONOMIC NEED**

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for the first quarter of Program Year 2015 (July - September 2015) and indicates that 85% of the participants are at or below poverty level and 55% are on public assistance.

Economic Need	Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
<b>Family income at or below the poverty level</b>	82	85	118	85	118	85

**C. ARE MINORITIES**

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for the first quarter of Program Year 2015 (July - September 2015) and indicates that 42% of the participants are Latino, Hispanic or Spanish origin and 16% are Black or African American.

Race	Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
<b>American Indian or Alaska Native</b>	1	1	1	1	1	1

Race	Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
<b>Asian</b>	0	0	1	1	1	1
<b>Black or African American</b>	13	14	22	16	22	16
<b>Native Hawaiian or Pacific Islander</b>	0	0	0	0	0	0
<b>White</b>	79	82	112	81	112	81

**D. ARE LIMITED ENGLISH PROFICIENT.**

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for the first quarter of Program Year 2015 (July - September 2015) and indicates that 1% are limited English proficient.

	Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
<b>Individuals with limited English proficiency</b>	0	0	1	1	1	1

**E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))**

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for the first quarter of Program Year 2015 (July - September 2015) and indicates that 71% of participants have the greatest social need, they live in a rural area and are at risk of being homeless or are homeless. (20 CFR 641.325(b))

<b>Individuals who failed to find employment after using WIA Title I</b>	<b>42</b>	<b>44</b>	<b>53</b>	<b>38</b>	<b>53</b>	<b>38</b>
<b>Individuals age 75 and over at date of report</b>	10	10	16	12	16	12
<b>Individuals who are homeless or at risk of homelessness</b>	28	29	46	33	46	33
<b>Displaced homemakers</b>	2	2	3	2	3	2
<b>Veterans (or spouses)</b>	19	20	26	19	26	19
<b>Individuals receiving public assistance</b>	52	54	77	55	77	55
<b>Individuals with severe disability</b>	2	2	5	4	5	4
<b>Individuals who are frail</b>	0	0	0	0	0	0
<b>Individuals old enough for but not receiving SS Title II</b>	1	1	3	2	3	2
<b>Individuals with disabilities</b>	3	3	4	3	4	3
<b>Individuals with severely limited employment prospects in areas of persistent unemployment</b>	11	11	54	39	54	39

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))

### **Transition Planning Activities**

Two months prior to reaching the durational limit, the participants will meet with SCSEP counselors to discuss transition options. The participant is given the following options:

1. Apply to WIOA for services through the local workforce centers;
2. Apply for a grant through the local community college to further education in an occupational field that has employment opportunities;
3. If the participant is a Veteran, work with the Veteran service officer for assistance in finding employment or assistance in enrolling in the local community college;
4. Participants with disabilities will be referred to a vocational rehabilitation counselor to receive employment training and job search assistance, and
5. Participants will be encouraged to apply to local county human services office for assistance through programs such as Old Age Pension, Supplemental Nutrition Assistance Program, Aid to the Needy Disabled, and Medicaid.

Participants transitioning out of the program will participate in an intensive job search training program developed in coordination with the local workforce center that will address the following skills:

1. Resume writing;
2. Networking;
3. Employment research through the workforce centers and on-line; and
4. Interviewing Skills.

Participants will work directly with their SCSEP case manager to find a position through On The Job Experience (OJE). The participant and the case manager will work together making cold calls to prospective employers and promote OJE through SCSEP. The participants will be given training on the computer and may be assigned to a mentor through Senior Corp or Retired Senior Volunteer Program (RSVP) to assist them with job search activities.

### **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

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## APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

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Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as “baseline” indicators in the first plan submission. A “baseline” indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. “Baseline” indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that have been designated as “baseline”. The actual performance data reported by States for indicators designated as “baseline” in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as “baseline” indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

### **Baseline Indicators for the First Two Years of the Plan**

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):

- Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings

- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the State indicators. Please identify any such State indicators under Additional Indicators of Performance.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adults</b>	74.90	79.60	74.90	79.60
<b>Dislocated Workers</b>	75.60	80.30	75.60	80.30
<b>Youth</b>	65.00	70.70	65.00	70.70
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	52.50	59.00	52.50	59.00
<b>Vocational Rehabilitation</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
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Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adults</b>	70.40	72.60	70.40	72.60
<b>Dislocated Workers</b>	71.50	73.20	71.50	73.20
<b>Youth</b>	56.80	61.90	56.80	61.90
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	49.20	55.50	49.20	55.50
<b>Vocational Rehabilitation</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adults</b>	7,388.00	6,900.00	7,388.00	6,900.00
<b>Dislocated Workers</b>	8,440.00	8,440.00	8,440.00	8,440.00
<b>Youth</b>	Baseline	Baseline	Baseline	Baseline

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	4,871.00	5,192.00	4,871.00	5,192.00
<b>Vocational Rehabilitation</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adults</b>	51.90	60.00	51.90	60.00
<b>Dislocated Workers</b>	50.00	50.00	50.00	50.00
<b>Youth</b>	57.50	58.50	57.50	58.50
<b>Adult Education</b>	Baseline	Baseline	Baseline	Baseline
<b>Wagner-Peyser</b>	n/a	n/a	n/a	n/a
<b>Vocational Rehabilitation</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Adults</b>	Baseline	Baseline	Baseline	Baseline
<b>Dislocated Workers</b>	Baseline	Baseline	Baseline	Baseline
<b>Youth</b>	Baseline	Baseline	Baseline	Baseline
<b>Adult Education</b>	35.00	35.00	35.00	37.00
<b>Wagner-Peyser</b>	n/a	n/a	n/a	n/a
<b>Vocational Rehabilitation</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
<b>Line 1 (enter the measure information in the comments below)</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 2</b>	Baseline	Baseline	Baseline	Baseline

<b>Line 3</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 4</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 5</b>	Baseline	Baseline	Baseline	Baseline
<b>Line 6</b>	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

TABLE 7. ADDITIONAL INDICATORS OF PERFORMANCE

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level

User remarks on Table 7

## APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

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Note on Appendix 1. Colorado proposes that the employment metrics and credential attainment rate for the Adult, Youth, Dislocated Worker, and Wagner-Peyser programs will increase by half a percentage point from PY 16 to PY 17. This increase in the proposed target is not reflected in the submitted Appendix 1 due to limitations of the system.